

To – Forestry Devolution Team
Natural Resources Division
Scottish Government
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Victoria Quay
Edinburgh
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Consultation on The Future of Forestry in Scotland

SANA's response

The Scottish Anglers National Association Ltd (SANA) is recognised as the governing body for game angling in Scotland. This response to the consultation has been prepared on its behalf by its Non-migratory Fish Committee.

Though the consultation document mentions environmental outcomes and wild life it says nothing about fish and angling, yet the National Forest Estate (NFE) incorporates streams and stillwaters, some publicly owned and often leased to angling interests. It is important for both fish and aquatic invertebrates that water courses are as free as possible from pollutants and sediment, so contour ploughing should be the norm rather than "vertical" ploughing which leads to faster run-off. We appreciate that the Forestry Commission has improved its policies towards the water environment over recent years and expect the proposed devolved arrangements will include plans for those improvements to continue in Scotland.

This response, however, is principally about access to fishings, in particular to those in the NFE. The Scottish government is currently engaged in an all species Wild Fisheries Reform (WFR) which potentially will change the way many fisheries are managed. It is proposed to abolish Protection Orders (POs); to make fishing throughout Scotland without written permission an offence; and to give the protection of the criminal law against unauthorised angling to all fishery owners. Currently only angling for migratory fish is covered by the criminal law, civil law covers all other fish species apart from a few areas where a PO is in force. A PO gives criminal law protection against fishing for other species without written permission (there are only fourteen POs of which Loch Awe is an example).

SANA is dedicated to maintaining and improving public access to fishings at a reasonable cost in accordance with acclaimed PO principles. If the current WFR proposals come to fruition many anglers fear they could limit or even preclude access to angling for trout and other species in some areas. It is uncertain how publicly owned waters (such as those in the NFE) and those in privately owned forests will be affected by the proposals. Consequently we ask the Forestry Devolution team to focus attention on them in order to ensure future forestry policy views publicly owned waters as national assets and makes them available to the angling public.

Alan Ayre
Secretary
Non-migratory Fish Committee
SANA Ltd

21 October 2016