



Institute of Fisheries Management

Response from the Institute of Fisheries Management to the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'

SUMMARY

The Institute of Fisheries Management welcomes the Government's 25 year plan to improve the environment.

Taking a strategic and longer-term approach to the protection and management of our environment and its wildlife is to be applauded. We also fully support the adoption of both a Natural Capital and Ecosystem Approach to management and hope that these principles will apply equally across marine and transitional waters.

The IFM strongly endorses the six 25 year goals, all of which are directly or indirectly vital to the creation of a healthy aquatic environment for fish whether in freshwater or in the sea.

The focus on using and managing land sustainably is particularly welcomed as shortfalls in this area are currently having a major and deleterious impact on the freshwater environment and the fish that live in it.

SPECIFIC COMMENTS

Chapter 1: Using and managing land sustainably

With respect to housing and planning, there needs to be reference to Sustainable Urban Drainage Schemes (described later in the document) and of the need to tackle the continuing issue of misconnections, whereby dirty water systems are deliberately or in error connected to clean water systems.

The IFM particularly welcomes the proposal to move to a system of paying farmers public money for public goods and that the principal one of these should be environmental protection and enhancement. There is considerable scope in this area to improve the water environment through simple and proven techniques such as buffer strips, ploughing and manure spreading practices and timing and fencing to keep livestock from damaging streams and rivers. We also strongly endorse the need for rules for all land managers designed to reduce water pollution from agriculture, however, it is vital that sufficient resources are made available to ensure that these rules are both monitored and enforced.

With respect to the efficient use of fertilisers, insufficient storage capacity and the spreading of slurry at inappropriate times are both issues that require to be addressed.

The latter should be included in the new farming rules. The impact of pesticides is also an issue for fish and the aquatic environment as clearly demonstrated by the historic impact of cypermethrin on the aquatic environment. It is good that agriculture is recognised as still being a major source of water

pollution, including sediment, but simple techniques such as the creation of buffer strips between land and water need to be promoted as being part of the remedy.

There is a particular need to apply the above principles to small (first and second order) headwater streams which constitute more than two thirds of the stream length and which have major effects on water quality and flows in downstream reaches.

We also welcome the focus on improving soil health and restoring vulnerable peat lands. However, it is not mentioned that the sediment input to streams caused by poor soil management has been and still it a major problem for the aquatic environment and fish in particular.

Woodland creation has the potential to improve water quality and moderate flows and is to be welcomed but it should also be recognised that historic forestry planting (particularly of conifers) has created a number of issues for water quality and fish. These include shading with subsequent temperature effects, acidification, siltation and pesticide contamination. Forestry planting in relation to water courses therefore needs careful consideration and control and on-going management.

We would also like to draw attention to the legacy issue of artificial barriers which can both impede the natural movement/migration of fish and can profoundly influence the water chemistry, thermal regime and ecology downstream. New legislation is required which will provide the full framework of controls necessary to meet minimum WFD requirements and support healthy and sustainable fish populations.

Chapter 2: Recovering nature and enhancing the beauty of landscapes

There needs to be specific mention within this section of the need to conserve fish species which are under threat.

A total of 15 fish species, including the iconic Atlantic Salmon, were listed in the UK Biodiversity Action Plan 2007, and these were identified as being the most threatened and requiring conservation actions.

We welcome the recognition of the importance of preventing disease and the introduction of invasive non-native species, both of which have had devastating effects on fish populations elsewhere e.g. the impact of the parasite *Gyrodactylus salaris* on salmonid populations in Northern Europe.

Safeguarding fish health should be a major priority. The current systems of controls on notifiable fish diseases have been successful in preventing the spread to the UK of many diseases affecting fish. It is essential that these systems are maintained and, where necessary, strengthened, and that we continue to prevent the import and spread of serious and commercially damaging fish diseases.

In relation to invasive, non-native species, the strategy does not address the key issues of who will be responsible for leading on these important issues and how preventative and eradication measures will be funded. In terms of the aquatic environment, these have been major issues in the past.

Respecting nature in how we use water is rightly recognised as being key to achieving a healthy water environment but is also vital for fish, their survival and their migrations.

In some parts of the UK, demand for water is extremely high, making it difficult to balance the demands of people and the environment. It is critical that this 25 year strategy takes into account the need to maintain sustainable flows in our rivers in order to protect fish and other wildlife. In particular, the IFM would wish to see the best available evidence used to inform future environmental flow constraints for abstraction permitting and that the Restoring Sustainable Abstractions Programme

delivers improvements for fish and wildlife. It is also key that abstraction reform provides a framework for the more flexible management of abstractions to better safeguard flows for the environment and for the upstream and downstream migration of fish.

More research needs to be done to understand precisely what the environmental, including fish, needs are in terms of water quality in order to remain healthy.

The proposal to regulate all historically exempt significant abstractions is to be welcomed and is long overdue. In terms of water trading, caution needs to be exercised in relation to the transport of water from one catchment to another in order to prevent significant changes to water chemistry, as well as the spread of disease and non native species.

Chapter 3: Connecting people with the environment to improve health and wellbeing

We welcome the desire to connect people with the environment to improve health and well being. Angling provides important social and well being benefits: relaxation, physical exercise and a route for socialising. Furthermore, those participating often do so throughout their lives from youth to old age. Anglers and angling interests are also involved in protecting the environment, carrying out environmental improvements (through for example the Rivers Trusts) and carrying out Citizens Science (e.g. the Riverfly Census initiative). Fisheries also provide jobs and income. It is estimated that close to two million anglers currently fish inland and coastal waters in England and Wales, expending £2.23 billion per year and supporting approximately 50,000 full time jobs. In addition, the marine sector employs around 12,500 commercial fishermen with a further 6,500 in processing.

We would advocate that connecting with the angling community through the Angling Governing Bodies will be an important vehicle for helping to take this objective forward.

Chapter 4: Increasing resource efficiency and reducing pollution and waste

We strongly support the ambition to tackle marine litter and pollution and to protect the marine environment.

Chapter 5: Securing clean, healthy, productive and biologically diverse seas and oceans

We endorse the need to introduce a sustainable fisheries policy as we leave the European Union and the need to adopt an ecosystem approach to fisheries management. Prior to the reforms of the Common Fisheries Policy, the UK and EU have lagged behind the US and Australia in achieving sustainable fisheries and the benefits that these bring. The UK now has the opportunity to be world leading in this area.

To achieve access to the EU market, to ensure fisheries are harvested at sustainable levels and to negotiate with other countries on the right to fish, will be a complex challenge for the UK. In future decisions on the allocation of fishing opportunities, the UK must ensure that social, economic and environmental considerations are properly accounted for, ensuring that there is a proper incentive to fish in the most sustainable way. The IFM believes that there is an opportunity in the future to ensure that a wider range of fisheries participants can benefit to yield greater economic returns. Examples of this opportunity are to reward specific, non-destructive fisheries with greater access to catches and also for the first time to ensure that the recreational sea fisheries are prioritised.

In recent years, there have been significant developments in the creation of a 'Blue Belt' of Marine Protected Areas (MPAs) in UK waters which the IFM has fully supported. We would wish to see the designation of an ambitious third tranche of MPAs. Furthermore, the slow and often problematic process of integrating EU and domestic conservation policy with fisheries policy needs to be overhauled. Whether or not non-UK boats access parts of UK territorial waters, Brexit will allow the UK to take more decisive and effective measures to ensure that fishing does not compromise the health of our seas and that biodiversity is not damaged by destructive fishing measures.

The reformed CFP has introduced measures to reduce the wasteful practice of discarding. Though these measures have yet to come fully into force, future management must ensure that selectivity, be it through technical measures or through appropriate allocation of access, should be at the forefront of fisheries management.

Any new fisheries management system must ensure that there is adequate representation from a range of stakeholders including both commercial and recreational fishermen as well as conservation interests and wider input from coastal communities. Management must be delivered at the appropriate regional scale to ensure that decisions take account of the local priorities.

Finally, the IFM is concerned about possible divergence in the fisheries policy between the four nations of the UK following Brexit. At present, although there is flexibility in the implementation of the EU Directives, these do provide a framework for delivering common objectives. Post Brexit, the devolved administrations may have greater freedom to develop their own approaches which could lead to four different fisheries management regimes within the UK. This concern is particularly relevant for species at risk, such as the Atlantic Salmon and Eel, where because of their migratory nature it is important that management action continues to be carried out not only on a national basis but Europe-wide.

Chapter 6: Protecting and improving our global environment

No specific comment but in principle we support this objective.

SECTION 2: PUTTING THE PLAN INTO PRACTICE

For this plan to succeed, there needs to be clear responsibilities and time-scales to deliver specified actions. There also needs to be sufficient monitoring of both the freshwater and marine environments to understand the status of the various elements of our biodiversity. This should be backed up by adequate investment into R&D, monitoring and enforcement.

We particularly support the need to develop better measures for soil health given its critical role in protecting the aquatic environment. We would suggest the following additional metrics for monitoring and measuring the health of our water environment and, in particular, that of fish stocks.

Proposed measures

1. To ensure fish stocks are maintained at a healthy level

- All water bodies meet 'good ecological status' as defined in the Water Framework Directive.

- All salmon and sea trout rivers in England and Wales are lifted out of the ‘at risk’ and ‘probably at risk’ categories by the end of this strategy.

NB. current stock assessment methods may need to be reviewed and updated and new methods will be necessary for rivers where exploitation has ceased due to low stock levels and therefore catch returns are not available.

- A new management and monitoring approach put in place for first and second order streams which are particularly vital for the health of catchments.
- Trout stocks are genetically diverse and habitats improved so that carrying capacity is maintained.
- The number of adult eels allowed to escape from inland waters to the sea exceeds 40% of production under pristine conditions.
- Populations of the fish species listed in the UK Biodiversity Plan as being most threatened (15 species in total) are monitored and shown to have been maintained or improved.
- Known aquatic invasive species are prevented from entering the country and those present eradicated or adequately controlled.

2. Measures to protect the environment in which fish live

- All water bodies meet ‘good chemical status’ as defined by the Water Framework Directive.
- Numbers of pollution incidents from all sources progressively decline.
- Ensure the maintenance of sustainable flows in order to protect fish and other wildlife.
- Increase the total area of Marine Conservation Zones in order to protect all threatened and endangered species.

3. Measures for the management and control of fisheries

- A national fisheries policy covering both marine and freshwater fish and fisheries is produced as soon as possible by the end of 2019.
- Legislation to address the legacy issue of barriers to fish movement/migration introduced within two years from now.
- Adequate public funding of fisheries is provided in order to maximise the economic value to local communities and the UK as a whole.
- The current level of research and development for freshwater and marine fisheries continues and replacement funding to compensate for that lost by leaving the EU is put in place as soon as possible.
- Setting of total allowable catches for fish stocks within the UK EEZ which must accord with best available scientific advice.
- Elimination of discards and by-catch from commercial marine fisheries.
- Designation of an ambitious third tranche of Marine Conservation Zones.

The Institute of Fisheries Management

March 2018

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