



Capital Business Centre
24 Canning Street
Edinburgh
EH3 8EG

Tel: 0131 272 2797
www.rafts.org.uk

Scottish Charity: SC 031021
Company Limited by Guarantee: SC 370242
VAT Registration Number: 918 1155 33

Woodland Expansion Advisory Group Secretariat
c/o Forestry Commission Scotland
Silvan House
231 Corstorphine Road
Edinburgh
EH12 7AT

09 January 2012

Dear Mr Barbour

Woodland Expansion Advisory Group Consultation

Thank you for contacting Rivers and Fisheries Trusts of Scotland (RAFTS) and the Association of Salmon Fishery Boards (ASFB) in respect of your recent consultation on the potential to expand woodland coverage in Scotland. We realise that the consultation closed on 06 January but trust that this slightly late submission might still be of some interest to the group.

Formed in 2005, Rivers and Fisheries Trusts of Scotland (RAFTS) is an independent freshwater conservation charity representing Scotland's national network of 25 rivers and fisheries Trusts and Foundations. Our members work across over 90% of Scotland's freshwaters to protect and develop our native fish stocks and populations by undertaking a range of activities including freshwater, river habitat restoration, fish and fisheries monitoring, research and education programmes. RAFTS is the membership organisation of the fisheries and rivers trusts operating in Scotland and is, itself, a charity and company limited by guarantee.

The ASFB 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.

Although the main objectives of the consultation seems to be how to overcome barriers to woodland expansion from other land management factors, features and conflicts and, in general terms, RAFTS and ASFB are supportive of woodland expansion under appropriate regulatory controls and in particular of native and deciduous plantings, we would wish to confirm that in some instances the constraints and regulatory restrictions on development are essential to provide protection to other interests, features and activities.

In RAFTS we recognise the positive contributions that can be made to Scotland's environments (water and land) by sensitive woodland development and the potential for woodlands to enhance riparian habitats, to contribute to sustainable flood management objectives, to provide rich and diverse habitats of biodiversity interest and importance, to provide high quality recreational locations, to buffer rivers against climate change induced temperature gain and, of course, support sustainable timber production.

However, there are instances, particularly in South West Scotland, where the commercial coniferous plantings made have caused significant problems in sensitive areas. High percentage single age coniferous cover in poorly buffered geology areas and at a time when acidifying atmospheric deposition was at its height resulted in damage to many important freshwaters in Galloway and many lochs and areas of river and freshwater became devoid of fish. Although there is now some evidence of very slow recovery from the worst of these impacts, the forest estate is now significantly restructured and atmospheric pollution is much reduced, conflicts remain between fisheries and forestry interests in the area.

Whilst there has been much progress on this subject in recent years, acidification related to forestry remains a significant problem. This is reflected in the Solway-Tweed River Basin Management Plan where >240km of classified freshwaters are less than target status and must be improved to meet the requirements of the Water Framework Directive.

Of course there may be other constraints on forestry development associated with archaeological or other heritage issues and there should be appropriately considered within the planning for woodland expansion.

In summary RAFTS and ASFB is generally supportive of woodland expansion in many areas of Scotland. However, we believe that there must always be areas, instances and constraints on development that should not be removed. A robust regulatory system to guide and direct future development and expansion will ensure that future woodlands are planted in the most appropriate locations and with least impact on other issues or interests. In the context of Galloway, for example, and given the ongoing downgrading of water quality attributed, in part to forest coverage, that expansion of coniferous woodland should not be taken forward.

We trust this submission is of interest. Of course, should you require further information or clarification then do please contact either of us at any time. The first point of contact for this response is Callum Sinclair of RAFTS.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Callum Sinclair', with a long horizontal flourish extending to the right.

Callum Sinclair
Director: RAFTS
Mail: callum@rafts.org.uk

A handwritten signature in black ink, appearing to read 'Alan Wells', written in a cursive style.

Alan Wells
Planning and Policy Director: ASFB
Mail: alan@asfb.org.uk