

The NRW Fisheries Team
Maes Newydd
Britannic Way West
Llandarcy
Neath Port Talbot
SA10 6JQ

15th December 2017

Dear Both

Thank you for your letter of 12th December responding to Afonydd Cymru's comments on Catch Control Byelaws. We appreciate the huge effort that goes into making fisheries byelaws and for that reason stress the need to produce regulations that deliver on the outcomes which in essence make the best of a bad job. Looking back over nearly forty years of byelaw changes, there are far too many examples where previous examples have arrived so late that circumstances have moved on either for the better or more likely, the worse.

We never thought we would criticise NRW for not having a "Vision" as in most other areas there is one either espoused by government or one from within but what is NRW's vision for migratory fish, fishing and our rivers? For now we have to accept that in parts of Wales, agricultural pollution is here to stay and likely to get appreciably worse. We now know there is less capacity to deal with fisheries issues than at any time and little will from government to grasp the nettle. The Natural Resources policy is just a chain of words and remains a surrogate for real action. So are the various compromises and fudges going to deliver what is needed for this rather dystopian vision of the future?

There are some further points to consider in making your final decision:

1. There will be virtually no checks on compliance with byelaws
2. In some rivers, the decline in sea trout stocks is gathering momentum
3. There will be fewer fishers out to protect against illegals who will **not** be complying with byelaws
4. While it is generally believed that that C&R will not damage the economics of a fishery significantly, this depends entirely on there being something to fish for: C&R will empty rivers where there are fish shortages and that's applies to most of the salmon rivers in Wales
5. It is also important to distinguish between those who fish for sport and those who fish for the table and distinguish between the objections and motives of each type of fisher.

Back to vision again: Is NRW's vision to manage fishing for the table albeit constrained by conservation targets or manage the limited stock for sport fishing, the latter being more conservative of stocks?

The essence of ACs counterproposals which lean more to the sport fishing approach are:

1. No worming at anytime, anywhere
2. Further delay in the start of netting, ideally 1st June
3. 50cm or 20" slot size of sea trout consistently throughout the season, ie no C&R early
4. C&R only for PAR salmon rivers and worse
5. Tidying up of the complex starts of spinning etc on the Usk will now be resolved with banning of prawn shrimp and worm, provided a 1st June start for spinning is acceptable.
6. Trebles: none above #12, Single hooks for Flying Condoms, doubles for larger flies, tubes, voluntary barbless
7. Otherwise as NRW advises

And here is why.....

Allowing **Worming** for sea trout in salmon rivers is likely to unpick the benefit of a worming ban thus undermining salmon conservation. NRW believes there are rivers where fish can only be caught on a worm, although it is never stated where these unusual places are, which somewhat detracts from the credibility of this argument. No worming would be preferable for those who fish for sport.

A further delay in the start of **Netting** would allow more, larger sea trout (the best breeders) to escape. Linked with the 50cm or 20" slot size all season, we can see good reasons for early season fishers to comply. NRW persist in claiming that outwith the netting season, sea trout should be returned in the early pre netting period but not in the post netting period (save for those over the slot size) This is just the type of weird and anomalous approach that invites noncompliance. We might accept a compromise of 15th May if the other suggestions are effected.

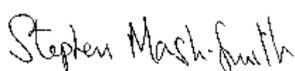
Catch and Release all season. NRW make no suggestion of what might happen if rivers recover to NAR or PNAR. This makes it all the more difficult to cede acceptance of full C&R on the Usk (PNAR). We accept that there is an urgent need to conserve salmon in the immediate future but with bait bans, better water management, a Clear and Decisive voluntary release campaign and better control of illegal fishing the same end can be achieved. It looks as though the much lauded NVZ will be replaced with voluntary measures so that's what WG work to!

Voluntary barbless is a suggestion made to avoid undue non compliance

Finally you picked up on the point we made of the difference between licence returns and owners salmon catch reports but rather ignored the substantial difference especially on the Wye. We think your 10% correction for under declaration is laughable in many areas.

In conclusion although we are broadly in support, we will **not** withdraw our specific objections as indicated above, notwithstanding the possibility of further compromises.

Yours sincerely



Dr Stephen Marsh-Smith