



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

RESPONSE FORM

Catch Controls: byelaws for Nets and Rods 2017

We would like to find out your views on the proposed byelaw changes to catch controls to help protect vulnerable salmon and sea trout stocks and fisheries. By providing this information we will be better able to understand the context to the answers that you provide to our consultation. We also want to quantify and be sure that we have received responses from all sectors that may be affected by, or have an interest in managing our fisheries. This information will therefore help us to accurately record who has responded to this consultation. Your details will only be kept for this consultation and any future work directly related to this.

Please note this is only a consultation on the proposed catch control byelaws. Any objections to the 2017 Net Limitation Order should be made separately to Welsh Government.

By Post to: Jeremy Frost, Marine and Fisheries Division, Inland Fisheries Strategy, CP2, North Core, 2Nd Floor Pillar, MO2, Cathays Park, Cardiff, CF10 3NQ . Or by email to jeremy.frost@Wales.gsi.gov.uk

Section 1

Q. 1a) About Yourself

Please tell us which one of the following categories best describes your primary interest in salmon and sea trout.

- I am a licensed net fishermen
- I am an angler.
- I represent a group of individuals who fish for salmon and sea trout (please tell us the name of the group).
- I own or lease salmon and sea trout fishing
- I represent a salmon and sea trout conservation or environmental conservation organisation (please tell us the name of your organisation).
- I am involved in the catering industry and buy/sell wild salmon and sea trout (fish retailer, fishmonger, restaurateur, etc.)
- I am involved in the tackle trade for angling
- Response from Non-Governmental Organisation

Other (**please specify**) **The Angling Trust – the national representative body for all angling in England in Wales. We represent 1,700 angling clubs, 350 fisheries/riparian owners and 12,000 individual anglers across England and Wales.**

If more than one of these categories applies to you please select all relevant categories.

Q. 1b) What part of the country do you have an interest in?

Please tell us where you primarily fish for salmon or where the salmon that support your business are from.

- North Wales (Anglesey and North Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham, Meirionnydd)
- Mid Wales (Montgomeryshire, Ceredigion, Radnorshire)
- South west Wales (Pembrokeshire, Carmarthenshire, Swansea, Neath Port Talbot and Bridgend)
- South east Wales (Ely and Vale, Taff, Rhymney and Ebbw, Usk and Wye)

All Wales

Other e.g. England/Ireland/Scotland (please specify) **England**

If more than one of these categories applies to you please select all relevant categories.

Q. 1c) Please tell us how you found out about the Catch Controls consultation:

From Natural Resources Wales

- From another organisation
- Through an organisation you're a member of
- Press article
- Social media e.g. Facebook, Twitter
- Through a meeting you attended
- Other (please specify)

How we will use your information

Natural Resources Wales will look to make all responses publicly available after the consultation, unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals who respond.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

We will not disclose financial or other individual specific information that could inadvertently identify an individual or his / her business.

We will also publish a summary of responses on our website in which we may publish the name of the organisation providing responses.

Returning your response

Your response to this consultation needs to be returned by 14th November 2017. Please respond using this form. You can add extra documents supporting any responses that you make but please make it very clear which question this additional information relates to.

Please ensure any evidence previously submitted as part of the Questionnaire in 2016 is re-submitted to make sure it is included in your submission.

We would like you to use this form if you are not submitting your response online. You can return it by email to Fisheries.Wales@cyfoethnaturiolcymru.gov.uk. Please use this email address if you have any questions regarding this consultation.

Or by post to: **David Mee, "Salmon and Sea Trout Byelaws", Natural Resources Wales, Maes Newydd, Llandarcy, Neath Port Talbot, SA10 6JQ**

We welcome your views on the catch control byelaws 2017.

Section 2

Q 2a Do you agree with Natural Resources Wales salmon and sea trout stock assessments?

Please tick the relevant box

- Yes
 No
 Don't know

Please explain your answer.

We agree that on many rivers salmon and sea trout stocks are in decline but we believe that the low level of catch returns submitted and a lack of fishing effort due to poor marketing of fishing and general despondency with the state of the rivers may have affected the quality of the data.

We believe that the stock assessment methodology should be reviewed in due course to explore the possibility of modifying the methodology to provide more confidence in it among anglers, and a clearer understanding of the basis for the assessment.

Q 2b Please tell us if have any evidence to support a different stock assessment conclusion.

Section 3

Q 3a Do you support the proposed Net fishing byelaws?

Please tick the relevant box

- Yes
 No
 Don't know

If no, please state on what grounds your objection is based.

While the Angling Trust welcomes the proposals for banning the netting of salmon, which was one of the campaign aims of its Save Our Salmon campaign, we are concerned that sea trout (sewin) nets would continue to operate during some months, taking large fish which contain high numbers of eggs and which have great economic and social value to recreational anglers. We have grave doubts about the welfare of salmon caught and released by those nets as a by-catch, particularly by coracles fishing at night. Compared to the risk to salmon from a barb on a small treble hook, these proposals seem to involve very asymmetric standards of regulation between a very small number of netsmen and a very large number of anglers.

Q 3b Do you support the proposed rod fishing byelaws?

Please tick the relevant box

- Yes
 No
 Don't know

If no, please state on what grounds your objection is based.

The Angling Trust feels that it is unacceptable and unjust to impose blanket mandatory catch and release regulations on anglers throughout Wales. Such measures will be very difficult to enforce given the level of resources for enforcement staff and the expected reduction in angling effort and goodwill that such a measure would generate.

The measures to micro-regulate anglers with mandatory restrictions on angling techniques such as the use of small barbed hooks and all trebles will have a significant impact on anglers' liberties, which will drive people away from the sport and generate significant animosity between the angling community and Natural Resources Wales. Furthermore (and perhaps most importantly), a survey conducted on behalf of Defra in 2001 (included alongside this response) showed that angling method had no apparent impact on the survival of salmon that were caught and released by anglers. This means that any micro-regulation is likely to result in little to no benefit to salmon stocks but very significant negative impacts on anglers.

We believe that any improvements to angling techniques should be achieved by voluntary measures. These proposals will have very significant negative effects on hundreds of angling clubs and riparian owners and thousands of individual anglers, who have asked us to make the strongest possible representations on their behalf against this consultation. The number of fish that the proposed measures will actually save is completely dwarfed by the number that are killed (and fail to spawn successfully) as a result of pollution, over-abstraction, barriers

to migration, unmanaged predation and habitat damage in Wales every year.

Natural Resources Wales and Welsh Government have failed, and continue to fail, to tackle the significant environmental issues negatively impacting on salmon and sea trout stocks. Mortality arising from angling is relatively minor in comparison to these factors. NRW and Welsh Government needs to take immediate and concerted action on the primary freshwater causes of salmon decline in Wales: agricultural and sewage pollution, lack of available habitat and the over-predation of juvenile fish by cormorants and goosanders.

Agricultural pollution in particular is completely out of control in many parts of Wales, and with NRW failing to take real action against farmers who pollute this has cultivated a culture of non-compliance. Even reducing all exploitation by nets and rods would be entirely insufficient to restore stocks in the long term.

Major and concerted action is required urgently to stop the regular serious pollution incidents and widespread diffuse pollution from agriculture and forestry if salmon and sea trout are to have a viable future in Wales. Sewage pollution, over-abstraction of water, hydropower and other barriers to migration are also locally significant issues that are harming fish stocks in some rivers. The Angling Trust has repeatedly raised concerns with Welsh Government over several years about its failure to address this serious and growing problem of diffuse water pollution, which is killing far more salmon and sea trout each year than the proposals for controls of exploitation by nets and rods would save.

Predation from cormorants and goosanders is widely thought to have a major and increasing impact on salmon and sea trout stocks, but Natural Resources Wales has made applying for licences to control these birds unnecessarily complicated and burdensome, and has required unreasonably high evidential standards from applicants. There is a need for far more licences for fishery managers to control numbers at sustainable levels without unnecessary bureaucracy and restrictions. Working proactively with fishery managers to reduce avian predation would have rapid results and would directly address the issue of poor juvenile numbers in many rivers, which is claimed by NRW to be linked to the warm, wet winter of 2015/16. It would also begin to repair relations with a large community who feel utterly aggrieved by inaction by the government and a series of proposals that seem to be intended to destroy game angling in Wales.

Salmon anglers and angling club officials commit a huge amount of volunteer time nationally to help conserve and improve river habitat, monitor salmon stocks and fly life, report pollutions and poaching. The Angling Trust regards the proposed mandatory measures as draconian, and early feedback from our member clubs in Wales suggests that imposing mandatory catch and release on salmon anglers alongside a number of regulations restricting the methods that anglers can use would drive many salmon anglers out of the sport.

The loss of goodwill from mandatory measures would also lead to a reduction in financial and volunteer time contributions to river habitat conservation, fewer eyes and ears on the riverbank to report pollution and poaching, as well as lost rod licence income to NRW. The reduction in fishing effort would also lead to a decline in catches and hence the accuracy of stock assessments.

It is important to point out that the perception of salmon and sea trout anglers by the general public, which will include many decision-makers, is often inaccurate. They are too often characterised as predominantly upper class and high income, when the reality is that many, if not most, salmon and sea trout anglers in Wales

are working men and women of modest means for whom salmon angling can be their main leisure activity, with enormous personal benefits. Many are advanced in years, have fished all their lives and care passionately about the liberties they have enjoyed for decades to be able to go and fish for salmon and sea trout and to take the occasional fish home to eat. There is widespread low-cost salmon angling available through angling clubs and angling passport schemes.

We would also like to emphasise that the impact of regulation on angling is not limited to affecting tens of thousands of individuals' enjoyment of a 'hobby', but it has a very real impact on employment, the capital and amenity value of private property and the very survival of angling clubs, many of which have been in existence for over a century. Angling clubs in particular, but also fishery and tackle shop owners, often operate with very slim financial margins and any loss of revenue or additional costs as a result of regulation could be critical for their survival at a time when they are already suffering due to poor catches in recent years which are not the result of over-exploitation by anglers.

Section 4

Q 4a Please tell us if you have any further comments that haven't been covered by the previous questions.

In England, the Environment Agency is recommending a voluntary approach to implementing higher rates of catch and release, which was developed in close consultation with the Angling Trust and our Salmon Anglers' Advisory Group, and to which we are committed to helping implement through our network of angling clubs, fisheries, consultatives and river associations. We believe that these voluntary measures may actually be more effective than unenforceable mandatory measures at saving salmon, and they will not alienate anglers in the process. We would like to see a similar process developed in Wales to get buy-in from the angling community.

The Angling Trust would like to see salmon and sea trout recognised as primarily sport fish in Wales because they have far greater socio-economic value if they are allowed to return to their natal rivers rather than being caught in nets. Anglers make a much larger contribution than netsmen to environmental conservation initiatives on rivers to help protect fish stocks and contribute to wider biodiversity objectives. This contribution is dependent on there being fish to catch and, for many anglers, the right to take the occasional fish for the table and to fish without fear of prosecution for using a size 12 treble, barbed hook on their fly – a technique which has been used for generations.

The government has repeatedly cut resources to support Natural Resource Wales to carry out its statutory duty to maintain, improve and develop salmon and sea trout fisheries over the past decade or so and we believe that these cuts should be reversed as a matter of urgency to help with the recovery of stocks and to support the professional promotion of angling to maximise its social, economic and environmental value to Wales. The costs of managing salmon and sea trout cannot nearly be met by rod licence fees; salmon and sea trout have a great value to the nation and to biodiversity beyond their substantial economic and cultural importance as a highly prized quarry for anglers from Wales and around the world.

Thank you for taking the time to fill in this consultation.