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Mr. Richard Howe
Corporate and Forestry Support
Forestry Commission
231 Corstorphine Road
Edinburgh
EH12 7AT

5th April 2010

Sent by email: Richard.howe@forestry.gsi.gov.uk

Dear Mr. Howe,

Angling Trust's response to UKFS: Water Guidelines (Consultation Draft February 2010)

The Angling Trust is the governing body for sea, game and coarse fishing in England. We represent the views of our membership which consists of over 14,000 individual anglers and 1,400 clubs and riparian owners.

We welcome and strongly support these proposed guidelines and in particular the direction of Forestry operations to incorporate requirements under the Water Framework Directive (2000) for achieving "Good Ecological Status" in all waters by 2015 as illustrated by WG74, WG75, BG32, BG34, BG33 and WG76 in particular.

We do have concerns regarding the guidance on pesticide use and in particular the comments on cypermethrin. We have fought the use of this chemical as a sheep dip for many years and will be encouraging government to ban the use of this pesticide in Forestry operations following the decision to ban its use in animal husbandry. Whilst we acknowledge that the guidelines specifically state that cypermethrin should only be used outside riparian buffer strips we consider this to be insufficient, on the basis of the chemical's high toxicity even when greatly diluted. At the very least there should be an extended "No Spray" buffer of twice the width of the riparian buffer strip. As you quite rightly highlight cypermethrin has a catastrophic effect on aquatic ecosystems, both because of its impact on invertebrates and because of its non-lethal impact on the ability of salmonid fish to breed and adapt to salt water.

Monitoring the effectiveness of these guidelines in practice is vital to ensure they are closely followed. Angling Trust would therefore request that a reporting hot line is set up so that bad practice can be brought to the Forestry Commission's attention quickly and at a high level in order that these can be investigated with a view to grants being withdrawn if infraction is shown to have occurred. We attach photographs taken last summer of grant aided Forestry operations that would not conform to these new guidelines.

Yours sincerely

Mark Lloyd
Chief Executive