



**Cyfoeth  
Naturiol  
Cymru  
Natural  
Resources  
Wales**

## RESPONSE FORM

### Catch Controls: The Welsh Cross Border Rivers Byelaws (Dee and Wye)

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.

#### Section 1

(Please take all details from the All Wales consultation)

**Name:** Dr Stephen Marsh-Smith .....

**Address** stephen@afonydd Cymru.org.....

(Per all Wales consultation) .....

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## 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 **5<sup>th</sup> February 2018**. 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. You can return it by email to [Fisheries.Wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.Wales@cyfoethnaturiolcymru.gov.uk). Please use this email address if you have any questions regarding this consultation.

Or by post to: **David Mee, "Cross Border Byelaws", Natural Resources Wales, Maes Newydd, Llandarcy, Neath Port Talbot, SA10 6JQ**

## We welcome your views on the Welsh cross border rivers (Dee and Wye) byelaws

### Section 2

**Q2a. Do you agree with Natural Resources Wales salmon and sea trout stock assessments?**

*(Please see our all Wales consultation response)*

**Q2b** Please tell us if have any evidence to support a different stock assessment conclusion.

*(Please see our all Wales consultation response)*

### Section 3

**Q3.** Do you support the proposed rod fishing byelaws?

**In part**

*(Please see our all Wales consultation response)*

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

*(Please see our all Wales consultation response)*

### Section 4

**Q4.** Please tell us if you have any further comments that haven't been covered by the previous questions.

We have supported some areas of the NRW proposals, we have given responses to the all Wales consultation and a letter of reply to the fisheries team following their initial response.

However, there are two specific points we make in connection with river Dee: the suggestion has been made that all sea trout are returned prior to the start of the netting season. In the rest of Wales this has been deferred to 1<sup>st</sup> May and we have suggested this is not enough and should be the 1<sup>st</sup> June, as was the case on Wye and Dee.

Crucially, the nets on the Dee have been bought off some while ago and there seems even less logic in linking the early proposed C&R for sea trout with the start date for nets with the rest of Wales. We suggest that as for all Wales, the Dee sea trout run would be better protected with a smaller slot size per that consultation.

Re worming: Unlike many of Wales other rivers, Dee doesn't run the various grubby colours that seem to require the use of the worm. We recommend that the ban on Worm, shrimp and prawn is extended to sea trout too, all season. Allowing worming for sea trout in what is principally a salmon river is allowing an opt out for any would be poacher.

Like the Wye, Dee is one of Wales larger rivers with (historically at least) early running MSW fish. Properly managed, spinning offers the chance of continued sport and in high water conditions but lures must be regulated too ensure minimum damage. In our view that means mandatory single hook use for Flying Cs. Experiences on the Wye (Wyesham) have shown that trebles and doubles cause significant damage that was completely alleviated with the use of single hooks, which the owner and ghillie enforced, the use of a barb was largely irrelevant to damage. If NRW introduce too many controls on hooks and lures the chance of compliance is reduced

In respect of Wye controls, the mandatory use of single hooks on FCs would do more good than any other single change. However, in both these large rivers a gape of 10mm would be appropriate and this would work on devons too.

Dr Stephen Marsh-Smith Afonydd Cymru (December 2017)

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

You can return it by email to [Fisheries.Wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.Wales@cyfoethnaturiolcymru.gov.uk).

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