Association of Salmon Fishery Boards

Comments on 'Practice Guide: Managing Forests in Acid Sensitive Water Catchments'

February 2013

Introduction

The Association of Salmon Fishery Boards is the representative body for Scotland's 41 District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), which have a statutory responsibility to protect and improve salmon and sea trout fisheries. The Association and Boards work to create the environment in which sustainable fisheries for salmon and sea trout can be enjoyed. Conservation of fish stocks, and the habitats on which they depend, is essential and many DSFB's operate riparian habitat enhancement schemes and have voluntarily adopted 'catch and release' practices, which in some cases are made mandatory by the introduction of Salmon Conservation Regulations. ASFB creates policies that seek where possible to protect wider biodiversity and our environment as well as enhancing the economic benefits for our rural economy that result from angling. An analysis completed in 2004 demonstrated that freshwater angling in Scotland results in the Scottish economy producing over £100 million worth of annual output, which supports around 2,800 jobs and generates nearly £50million in wages and self-employment into Scottish households, most of which are in rural areas.

We welcome the opportunity to comment on this consultation. This response should be read in conjunction with the Galloway Fisheries Trust submission, which we fully endorse.

General Comments

- Whilst approximately 70% of Scotland's acidified waters lie within the Galloway area, due largely to poorly-buffered underlying geology and extensive Sitka spruce afforestation in the uplands, there are significant parts of Argyll which are also adversely affected.
- Fishery Trusts and District Salmon Fishery Boards undertaken extensive surveys in their respective catchments and this data forms an extremely important data set to inform forestry issues. For example, the Galloway Fisheries Trust (GFT) has demonstrated that fish populations are severely impacted in the Galloway area, with some areas being devoid of fish. Salmon are very rarely found in some headwaters even though historical information suggests that most were important spring salmon nursery areas.
- Studies of water chemistry have demonstrated very low pH remains a problem. These studies strongly suggest that fish survival will be compromised and comparison with historical data from the same sites suggests that there is very limited recovery in the upper Bladnoch, a Special Area for Conservation for Atlantic salmon, since the last detailed study in 1998. It is clear that in SW Scotland there are still significant problems with acidification despite large scale restructuring of the forests in question.
- Critical Load Assessment (CLA) has been used by previous Forest and Water Guidelines since the early 1990's with the aim of protecting watercourses from acidification. In Galloway, CLA has not worked to protect and recover the water quality and fish populations of many upland watercourses. There is limited evidence of recovery of fish stocks in any of the afforested watercourses. We share GFT's concern that the use of CLA alone will not protect Galloway's waters.
- Using only CLA with a threshold pass / fail figure will continue to allow forestry to be planted in catchments which are suffering from acidification and fish populations will continue to be impacted. These waters will not reach good ecological status in the near future unless more proactive action is taken regarding forest planning. Biological data should be considered in the overall process and we suggest the use of a 'traffic light' system when considering CLA findings and forest design. Large scale

coniferous forestry should not be replanted into catchments which can be shown that are acidified now and unable to support fish populations.

Specific Comments

- The document highlights the uncertainty remaining with regard to recovery and future interactions in acidified waters (Page 2). This highlights the clear need for a precautionary approach to be taken. Where waters continue to be heavily acidified, high density coniferous forestry should not be replanted into these catchments.
- We are disappointing that the assessment methodology appears to be the same as in previous editions of the Forest and Water Guidelines (Page 3). This methodology has failed to protect water courses in the past and therefore it is unclear why it should do so now. Experience of where CLA has been used in Galloway in the past has demonstrated that nearly every acidified watercourse 'passed' thus allowing restocking to occur. These watercourses have still not recovered significantly. We do not support the reference to 'sensitive catchments' being limited to SACs and SSSIs. A number of the catchments that are very heavily impacted by acidification and below 'good ecological status' should be considered as being sensitive including the Cree (82.93 km acidified), Fleet (28.24 km) and Kirkcudbrightshire Dee (55.94 km acidified). Improvement of these impacted catchments is a requirement of the Water Framework Directive.
- The River Bladnoch is designated as Special Areas of Conservation (SAC), part of the Natura 2000 network – a series of internationally important wildlife sites throughout the European Union. The conservation objectives for this site are set out below[1].
    - *To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and*
        - *To ensure for the qualifying species that the following are maintained in the long term:*
        - *Population of the species, including range of genetic types for salmon, as a viable component of the site*
        - *Distribution of the species within site*
        - *Distribution and extent of habitats supporting the species*
        - *Structure, function and supporting processes of habitats supporting the species*
        - *No significant disturbance of the species*
        - *Structure, function and supporting processes of habitats*

  The Habitats Directive (article 6) requires that *Member States shall take appropriate steps to avoid, in the special areas of conservation, the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of this Directive.*

  It also states: *In the light of the conclusions of the [appropriate] assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public*.

  If this is not the case and there are no alternative solutions, the proposal can only be allowed to proceed if there are imperative reasons of overriding public interest. The River Bladnoch, has over 75 km of acidified running waters which used to support juvenile salmon pre-afforestation. We believe that, in order to be compliant with the requirements of the EU Habitats Directive, much more has to be done to meet the conservation objectives for this river.

[1] http://gateway.snh.gov.uk/sitelink/index.jsp

- It is ***unacceptable*** to set a fixed threshold for CLA as used in previous guideline editions. The fixed threshold did not work previously to protect 'at risk' bodies. We agree with the GFT who recommend a traffic light system where definite passes are green (well buffered waters where planting/replanting can proceed), definite fails are red (very poorly buffered waters where planting/replanting cannot take place) and amber covering an agreed range of results where aquatic life is affected by acidification and planting/replanting can only proceed if additional actions are undertaken to protect the watercourses such as reduced % of conifers, wider buffer zones, changes to drainage, etc. Such actions would need to be agreed with the water regulator.
- With regard to page 10, we would highlight that trials in Wales and Scotland suggest that liming may have a role is promoting recovery and protecting important fish populations. We believe that the potential of liming as a means of protecting fish populations, and promoting recovery of impacted populations, should be a key issue for further research and assessment.
- The decision tree on Page 20 should consider relevant biological data in addition to CLA and include an amber zone for CLA results.
- We agree with GFT that it is important that whatever methodology is finally agreed that a trial is undertaken at a range of sites (from well buffered to heavily acidified) to examine how suitable it is at assessing risk and possible impacts it might have on forest designs.

For further information please contact:

Alan Wells | Policy & Planning Director
Tel: 0131 272 2797 | Email: alan@asfb.org.uk