I welcome the opportunity to comment on the proposals put forward in the Land Reform (Scotland) Bill. I work in the forestry sector, which is an active part of the rural economy and one which I believe offers great potential for the future, not only in the production of commercial timber but also in the enhancement of landscape, biodiversity and recreational opportunities. I believe there are certain parts of your proposals which require careful consideration as follows:

1. **Scottish Land Commission**

   While it would appear at first sight sensible to have an over-arching body looking at land use in Scotland, there is nothing in the bill which states how this Commission is to be constituted. I would urge that the Commission must include appropriate representation of forestry interests. There must be members of the Commission with forestry experience, who understand the practicalities of making forestry work.

2. **Public Consultation**

   There is already in place extensive consultation on forestry proposals, as they progress through the SRDP scoping application and approval process. While I understand the need for consultation and agreement with various bodies, there is no doubt that the existing level of consultation leads to delay, lack of confidence in investment and potentially deters applicants from putting forward otherwise sound proposals. While not wishing to exclude communities from involvement, I would not wish to see the process made any more complex or duplicated by new proposals.

3. **Sustainability**

   The arguments for land use and land management which is sustainable are laudable. However, there is no definition of what sustainable development means. Forestry is a long-term business and for many years forests can appear to be inactive. This is simply allowing time for the trees to grow and the commercial timber crop to develop. We would not wish to see any definition of sustainable development that ignored these realities.

4. **Deer Management**

   The successful management of forestry crops requires attention to browsing animals; and, in particular, to deer. Over recent years, considerable effort has been put in to reducing deer populations in forest areas and with it the requirement for deer fencing. This has been done in part for cost reasons, but also to meet with conservation objectives linked to bird populations that are put at risk by deer fencing.
The introduction of sporting rates should reflect that the control of deer and other animals injurious to trees in a forestry setting is not a sporting activity but a management tool designed to meet the objectives of growing the crop in compliance with government approved schemes and desired biodiversity.

The application of sporting rates needs to bear this in mind.

I thank you for the opportunity to comment and would be pleased to expand further on any of the points mentioned above, if required.