

Response ID ANON-XSSW-SGNJ-7

Submitted to **Scotland's Forestry Strategy 2019-29**

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50-year vision and 10-year objectives for forestry in Scotland

1 Do you agree with our long-term vision for forestry in Scotland?

Yes

Please explain your answer.:

Introductory Comments

Fisheries Management Scotland is the representative body for the District Salmon Fishery Boards, the River Tweed Commission and the Rivers and Fisheries Trusts in Scotland. We work to promote and ensure the best fisheries management for the protection, preservation, and development of Scotland's wild salmon and freshwater fish, along with their fisheries and the wider environment. District Salmon Fishery Boards have a statutory responsibility to protect and improve salmon and sea trout fisheries in their district, but their remit does not extend to other freshwater species. The statutory remit of the River Tweed Commission is broader and covers salmon and all freshwater fish. Rivers and Fisheries Trusts charitable objectives extend to all fish species and the wider aquatic environment.

Fisheries Management Scotland welcomes the opportunity to respond to the consultation on Scotland's Forestry Strategy 2019-2029. Our members have statutory responsibility to manage salmon and freshwater fish, fisheries and associated aquatic habitats. Many of our members manage fisheries in areas containing large-scale forestry activity, whereas others are actively involved in projects to increase the cover of native trees in the riparian zone. We recognise that there is a national strategic commitment to expand the woodland resource in Scotland, and we support regulatory means to better balance maintaining appropriate levels of woodland cover through avoiding inappropriate woodland removal and encouraging sustainable forest management practices. Fish and their habitats can be particularly sensitive to certain forestry practices, and we hope that Scotland's Forestry Strategy will prevent further impacts on water quality and fish, and support efforts to improve and enhance habitat in riparian zones. Such efforts have multiple benefits including helping to cool rivers which may be impacted by climate-change induced warming.

Fisheries Management Scotland supports the work that has been undertaken to develop and refine the Water and Forest Guidelines in Scotland, and we support and recognise the good practice that is now taking place. The improved standards associated with felling and replanting have promoted recovery in some afforested areas and led to environmental improvements. However, it is important to emphasise that in some parts of Scotland, more needs to be done.

Answer to Question 1

We are broadly in agreement with the long-term vision, but we consider that the commitment to the right tree, in the right place for the right purpose is crucial to the sustainability of the forestry expansion targets. However, it is also important to recognise, and address the extensive damage that has occurred through forestry practices, particularly in south-west Scotland. Much of the established conifer estate has resulted in extensive drainage and blanket planting of available land, and in some areas these practices have contributed to serious deterioration of the water quality, aquatic habitat, fish populations and associated fisheries.

As an example, the SEPA 'Solway Tweed River Basin Management Plan 2009' stated that over 200 km of running water in Galloway was considered as downgraded due to 'acidification'. This is supported by GFT electrofishing data that showed salmon had died out from numerous water courses within these conifer forests. These forests and their management have also impacted on surrounding watercourses through over shading, silt input, bankside erosion, increased surface runoff and dredging.

In addition, since the announcement of the Scottish forestry targets, forestry practice has changed in some areas. For example, conifers were being pulled down from higher ground (>300m altitude), where conifer tree most exacerbate acidification, but recent restructuring schemes are now reluctant to do this.

We support the point that forestry should be integrated with other land uses and businesses, but we seek clarity that this also includes serious consideration of wider benefits, such as developing habitat networks to ensure habitat for protected species including fish (and species which are dependent on them, such as freshwater pearl mussels). These considerations should be integrated at the start of the design, rather than as an afterthought.

It is important that these specific issues are addressed through Scotland's Forestry Strategy.

2 Does the strategy identify the right objectives for forestry in Scotland over the next 10 years?

No

Please explain your answer.:

Whilst we broadly agree with the 10-year objectives, there is an additional theme that we believe needs to be included. This relates to restoration of damage due to forestry, and could either be included as an additional, stand-alone objective or be integrated into the second objective. This might take many forms, including liming of currently acidified water courses, extending (where necessary) existing riparian buffer zones, and removal of natural regeneration of conifers (whatever the tree diameter) present in riparian buffer zones. Such natural regeneration is undermining the benefits of the environmental standards requiring unplanted buffer zones to protect water courses. In Galloway there are extensive areas which should be 'open space' or native deciduous woodland which are now filled with Sitka spruce. It is important that forest interests have adequate resources to manage these unwanted trees and that it becomes a routine forest management practice to remove them. In other cases, it is the access to the plantations which is the issue for fish and fisheries. Drainage schemes for roads and culverts can impede or exclude fish from accessing habitat.

Realising the vision and achieving the objectives: the major issues to be addressed

3 Do you agree with our assessment of the major issues likely to have the greatest impact on the achievement of our objectives?

Not Answered

Please explain your answer.:

The purpose of this section of the document is not clear. Whilst it identifies a number of issues, it doesn't really set out the extent of these issues are in reality, nor is there any prioritisation. On that basis, it is difficult to comment in detail.

As discussed above, we welcome the recognition in section 4.2 that forest and woodland management must be considered within the context of wider land-use, and the recognition that silo thinking has resulted in major criticism and badly designed forests. Wild fisheries interests, particularly in south-west Scotland are working hard to address the legacy of such practice. On that basis we would like more information on the specific means by which woodland management will be considered in future. We believe that there is a strong case for wild fisheries managers to contribute to any such discussions.

We consider that any rural support mechanisms that will be developed after Brexit must contribute to the restoration of damage due to previous forestry practices. These should embed good forestry practice and not be dominated by purely economic drivers. We emphasise the importance of restoration of native riparian woodland and the range of benefits that this provides, including benefits to fish and fisheries. At present this is not well supported by forestry grant schemes. We believe that restoration of native riparian woodland should be a high national priority with appropriate funding available to achieve it. We also consider that there is an opportunity for Fisheries Management Scotland members to facilitate such activity on private land, in addition to the current work with FCS on public land.

It is disappointing that section 4.6 does not make reference to peatland restoration. This is despite the fact that the Environmental Report (page 83) recognises tree planting and woodland expansion as pressures on peatland. Whilst the document is correct to state that (appropriately sited) forestry can play an important role in the removal of CO₂, we have significant concerns about the continuing practice of replanting conifers on deep peats after tree felling. Currently, new conifer planting schemes are not permitted on peat deeper than 50cm – we believe that this should be extended to replanting on deep peats. The extensive drainage of these peatlands to create conditions suitable for good tree growth is degrading these peatlands resulting in carbon loss, reduced water quality, including low pH, sedimentation and accelerated run-off. These effects are impacting on the recovery of rivers and the aquatic environment, including in the River Bladnoch SAC, parts of which only support very degraded fish populations. Indeed, the River Bladnoch is assessed by Marine Scotland as being below its conservation limits and therefore no fish are permitted to be killed by anglers.

We welcome the recognition of the role of native forests in enhancing our natural assets and improving their biodiversity. We would also emphasise the role of native woodland in providing 'dappled shade' to help cool rivers which may be impacted by climate-change induced warming. Riparian planting, often on a much smaller scale than would be undertaken commercially, is a potentially vital climate change mitigation strategy. Such planting also has the potential to provide important wildlife corridors in upland areas. It is important that such small-scale work is recognised and funded (and not precluded) from any future rural support mechanisms that will be developed after Brexit.

Delivering the vision: priorities for action and policies for delivery

4 Do the ten priorities identified capture the areas where action is most needed to deliver our objectives and vision?

Not Answered

Comments.:

It is not clear what message is being relayed by table 1. Are these 'impacts' positive, negative, or a mixture of the two?

It is difficult to offer detailed comment on table 2, as the priorities identified are so broad that it is difficult to understand how the delivery of these priorities will work in practice. We would like to see the following specific priorities included:

- Restoration of existing damage, and consistent best practice in both new and existing forestry;
- The principle of the right tree, in the right place for the right purpose should be clearly stated, either as a stand-alone priority, or clearly integrated into one of the other priorities.

Policies for delivery

5 Can you provide any examples of delivery mechanisms that have previously been effective in delivering similar objectives and priorities?

Comments.:

As stated above, we believe that a multi-stakeholder forum/ mechanism is vital to ensure that woodland management is considered in the wider context of other policy priorities. One example, that might be worth looking at is the National Advisory Group that informs SEPAs delivery of River Basin Management Planning. We note that this forum has not met in recent years and this, in our view, has had an impact on the wider understanding, and support, of SEPAs priorities among some stakeholders.

6 For any delivery mechanism examples given in answer to question 5, please explain why they worked well?

Comments.:

It is useful for a range of stakeholders to have an overview of such strategies. This allows potential conflicts to be identified and addressed early in the process.

Monitoring and reporting

7 Do you think the proposed progress indicators are the right ones?

Not Answered

Please explain your answer.:

See answer to question 5 above.

8 Do you have any suggestions for other indicators we could use to measure progress (especially ones which draw on existing data)?

Comments::

We believe that restoring water quality where inappropriate past planting, especially Sitka spruce on deep peats, has caused problems should be a progress indicator. This can be achieved by using the SEPA River Basin Management Planning Process which highlights where water courses have been downgraded due to forestry associated impacts. These downgraded areas should be priority areas to be addressed if sustainable forestry is a key objective of the Strategy. That said, we have significant concerns that the process for 'downgrading' water courses for acidification now relies on an annual mean figure for pH. This change has been very damaging as there are significant changes through the year in both dissolved organic carbon and pH. The main impact on fish is in early spring when the lowest pH and lowest DOC figures are found. Thus the use of an annual mean pH masks the fact that there may be months in the spring when all salmonids (especially salmon) will be killed by the impacts of low pH. The danger here is that if it is not labelled as being acidified then further expansion of forestry may occur and/or limited restructuring of existing forestry.

9 For any indicators suggested in answer to question Q8, please explain why you think they would be appropriate.

Comments::

SEPA use a range of agreed biological and chemical sampling and assessments to classify rivers and burns and give them a single classification class or status. There is a requirement from the Water Framework Directive that measures should be undertaken to raise the status of all water courses to 'good' apart from in a few instances. A suitable indicator should be to reduce the number of water courses downgraded to below 'good' status for reasons related to forestry activities.

Impact assessments

10 Would you add or change anything in the Equality Impact Assessment (which includes our assessment of the potential impact of the strategy on inequalities caused by socioeconomic disadvantage – Fairer Scotland Duty)?

Comments.:

No comment

11 Would you add or change anything in the Business and Regulatory Impact Assessment?

Comments.:

No comment

12 What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process?

Comments.:

No additional comment - see answers above.

13 Should any additional evidence sources be used in the Environmental Report?

Yes

Please provide details. :

SEPA give a status to water courses based on biological and chemical data. These river classes or status would help to identify how many water courses and their length which are downgraded due to forestry related activities and downgraded water courses.

14 What are your views on the predicted environmental effects as set out in the Environmental Report?

Comments.:

We are concerned that the necessary improvements to water quality in Galloway from forestry sites will not occur unless there is a significant reduction in replanting on the deep peats and that peatland restoration is considered at deep peat afforested sites.

15 Do you agree with the conclusions and recommendations set out in the Environmental Report?

Not Answered

Comments.:

The report needs to be clearer that tree planting on deep peats, especially if it is drained, may result in a net loss of carbon due to the damage and loss of peat. GFT consider that to improve water quality there will need to be a change against the requirement to replant conifers on deep peats.

Natural flood management from forestry is complicated and it needs to be clear that forest drainage may make flooding issues downstream worse. Forestry aiming to play an important role in flood management needs to be carefully planned and designed for this purpose.

We note the report on page 47 does recognise that water quality / environment could be downgraded by forestry activity.

16 Please provide any other further comments you have on the Environmental Report.

Comments.:

No comment

Conclusion

17 Do you have any other comments you would like to make about the draft strategy for forestry in Scotland?

Comments.:

Fisheries Management Scotland would welcome the opportunity to discuss some of the issues raised above in more detail.

About you

What is your name?

Name:

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What is your email address?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Fisheries Management Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly dissatisfied

Please enter comments here.: