



Department for Environment Food and Rural Affairs
Area 2C
Ergon House
London
SW1P 2AL

20/07/2009

Dear Sujata Sinha,

Proposals for Time Limiting of Water Abstraction Licences

This response to the consultation on the 'Proposals for time limiting of water abstraction licences' is on behalf of the Salmon and Trout Association and Atlantic Salmon Trust.

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.

We support Option 3, as it is the only option which will provide the flexibility needed to reduce abstraction levels within a reasonable time frame. We believe the introduction of universal time limiting of abstraction licences to limit or remove abstractions which currently damage, or may in the future damage the environment, will help achieve the objectives of the Water Framework Directive (WFD).

Our answers to the relevant individual questions are as follows;

Fishmongers' Hall, London Bridge, London EC4R 9EL

T: 020 7283 5838 | F: 020 7626 5137 | E: hq@salmon-trout.org | W: www.salmon-trout.org

Patron: HRH The Prince of Wales | President: The Duke of Northumberland

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Q1. Do you agree with our assessment of the pressures on water resources and the rationale for time limiting?

Yes, we agree with the assessment and believe it represents an undeniable case for action, including time limiting all abstractions, to control both overall and per capita demand for water.

Q2. Do you agree with the limitations? Are there other consequences of the 'Do Nothing' option?

A. Yes. The environment would deteriorate further under this option.

Q3. If you agree that targeted time limiting is the right option, which of the criteria would you support and why?

We do not support this option.

Q5. What are your views on implementing targeted time limiting of abstraction licences through new legislative powers?

We do not support this option. We feel it would take too long to implement, which could result in a breach of the WFD requirement of 'no deterioration'. The option would also be complex and expensive to execute, as well difficult to define. This option is inflexible due to the inability to change criteria of abstraction within catchments promptly in order to react to unpredictable environmental changes, such as differing rainfall and evaporation rates.

Q11. Which method of expiry date selection do you prefer and why?

The consultation document favours linking limits on abstraction licences to CAMs CEDs, for administrative reasons, but ease of administration should not be at the expense of the environment. Unless there is convincing evidence that earlier introduction of limits is not necessary, we feel the system should be introduced on a fixed date in order to achieve the environmental objectives required.

Q13. Which is your preferred option for mandatory time limiting, targeted time limiting using existing power (s52) or universal time limiting through legislative change? Why is this your preferred option?

Option 3; the universal time limiting through legislative change. It is the only option which will deliver the environmental outcomes required, within the time frames of European Directives, such as WFD. It also offers the best flexibility in light on climate change, the best value for money and the most effective means by which the regulator can manage water resources for the benefit of people and the environment.

Q14. Which option for time limiting is more likely to enable the environmental impacts of water abstraction to be managed and reduced?

Option 3

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Yours sincerely,

A handwritten signature in black ink, appearing to read "Paul Knight".

Paul Knight

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

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