

Countryside Alliance Response to the Environment Agency Consultation: Proposed National Salmon and Sea Trout Protection Byelaws

April 2018

Renewal of existing byelaws protecting spring salmon stocks

We propose to renew the existing byelaws that protect early running, spring salmon for a further 10 years. These byelaws will continue to:

- set the start date of the season for fishing with nets or fixed engines for salmon and sea trout to 1 June.
- require that there is no angling for salmon, other than with artificial fly or lure, before 16 June; and
- require that all salmon caught by anglers before 16 June are returned, with the minimum of injury

7. Please tell us if you object to, or support, the renewal of the byelaws to protect spring salmon stocks, and provide your reason why.

- The Countryside Alliance supports these proposals.

New byelaws for net and fixed engine fisheries

In addition to the renewal of existing byelaws that protect early running, spring salmon we are proposing new byelaws for net and fixed engine fisheries. These proposed byelaws will stop the take of salmon by net and fixed engine fisheries from rivers whose stocks are predicted to be 'At Risk' or 'Probably at Risk' in 2021. This will mean the closure of some fisheries, whilst others can continue to fish and take sea trout with the return of all salmon caught. The proposed byelaws, if confirmed, will:

- **From 2018** close the drift net fisheries of the North East Coast and the Rivers Ribble, Lune and Camel.
- **From 2018** require the release of all salmon caught by the Anglian and Southern Coastal Fisheries and the River Lune Haaf Net Fishery.
- **From 2019** close the seine and draft net fisheries on the Rivers Exe, Tamar, Tavy, Lynher, Camel, Taw and Torridge.
- **From 2019** require the release of all salmon caught by the lave net fisheries on the Rivers Kent and Leven.
- **From 2019** require the release of all salmon caught by the North East Coast T and J (beach) Nets and shorten their fishing season to: **Districts 1 - 3, 26 March - 31 May; Districts 4 and 5, 26 March - 30 June; Districts 6 and 7, 26 March - 31 August** (no change).
- **From 2019** remove the ability for North East Coast T and J nets to fish in the Tyne and Coquet Conservation Areas in District 1.
- **From 2019** require the release of all salmon caught by the seine and draft net fisheries on the Rivers Teign, Dart and Fowey and in Poole Harbour and shorten their fishing seasons to: **Rivers Teign, Dart and Fowey, 15 March - 31 May; Poole Harbour, 1 June - 30 June.**

8. Please tell us if you object to, or support, the proposed byelaws for net and fixed engine fisheries and provide your reason why.

- The Countryside Alliance supports these proposals.

New byelaws requiring the catch and release of salmon by rod fisheries

We are proposing a new byelaw that will require all salmon caught by rod and line to be immediately returned on rivers that are predicted to be 'At Risk' in 2021 and for rivers that do not have minimum salmon spawning levels set for them ('Recovering Rivers').

The 'At Risk' rivers are the: Lune, Ribble, Tees, Crake, Dorset Stour, Yealm, Cumbrian Derwent, Plym, Wyre and Calder.

The 'Recovering Rivers' are listed in Schedule 2 of the proposed byelaws.

The proposed byelaw (Byelaw 11) can be viewed in the supporting information below.

9. Please tell us if you object to, or support, the proposed byelaw requiring the catch and release of salmon caught by rod and line on specified rivers and provide your reason why.

- The Countryside Alliance objects to these proposals.
- The majority of 'At Risk' rivers are already delivering over 90 per cent catch and release levels and we believe they should be given the opportunity to deliver 100 per cent levels voluntarily. Fisheries and clubs have worked hard over the past 20 years to avoid a mandatory policy being introduced and it is disappointing that the Environment Agency has chosen to ignore this work.
- Angling provides significant investment in, and support for, conservation work across the country, including in the rivers listed in these proposals. Besides the over £20 million which the rod licence generates annually to help the Environment Agency maintain and enhance fish stocks, many people who fish also take part in conservation work in their own time. We believe these proposals will have an impact on their willingness to undertake voluntary work and to invest time and money in those rivers where salmon stocks are most in need of improvement.
- As well as the damage which could be caused to fish stocks and the water environment, there is also the potential for loss of revenue to associated businesses and the local economy. Angling is worth more than £3 billion to the UK economy and supports the equivalent of 37,000 jobs in England and Wales. Much of this investment is in some of the most rural parts of the country where other sources of income and employment can be limited. Like many other country sports, fishing is an important contributor to rural tourism which helps to bring money into the wider local economy. These proposals could result in rivers becoming less popular with people who fish which would reduce investment and put jobs at risk.
- The proposals will be difficult to enforce, and will place an unnecessary burden on the resources on the Environment Agency. It is disappointing that other options have not been properly considered, such as a tagging system, before moving to a mandatory policy. Ireland and Canada have introduced successful tagging systems which enable people who fish to keep a limited number of salmon they catch for a fee which is used to fund conservation work. We believe there is no benefit for fish stocks or the public interest in punishing people who take the very occasional fish from the river.
- If a mandatory policy is introduced then this should not commence until 2019 in recognition of the fact that many people who fish have already purchased their rod licence for the 2018 season. Fisheries and clubs, as well as associated businesses, will need time to adjust to any changes to the byelaws.
- Any mandatory policy must include an end date or date for review to ensure that the proposed changes to the byelaws do not become permanent and set a precedent for other rivers.

New byelaw restricting certain rod angling methods

To minimise the risk of injury to rod caught salmon a new byelaw is proposed when fishing for salmon or sea trout in England and on the Border Esk. The byelaw, if confirmed, will from 2019:

- require that fishing with a prawn or shrimp as bait is only carried out with a single, double or treble hook with a gape (measured from shank to hook point) of 7 millimetres or less.
- require that fishing with an artificial lure is only carried out with a single hook with a gape (measured from shank to hook point) of 13 millimetres or less.
- require that fishing with an artificial fly with a treble hook is only permitted if the gape (measured from shank to hook point) of the treble hook is 7 millimeters or less.

Please note there is no restriction proposed on the use of artificial flies with single or double hooks.

10. Please tell us if you object to, or support, the proposed byelaw restricting rod angling methods and provide your reason why.

- The Countryside Alliance objects to these proposals being made mandatory under a new byelaw.
- The majority of people who fish already comply with best practice in hook sizes and angling methods. Many of the requirements contained in the proposals are sensible but the best way to encourage greater compliance with best practice is through a voluntary approach rather than introducing a mandatory policy.
- The proposals will be difficult to enforce, and will place an unnecessary burden on the resources on the Environment Agency.
- We recognise that people who fish have a continuing role to play in improving salmon stocks by releasing more fish and reducing the damage that is done to fish which are released however this should not impede on those involved in sea trout fishing.