

23 Questions

ConFor was established in 2004 and fully integrated with the Forestry & Timber Association on 1 September 2006. FMJ took the opportunity to ask them some questions about themselves, and to find out where they stand on some of the more intractable questions facing forestry.

1. Can you tell us how many individual members you have? Is it true that individual members can only vote for two seats on the board, which is the same number of seats as the processors can vote for, of which there are just a dozen or so?

ConFor: The first part of this question is not clear, but is assumed to mean members in the growing sector (previously FTA), of which there are 1657. The processors' group (15) includes various timber-users, harvesting companies and timber agents. At present, the growing sector and the processing sector each contribute broadly equal amounts in subscriptions.

Members from the growing sector, through the Growing Sector Council, nominate three members to the ConFor board. Similarly, members from the processing sector, through the Processing Sector Council, also nominate three members to the board. This ensures equality of representation from the two sectors. The councils advise and inform the board on issues directly relating to their sector.

In addition to the six board members nominated by the two councils, the board also includes representatives from the panel and paper sectors. The ConFor chief executive is also a member of the board.

ConFor's directors are listed in every issue of Forestry & Timber News and on the website. They are: Tony Willis, Chairman, representing processing sector; John Firn, Vice-chairman, representing growing sector; David Crichton, ConFor chief executive; Chris Inglis, Executive, representing growing sector; company secretary; John Kissock, representing processing sector; John Brownlie, representing processing sector; Nick Hoare, representing growing sector; George Webb, representing Wood Panels Industry Federation; Martin Gale, representing Confederation of Paper Industries.

The chairmanship will alternate between the processors and the

growing sector.

2. How can ConFor claim it represents the entire industry when the majority of processors are not members?

The ConFor membership includes representatives from across the entire supply chain and similarly, the board includes members from the different sectors. The ratio of ConFor's membership to all possible members varies by each sector. Very few trade organisations would claim to have 100% coverage of their industry.

With regard to the processing sector, it is true that the majority of possible members are not members of ConFor. However all of the larger processing companies, as well as a growing number of smaller ones are members. Between them, the processing sector members account for a substantial majority of timber used and sector revenues. Processing members include paper and panel manufacturers, other users of fibre and sawmills.

It is also important to recognise that ConFor works in partnership with a wide range of other industry organisations, both on lobbying work and on specific projects such as *Wood for Gold*, the campaign to promote the use of wood through the 2012 Olympics. This cooperation enables all of us to speak with a single voice on behalf of our industry, something which has rarely been possible in the past.

3. How can ConFor represent woodland owners, who want the best possible price for their timber, at the same time as the processors, who want to get it at the lowest price?

ConFor was set up because many in the industry believe that there is more that unites the various sectors in the supply chain than divides them. Everyone benefits from an improved market for timber and timber products, from more timber coming to market, and from a more favourable policy environ-

ment. These are the objectives that ConFor pursues and experience so far has been that everyone can unite behind them. There have not yet been any conflicts within the membership that prevent us from adopting a common position.

Major areas of agreement include, improving the market, supporting commercial planting and production, strengthening the supply chain, promoting the industry's contribution to climate change policy.

Of course the membership includes businesses that trade and compete with one another. This is the case in any trade organisation and was in the Forestry & Timber Association. It is not a trade organisation's job to interfere with the workings of the market between its members or to take sides. ConFor leaves its members to conduct their business with one another on their own terms.

4. What do you say to allegations that individual companies are able to buy a seat on ConFor's board if they have a large enough cheque book?

Any such allegations are quite simply wrong. The growing and processing sector councils make their nominations to the board (see Q1). The representatives from the panel and paper sectors were invited to give the board a full perspective across the industry. They do not represent their individual companies.

5. What do they expect to get for their substantial donations, which we understand can run to something approaching six figures on an individual basis?

Your understanding is wrong. No member contributes a six figure sum. The largest member contribution is £50,000. Processing sector members pay according to their annual usage of timber; growing sector members pay on the same basis as their previous FTA subscriptions.

Every member should expect the same level of service from ConFor. They should also expect equal say in setting of ConFor's priorities, through their respective sector councils and regional groups. There are no special privileges for sale, and none have been asked for.

6. How much funding do you get from the Forestry Commission and for what purposes? Will you ever be able to oppose anything they do if you require money from them to survive?

ConFor does not receive core funding from the Forestry Commission, and does not require its money to survive.

FC does support specific projects that ConFor is involved in with other partners. An example is the England Forest Industries Partnership, where FC meets the costs of the project manager. It also co-funds projects such as the economic impact of the industry that ConFor undertook last year. ConFor has similar arrangements with other organisations such as Scottish Enterprise for specific projects, for example the timber transport initiative. All of these arrangements bring additional resources and benefits into the industry.

If the funding were not there, the projects might not happen, or ConFor would look for other sources of support. The only funding that ConFor is dependent upon for survival is membership income, although additional funds are raised through events and provision of services. ConFor is therefore free to oppose FC or any other public body when the situation demands it, and frequently does.

7. Where else do you get your funding, and how much?

The budgeted subscription income for 2007 from members is just over £520,000. In addition, ConFor earns income from the proceeds of events such as the International Forestry Exhibition and the South West Woodland Show, provided of course that they make a surplus. ConFor also earns some income from providing services, for example through acting as the secretariat for UKWAS and renting space to the Scottish Forestry Trust. Finally, ConFor receives contributions to cover administration costs and expenses for project work management on behalf of other partners, such as the timber transport project and the Scottish Forest Industries Cluster.

ConFor accounts also show some income that is then used in full to meet the costs of other projects. For example, a small number of members make their contribution to the *Wood for Good* campaign through ConFor. Also, the employment costs of the project managers for the England Forest Industries Partnership, the Scottish Forest Industries Cluster and the timber transport project are channelled through ConFor by the partners involved. Such funds appear as income, and go out again as expenditure.

Overall, the budgeted income for 2007 is just over £930,000, and the plan is to break even on that basis.

8. Is it true that the APF/FTA's premises in Edinburgh are to be sold off? Many look upon this as selling off the family silver. What will become of the proceeds?

Ownership of the Edinburgh premises passed to ConFor following the integration with FTA. No final decision has been taken on the future of the premises, but selling them is an option being considered.

The current offices are not suitable for efficient, modern working, nor can they accommodate meetings or events of any significant scale. Anyone who has visited them recently will have seen that for themselves. ConFor is therefore looking for more suitable premises to rent.

Once that is done, the board will decide the best option for the current premises. Letting would generate income, though would require significant improvement works at a time when the rental market in Edinburgh is poor. Selling would allow ConFor to pay off the loan from the Scottish Forestry Trust, as well as realise a capital sum to be invested on behalf of members, though of course it does involve disposing of an asset. All options remain open, and will not be determined unless and until ConFor has secured new premises.

9. What do you say to those who regard ConFor as a cartel of mainly large, Scottish companies running the industry to its own ends, quite possibly putting themselves in a position to manipulate wood supply?

Such comments are wrong and dangerously misguided. The board provides balanced representation for the growing and processing sectors, and the growing and processing sector councils provide direction, advice and feedback on the their needs. The minutes of board and council meetings are shared amongst the members of each. Membership of ConFor, its councils and its board comes from all parts of the UK.

ConFor has no role in determining wood supply or price and indeed, would be in serious legal trouble if it attempted to, just as any trade association would be. These are matters for the market to determine, and members are left to do business with each other and with the outside world.

No one has brought any accu-

sations, never mind evidence, of uncompetitive behaviour and they would be directed to the appropriate competition and regulatory authorities if they did. If there are such accusations around, then perhaps they represent old suspicions and immaturity in our industry. People need to recognise that the long-term interests of the industry lie in finding common cause across the supply chain. This is the basis of ConFor which aims to break down barriers between the sectors,

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improve communications and foster closer working.

10. What is ConFor's view on the possibility of FC privatisation, and what would ConFor's role be if this happened?

In meetings with members a number of concerns have been raised about FC. These range from the negative impact of FC on businesses, bureaucracy and stop-go grant schemes to concern about future timber supplies as demand increases. A recurring theme has been disappointment that FC is no longer providing the leadership role for the sector that it once did.

It is ConFor's perspective, supported by members at meetings throughout the country, that the private sector should do more to provide leadership and seek its own solutions rather than look to FC. As public sector production peaks, it is the private sector which will emerge as the dominant supplier of timber, as well as the owner of the majority of the UK's woods and forests. Timber prices are rising, there is increasing recognition that woodland management needs to be profitable and that under-managed woods are bad for biodiversity, while climate change provides a fantastic opportunity to promote the industry and its products.

Following the current round of meetings with members, ConFor will develop its forward-looking agenda for the sector, part of which will consider the appropriate role of FC. In the meantime, ConFor is aware that FC is currently causing some crowding out of the private sector and it will continue to represent specific issues robustly to FC.

With a large state sector trading in the marketplace there are indeed questions to be raised (see FTA's level playing field manifesto)

and ConFor will not shy away from these. There are indications that FC is willing to discuss these constructively.

11. Very many contractors have left the industry in the past few years. Why is this and what can be done to retain them and their skills?

This is a very real and challenging problem. The major problem of course has been a lack of work overall, due to low timber prices, combined with a growing burden of regulation and insurance. Contractor rates have been squeezed and many forced to leave the industry. Most of those who have remained have found a specialist niche and/or are operating very professionally on a large scale. It is difficult for new entrants to invest in expensive machinery and compete with established experts.

There is now more optimism, with good reason, but there is a real danger that opportunities will be lost without a vibrant, modern supply chain, including contractors, to bring wood to the market.

The first step has to be to develop better market conditions, for example, through the emerging wood fuel strategy in England which, if properly funded, will help bring neglected woodlands back into production. Barrie Gardiner, the England forestry minister, has told ConFor that he is wholeheartedly behind this. If this helps to bring neglected woodlands into production, timber prices continue to firm and the image of the industry can be enhanced, then people and capital should flow in. Other market initiatives, such as the *Wood for good* campaign and *Wood for Gold*, aim to stimulate the overall market.

ConFor then needs to encourage more effective supply chains at regional level, encouraging woodland owners, contractors, managers and processors to work innovatively and cooperatively. ConFor, working with others, also needs to address training and recruitment issues, to reverse declining skills and people in the contracting sector. Such initiatives are underway in Scotland, and other parts of the UK need to follow.

Cluster-style working in each country is a robust starting point on which to build. (The European automotive industry is held up as a model of achievement through cluster working.) Wood fuel supply groups are becoming established in some parts of England. Government must be (and increasingly is) persuaded of the merit in supporting

a green industry through transition. It is not going to be an easy process because the path will not be smooth, but within 10 years it should be possible to transform the currently incomplete skeleton into a robust supply chain.

ConFor has not had enough contact with FCA and would welcome working with it to address these challenges and achieve these aims.

12. What has ConFor done, or is it planning to do, with regard to training for contractors? Is ConFor trying to source funding to assist with contractor training?

ConFor administers the APF Education and Provident Fund, a charitable fund available to individuals who have been members for at least a year. Discretionary grants of up to £500 per application are available for education and training and there is no limit to the number of applications. The trustees would welcome more applications.

ConFor has not had enough contact with FCA and would welcome working with it to address these challenges and achieve these aims.

There is also some subsidised training available, such as through regional initiatives, for example, Northwoods, and ConFor can help direct people to the appropriate sources and encourage uptake.

Beyond that, ConFor needs to influence the larger providers and funders of training to be more supportive of industry needs. In Scotland, ConFor recently organised a conference on workforce development with the Scottish Forest Industries Cluster, and participates in a workforce development group through the Cluster. ConFor also takes part in Lantra's trees and timber group. In England, ConFor will seek to influence the regional development agencies which hold much of the funds available for skills training.

Training is a hugely complex area with a host of usually un-coordinated funders and providers. ConFor does not wish to complicate it further by trying to deliver training in its own right, but seeks to play a more influential role on behalf of members. And ConFor would welcome greater cooperation with other industry bodies such as the FCA.

13. Many of the large processors will only pay for chip and pulp wood at cost. Do you recognise this as a factor in persuading contractors to

leave the industry, and woodland owners not to fell?

The short answer is money. Processors will pay whatever it takes to achieve the required supplies, but are constrained by the price that they can achieve for their end product. Timber supplies throughout Europe are becoming increasingly tight and while that continues, inevitably, round timber prices will rise and, if this is across the board, then so will the price of the final product.

There is no doubt, poor prices for small round-wood have deterred owners from thinning and harvesting, which consequently means less work for contractors. Wood fuel developments are therefore welcome as they will both encourage thinning and help to improve the profitability of woodland management by providing an additional market for low grade material.

It is reported in TTJ (03/10 March 07) that, "Chipboard supply (in Europe) is such a problem that some producers are talking of rationing the product." Also: "Some producers raised prices by 7-10% in January and further increases are planned for March."

14. Would you accept that the industry is over regulated? If so, is there any chance of reversing this?

All elements in the industry face a huge burden of regulation, which appears to be increasingly daunting. Much of the legislation is not in itself wrong, but often the implementation and interpretation are excessive.

In addition, there is a tendency for 'best practice' to become requirements, for example in FC grant schemes. Interestingly, the more onerous and remote grant conditions become, the more owners are turned off and FC actually loses influence. It is already evident that many owners and managers, particularly in England, find grant schemes irrelevant.

ConFor is participating in the government's better regulation initiative and recently took a group from the Better Regulation Executive out for an educational field day. These people are dedicated to improving the day-to-day lives of those trying to earn a living in business, by reducing red tape. They oversee every government department to ensure that each produces a simplification plan with targets for reducing the regulatory burden on business and then implements it. This is a continuous process. Defra, for example, has a target of reducing the bur-

den by 25%, although the Better Regulation Executive acknowledges that this is difficult to measure, but insists that there should be noticeable improvements. ConFor sees real potential through this initiative and will continue to work with the process as well as through the normal FC, Defra, HSE and other channels.

As timber prices rise and with increasing recognition that woods benefit from management, it is time for UKWAS, and the certification schemes that use it, to be made relevant to the small woodland owning community in the UK.

15. Do you see any irony in the fact that as an industry we find it difficult to recruit people to do the actual work, while having so many people who live off their efforts? How do so many people find niches running the industry, while we find it difficult to get anyone to do the essential work on the ground?

The people who run our industry are the owners and managers who have to compete in the market place day to day. With the establishment of ConFor, there is a small team – far smaller than that representing other sectors, such as, agriculture, steel or concrete – which, working with members, aims to improve the market and policy environment to help promote a sustainable industry.

It is vital that the private sector's voice is heard in a frequent and consistent manner, with evidence to support the arguments and messages that are put forward. When industry representatives attend the plethora of meetings, they are usually hugely outnumbered by civil servants, staff from agencies with narrow environmental remits and environmental and social non-governmental organisations whose focus is not commercial forestry. ConFor supplements its core staff with the welcome contributions of a large number of member volunteers who, unlike other participants, are not paid to attend meetings. The combined contribution from staff and volunteers is vital to ensure that our industry's voice is heard, understood and taken into account.

16. Many of our woodlands remain unmanaged, with timber that will never be brought to market. Certification and bureaucracy are often blamed for this. Is this not an indictment of the industry, and a sign of abject failure in its overall management? What remedies might you propose?

ConFor and others are striving to bring woods back into management for economic, social and environmental reasons. ConFor members report that certification is the last straw for many woodland owners, even some who are above the 100 hectare definition of small woods. The UKWAS steering group, on which ConFor is represented, acknowledges that certification is difficult for the smaller owner and pledged to address this as a priority (see FMJ March 07 and December 06).

The evidence points towards increased demand for certification. It is here to stay and therefore ConFor's focus has to be on making it relevant and accessible to all. As regards bureaucracy, as long as an owner receives public funds, he will be subject to paperwork and inspection. (See Q14 above.)

As timber prices rise and with increasing recognition that woods benefit from management, it is time for UKWAS, and the certification schemes that use it, to be made relevant to the small woodland owning community in the UK.

There is increasing optimism in the industry now and as profitability increases so more woodland should return to management. The wood-fuel strategy, the England Forestry Strategy, the Scottish Forestry Strategy and, with luck, the Rural Development Programme should all contribute to the upturn and ConFor will strive to make the most of these and other opportunities.

17. ConFor has appeared to want to take the credit for events on which it has had little or no input: for instance last year's £6 million Scottish Executive support for SFGS, and the Bloomfield report on future wood supply. Could you comment on this?

If ConFor had not acted, this £6 million would not have been secured for the sector. When SFGS was closed abruptly, the FC asked for additional funding and was told there was none. The outcry in the sector over the closure was considerable, but it was fragmented and it was targeted at the FC which had no means to secure additional funding.

ConFor very quickly met with members to establish what was needed to remedy the situation. ConFor prepared evidence and arguments with which to lobby politicians. The coordinated lobbying by ConFor and its members across the sector, supported with consistent messages and evidence,

provided the platform on which FC could make a successful request for additional funding. ConFor also secured important support from the Woodland Trust which, alongside the industry, met with the minister when he confirmed the additional money. This new money has helped businesses all along the supply chain.

As regards the wood supply report, ConFor has never claimed credit for its production. ConFor was part of the steering group for the study, along with the companies that funded it, many of which are not ConFor members. The steering group asked ConFor to publicise the report and take forward its key findings. ConFor has done this, making clear that the report was the result of the foresight and funding of the companies involved.

A feature of recent meetings with members in England has been the lack of awareness of what ConFor has actually achieved and the influence it has had, and a desire to learn more about its impact. Rather than claiming undeserved credit, ConFor may in fact be guilty of not communicating its successes effectively enough.

18. Given the predicted shortfall in timber supply, what is ConFor doing to redress it? What pressure is ConFor putting on the FC in England, Wales and Scotland to increase its area of commercial woodlands? What will happen after the peak in harvesting in 2020?

The predicted shortfall is in the study area of Scotland and northern England. There is increasing concern in Wales and southwest England over timber supply, but no similar study has been undertaken covering the whole of England or for Wales or Northern Ireland. It is important that ConFor has the evidence on which to base any action.

The predicted shortfall is arising primarily because of actual and planned increased demand for wood for various uses. In Wales, there are problems in transition to continuous cover. There are also supply problems in Europe due to increased demand both there and in the growing economies of Asia, eastern Europe and Russia. Wood has an important role to play in climate change mitigation and ConFor has made this point when pressing for action to address future supply.

Following publication of the report, ConFor organised an event involving the industry sponsors of the report, FC in England and Scotland and the development

agencies in the areas covered by the report. This meeting produced the following conclusions and actions:

- there is a real opportunity for the sector, but one which requires action to maximise the benefits and to minimise negative impacts.
- the results of this study should be used to change thinking amongst policy-makers and how the industry is perceived, so that better informed investment decisions can be taken.
- information for policy development, especially about the use of wood for energy, should be reinforced. The message to government should focus on heat and district heating schemes and recognise that waste material can be fed into the process.
- more should be squeezed from the existing resource - this will be studied in the near future – and action taken on future supply.
- better information on forecasting is required; ConFor as the trade body will engage in this process.

ConFor is a member of the Wales Forest Business Partnership and participated in a recent conference looking at mobilising supply in Wales. ConFor is also undertaking work to identify how to bring unmanaged woods into production in Wales.

The opportunity provided by climate change and the need to stimulate supply both in the short and longer term are at the heart of ConFor's political campaigning for the Welsh and Scottish elections.

In England and Northern Ireland the picture is more complex, particularly in the former where 60% of annual increment is not currently harvested. ConFor has recently attracted new processor members in north England and will build on this to develop further action for this area. This is vital given that FC output will decline there from 2016.

19. We have been hearing about biomass since the start of the nineties. Why is the industry so ill prepared to meet the demand that is already beginning to be felt? There are concerns that roundwood will be displaced into the energy sector. What is ConFor doing to ensure adequate supply?

While biomass for energy is not new, it is only recently that it has begun to expand rapidly. There are many examples of where the industry has responded successfully to the opportunity that this essentially new market has provided. For example, new

businesses are appearing, as well as supply groups, such as, NewFuels facilitated by Northwoods, and the Marches Wood Energy Network. As with any emerging market, progress has been patchy, and will remain so until such time as the knowledge, expertise and infrastructure are established throughout the supply chain and the customer can see this with confidence.

There have been some false starts and it is regrettable that some brave pioneers fall by the wayside. While some supply companies are equipped and operating successfully, it is not easy for new entrants to obtain finance on the strength of rather vague business forecasts. There are regional differences in public support and development, with perhaps southwest England and Scotland leading the way. The Ignite training programme is being delivered to ensure quality service and proper understanding, alongside increasingly positive indications from governments and agencies.

ConFor has also lobbied ministers, Defra, the Scottish Executive and FC, frequently and consistently, for support to develop both the supply and demand for wood fuel. It is expected that there will be recognition of this in the forthcoming FC wood fuel strategy in England as well as the biomass action plan for Scotland.

ConFor is also aware that, while biomass is and will be a useful market for low-grade produce, it is vital that markets for quality material, which should not be burnt, are developed as is currently happening.

20. Why has so little SRF gone into the ground during the current planting season? Who is responsible for this failure to plant? Is this not a terrible waste of an opportunity – or doesn't it matter?

Feedstock can come from the existing woodland resource, short rotation coppice, short rotation forestry, reclaimed timber, arboricultural arisings, secondary sawmill products and agricultural crops.

For woodlands, see above.

SRC is not taking off at any great rate for a number of reasons, including lack of confidence and technical constraints.

SRF is not taking off because of lack of confidence in an untried and untested regime and economic concerns. The advantage over SRC is that the produce can be harvested at various stages for various markets.

Reclaimed timber and arboricul-

tural arisings cause some market difficulties for producers of forest material because there is an artificial cost attached to other means of disposal, such as landfill, (or the cost of production having already been paid for as in arboricultural work), thereby giving competitive advantage, but there should be space for all.

Agricultural crops such as Miscanthus have not proved as popular as some expected.

ConFor is maintaining a watching brief on SRF. There is no doubt that the industry needs to be innovative and experimental, but ConFor would like to see more evidence before promoting it. In particular, experts appear to be at best divided on the wisdom of planting large areas of eucalypts or southern beech because of uncertain hardiness. Certainly, the co-firers, particularly Drax, which first encouraged landowners to pursue this, are not convincing in their commitment to the use of wood fuel and it is an illogical, artificial market.

While it seems unlikely that the UK will be able to deliver 100% of domestic demand in the longer-term, this is a great opportunity for forestry, especially where there is no industrial-scale market for low grade material. ConFor and its predecessor organisations have fought for and won some government support, but this continues to be a major policy priority for ConFor and a very promising one because it ticks all the right political boxes.

21. Who do you think is to blame for increasing infestation of timber with, for instance, Platypus beetle, and attacks on young trees by weevils? This is ascribed by many to the policy of leaving timber to rot, an essential component in the requirements to achieve certification.

This question should be put to Forest Research. Indeed, ConFor asked a question about the rise of new pest species, at the recent Northern Research Station update meeting and what was being done about them (response will appear in June *Forestry & Timber News*). Platypus cylindrus, red band needle blight (there was a presentation on this at the meeting and information from Forest Research is imminent), various diseases of horse chestnut and other pests and diseases are of concern and by asking questions of the experts ConFor is informing itself and the industry about the status and any action required (report from Forest Research awaited).

Mark Broadmeadow of Forest

Research has repeatedly warned that global warming will mean that new pests and diseases will not only arrive here, but some will thrive when in the past they might have failed.

Dead wood, standing or fallen, is an important habitat in any woodland. It would be difficult to find a woodland without some of each. In the past, when timber was more profitable and woodlands were well staffed, conservationists criticised foresters for being too tidy. For more than a decade, in this country, dead wood appears to be most plentiful, regardless of whether the woodland is certificated or not. UKWAS merely formalises this and perhaps lays down a marker for such time when we may sweep up every last twig for wood fuel, as happens in some other countries.

22. What do you think of the statement: "The consensus is that the FSC is unnecessary. The only badge a piece of timber needs to prove it is from a sustainable source is 'not imported'?"

If the customer requests certification then it is necessary (see FMJ March 07). There are some who brand their timber as local, English or Welsh and in some markets that is sufficient and attractive to the customer. However, where the customer wishes to have independent confirmation of the source of timber then certification will be required whether it is for imported or home-grown timber.

23. Do you recognise that this view is held by many owners of smaller woodlands? These are of course the people ConFor is supposed to represent. Is it right not to support them if this is what they think?

ConFor is aware that many woodland owners consider certification to be unnecessary. Some other owners recognise that certification is necessary and some members even embrace it. It is ConFor's view that certification is here to stay, that it will become even more widely requested in the market place and that any attempt simply to resist it, rather than make it accessible to owners of small woods, would not best serve members' interests. ConFor has agreed to work with UKWAS in its pledge to help smaller woodland owners.

ConFor produces a monthly enews to which anyone can subscribe, by emailing liz.hughson@confor.org.uk. It is also posted at www.confor.org.uk.