



Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

Defra Protected Species and Non-Native Species Team,
1/09 Temple Quay House,
2 The Square,
Bristol,
BS1 6PN

Dear Sir,

CONSULTATION ON SCHEDULE 9 OF THE WILDLIFE AND COUNTRYSIDE ACT 1981

Thank you for giving the Salmon & Trout Association (S&TA) the opportunity to respond to this consultation on Schedule 9 of the Wildlife and Countryside Act 1981.

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.

We are very concerned with the introduction and spread of non-native species, such as the topmouth gudgeon (*Pseudorasbora parva*), which have the ability to out-compete native species, and act as vectors for disease. These introductions can result in food-web and ecosystem destruction, and the loss of many native species. We, therefore, strongly support the efforts to constrict further introductions of these species through greater controls. We feel a quicker response strategy for effective, early detection of new arrivals is also required.

The S&TA support the concerns raised by the Atlantic Salmon Trust (AST), in that the consultation document did not refer to the Prohibition of the Keeping or Release of Live Fish (Specified Species) Order 1998, made under the Import of Live Fish Act 1980. This order prohibits the keeping of specified non-native fish species, except under licence. The three fish species proposed for inclusion in the revised Schedule 9 are already covered in this existing legislation, which seems more a comprehensive scheme, as it applies to all waters and to anyone keeping the species.

While the inclusion of these species in the Schedule 9 will not reduce the existing controls, we are disappointed there was no coordination between the two pieces of legalisation, and corresponding departments within Defra. We feel successful management in this challenging area, as well as all environmental policy, requires holistic and comprehensive control measures. We believe a weakness in the current policy is the lack of integrated thinking, a discrepancy which can only increase the problems of enforcing these legislations. There is a critical need for a more joined up thinking and approaches within Defra.