



06/04/2009

Chetal Moghraby  
Area 2D  
London  
SW1P 3JR

Dear Ruth,

**Modernisation of Salmon and Freshwater Fisheries Legislation: New Order to Address the Passage of Fish.**

I am responding on behalf of the Salmon and Trout Association and the Atlantic Salmon Trust to your letter of 15 January seeking comments on these proposals.

The Salmon & Trout Association (S&TA), which was awarded charitable status due to our work concerning fish stock management and aquatic conservation, has over 100,000 individual and club members. We represent the public interest over issues relevant to the management and conservation of fish, water, the aquatic environment and all its dependent species.

Established in 1967, the Atlantic Salmon Trust (AST) is a UK-wide organisation which champions the wild salmon and sea trout. It does not represent any other interests or body, only the fish themselves. It:

- a. Works for the conservation and improvement of wild salmon and sea trout stocks to a level which allows sustainable exploitation.
- b. Conducts and supports marine and freshwater research.
- c. Gives practical advice on the management of fisheries and rivers.
- d. Gives independent research based advice to governments, international and national authorities and to commercial enterprises.
- e. Coordinates activities with other conservation, environmental, fishery, heritage and wildlife agencies and organisations.
- f. Holds and supports seminars and workshops to investigate specific issues.
- g. Publishes high quality reports and booklets to inform and educate the public.

The S&TA and the AST are both members of the Moran Committee, and are parties to the Committee's response, which we fully endorse. There are, however, a number of points that we wish to draw particular attention to.

Current legislation already prohibits actions which increase barriers to the passage of salmon and sea trout. We welcome the proposals to extend these powers to provide for action to be on existing barriers, and to widen them to cover other fish species.

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The Water Framework Directive, though, requires a comprehensive view to be taken of artificial obstructions to the natural flow of a water course. This needs to be reflected in the new legislation. In particular:

- the impact of obstructions on invertebrates needs to be taken into account, both in deciding whether obstructions should be removed and in designing ways around obstructions. Both the S&TA and the AST are members of the Riverfly Partnership, which brings together a wide range of organisations to monitor and conserve river flies and other aquatic invertebrates. Invertebrates are fundamental to the ecology of our water courses, and an essential component of good ecological status.
- the effect of obstructions on the morphology of watercourses and on flow regimes must be taken into account. These can critically affect such factors as sediment and oxygen levels, which in turn can affect salmonid egg and fry survival and invertebrates

While these proposed new powers are very welcome, they will only contribute significantly to the achievement of *good ecological status* if they are used in properly funded and ambitious programmes of work within River Basin Management Plans. We therefore particularly support the Moran Committee's comments on funding and urge the Government to provide the necessary resources.

Yours sincerely,

Paul Knight

Salmon and Trout Association Chief Executive, on behalf of the Salmon and Trout Association and Atlantic Salmon Trust

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