

Climate Change, Environment and Rural Affairs Committee
National Assembly for Wales
Pierhead Street
Cardiff
CF99 1NA

6th April 2017

Consultation on Forestry and Woodland Policy in Wales

Dear CCERA Committee

I write on behalf of Cymdeithas Eryri the Snowdonia Society, the charity which since 1967 has worked to protect and enhance Snowdonia.

Thank you for the opportunity to comment on this important consultation. The Snowdonia Society fully endorses and supports the detailed Wales Environment Link response to which we are a signatory.

Briefly we wish to emphasise the following important points.

1. Policy needs to underpin and support the sustainable management of existing woodland, with priorities focused on ancient woodland and native woodland to ensure they reach their full potential.
2. Such policy needs to be an integral part of a comprehensive and coherent approach to sustainable land management.
3. All woodland management needs to have clear objectives for biodiversity and, where appropriate, for public access.
4. There is a need for elements of plantation forestry practice to be influenced so as to reduce or eliminate their negative impacts on biodiversity, on landscape and on the capacity for sustainable management of both land and freshwater.
5. The planting of invasive non-native conifer species in the vicinity of fragile sites designated for their nature conservation importance is at odds with wider strategies regarding INNS (Invasive Non-Native Species). We have received grant aid from NRW to carry out practical conservation work which often involves removing conifers and in particular their self-seeded saplings from peatland sites where they are a significant problem. NRW is responsible for many of the commercial conifer plantations from which these saplings arise as a result of wind-borne seed dispersal.

Cymdeithas Eryri the Snowdonia Society
1967 - 2017

Yn gwarchod, gwella a dathlu Eryri ers 50 mlynedd - Protecting, enhancing and celebrating Snowdonia for 50 years

Elusen gofrestredig rhif/Registered Charity no: 1155401

6. The use of cypermethrin – whether as prophylactic or reactive treatments in commercial forestry and in proximity to freshwater and designated conservation sites is a matter of serious concern. The scale of use of non-native genetic material by NRW and other commercial forestry operators is relevant here.
7. NRW needs to apply a holistic approach to its forestry management operations. We responded to a specific case where NRW applied for planning permission to carry out large scale track-building and clearance work in close proximity to a nationally and internationally designated freshwater site (Cors Goch Trawsfynydd and Afon Eden SAC) without carrying out any site specific environmental impact assessment. When we queried this we were told that the generic assessment for the whole forest unit would suffice. We pointed out why this could not be correct; NRW's response was to commission a consultant to do a one-off assessment and evaluation. This is a highly ineffective and inefficient way for the statutory conservation consultee to plan and execute its land management.

Once again we urge you to pay close attention to the comprehensive WEL submission.