

DEFRA
European and UK Species Policy Team
Wildlife Management Team
Room 108
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6NE

16th November 2009

Dear Sir,

Wildlife Management Strategy for England – Stakeholders response.

The Angling Trust is the governing body for coarse, sea and game angling in England. As such this proposed strategy will be of considerable interest to our members as has been illustrated in the document by the use of cormorant predation as an example of required wildlife management. We therefore welcome the intention to have a clear strategy across government departments to ensure the sustainable management and conservation of wildlife and that it is envisaged that this will be based on a holistic, ecosystem approach.

We do, however, have concerns as to the depth of the strategy and have identified areas of conflict not reflected in this report which appear to undermine its intentions. In stating this it should be noted that as the Angling Trust was formed at the beginning of this year we were not involved in the preliminary scoping that was carried out in 2008. To illustrate this, the sub-title of the report states that it is for terrestrial wildlife only which appears at odds with the intention to adopt ecosystem approaches.

In detail there appears to be no recognition of potential conflicts of different government policies or drivers that may bring about pressures on different species. By way of example Annex B makes no reference to the Water Framework Directive (WFD) or the Marine Directive that is due to be transposed into English law in 2010 although it does include the Marine and Coastal Access Bill. Whilst the report makes reference to the necessity of control of cormorant numbers for socio-economic reasons, WFD requires good ecological status/ potential for water bodies by 2015 and Environment Agency analysis shows that most water bodies will fail this due to low fish stocks. Whilst there are a large number of reasons for this avian predation will also be a factor. There therefore appears to be a conflict in DEFRA's stated objective in keeping over-wintering cormorant numbers to a level that would not affect the population status and hence conflict with WFD requirements to increase fish stocks to a healthy level. Smith *et al*

(2008) state that the cormorant population when assessed were above their carrying capacity and yet it has been left to anglers to apply for licences to address the situation.

This report therefore appears to have missed an opportunity of providing a prioritisation strategy when these conflicts arise with a weighting based on ecosystem priorities rather than individual species.

Yours faithfully

Mark Lloyd
Chief Executive
Angling Trust