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20th December 2009

Dear Stephen,

Draft Position on Freshwater Fisheries

Further to your email of the 18th December, the Angling Trust very much welcomes your invitation to comment on Natural England's Draft Position and our comments are detailed below:

1. Purpose

We agree with the comments in this section and in addition would point out the findings of Granek *et al* (2008) who found that "*recreational fishers can be instrumental in successful fisheries conservation through active involvement in, or initiation of, conservation projects to reduce both direct and external stressors contributing to fishery declines. Understanding fishers' concerns for sustained access to the resource and developing methods for their meaningful participation can have positive impacts on conservation efforts*".

3. Context

We agree with the comments in this section as a general point and look forward to working with Natural England as outlined in 3.5 regarding specifics.

4. Summary of NE's draft position on Freshwater Fisheries

We welcome the sentiments stated here subject to comments detailed below with regard to Annex 1.

Annex 1

Context

You may wish to note that the Angling Trust has now been recognised as the governing body for coarse, sea & game angling in England.

Whilst we agree that angling can result in wildlife disturbance, recent surveys have shown that of all recreational past times angling results in the least disturbance.

Issues

As previously agreed, angling can have an impact however we believe that approaches to these issues should be site specific rather than generic. For example Sereda *et al* (2008) showed that fish are important Phosphate sinks and on sites where there are issues total removal of fish has adverse eutrophic consequences. This is further highlighted by Hahn *et al* (2007) who concluded that breeding colonies of cormorants and grey heron may be responsible for significant P loading of freshwater lakes and wetlands.

There are wildlife implications to bank erosion on the edge of lentic and lotic environments, Brauns *et al* (2007) found that the protection of the littoral zone for macro invertebrates should be a critical part of any water management plan and recommend priority be given to increasing littoral habitat complexity and heterogeneity. Erosion of banks to form a beach type environment results in worse habitat for littoral macro invertebrates than other anthropogenic influences including the adding of rip-rap or wooden retaining walls. Funding from rod licences via the EA is available to prevent beach type environments forming when angling access is an issue.

The Angling Trust's position on sharing access with other users is well known in that we advocate such sharing should be with the agreement of all relevant parties.

Rationale for NE's involvement in freshwater fisheries

We recognise NE's legitimate involvement in this matter and welcome the comments made as to how angling may contribute to the achievement of PSA SSSI targets. We feel "good practice" case examples could be quoted here to strengthen this. One example is Hilton Gravel Pits SSSI owned and managed by Derbyshire Wildlife Trust; historical anthropological activities have created a mosaic of open water, marsh, scrub, wet woodland and there are the remains of neutral grassland. However, as there is no permanent staff present on the reserve, there have been problems with unauthorised access including horse riding, motor bikes and litter to the detriment of the site condition. As part of their present management plan, Derbyshire Wildlife Trust has leased the fishing rights to an angling club in return for providing a bailiffing service which has now overcome these problems.

NE's draft positions on freshwater fisheries

1. We agree with these comments. Funding is an issue here but where waters are fished then there is access to funds from rod licences on a project basis for improvements.

Evidence

We welcome the comments regarding to fish movement, in particular the recognition that this adversely affects both salmonids and cyprinids. We therefore look to Natural England to support our stance on hydroelectric projects that compound fish movement problems.

2. We welcome NE's commitment to work with the angling community and the recognition of the positive contribution being made by some anglers and fishery managers. Substantial strides have been made recently on the issues of bank maintenance, removal of woody debris and in-channel weed clearance most notably with the publication of the Wild Trout Trust's Chalk Stream Management Manual. It should also be noted that whilst present interest has been focused on woody debris in rivers, NE staff should be equally aware of its importance in still waters as shown by the work of Brauns *et al* (2007) regarding macro invertebrate habitat and Helmus and Sass (2008) using whole lake experiments on the benefits for fish breeding and protection from avian predation.

3. We agree with the sentiments in conserving or restoring characteristic and sustainable communities of native fish. We are therefore concerned that there have been considerable delays in the re-introduction of Burbot to its native range and look to NE to ensure that any difficulties are swiftly remedied.

4. We note the concerns of NE regarding the possibilities of escapes of non-native fish species from enclosed waters to river systems and agree that bio security may have to be increased at these sites. We believe such remedies should be site specific and proportionate to the risk. The Angling Trust would not welcome our members being faced with requirements based on a "catch all" basis. In the same vein we do not agree that fencing off river banks from live stock in all cases is a panacea but that this should be assessed on a case by case basis according to threat.

Evidence

We have commented earlier on eutrophication from bottom feeders plus fish as a Phosphate sink.

Further work is required before we can agree to the statement on hybridization of cyprinids and we would welcome further clarification as to how this position has been formulated. We are not aware of any work in the literature that supports this position, our scientific advisor on cyprinids has over 20 years experience of electro surveys in the Trent catchment and has very rarely encountered hybrid cyprinids. The Trent catchment is highly impounded and would be an example of where hybrids should be found if your comments are correct. Advice we have received indicates that hybridization does not occur between cyprinids due to the difference in timings of species spawning. We suspect that this position follows the work done on salmonids that lead to the Environment Agency phasing out diploid stocking of trout. We do not agree that this can be extrapolated to cyprinids as there is considerably less genetic variety in cyprinids versus salmonids which reflects their survival through the last ice age whereas cyprinids probably originated from east flowing rivers as glaciations retreated.

We would welcome further discussion on this subject before NE finalises its position.

5 & 6. The Angling Trust fully agrees with these sections of the paper and looks forward to working with NE to develop this position.

Yours sincerely

Roger Furniss
Director
Angling Trust

References:

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Hahn, S., Bauer, S. and Klaasen, M. (2007) Estimating the Contribution of Carnivorous Waterbirds to Nutrient Loading in Freshwater Habitats. *Freshwater Biology* 52 pp.2421-2433.

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