

FISH EATING BIRDS POSITION STATEMENT

WOS's Position

- WOS ..
- Strongly supports measures aimed at reversing the substantial declines in fish species in Welsh rivers and lakes and returning these highly important ecosystems to favourable conservation status.
- Wishes to see urgent measures taken by NRW and water companies to substantially reduce pollution incidents from sewage treatment plants and from septic tanks and other sources into rivers.
- Wishes to see implementation of further measures by Welsh Government's Agriculture Department and by NRW to reduce fertiliser and manure runoff from farms into rivers.
- Is unaware of any scientific evidence which differentiates the contribution of the numerous factors causing ecological deterioration including fish depletion in Welsh rivers and lakes.
- Is unaware of any scientific evidence which directly links fish declines in our rivers and lakes to predation by fish eating birds.
- Considers that a variety of scaring methods should be used at stillwater fisheries and hatcheries and on lakes and identified stretches of rivers where large numbers of fish eating birds concentrate.

Background

With many of our Welsh rivers, formerly a rich habitat for a wide range of plants and animals, degraded and depleted in species, WOS wants to see them returned to their previous, species-rich condition. Many bird species are dependent on this habitat and are a natural component of river and other freshwater habitats.

WOS is equally aware that most of our native freshwater fish, both resident and migratory species – for which many of our rivers are of international importance – are in decline and that some are seriously depleted.

WOS is concerned that the decline of our native fish populations has often centred on the possible impact of some fish-eating birds, especially Cormorant and Goosander. However, there are multiple factors driving the decline of river species, fish included, the balance of these probably varying between river catchments. They include pollution from sewage treatment installations, septic tanks and agricultural fertiliser and manure runoff; changes in river flow rates; changes in water temperature and drought frequency; artificial river and stream blockages such as weirs; the impact of fish-eating birds; residual acidification in upland rivers and streams; recovery of Otter populations; angling including any impact on caught fish returns; and licensed fish netting.

It is impossible to quantify any one of these individual factors in terms of their contribution to fish population declines. NRW, in its January 2026 assessment, singles out agriculture as the “most commonly reported pressure” for freshwater species. Agricultural practices affected 44 of the 53 species assessed. “Specifically for fish”, says NRW, agriculture was a high ranked pressure for 6 out of the 9 fish species assessed”. Forestry and climate change were also major pressures. Fish-eating birds were not mentioned in NRW’s assessment.

Many artificial obstructions to fish migration, such as weirs and similar features, have been removed in recent years – or fish passes installed – in order to open up longer stretches of rivers and streams particularly for spawning. Such obstruction removals also take away the attraction to Goosander in particular of numbers of fish (and easy catches) that often accumulate below such obstacles.

Catch and release practices by anglers can result in high fish survival rates depending on a number of factors including fish species, hook location within the fish, handling and water temperature. A review in 2013 by Dr John B Hume, an expert in fish population dynamics, concluded that catch and release mortality rates across a range of freshwater and marine species averaged 18%. A report commissioned by The Environment Agency in 2017 concluded that “studies on Atlantic salmon have generally demonstrated high survival rates and successful spawning for salmon released after capture”.

NRW's compiled catch returns for 2024 show that 3,510 Sewin were caught by rod in Wales and 91% of them returned. For Salmon, the figures were 812 caught and all returned. 260 Sewin and 122 Salmon were caught by net. Most commercial river and estuary netting is now illegal though a few limited practices remain and are licensed by NRW. While Salmon have to be returned, Sewin can be kept and sold.

There are a number of fish-eating birds inhabiting Welsh rivers and lakes including Kingfisher, Grey Heron, Red-breasted Merganser and Osprey but angler concern about their impact on fish populations is almost entirely focussed on Goosander and Cormorant. In Wales, Cormorant is almost entirely a coastal breeder with just one small inland colony. The breeding population is relatively stable but the species is amber listed here because of the international importance of the non-breeding population. There are perhaps 1400 breeding pairs of Cormorant in Wales. While the continental subspecies breeds in England, there have not been any breeding records in Wales.

Goosander is green listed in the UK and in Wales; its numbers have increased substantially since the 1960s and the number of breeding pairs is now thought to be between 565 and 855. They are found on most rivers, even small tributaries, on lakes and reservoirs.

Red-breasted Merganser is sometimes mentioned in the context of its possible impact on fish populations. Its breeding population in Wales is declining (it is amber listed) and maybe is no more than 100 pairs. Most winter in coastal waters.

As for almost all species of birds in the UK, both Goosander and Cormorant are fully protected in law but licences to kill them in Wales can be issued upon application to NRW. Physical protection and scaring is usually used at stillwater fisheries and hatcheries and does not require a licence (provided there is no impact on breeding) but scaring has to be varied in content and repeated frequently to be effective. Proof that scaring is ineffective is necessary before a licence to kill can even be considered. Based on the conclusions of the NRW convened Fish Eating Birds Advisory Group in 2022, NRW states that the decision-making process to assess applications for licences to kill fish-eating birds is not robust and may be open to legal challenge. It noted that the absence of

a comprehensive national policy on fish-eating birds leaves the decision-making process for assessing lethal control applications vulnerable.

A review in Scotland (E. M. Humphreys et al, 2016) on the impacts of fish-eating birds on salmonid populations and game fisheries concluded that there is substantial evidence that, at a site level, fish-eating birds can take large numbers of fish from natural and stocked fisheries. In Scotland, the highest levels of concern have been raised for wintering cormorants foraging at still water fisheries where wild (and farmed) trout species are targeted, and also in rivers where salmon parr and smolt are taken in the early winter period and spring. It also concluded that there is a lack of evidence that such predation effects fish species at the population level, or causes direct economic losses. The study points out that this cannot be interpreted as a lack of the existence of an effect, rather that it is very difficult to measure. The authors also point out that the lack of evidence available for key parameters of fish populations, and accurate assessments of fish consumption rates by fish eating birds, has hindered any attempts to demonstrate any reduction in numbers or productivity of fish species.

A more recent study (I. C. Russell et al, 2022) of the diet of the two subspecies of 1400 Cormorant shot while wintering around inland fisheries in England found that they predate a very wide range of fish species but just six species accounted for 80% of diet biomass with roach being the most abundant, followed by rainbow trout, brown trout, perch, bream and common carp. Roach comprised almost half of the prey items in numerical terms and just over a quarter of the biomass. Cormorants are versatile feeders and their diet at other times of year and on rivers is likely to be different.

A report to NRW (C. J. Macgregor et al, 2022 “Informing decisions on lethal control of Great Cormorant and Goosander in Wales: scenarios from Population Viability Analysis (PVA”)) assessed the potential impact of lethal control on both species. It found that under the current scenario (which includes the relatively recent introduction of lethal control in Wales), the majority (64.5%) of models predicted Cormorant population decline, whereas only a small minority (6.3%) of models for Goosander predicted population decline. But for both species, increasing levels of lethal control were associated with increasing likelihood of

population decline, and associated with negative changes in conservation status over progressively shorter timescales.

The authors pointed out that PVA modelling assumes demographic parameters are stable over time, yet evidence suggests several demographic parameters are changing, especially for Cormorant. Productivity is declining at Welsh Cormorant colonies, and survival analysis of ring-recovery data from the largest Welsh colony (Ynys Seiriol/Puffin Island Special Protection Area) suggests long-term change in survival rates. If declining productivity is included in model scenarios, the likelihood of population decline was substantially increased compared to models using stable productivity estimates. It concludes that these analyses highlight the critical need for appropriate population monitoring to ensure that unpredicted population declines can be detected and factored into future licensing decisions. This is particularly important for species with poorer demographic trends, such as cormorant.

Policies of Involved Agencies

Afonydd Cymru – representing the six Regional Welsh River Trusts – claims that excessive predation by fish-eating birds is a major limiting factor for depleted salmonid populations but stresses that fixing widespread environmental pressures, including agricultural pollution, habitat degradation, and climate change impacts is also imperative.

Wildlife Trusts Wales advocates for a balanced, evidence-based approach to managing fish-eating birds but prioritizes long-term habitat restoration as the primary solution for reversing declines in fish populations.

NRW operates an evidence-led action plan to protect vulnerable fish stocks from predation by fish-eating birds. The policy prioritises non-lethal deterrents but allows strictly licensed lethal control as a last resort in areas with threatened populations such as Atlantic salmon. NRW is the licensing authority, granting permissions to control birds under strict criteria where there is documented, serious damage to inland fisheries or migratory fish populations.

The RSPB maintains that the primary threat to declining fish populations is poor river health and water quality. The RSPB's policy on fish-eating birds balances the conservation of protected birds with the protection of vulnerable fish stocks. It states that non-lethal deterrents take priority, while lethal control is strictly a last resort evaluated on robust, catchment-specific evidence.

The Countryside Alliance strongly advocates for the active management and lethal control of fish-eating birds to protect game and coarse fish stocks. It emphasizes that fishery protection and predator control are vital conservation measures to sustain recreational angling.

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