

Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

12th November 2007

Russell Todd
Department for Environment, Food and Rural Affairs
CSF Policy
Room 2.03
Zone A/B, 2nd Floor
Ergon House
Horseferry Road
London, SW1P 2AL

Dear Russell Todd,

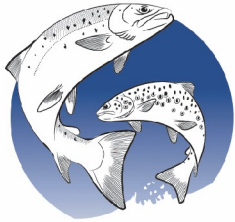
Thank you for giving the Salmon & Trout Association the opportunity to respond to the Protection of Waters against Pollution from Agriculture: Consultation on diffuse sources in England

The Salmon & Trout Association (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.

Diffuse water pollution from nutrients, pesticides and sediment can have a major impact on fish stocks, and the general health of aquatic systems. We feel it is very important to tackle this issue of diffuse pollution nationally, and not simply focus on apparent hot-spots. Under the Water Framework Directive (WFD), we feel a new, more integrated and holistic approach to diffuse pollution is required. Current initiatives could be consolidated to reinforce objectives and methods for obtaining them.

Q1). Do you agree with the three policy packages we have chosen for this consultation? If not please suggest alternatives.

The DEFRA website states the Diffuse Water Pollution from Agriculture (DWPA) consultation was set up to deal with other agricultural pollutants (excluding nitrogen) affecting water pollution and to consider how they might meet the requirements of the WFD. Yet, this consultation focuses specifically on phosphorus, of which agriculture is responsible for approximately 25% of the national phosphate reaching UK waters. On the other hand, 75% of excess sediment in rivers is stated (in this document) as being attributed to agricultural sources, yet sediment issues are not adequately addressed.



Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

Excess sediment in rivers causes major problems to fish populations, particularly salmonids, where concretion of spawning gravels and oxygen deprivation of eggs and fry, result in reduced reproductive success.

There is also no mention of sheep dips and their impacts on watercourses. We feel this is as big a problem as phosphorous and sediment, and that synthetic pyrethroid (cypermethrin) sheep dips should not be permitted for re-introduction to the market place (they are currently under a temporary ban). Cypermethrin sheep dips are currently the commonest cause of failure to meet Environmental Quality Standards (EQS) in rivers. Concentrations as low as 1 part per billion have been shown to have damaging effects on salmonid reproduction, fertilisation and egg development. Recent Government commissioned research has found that one recently dipped sheep crossing three inches depth of water in a stream, can poison 2,500 metres of that stream, yet this issue has failed to be raised in a consultation concerning the protection of waters from agricultural pollution.

We feel there is a need for an alternative policy package with more detailed measures to tackle other general sources of diffuse pollution. Failure to include and address these other issues could result in farmers facing action from the Agency, or the UK facing infraction proceedings from the EU for failure to meet WFD objectives.

Q2). Which of the three policy packages do you think should be added to the range of Programmes of Measures to tackle diffuse water pollution from agriculture?

Fundamentally, we support the principal of Water Protection Zones (WPZ) as a focused regulatory tool, but feel this should not be used in isolation, or at the expense of other schemes. It is important to gain the confidence and cooperation of farmers to ensure success and compliance; this therefore requires communication, education and advice on the initiative. Support should also come from existing initiatives such as the England Catchment Sensitive Farming Delivery Initiative (ECSFDI), which would help ensure continued integrated management of diffuse pollution, provided there is commitment to continue the programme beyond the present two year limit, and to expand the initiative to cover all heavily impacted catchments.

Q3). If we take forward WPZs, should we consider merging WPZs with Nitrogen Vulnerable Zones (NVZs)? What are the advantages and disadvantages?

We support the principal of merging WPZs with NVZs, which would help implement integrated holistic management, as required under WFD. This would allow issues to be managed with an overview and cooperation from stakeholders, and no longer as separate



Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

entities. However, we do not know if this would be possible, or compatible, under their current guidelines.

WPZs could be an important tool to deal with problems facing specific areas, as each area requires individual attention to find the most viable local solutions. There is, however, a need for national baseline regulatory measures, in which WPZs could be incorporated as a local region-specific tool.
