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Strategic Plan Consultation
Forest Enterprise Scotland Head Office
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7 June 2008

Dear Sirs,

Consultation on the FES Framework and Forest District Strategic Plans

The Game & Wildlife Conservation Trust is an independent wildlife conservation charity which carries out scientific research into Britain's game and wildlife. The Trust advises farmers and landowners on improving wildlife habitats and argues for agricultural and conservation policies based on science. We are members of Scotland's Moorland Forum and act as advisors to Scottish Government in a number of other capacities. We are also joint lead partners and current Scottish chair of the Black Grouse Biodiversity Action Plan/Group and members of the Capercaillie Biodiversity Action Plan Group. We hope that our views on the FES Framework and Forest District Strategic Plans will be considered.

Many of the issues laid out in the consultation are not within the Trust's competence and we are not commenting on any of the individual Forest District Strategic Plans (FDSPs). However the Trust feels there is considerable potential for the development and operation of Scotland's publicly owned forests and woodlands to be engaged with sporting land managers, as this would lead to enhancements in the following key themes identified in the draft framework:

- 1: Climate Change
- 3: Business Development
- 4: Community Development
- 5: Access and health
- 6: Environmental quality
- 7: Biodiversity

In particular there are four issues which cut across the draft Strategic Framework and which we hope would be integrated into all of the FDSPs. These four issues also answer in first 5 questions asked in the draft Strategic Framework document.

Balancing woodlands & peatlands (Key Themes 1, 6 and 7)

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The Scottish Forestry Strategy 2006 has a national target to expand woodland from the current 17.1% of land cover to 25% by 2050. Most woodland expansion is likely to take place on moorland and we feel that there is a consequent risk of carbon loss and impact on moorland ecosystem management and function.

The limited expansion of native woodland onto currently un-managed or severely degraded moorland with the primary intention of habitat linkage could be no real loss to the red grouse interest and of positive biodiversity benefit. However, any expansion should be underpinned by enhancing predator and deer control in all the adjacent habitats, notably ensuring that the intensive management of open moorland for red grouse shooting can remain effective and thus protect heather cover.

Without careful planning and consultation we feel there is a real risk that improving habitat linkage for upland woodland may come at the expense of reducing the linkage of moorland. This would be unfortunate when increased moorland habitat fragmentation has been identified in DETR and SNH reports as a likely limiting factor in retaining red grouse and mountain hare populations. Woodland expansion is likely to have a greater than predicted fragmenting effect on moorland because of the action of corvids, ticks and impact on the ability to safely conduct muirburn.

In addition to these effects on biodiversity, the Trust believes that while peat under moorland locks-up carbon, forestry can cause a net loss of carbon during planting and growth by drying out soils and at best recycles carbon as trees are felled and turned into product. Therefore we feel that the current Scottish Forestry Strategy could lead to a net loss of carbon storage potential from upland areas as a result of a general aim to increase Scotland's tree cover, notably onto current peatland areas.

Recommendations:

- We recommend collaborative research, similar to that which underpins existing woodland connectivity models, is undertaken into moorland habitat linkage and requirements before further woodland expansion is considered or undertaken.
- We suggest that the management priorities for plantation woodland neighbouring moorland should be in order 1) return to moorland, 2) restructured to native woodland and 3) managed for high biodiversity value before further expansion is considered.
- We feel more resources should be allocated to train, equip and encourage FES staff to control foxes and corvids in core management areas for Capercaillie and Black Grouse; and in areas neighbouring moorlands and grasslands with potential for enhancing populations of wading birds. Where further resources are not available a general policy should be put in place to support the activities of sporting managers who wish to conduct legal predator control of the Forest Estate.
- We suggest that guidance be introduced such that FES avoids disturbance to and loss of peat producing soils through tree regeneration and planting.
- We recommend research into wildfire risk scenarios, agreement on best practice managed fire regimes to reduce wildfire risk and the development of enhanced public awareness strategies such as media based alerts with the aim of reducing uncontrolled fires that can seriously damage neighbouring peat accumulating systems.

Biofuels (Key Themes 1, 3, 4 and 7)

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Biofuels are an active area of research and debate. The Trust's research has shown planting and management of short rotation coppice in small patches on arable or pasture land can contribute to both carbon neutral fuel production for local and regional communities and bring the greatest net biodiversity gain of any row-crop.

Recommendations:

- We suggest the Strategic Frameworks incorporate sensitive promotion of this land use for both carbon emission reduction and biodiversity benefit.
- We recommend that wherever possible Forest Estate woodlands are thinned and open woodland edge and internal spaces created, thus providing a source of bio-fuels and enhancing the conservation value of the woodland.

Engagement with private enterprise (key themes 3, 4 and 7)

We suggest sporting activities could benefit Scotland's Forest Estate through protecting and enhancing woodlands. As noted previously, sporting management of the uplands through short rotation muirburn and grazing helps reduce the risk of wildfire in Forest stands. In the lowlands pheasant shooting is a key driver for the planting of trees and GWCT research has shown significant gains in woodland biodiversity where such woods remain under sporting management that encourages good woodland edge design and open space management.

Salmon and Trout fishing are also important sources of employment, income and drivers of conservation management of water courses and their continued sustainable development requires the careful management of hill catchment areas.

In summary these collaborations could lead to gains in revenue, offset management costs, improved biodiversity, engagement with local communities and developing tourism with or without the need to dispose of land parcels.

Recommendations:

- Engagement with sporting enterprises neighbouring and wishing to use and adapt parts of the Forest Estate for stalking or gamebird shooting to allow for development of new businesses in the Forest Estate.
- We suggest the active support of moorland management through purchase and sharing of fire control equipment with neighbouring upland sporting estates would lead to improved the protection of existing forest in upland areas.
- The impacts of forestry on the ecological quality of catchments with downstream trout and salmon interests should be considered in terms of design, operations and monitoring in the context of flood and catchment management plans.

Tackling ticks (key themes 4, 5 and 7)

GWCT has carried out research which suggests that an important problem associated with expanding woodland in upland and lowland areas will be *Ixodes ricinus* sheep ticks. Ticks can reach their greatest

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abundance in woodland because these habitats provide a suitable micro-climate for tick survival and support increasing numbers of red and roe deer hosts, key drivers of the recent increase in ticks abundance and distribution.

Public and FES employee health is therefore at increasing risk from direct tick biting and potential infection with the tick-borne disease Lyme Borreliosis. There are also potential impacts on biodiversity as both Capercaillie and Black Grouse are known tick hosts.

Recommendations:

- Resources should be put in place to reduce the numbers of deer on the Forest Estate to assist natural regeneration and to reduce the tick carrying capacity of woodland without unnecessary fencing. Any fencing which must be retained for deer control must be clearly marked with plastic flagging to reduce losses of woodland grouse through collision.
- FES should be encouraged to support the activities of Deer Management Groups in all areas where this would help with controlling deer numbers and movement and provide a source of rural employment and income.
- In addition we recommend the development of collaborative research into the application of topical and feed based compounds which reduce tick feeding on deer species that use woodland habitats.

The Trust values well connected areas of native woodland with a diverse shrub and scrub layer as an important habitat for game and other species of conservation interest. However while we urge FES to adopt measures consistent with enhancing these habitats, we argue that such measures should only be undertaken where these can be achieved without risk to the conservation and sporting value of neighbouring habitats. Achieving these goals is most likely to be met when undertaken together with the agricultural and sporting enterprises which manage the land surrounding the Forest Estate.

I hope these comments are helpful and if you need clarification of any of the issues raised, please do not hesitate to get in touch.

Yours sincerely,



Dr Adam Smith