

# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

Dr Dafydd Evans  
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November 30<sup>th</sup> 2007

Dear Dafydd,

## **Trout & Grayling Strategy – Response to Consultation**

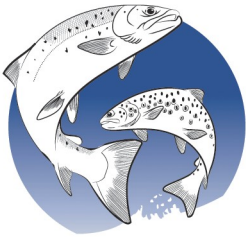
We have spoken on several occasions about the Trout & Grayling Strategy, and how it might be implemented so that wild trout stocks are protected and enhanced in England and Wales, at the same time as allowing fisheries to produce the maximum socio-economic benefits to communities. I thought that I would now write down some observations from the Association, in the hope that they might help the EA in formulating policy for the future. I am also copying this letter to Godfrey Williams.

The first point to make is that we feel it better if you take fishery owners and managers with you in this policy making process, rather than being too prescriptive. An example of this is that, while some regions seem to strongly support the measures you advocate, and especially the use of triploid stocked brown trout, other areas are concerned that this might not be the way for their rivers to go. A process of persuading them over time, backed by strong scientific evidence, is, we feel, a far better medium term goal than giving people time limits to adopt policies they might not presently see as the right option for them.

To elaborate over specific issues:

1. **Triploid brown trout** – you are already aware of the concerns certain interests have over stocking triploids. We see these as fitting into the following categories:

Why, after some 150 years of stocking diploids, do we feel that triploids will now protect our remaining wild stocks? If there were to be genetic impact, would it not have occurred by now, and so what are we trying to protect? Where is the scientific evidence of this impact, as opposed to the mere hypothesis of certain high-profile scientists? To what time scale are we trying to return our self sustaining stocks of brown trout?



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Are we certain that triploids will survive the more challenging conditions of spate rivers? There has been concern expressed by some of our Northern members that triploids do not perform well in rivers prone to high levels of suspended solids following heavy rainfall.

There are worries in some chalk streams that triploids do not perform so well as diploids in certain circumstances. I am, of course, aware of the trials undertaken by the Game Conservancy Trust on the Salisbury Angling Club waters, where anglers saw little difference between the performance of triploids and diploids. However, this flies in the face of equally anecdotal evidence submitted by Richard Slocock, a past Chairman of the Wild Trout Trust, who has observed, over the past two years, unwillingness for triploids to rise freely to the dry fly in the Dorset Frome. When he realised that he still had a diploid quota with the EA, he stocked a number of diploids in a stretch of river between two others inhabited by triploids (a very creditable control, one would assume), and found that they rose far more readily to the dry fly.

S&TA's response to the triploid issue is that we need more scientific evidence on which to base stocking policies, and that it would be better to allow fisheries who wish to stock diploids, to continue to do so, until such time as this evidence is available. Whilst one might argue for the precautionary approach in such a situation, the long history of diploid stocking might leave the EA open to ridicule. On the other hand, involving some sceptical fisheries interests in a research project might help to win hearts and minds more readily than a more prescriptive approach.

## 2. Stocking with Eggs

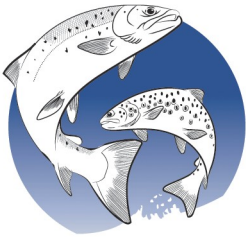
Some fisheries do not wish to stock with adults, but prefer to lay down eggs, the survivors from which will be more akin to wild fish when they become adults. Whilst there is an allowance for this practice within the Strategy, the reality is that it is extremely difficult to collect eggs from local wild fish and successfully hatch them. This is extremely frustrating for those fisheries, such as the Wilton Fly Fishing Club on the River Wylye in Wiltshire, which have lost their wild spawning streams to excessive water abstraction.

In these instances, we would urge the EA to act in three ways:

To give scientific assistance to relevant fisheries interests to collect eggs from local wild brood stock, and assist their successful hatching in conditions which are as close to 'natural' as possible.

To allocate extra resources to improve habitat in those areas impacted by water abstraction, with special emphasis on spawning and juvenile habitat.

To coordinate work within other EA departments to close down environmentally damaging abstraction licenses, and so alleviate the impact of unnaturally reduced



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water flows on spawning and juvenile habitat.

S&TA strongly supports the protection of wild brown trout and sea trout stocks, but we urge the EA to adopt policies and measures which take account of the above concerns and, in so doing, embrace the considerable appetite within fisheries interests to assist in this matter. At the same time, if the above concerns are overcome, we believe that the EA will achieve its ultimate aim, as stated in the Strategy, of protecting wild fish stocks while maximising socio economic benefit from their fisheries.

Best wishes,

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul Knight'. The signature is fluid and cursive, with a large initial 'P' and 'K'.

Paul Knight  
Director

