

# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

30<sup>th</sup> November 2007

Adam Mantell  
Water Resources Change Programme Manager  
Olton Court  
10 Warwick Road, Olton  
Solihull, B92 7HX

Dear Adam Mantell,

Thank you for giving the Salmon & Trout Association (S&TA) the opportunity to respond to the Review of the Water Abstraction Charges Scheme.

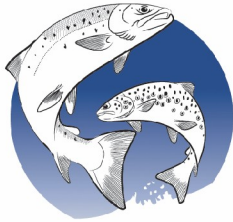
The S&TA is an international organisation representing the interests of 100,000 individual and club-based game anglers, fishery owners, managers and affiliated trades throughout the United Kingdom. We are especially concerned with promoting and communicating the environmental, social and economic benefits of game angling and fisheries management.

Abstraction authorised under existing licences are a matter of major and continuing concern to the S&TA. Excessive water abstraction is a serious problem in many parts of England and Wales, resulting in the degradation of whole aquatic environments, as well as fisheries. The Environment Agency (EA) risk assessments show that many of our water bodies are likely to fail the 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, and requires dramatic action. We, therefore welcome all moves towards the revocation of, or changes to, all licences causing damage, actually or potentially, to the aquatic environment so as to ensure that abstraction is controlled in a sustainable manner.

The S&TA would also like to reiterate the requests in the Blueprint for Water, produced by a coalition of fisheries and conservation NGO's including S&TA, regarding water abstraction licenses, appealing for:

- By 2008, the EA should introduce a better way of determining how much water is needed to protect freshwater species and habitats.
- In the PR09, Ofwat should approve water companies to end damaging abstractions and meet any resulting loss in supply through increased efficiency and the development of alternatives.
- By 2010, the EA must amend or revoke abstraction licences that threaten nationally and internationally important wildlife sites.
- By 2015, the EA must amend or revoke abstraction licenses that damage the ecology of all other rivers, still waters and wetlands.

We are pleased that the Government has decided (in consultation with Ofwat) that all costs associated with changes to water company licenses to meet the Habitats Directive should be funded through PR09. However, the need to calculate safe minimum ecological flows for all



# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

catchments, and to revoke all environmentally damaging abstraction licences, is now of paramount importance.

Our responses to the three individual questions set out in the consultation are as follows:

## **CSR 1) Should compensation costs be recovered on a national or regional basis in England?**

We believe in terms of equity the choice is finely balanced between these two options. However, we feel timing is now the most important factor in terming how the compensation costs should be generated, and therefore, on the basis of the estimated times quoted, we favour the national cost recovery option. This option predicts delivery of the necessary funds in 7 years, as opposed to up to 12 years for the southern region under the regional scheme.

We feel the overriding requirement of this consultation must be to achieve sustainable abstraction urgently, in order to help protect freshwater biodiversity. With population pressures expected to increase significantly in the coming years, there is a real danger that if action is not taken soon, environmental problems will increase faster than the damaging abstractions are reduced.

The national approach would also reduce the risk of possible infraction by the EU for delayed recovery of funds.

## **CSR 2) Do you agree that brine abstraction should be included as a new purpose based exemption within the charging scheme?**

The brine industry of Cheshire currently does not require an abstraction licence, and therefore does not pay under the EA's Abstraction Charges. In light of WFD delivery through holistic river basin management, it makes sense that these charges are collected by the EA to use in cooperation and conjunction with other funding streams, to take account of the affect brine mining subsidence and pollution has on the local environment.

We do not feel exemption should be allowed for this activity based on its ability to create gas storage areas, as holistic integrated management calls for a level playing field for all stakeholders.

## **CSR 3) Do you agree with the different charge factors we propose to apply to 'horticultural' activities? What is your opinion on the loss factor to apply to a level dependent, flood irrigation system.**

We agree with the different charge factors proposed to apply to 'horticultural' activities. It makes sense that activities and industries dependent on abstraction from aquatic systems are charged according to their water- footprint, and how this affects the surrounding environment (e.g. the quality of water returned to systems). Introducing increased charges for less environmentally friendly ways of abstracting and removing water will encourage more stringent management of the resource.



# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

Implementing this use-dependent charging system for horticultural activities highlights the overdue need to tackle this issue nationally for consumer/residential water bills.

With regards to applying the loss factor to level dependent flood irrigation, we would support low abstraction charges in this instance, but would like to clearly state not at the expense of existing, or the future creation of wetlands.

\*\*\*\*\*

