

## Trout Matters

The Environment Agency (EA) has recently published the long-awaited final version of its National Trout & Grayling Fisheries Strategy. The Salmon & Trout Association (S&TA) was heavily involved in putting forward amendments during the consultation process, some of which have been accepted into this published document. The Strategy has a good deal to recommend it, although there are still some areas of concern. First, though, it is timely to look again at some of the major issues addressed by the Strategy.

The specific aim of the Strategy is to *conserve and improve wild stocks of trout, sea trout, char and grayling, while enhancing the environment for all types of fisheries for these species within England and Wales. It also aims to enhance the social and economic benefit derived from these fisheries.*

There are 32 policy statements within the document, covering management, habitat quality, exploitation, stocking and predation. The Strategy aims to protect and enhance the natural resource, including using the Precautionary Principle where necessary, while still deriving socio-economic benefits from fisheries.

The burning issue is; *will stocking still be allowed in rivers?* The Strategy admits that stocking is crucial to the success of many fisheries, but lists ways in which stock fish can adversely impact an ecosystem by:

- competing with, or predated upon, wild fish
- attracting predators by increasing stock abundance
- increasing fishing effort and, hence, exploitation of wild fish
- introduction of disease
- genetic dilution through interbreeding of stocked and wild fish

When considering an application to stock fish, the EA will have to be convinced that the introduction will not jeopardise the well-being of ecosystems, and that there will be no detriment to the stock, habitat or performance of the fisheries. The EA say they will *work with others* to identify the number and size of stock fish which could be stocked into different types of water, without undue impact on wild populations.

Stocking of **rainbow trout** will be consented where there is a history of the species being used, or, interestingly, where the introduction of triploid (non-maturing) rainbows are deemed the preferred option in protecting wild brown trout populations. However, it is highly unlikely that stocking with rainbows will be consented in fisheries where they have not been introduced before.

Stocking with **brown trout** will be consented where they have been traditionally used, although if a proposed stocking *differs from current practice*, then applications will be refused if there is potential to reduce the viability of wild populations. Research is being carried out into the impact of hatchery-reared both sterile and fertile brown trout on wild stocks, and a further assessment will be made to the Strategy, in light of the results, in 2007.

**Grayling** stocking will only be permitted in catchments where they are already present, or to re-establish a historic population, or where rivers are recovering from long-term pollution and grayling are considered an acceptable species to encourage.

*In addition to the species of fish, stocking will also take into account the fishery's designation, which is either:*

- Native – *waters that have significant natural production of trout (salmon trutta), whether migratory or non migratory, or from which there is ready access to other waters with such production, or.*
- Other – *waters which do not have such production or access.*

Stocking into Native waters will generally be consented if it is consistent with practice over the past five years, or triploids are used, or the progeny of local, naturally produced trout are reared under a suitable hatchery regime.

However, stocking will not be consented in native waters designated as Wild Fisheries Protection Zones, because:

- Local fisheries interests wish for such a classification to protect wild stocks. Additionally, it may attract premium rates from anglers wishing to catch wild trout; or,
- The wild trout are considered genetically *distinct or evolutionary important; or,*
- The zone contains important spawning and nursery areas for trout or salmon, which are deemed at risk from impact of stocking

The Strategy articulates policy statements on habitat protection and enhancement, diffuse pollution and predation, and the EA intend to provide advice for fishery managers on these subjects. They also plan to promote angling and provide accessible fishing for beginners.

S&TA broadly supports the Strategy, although there are still areas of concern. Consultation with local fishery interests is vital if the Strategy is to succeed, and we lobbied especially hard for consultation to be through the Fisheries Action Plan (FAP) process at catchment level. It is pleasing to see the EA intend to use FAPs, although their leaning is still area based planning rather than local. They also intend to designate Natural waters through their area staff, then informing local interests *afterwards*. S&TA still maintains that such important decisions must have the support of fishery managers and anglers, and that can only be sensibly achieved by first consulting fisheries people about *all* aspects of the Strategy in their particular catchments.

We are also concerned to hear of agreements being made outside the Strategy between the EA and English Nature (EN), regarding the stocking of rivers designated as candidate Special Areas of Conservation (cSACs) under the European Habitats Directive. No mention is made of this type of river designation in the Strategy. Of course we support the principle of SACs to protect vulnerable species – *Ranunculus* weed, Atlantic salmon, bullheads, lampreys and otters - but trout are not included amongst them. The most prominent Southern chalkstream designated a cSAC is the Itchen, where *Ranunculus* is obviously the primary target for the Directive's protection. Rivers designated as cSACs were done so from their UK status as Special Sites of Scientific Interests (SSSIs), and the criteria are the same for both classifications. English Nature and the EA agreed that stocking did no harm to the Itchen's status as an SSSI, so what has changed now it is a cSAC? Where has been the consultation with local fishery interests? Why was there no mention of SSSIs, let alone cSACs, in the Strategy?

S&TA supports the work of the EA and EN wherever we can, but support is a two-way process where regulators are concerned, and close consultation with stakeholders is an absolute must if relationships are to stay intact. The National Angling Alliance, *of which S&TA is a member*, has even signed a memorandum of Understanding with EN to this effect, so we might be forgiven for some suspicion that if cSACs can be regulated with the stroke of a non-consulted pen, is the next stage SSSIs, which brings into play far more rivers across England and Wales? If so, all the good intentions of the Trout & Grayling Strategy will count for nothing, nor will the interests of local fisheries people.

S&TA strongly supports the principle of protecting self-sustaining trout populations, and stocking should not be permitted on a wholesale, unregulated scale. However, we would never support any proposal, either UK or European in origin, which limited stocking to the extent that river fishing for trout became so exclusive as to return it to the pre-war era, where only the privileged few took part. The EA states support in the Strategy for the premise that stocking allows greater access to fisheries, allowing more anglers the opportunity to experience classic river game fishing and therefore obtaining maximum economic benefit there from. They must therefore never allow regulation to destroy the fine balance between protection and acceptable access.

Finally, S&TA's position on consultation at a catchment level is unflinching, even in the face of regulators saying that it is impractical on a bureaucratic level. National strategies are fine as far as they go, but rivers are too diverse in nature for one policy to work across the entire network. Additionally, if local interests have been included in the decision-making process, and thus hold a genuine *stake* in any strategy, then they are more likely to work for its successful implementation. Conversely, if they feel regulated upon from on high, without any say in the matter, there will never be the same level of cooperation, and that would be to the detriment of both angling and the aquatic environment.

Whatever skills are held in the Regulator's head office, they must never disregard the vast local environmental knowledge gained from generations of fishery managers, and anglers, on the river bank. If this experience is taken into account, then a far better decision will result, one which actually warrants implementation! Signs are encouraging from the Trout & Grayling Strategy, but S&TA will work to ensure European legislation does not bypass the system!