



Salmon & Trout Association

Fighting for the future of game angling

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Catchment Abstraction Management Strategies (CAMS)

The Salmon & Trout Association (S&TA) represents the interests of 100,000 individual and club game anglers, fishery owners, managers and affiliated trades. On behalf of our members, I am writing to voice deep concerns over the CAMS process currently being undertaken by the Environment Agency (EA).

S&TA believes that excessive water abstraction is a national problem with far-reaching impacts over the general degradation of the aquatic environment. While many catchments are chemically cleaner than in the days of heavy industrial pollution, EA risk assessments show that 95% of our water bodies would likely fail requirements of 'good ecological status', the principle aim (by 2015) of the EU Water Framework Directive (WFD). Water abstraction is a major issue affecting that status.

S&TA seeks an urgent review of the CAMS process, so that it can contribute fully to integrated and sustainable river basin management. In the immediate term, EA officers managing CAMS require clear instruction to adopt the Precautionary Principle. In particular, allowances should be made for climate change (in common with other EA strategies) and the inadequacies of historical flow data in assessing future flows and water availability. Ecological River Flows should be set to ensure compliance with the Good Ecological Status of WFD, but the proposed CAMS review date of 2008 leaves little time to correct current failings ahead of the 2009 deadline for the completion of the WFD River Basin Management Plans, in order to achieve good ecological status by 2015.

Unnaturally low flows caused by excessive water abstraction impact rivers in several ways, the principal ones being:

- The geomorphological processes which form and characterise our rivers are largely a function of their flow regime, including floods, low flows and flow variability. Significant modifications to these regimes inevitably change their character. This is especially true of long periods of unnaturally low flow caused by excessive abstraction without the support of winter storage. Silt deposition increases, gravels become compacted and temperatures increase.

- Lack of dilution for industrial and agricultural pollution, and of sewage outflows, leads to poorer water quality and eutrophication. The majority of discharge consents are set with an assumed level of dilution, a principle established by the Royal Commission on Environmental Pollution in 1912. Both the Government and EA have acknowledged the adverse impact of diffuse pollution. Reduced river flows jeopardise the capacity of rivers to absorb the impact of both point and diffuse pollution.
- Low flows inhibit the growth of important aquatic flora, principally *Ranunculus* weed, the staple in-river vegetation of many salmonid rivers.
- Low flows alter habitat and lead to unnaturally high water temperatures in times of drought, altering the ecology of the environment with the potential to severely impact invertebrates and fish
- Low flows impede the passage of migratory salmonids, which, in severe situations, can limit the distribution of spawning fish and jeopardise angling participation, with the consequent loss of social, economic and environmental benefits to local communities
- The production of juvenile salmonids relies on available wetted area, often in the upper reaches of river catchments, and these are especially vulnerable to loss of water in summer through abstraction

This CAMS process offers an opportunity to address the abstraction issue, but in reality it holds the threat of even less protection for our aquatic environment than at present. The advent of trading licenses, and the classification of rivers as to their supposed ability to sustain increased abstraction, has brought this issue to a head.

We have had adverse comments concerning local CAMS processes from several regions. S&TA Branches and local Fisheries Associations will respond to individual CAMS, and I am aware that, in Devon and Cornwall, the South West Rivers Association has taken up its concerns through the Agency's Advisory Committee route, although presently to no avail. I know they will be writing separately with the detail of their concerns, which reinforce our own.

May I remind you of the EA's responsibilities to protect fisheries and the aquatic environment?

- Under the Salmon & Freshwater Fisheries Act 1975, the EA (set up by the Environment Act 1995 and taking on responsibilities under the '75 Act), has the statutory duty to 'Maintain, Improve and Develop' fisheries.
- This was further enhanced by Section 4 guidance in 2003, which set out the Government's policy following the review of Fisheries Legislation undertaken by Professor Lynda Warren's Committee in the late 1990s. A significant issue within that guidance was that angling should be promoted alongside fisheries, principally for its social and economic benefits – a recent EA survey has confirmed participation of 4 million anglers producing an annual economy worth £3.5 billion.
- The EA is the competent authority in delivering WFD.
- A significant number of rivers are designated SSSIs, and many are further protected as Special Areas of Conservation (SACs) under the EU Habitats Directive. Two of the main protected SAC species, *Ranunculus* weed and Atlantic salmon, are especially reliant on good water flows, the former for healthy growth and the latter to enable

upstream migration to spawning areas and juvenile production. There is evidence that many SAC rivers are already impacted by excessive abstraction.

- Similarly, Biodiversity Action Plans, Salmon Action Plans and Fishery Action Plans will be impacted by decisions taken under CAMS.

S&TA has further serious concerns regarding the CAMS process and application:

- CAMS are being addressed by Stakeholder Groups, yet the EA's responsibility for fisheries is not adequately represented. There should be at least two NGO fisheries representatives on each CAMS group.
- The technical data behind decisions must be made available to the group in a way that non-experts can clearly understand. This should include the calculation of the Ecological Flow Requirement for each water resource management unit.
- The input to CAMS from each Area Fisheries Technical Team should be evident and include references to Salmon Action Plans and Fisheries Action Plans, showing the strategy to be consistent with these plans.
- All applicants for abstraction licences should be required to first consider winter storage.
- When EA Area staff determine future licence applications (new or variations), conditions should be imposed to protect river ecology at times of greatest environmental stress or sensitivity in fish lifecycles. This will give better protection for fisheries at times of low flow now and in the future when climate change threatens more frequent incidents. However, licence conditions based on low flows expressed as frequencies taken from past data (eg percentile flows) will fail to protect in future as the frequencies of occurrence themselves increase.
- Seasonal variations, and the way in which aquifer-fed catchments are replenished, seem to be misunderstood in several areas. A perfect example is the Bourne Rivulet, in the Test & Itchen CAMS, where the EA is still prepared to allow massive abstraction for watercress operations in the winter under the misguided illusion that this is acceptable because of high seasonal rainfall. Catchments fed by aquifers require replenishment from winter rain and snow to store water for the summer, but that process is severely jeopardised if the aquifer is abstracted as fast as it is replenished.

There is a deep suspicion that the interests of agriculture, of which watercress is a part, are being allowed precedence over fisheries and environmental interests, yet this is at odds with Defra's stated aim of Catchment Sensitive Farming. The idea is that agriculture should not impact sensitive aquatic environments as it historically did under the production-orientated Common Agricultural Policy.

- The CAMS process does not dovetail with the Periodic Review of Water Price Limits (or AMP) process. While the next review, AMP5, is still five years away, decisions taken under CAMS require funding not necessarily covered under AMP4, and so must wait until 2010. Whilst we appreciate that potable water supply is a priority to a crowded, expanding island population, S&TA firmly believes that more thought must be given as to where that water originates, and how it is supplied. Water companies require urgent funding to plan for the future by researching alternative methods of supplying water, and such funding relies completely on the AMP review process.

With a new reservoir, for instance, taking at least fifteen years from concept to delivery, timing is not on the side of the environment. This is especially so considering the UK's population has just broken the 60 million mark and future development will put even greater demands on water resources, almost certainly in areas already over-burdened with abstraction. When one adds the threat of global warming, the implications to the aquatic environment are potentially disastrous unless proper regard is given to the ecology of river catchments.

- We have serious concerns regarding the trading of licenses to abstract. One way of protecting a catchment is to seek the voluntary revocation of unused licenses, but this has become highly unlikely now that a cash value has been placed on them. Whilst S&TA has received assurances from the EA's HQ Water Quality department that no catchment will be environmentally worse off than at present through trading licenses, we feel this entirely misses the point. The baseline for a river's ecological status must not be taken at present levels; abstraction strategies should start to plan for a return towards historic flow rates rather than simply attempt to protect a river's 2005 status. As a general rule, therefore, aquifer and in-river abstraction must be reduced as soon as possible, and the trading of water licenses only delays that process.

S&TA enjoys a close working relationship with EA's Fishery Department, with whom we are attempting to produce a sustainable fisheries resource for future generations, and an angling participation programme which will ensure a long-term community benefit from the considerable public and private investment in our aquatic environment. We therefore urge, in the strongest possible terms, all other departments within the EA to keep fisheries issues firmly in the frame when taking decisions over abstraction strategies, and similarly in the delivery of WFD and other future projects. Not only will that protect the aquatic environment, but also the tremendous socio-economic benefits derived from the most significant participation sport within England and Wales.

I reiterate the S&TA's firmly held view that an early review of the CAMS process is necessary if the EA is to move towards meeting the UK's commitments under WFD, and if it is to discharge its statutory fisheries responsibilities effectively.

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