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Rt Hon. George Eustice MP
Minister of State
Department for the Environment, Food and Rural Affairs
Marsham Street
London
SW1P 3JR

28th January 2020

Dear Minister,

Re: Review of the General Licence and the inclusion of cormorants

Thank you for seeing us today and indicating your willingness to look again at the issue of controls on cormorant numbers.

We are grateful to your department for launching the review of the general licence and for giving us the opportunity to submit evidence via the online consultation, which closed on the 5th December 2019. We know many anglers welcomed this consultation and many of them submitted responses, either individually or through their angling clubs. In addition to our response, both the Angling Trust and the Avon Roach Project published detailed reports setting out the evidence of the devastating impact the growth in the number of cormorants over-wintering in England is having on our fisheries. Copies of these are attached.

Now that the public consultation has closed, we'd be grateful if you could set out what further steps your department is taking to consider the evidence and when you think a decision on the review of the general licence is likely to be taken and published.

We strongly believe cormorants should be added to the general licence, subject to a regular review of their conservation status to ensure a proper balance is struck between these birds and the need to protect and restore our fisheries and our aquatic ecosystems.

In short we believe:

- The biodiversity of our rivers and still waters is at serious risk from excessive predation from cormorants. Figures on cormorant abundance from the British Trust for Ornithology (BTO) suggest that the UK population has undergone a 53 per cent range expansion since 1981-84. Over this same period there has been a shift in breeding populations from coastal to inland. Furthermore, between 1981 and 2018, the overwintering population of cormorants in Great Britain grew dramatically from just a few thousand birds to a staggering 62,000 individuals, with over 50 per cent of these birds based in England

- This increase in the number of birds, to often unsustainable levels in many areas, is in part due to an influx of the migrant European sub-species *Phalacrocorax carbo sinensis* from mainland Europe, which, unlike our native *Phalacrocorax carbo carbo*, prefer living and

hunting inland in fresh water making them now possibly the biggest single threat to our inland fish populations here in the UK.

- 86% of rivers in the UK are failing to meet the standard of good ecological condition measured against the Water Framework Directive – with part of the assessment based upon general fish assemblage.
- 85% of the worlds Chalk Streams, one of the most valuable and rare riverine habitats on the planet, are found in England. Sadly, 77% of these are failing to meet good ecological condition measured by the Water Framework Directive; again, partly measured on general fish assemblage. The Chalk Streams characteristic clear, shallow waters mean they are extremely vulnerable to the unsustainable numbers of over-wintering cormorants which plunder them in increasing numbers each winter.
- It is an accepted fact that predation by Cormorants is a significant factor in fish population declines, particularly in the context of low flows, loss of spawning habitat, barriers to migration and pollution that threaten the regeneration of fish populations.
- Modification of our rivers by man has resulted in all coarse and game fish species being increasingly vulnerable to cormorants as they try to migrate up and down rivers through weirs, hydropower plants and other man-made barriers to complete their life cycles.
- Cormorants pose a direct threat to designated endangered fish species protected under European legislation, including European eel, Atlantic salmon, lamprey and bullhead.
- Over wintering cormorants in England are now estimated at over 62,000. Each individual requires approximately 500g (in excess of 1lb) of fish every day.
- The Eel Management Plans submitted and accepted by the European Commission estimate that between 29 & 43 tonnes of endangered eels are eaten by cormorants every year in England and Wales.
- The government's Moran Committee acknowledged the damage that cormorants can do to inland fisheries.
- We believe that cormorants should be included on the revised General Licences, under section 16(1) of the Wildlife and Countryside Act 1981, subsection (k) *preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber, fisheries or inland waters*, in order to enable fishery managers to adequately protect their fish stocks and their livelihoods.

- We believe that cormorants should be included on the revised General Licence under section 16(1) of the Wildlife and Countryside Act 1981, in order to protect Fauna & Flora in respect of those endangered fish species.

We do not believe that the inclusion of the cormorant on the General Licence would pose any threat to the conservation status of the bird given the huge increase in numbers if such a measure was subject to regular review.

Thank you for taking the time to consider the contents of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Salter', with a long horizontal stroke underneath.

Martin Salter, Head of Policy, Angling Trust

A handwritten signature in black ink, appearing to read 'T.C. Harrop'.

Trevor Harrop, Avon Roach Project