



**COUNTRYSIDE
ALLIANCE**

The voice of the countryside



Angling Trust
Eastwood House
6 Rainbow Street
Leominster
Herefordshire HR6 8DQ

t: 0844 770 0616
e: admin@anglingtrust.net
w: www.anglingtrust.net

Reg Address: Angling Trust Ltd
Eastwood House
6 Rainbow Street Leominster
Herefordshire HR6 8DQ
Reg No: 05320350
VAT No: 948411215

George Eustice
Minister of State for Agriculture, Fisheries and Food
Nobel House
17 Smith Square
London
SW1P 3JR

Thursday, 27 October 2016

Dear Minister,

Each of our organisations will be responding individually to the Environment Agency's informal consultation on exploitation of salmon, but we are writing jointly to express a unified view on two key points which arise from the consultation.

1. Netting controls

All of our organisations wish to register our official support for the proposals to halt the netting of salmon returning to 'at risk' and 'probably at risk' rivers and particularly to have a moratorium on mixed stock fisheries. The latter have long been an embarrassment for the UK and they put at grave risk international agreements to control subsistence fisheries in Greenland and the Faroe Islands which affect all Atlantic salmon stocks originating from the UK.

Our colleagues in Fisheries Management Scotland (FMS), the representative body for District Salmon Fishery Boards and Fisheries Trusts in Scotland, will also respond to the consultation independently. However, FMS have asked us to emphasise their view that any decisions on mixed stock fisheries in England must take account of the conservation status of Scottish rivers which will also be impacted by the netting of salmon. In particular, the NE drift nets and T&J nets have been shown to exploit a significant number of fish destined for Scottish rivers, including SAC rivers and rivers falling below defined conservation limits and in which mandatory catch and release has been instigated via national conservation measures.

However, we all agree that we would not want to see any increase in exploitation of sea trout as a result of these proposals and urge a precautionary approach to controlling exploitation of these fish if the recommended proposals for salmon are indeed implemented after the consultation. We highlight the fact that very little is known about stocks of sea trout and thus the impact of commercial fisheries on those stocks; improved methods for assessing the state of sea trout stocks are urgently required. Moreover, the net fisheries are of benefit to a very limited number of licensed operators and the price of these fish at the market often plummets to low levels when large numbers of fish are caught. Furthermore, the option to continue fishing with T&J nets for sea trout is on the proviso that there is "...no significant impact on salmon stocks (e.g. if all salmon captured could be released with a high likelihood of survival)." We would like to see what evidence is available that salmon released from fixed engine traps have a high likelihood of survival.

2. Salmon 5 Point Approach

Whilst the proposed controls on netting are extremely welcome, they will have limited direct benefit for large parts of the country where salmon stocks are in poor condition but there is little or no exploitation of fish. As the 5 Point Approach acknowledges, action to address the many factors contributing to the decline in salmon stocks needs to be wide ranging and to involve all parts of the Agency as well as Defra and its other agencies. Particular issues which need urgent and concerted action are: pollution (in particular from agriculture and sewage), barriers to migration, excessive water abstraction, predation, illegal netting, marine survival and marine salmon farming. Our organisations have played an active role in the Salmon Steering Group for the 5 Point Approach but we are very frustrated by the lack of progress on all of these fronts. By way of example:

- introduction of the draft statutory instrument for easing barriers to migration has still not been approved by the government, despite us raising it several times a year with civil servants and numerous fisheries ministers for over a decade;
- there has been no progress with implementation of abstraction reform, which was promised as long ago as 2011;
- the Environment Agency has identified as a risk factor in the delivery of the 5 Point Approach the fact that it has an “inability to exert sufficient influence over land management, agricultural pollution & diffuse pollution controls to improve water quality in some catchments to maximise spawning success”. Given the importance of agricultural pollution, unequivocally recognised by Government, we would like to know which agency does have sufficient influence to tackle this widespread and endemic issue;
- the Environment Agency does not have the resources it needs to investigate thoroughly pollution incidents (particularly the thousands of minor ones which occur each year) to prevent them re-occurring.

We of course accept that the principal cause of the fall in salmon numbers is the decline in marine survival, but this makes it all the more important to deal with the many threats to the freshwater and coastal environments that are within our control. As the 5 Point Approach makes clear, doing so will also benefit many other species of fish and other wildlife.

We recognise that there will be opportunities to address some of these issues as part of the process of leaving the EU, for example through reformed policies for agriculture, but our salmon cannot wait until the Brexit process is complete. Urgent action is required now.

We request a meeting with you to discuss ways in which barriers to delivery of the other elements of the 5 Point Approach might be overcome in the immediate future.

Yours sincerely,



Mark Lloyd (Angling Trust & Fish Legal)
Ivor Llewelyn (Atlantic Salmon Trust)
Tim Bonner (Countryside Alliance)
Paul Knight (Salmon and Trout Conservation UK)
Arin Rickard (The Rivers Trust)

Shaun Leonard (Wild Trout Trust)