

Salmon and Sea Trout Bylaw Consultation

The Institute of Fisheries Management welcomes the development of new National salmon and Sea trout Byelaws in England. We consider that the current status of both salmon and sea trout stocks warrants further protection and urgent action to try to prevent their relentless decline and possible extinction from many of our rivers.

We support the proposal to apply the proposed salmon and sea trout measures to all Principal Salmon Rivers (PSRs) that are predicted to be either “At risk” or “Probably at risk” However we would suggest the following for **salmon**:

Where it is warranted, for example where a river has consistently failed to meet the management objective over several generations of salmon spawning and this is assessed to continue, the river should be closed to all salmon angling until such time as it can be demonstrated that stock levels have recovered to an acceptable level. This approach has been operating in Ireland for 20 years and should be considered in England.

The suggestion that measures should apply to all rivers that support salmon and sea trout in England, regardless of their current stock statuses, has merit and should be explored further in formal consultation. Conserving populations that are generating fit smolts is likely to be critical to stock rebuilding at national level, caveats on genetic integrity notwithstanding.

Where salmon are a designated feature in SAC rivers under the Habitats Regulations the measures must be adequate to protect them under this legislation. SAC rivers may require even greater protection than proposed for other salmon rivers such as whole river closure to angling for this species.

We support a continuation of the prohibition on the taking of salmon by all net fisheries in England.

Where sea trout net fisheries continue to operate there needs to be a review of the bycatch of salmon to ensure that the impacts of these fisheries on salmon are minimised.

For Sea Trout:

We accept that stock assessment of sea trout is more difficult for salmon than sea trout and believe that the need for protection measures should be based on rod catch or counter data and that declines in the numbers of adult sea trout recorded should drive the necessary management measures. Consideration should be made as to the closure of the few remaining sea trout net fisheries as a precautionary measure.

We support the mandatory catch and release of all sea trout over a maximum size limit length. This should be set to protect 1&2 SW maiden sea trout which have been shown to provide most of the viable egg deposition. As growth rates of sea trout vary considerably regionally, this should be determined at a regional level. The proposed mandatory catch and release below a specified minimum size should be aimed at protecting sea trout smolts rather than O+ sea trout

There should be provisions for compulsory catch and release or ceasing all exploitation if stock levels warrant it.

Where stock levels warrant it, we support the proposed bag limit but consider that there needs to be a campaign to influence anglers to carry out routine catch and release for this species. This cultural change has grown amongst salmon anglers and a similar change in mindset needs to be encouraged amongst sea trout anglers.

Increasingly sea trout are targeted by rod anglers in the sea. All of the proposed measures set out in the proposed byelaws should apply to and be enforced in the sea.

General: Restrictions on fishing method and allowable tackle should be determined by the ability to release the fish easily and without harm

The proposal to bring in these byelaws should clearly set out the conservation case which drives them. It is vital that fishery owners, netsmen and anglers understand the critical status of many of our stocks and are bought in to the contribution that they can make to halting and reversing this decline. Consultation needs to be carried out with the regulatory bodies in Wales and Scotland to ensure that cross border rivers are managed consistently and stock protection measures co-ordinated. The Environment Agency must sufficiently resources to ensure that any new byelaws are complied with and enforced against