

Response to KHV Health Status Consultation

Angling Trust is the representative body for all angling, anglers and fisheries in England. Angling Trust currently represents over 1100 angling clubs and about 14,000 individual anglers, all of which have been recruited since the launch of AT in January 2009.

The documents supplied to assist with this consultation appear to be as up to date in knowledge of this disease and its implications as it is possible to be. The reports on disease distribution and the potential impacts of importing vaccinated carp, having been prepared by Cefas, are reflective of our best current knowledge of this novel disease.

The financial model does not appear to be reasonable in its assumptions. In our opinion the costs to the economy and to fisheries are understated and the mix of fisheries described and used is flawed. The mix appears to have been taken from the Cefas report into KHV distribution, which does not reflect the population of fisheries in England or the degree of risk to which each type of fishery is exposed. Heavily stocked commercial waters which rely on injections of fish throughout the fishing year are at significantly greater risk of exposure than specimen waters which only very occasionally, if ever, introduce fish.

We have attached an Economic Impact Assessment of our own using figures drawn from members of the fisheries and angling club community and the Angling Trade Association.

Summary: Intervention & Options

Q1. Government Central Statistical Service should be able to define very closely this answer from industry returns.

Q2. Diseased fish are present in nearly every country with aquaculture systems producing ornamental fish for the European markets.

Q3. Many supplying countries will claim disease free status. Regular checks of import samples, as they arrive, are required to determine that national authorities are fulfilling their roles in maintaining fish health, not only for the fisheries sector but also for the ornamental sector, which is of keen interest to many anglers..

Q4. We believe this to be a low assumption given the historic data of KHV outbreak numbers contained in the consultation papers;

Year	Number of outbreaks
2003	6
2004	4

2005	6
2006	23
2007	10
2008	12

The expectation that there will only be two additional outbreaks a year over the period being studied is simply a guess with no statistical evidence provided to justify that position.

We do know that all significant fish disease outbreaks are stress and weather related. KHV is a novel disease and without controls we would expect to see, in poor spring/summer conditions, when fish can be stressed by warming and cooling during the early spring prior to spawning, disease events of significantly higher number than those experienced in the last two years, which have been cool and wet throughout the cycle.

Given that those fisheries most at risk are those which most regularly stock fish. In poor weather conditions, without controls on either infected fish or vaccinated fish, we might expect to see as many as 20 new outbreaks a year in poor years (hot and cold spring and hot summer weather) and perhaps only 2 new outbreaks in cooler years. However as the number of exposed fisheries increases with each passing year we should also expect to see increasingly exponential growth in the number of infected fisheries.

As an illustration, in 2006 we had a warm January, when fish started to exhibit pairing up, a prelude to spawning, immediately followed by a much colder February and even colder March. In early April temperatures rose and the fish started to pair up again, only to be thwarted by colder weather at the end of April and into May. In mid May temperatures rose and then stayed hot throughout the summer. In this year 23 outbreaks of the disease occurred and were notified, before the disease became notifiable. We can never know how many outbreaks, in 2006, went unreported and unrecorded. It must be assumed that the changeable early year temperatures led the fish to be stressed and their immune response system to be suppressed into mid May. (evidence by personal observation and recording of fisheries in Hertfordshire)

2006 accounted for 37% of the recorded outbreaks over a six year period. The January to April weather pattern has been recorded in successive years but without the long hot spells of summer weather, and disease outbreaks have been fewer.

Considerable anecdotal evidence supports the fact that sudden temperature variations and high summer temperatures are correlated with the number of outbreaks of KHV. Climate change is likely to increase both the variability of temperature and the frequency of hot summers and the incidence of summer flooding. Therefore we believe that the predicted number of outbreaks in this consultation document is likely to be exceeded.

Summer flooding has the potential to distribute KHV to a significantly larger number of fisheries, of different types, as appears to be the case with certain outbreaks in the Midlands, where no fish had been stocked with the knowledge of the fishery manager for some years but the waters had been subject to incursions of flood water.

Using the history of KHV disease development over the last six years, the only certain database available for KHV in Britain, suggests figures as given below for new outbreaks each year. The basis of calculation is that 2005 numbers were 26% of the 2006 outbreaks and this level occurred after only three years of records. The outbreaks in 2007/2008 were subject to mandatory reporting but this may not have occurred in all cases and these could be low estimates of reality. However we will assume the record is correct and extrapolate using the percentages of the first six years of record, and allowing five years between extreme weather conditions in the spring//summer, as occurred in 2006.

Year	KHV Outbreaks	Annual (see spread sheets) Costs without controls
2003	6	999486
2004	4	1629420
2005	6	3805282
2006	23	6693853
2007	10	8129998
2008	12	12646626
2009	14	10042453
2010	16	11310530
2011	18	12460385
2012	69	22247622
2013	34	25508811
2014	36	38931024
2015	38	30998791

2016	40	32334362
2017	153	51365086
2018	76	57684447
2019	78	86438291
2020	80	68118087
2021	82	69404492
2022	315	107162530
2023	157	119285150
2024	159	178001514
2025	161	139651222
2026	163	140843684
2027	165	137733127
2028	167	139500380
2029	169	139998061
2030	650	221630958

Thus the twenty seven year cost of not implementing controls on KHV to the economy, angling, fisheries and trade interests could be in the region of £1,874,555,672.00, based on only 10,000 fisheries being exploited by anglers and liable to disease outbreaks. Outbreaks may well occur in fisheries which are not exploited by anglers and we have ignored the ecological, social and environmental costs of these potential outbreaks, so we believe our outbreak projection and cost analysis is conservative in its outcomes. We have not costed government agency costs or attempted to calculate the costs to government revenues of such large impacts in a key angling market.

This conservative extrapolation gives us a figure for new outbreaks of 2626 in the years up to 2030 with no eradication or import controls being put in place, significantly higher than the suggested figures in the consultation and at significantly higher cost to the Nation and the exchequer. This shows to the angling community that only an eradication and control mechanism is an acceptable response to this disease.

Q5. There are thought to be 60,000 water bodies which might be considered fisheries in the UK. Not all of these are fished (exploited). Many have never received any external stock, other than by natural progression. Of those remaining, as many as 20,000 may be considered to be fisheries exploited by anglers (the EA has nearly 15,000 stillwaters on its Section 30 database, not all of these will be coarse fisheries.).

We would expect the majority (65%) to be managed with low stock densities (specimen waters, using the Defra definition) and a lesser proportion (35%) than indicated in this consultation to be managed with significantly higher stock densities (match waters, using the Defra definition). There will be some specimen waters which do hold fish at high density, as there will be some match waters which are managed at lower densities, so the definitions used in the consultation documents are misleading. We feel it would be better to discuss stock density rather than the use to which the fishery might be put, however in our own Economic Impact Assessment we have divided fisheries into three major classes and four sub-classes to aid understanding and the costing analysis.

In our opinion the percentage split of coarse fisheries management profiles overstates those run at high density (reflective of the distribution research?) and understates those run at lower densities.

The Environment Agency supplied the following data;

Details of stillwater coarse fish stocking is below for the last 3 full years (2005 - 2008), as the current system was implemented in late 1999.

During this period, there were 5,540 unique stillwaters or Stillwater sites which received consented Section 30s for coarse fish.

These split between:

Fully Enclosed: 3,006

On-line stillwater: 2,041

Stillwater in the floodplain: 493

During the 3 years, 11,891 individual consents were issued to these waters. Of these 7,992 contained or were solely for carp (common and mirror only).

Please note, these sites may be individual waters or sites with more than one water on. Please also note that these are permissions which may not have proceeded.

Nevertheless, it would appear to indicate that 9,100 intensive match fisheries is a significant over estimate. As we both know, despite the drive for match waters, many club waters remain as mixed fisheries and a great many continue to resist stocking.

Q6. See our response to Q5 and our EIA.

Conclusion

The conclusion reached in the consultation document of a net benefit to society of £3.7m over a 21 year time scales is far short of reality. We do not accept the economic model provided by Defra, feeling it understates risk at fishery level, misunderstands the variety of fisheries which may be impacted and understates the cost to the community in fiscal, employment and investment terms of not implementing control and eradication procedures.

Consultation on Aquatic Animal health – KHV Disease status for England and Wales

Q1. The relatively low prevalence of KHV in English and Welsh fisheries and the very low prevalence in local fish farms offers a very good hope of controlling and ultimately eradicating KHV from English and Welsh stocks. Without controls being put in place we are at risk of the disease spreading to significant river systems and then through flooding infecting both off-line and on-line fishery lakes, even though they are well managed and not susceptible to diseases at the moment. Every delay in implementing adequate disease controls makes it harder to gain control and eradicate so the Government and Defra should be seeking to implement controls as soon as is practicable to ensure that we do not suffer a pandemic effect and lose the possibility of control. The history of control and eradication for SVC, where there have been few outbreaks in recent years shows how effectively fish health can be managed if action is taken quickly enough after the emergence of a novel disease.

Q2. Time is of the essence in the future successful control of KHV. With each year which passes fish are imported into fisheries and with every importation the danger of introducing KHV is enhanced without controls being available. We see in Non Native Species work massive costs to government and NGOs applied to eradication programmes, which had controls been applied earlier would now be avoided and the natural environment for native species healthier.

Q3. There is a more than adequate supply of disease free fish in England and Wales for the needs of the angling community and fisheries, as well as for the ornamental trade. Any temporary shortfall in supplies would be covered very quickly by expansion of local supplies which would present new business and job opportunities in the local economy.

There may be a shortfall in supplies of ornamental fish of susceptible species in certain year classes but again local production could rapidly be stepped up to fill any gaps.

Q4. We believe that any shortfall in certain sizes of ornamental fish would rapidly be made up by increases in local production. The initial timescale for increased production is less than one year, for fingerlings. The timescales for increased production of other sizes is a function of the age class of fish desired and the initial delay of less than one year.

Q5. The findings and conclusions in the study have been much discussed by the KHV Working Group and there has always been general support for the conclusions reached. The Angling and Fisheries Working Group has firmly believed for many months that the Government should be seeking Category VI status and protecting valuable angling interests for the betterment of the wider society.

Q6. In the light of current knowledge we should adopt a programme of control with the eventual aim of eradicating KHV from England and Wales, similar to the controls used to cover SVC which has not appeared in English or Welsh fisheries for some years now and from which we are nearly clear.

Angling Trust 2009