

Department for Environment, Food and Rural Affairs

The response from the Angling Trust is primarily concerned with the arrangements which may be made following abolition of the RLFACs, for the management of rivers and stillwaters and the angling which takes place on them. However it is essential that there are adequate arrangements to ensure that the decisions and actions which are taken in other areas of the EA, such as Flood Risk Management and Water Resources, take due account of their impact on freshwater conservation and angling and that organisations dealing with the latter are kept informed.

Summary of questions:

Q1. Do consultees agree with the principle of abolition of the Environment Agency's statutory Environment Protection Advisory Committees (EPACs) and Regional and Local Fisheries Advisory Committees (RLFACs) [also known as the Fisheries, Ecology and Recreation Advisory Committees – FERACs] and the establishment of flexible non-statutory arrangements?

We agree with the abolition of the statutory committees in their current form; providing better alternative arrangements are made at national, regional and catchment levels.

We also agree that there should be a holistic approach to engagement on environmental improvement, especially delivery of the Water Framework Directive.

Nonetheless, a basic reason for having statutory regional and local fisheries committees was to help ensure accountability for the funding raised annually from anglers, currently about £25 million. This still needs to be done, indeed improved, given the reduced transparency that has resulted from:

- integration of operational management and budgets within the Agency; and
- the limited constraint on the Agency's use of rod licence income, since the rod licence duty is not classed as a charge. Government rules require greater justification for charges that can be levied on others, such as water companies and authorised netsmen.

This review is an opportunity to meet this challenge at all levels.

Individual and angling club owners and lessees of riparian fishing rights also need a clear mechanism for influencing decisions which directly affect their property rights and value, which are worth billions of pounds nationwide.

Q2. Do consultees agree with the proposed high level principles against which to design future stakeholder engagement? Are there any gaps?

We agree with the general principles which are proposed, but would want to see the following additions:

1. **Partnership** We welcome the references to partnership in the high level principles providing it is recognised as an express commitment at all levels in the EA, nationally, regionally and at catchment level. Partnership involves participation in the decision making process, particularly where the private sector is contributing resources. 'Business as usual' but without the onus of the regional committees is not acceptable.
2. **Recognition of the expertise within the third sector:** The high level principles should explicitly recognise and require the full use of the skills, data and capabilities available from people and organisations in the third sector. For angling and fisheries, this includes activities such as bailiffing, angling development and angler communication and the use of cost-effective, third sector organisations for monitoring and habitat improvement.
3. **Key Stakeholders** Recognition that effective delivery of outcomes requires the involvement of people and organisations that own or control the resource and are capable of delivery and not just in possession of opinions. In particular the involvement of riparian and freshwater owners and leaseholders, who can deliver improvements, is essential and should be included as a high level principle. This is particularly important at a catchment level.

Q3. Do consultees support the more flexible and region specific approaches being developed to allow more engagement at the local level (Appendix D)? Are there any gaps?

We support the adoption of flexible regional approaches to engagement at a local level, subject to the high level principles above and the provisos below.

Regional Angling Fora, organised in partnership with the Angling Trust, are essential to address the current shortcomings in accountability. To facilitate consultation by the Agency on national issues, policies and planning, there needs to be a level of consistency between regions on the structure of these fora and the timing of their meetings. They need to be officially recognised by the Agency and Defra as the mechanism for angling interests to provide feedback to the Agency and for information to be disseminated from the Agency and Defra.

There is a clear need for annual reporting at national, regional and local levels, to improve accountability. This should cover not only the outcomes but also the level of activity. Whilst there should be some flexibility, a common framework and statistical basis is needed for such reporting to allow comparison not only between years but also between and within regions, areas and River Basin Districts in line with the Water White Paper requirements for Water Companies. A common framework and publishing date on the internet would also facilitate consistent and timely national reporting.

For geographically large and diverse regions such as the South it will be necessary to have more than one forum in a region. This flexibility is important not only for the traveling and time costs for members and Agency staff, but also to allow more focused discussion. There should also be recognition of the existence of long-standing angling consultatives, such as in Midlands Region.

Local engagement: We agree that flexibility is particularly important at a catchment level for delivery of environmental outcomes relating to the Water Framework Directive.

At a regional level the responsibilities of the main groups are clear. However at a sub-regional level some of the regional engagement models have numerous overlapping groups within the context of the freshwater environment, e.g. fishery and angling fora, conservation and biodiversity groups. For any particular catchment it should be clear which is the lead group for meeting specific objectives such as implementing WFD. However it is essential that the lead or 'host' group for a catchment should have the confidence of all stakeholders within that catchment. It is not acceptable for the Environment Agency to decide on its own who should lead a particular catchment as this will be perceived as an imposition and does not meet localism criteria. Instead transparent local consultations should be carried out amongst stakeholders to ensure that the lead / 'host' organisation has the confidence of other interested local bodies. In the event of there being no local agreement as to a lead NGO organisation then the Environment Agency should lead as the competent authority under WFD using other NGOs as delivery organisations where possible. It should also be prominently stated how the EA intends to effectively regulate in catchments where a lead body is an NGO.

Ideally for each catchment, (which may cover similar rivers and water bodies) there should be an identifiable catchment group dealing with all conservation and fishery issues. It should have a core membership of representatives of delivery organisations but able to bring in other representation as and when particular issues arise.

We believe it is essential that there is a good coverage of all catchments and water bodies across the country. In order to avoid geographical gaps occurring as a result of the more flexible structures, it is important that the E & W Fisheries Group makes regular appraisals of the arrangements which are current in each region and to stimulate appropriate action if there appear to be any deficiencies.