

Response by Guy Mawle to Environment Agency consultation on 10-year salmon byelaws and a new Net Limitation Order (NLO):

The background and proposals are here:

<https://consult.environment-agency.gov.uk/west-midlands/river-severn-net-limitation-order-and-byelaws/>

The new byelaws and NLO are relevant to the Usk fisheries as the net and putcher fisheries in the Severn Estuary exploit mainly Usk and Wye salmon. Usk salmon interests are encouraged to support the measures for the Estuary as they:

- Keep the putcher and seine net fisheries closed.
- Allow a maximum of 22 lave nets men to fish catch & release.

The measures would be in place for ten years. This 'no kill' policy maintains the position in 2020, achieved through emergency byelaws that have now expired.

The response form is:

<https://consult.environment-agency.gov.uk/west-midlands/river-severn-net-limitation-order-and-byelaws/consultation/intro/>

My responses to questions 6 on are:

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6. Do you agree that salmon stocks on the River Severn have declined within recent years and require additional protection to ensure their future sustainability?

Yes No Don't know

If you answer no, please provide evidence to support your view.

Our/my concern is with the restoration of the salmon stock in the river Usk which is exploited by the Severn Estuary fisheries.

7. Do you agree that there is a need to reduce the number of salmon being taken within the fisheries that exploit them?

Yes No Don't know

If you answer no, please provide evidence to justify this view.

8. Do you support the Net Limitation Order (NLO) proposal to maintain 22 lave net licences on the Severn Estuary if combined with a requirement for catch and release fishing only?

Yes No Don't know

If you answer no, please provide evidence to justify this view.

9. Do you support the proposal for mandatory catch and release for the salmon rod fishery as set out in these rod fishery byelaws for the River Severn?

Yes No Don't know

If you answer no, please provide your reason and supporting evidence to justify this view.

Our/my concern is with the salmon returning to the Usk which are not affected by the Severn rod fishery, only the Estuary fisheries.

10. Do you support the proposed rod angling measures (no bait fishing, requirement to use barbless hooks and restrictions to hook sizes) to protect salmon stocks in order to maximise the survival of salmon that are released on the River Severn?

Yes No Don't know

If you answer no, please provide evidence to justify this view.

Our/my concern is with the salmon returning to the Usk (& Wye) which are not affected by the Severn rod fishery, only the Estuary fisheries.

11. Please tell us if you have any further comments that haven't been covered by the previous questions. For instance, do you believe that there is a need for any alternative measures to adequately protect salmon stocks on the River Severn.

Please give any reasons for your answer, including any relevant evidence to support your suggestions.

As made clear in the Technical Case, measures are required for the Severn Estuary fisheries to help restore stocks in rivers other than the Severn, including the Taff (the weakest stock), and the Wye and Usk which are Special Areas of Conservation with salmon as a designated feature.

For all these rivers, local legal fisheries are not the reason for the decline in salmon stocks. Neither are further restrictions on these, much reduced, fisheries likely to restore stocks to a safe level on their own. As you point out, other measures are needed, including on river flows, pollution, obstructions to migration, illegal fishing and predation. On the Usk, the recent decline in salmon stocks is related to poorer conditions within the catchment. For example, a recent report by NRW showed that 88 percent of water bodies within the Usk SAC were failing their phosphate standard, see:

<https://cdn.cyfoethnaturiol.cymru/media/693025/compliance-assessment-of-welsh-sacs-against-phosphorus-targets-final-v10.pdf?mode=pad&rnd=132557227300000000>

At least phosphate is monitored. Although sediment from soil erosion has long been recognised as a problem, it is not monitored or addressed and is probably worsening with climate change and changing farming practices. There is a helpful summary of the problem, across England and Wales as part of the consultation for the next round of River Basin Management Plans:

https://consult.environment-agency.gov.uk/++preview++/environment-and-business/challenges-and-choices/user_uploads/fine-sediment-pressure-rbmp-2021.pdf

Note that the soil types in the Usk catchment make it particularly susceptible to this problem. Pesticides are not monitored at all by NRW in the catchment.

This is symptomatic of the wider 'nature emergency'. The Environment Agency and English Government, are encouraged to challenge NRW and the Welsh Government to take prompt and effective action to deal with these other issues in Wales which, to date, they have largely failed to do.

The byelaws and NLO proposed for the Severn Estuary fisheries are both necessary and equitable, insofar as fishermen are treated similarly whether they are netmen or anglers, in Wales or England. Methods that have a high risk of killing salmon are banned, (e.g. bait fishing by anglers, putcher ranks) whilst allowing catch & release fishing to continue, as far as possible, to maintain the associated socio-economic benefits. This is in line with the international Guidelines for the Management of Salmon Fisheries agreed by governments at NASCO as well as national policies for England and Wales.

The Technical Case presents stock data up to 2019. More recent information on both juvenile and adult salmon stocks in the Usk can be found in a 'Note for the Usk Local Fisheries Group, Rod and net catches of Usk salmon and stock status in 2020', published December 2020, which concludes:

- Adult stock status, based on catches, is likely to remain 'Probably at Risk'.
- This concern is reinforced by continued low abundance of juvenile salmon, indicated by a survey by the Wye & Usk Foundation.

This emphasises the need for the proposed measures. The report is available from the Usk Fishing Association: <https://uskfishing.us4.list-manage.com/track/click?u=918640d060971db9b067453bb&id=a00a171699&e=7497051cf8>

With regard to the meshes used on lave nets, the Technical Case says in the section on Preferred Fishery Management Options, 5.1.1:

The "Lave Net" interpretation in the byelaw shall allow an option for a sheet of netting with a smaller knotless mesh size to be used. This provides an option to reduce the risk of potential damage and increase survival chances of fish caught and released.

This option is included in the definition of a lave net in Byelaw 2. It seems perverse to allow lave nets to have a large, knotted mesh for catch & release instead of a smaller, knotless mesh. Anglers are required to use knotless mesh for landing nets to reduce damage to fish that are to be released. Logically, the same should apply to lave nets though I appreciate it might take time to source suitable materials. Also, it is not clear why there needs to be a minimum size of mesh for these nets to protect salmon. It would be better to have a maximum size of knotless mesh to reduce the risk of damage to salmon.

Guy Mawle, 12 March 2021