



## **Proposals for new fishing controls to protect salmon and sea trout stocks in Wales.**

### **Frequently asked questions.**

#### **Sections**

1. Conservation limits (CL) for salmon management .....	1
2. Sea trout ‘SR stock-recruitment’ approach .....	6
3. Juvenile salmon and trout.....	7
4. Nets, Net Limitation Orders and byelaws.....	8
5. Rod fishery, Catch and Release & Method control byelaws .....	11
6. Other issues.....	15
7. Timetable .....	19

#### **1. Conservation limits (CL) for salmon management**

##### **Q1 Why do you place such heavy reliance on catch returns when you assess CL compliance?**

##### **Answer**

Among the ~80 principal salmon and sea trout rivers in E&W, nine (Tyne, Test, Itchen, Hants Avon, Frome, Tamar, Fowey, Dee, Lune) are currently ‘monitored rivers’. As such, they operate counters/traps to provide estimates of the number of salmon (and in some cases sea trout) returning each year.

Four of these rivers – Tyne, Tamar, Dee and Lune are classed as ‘Index Rivers’ because of the additional biological information they collect on the stock (e.g. age, length, weight, sex, etc.)

Ideally, fishery independent measures of the salmon (and sea trout) run would be available on all rivers, but resources are limited and we probably don’t need that level of data anyway.

We DO, however, have catch data for all principal salmon and sea trout rivers. On these, we use figures on angling exploitation rate obtained from our network of monitored rivers to estimate – from rod catches – the numbers of adult spawners and their egg contribution to assess compliance with Conservation Limits (CLs).



**Q2 Relying on catch returns to make any assessment is flawed, licence return rates are poor and declining, and anglers may not declare what they catch.**

As indicated above, catch returns for salmon and sea trout are available for all principal rivers in E&W and are among our longest running and most consistent data sets.

Since the introduction of the current national rod catch return system in the early 1990s, the total number of rod licences sold each year in E&W has remained relatively stable (average around 33,000) as has the proportion of licencees making a catch return (average around 60%).

Most fish are caught by full and concessionary licence holders whereas short-term and junior licence holders catch very few fish. Taking account of these differences, estimates of the catch declaration rate (i.e. the proportion of the total catch declared) can be made. These estimates average around 90% and have been used as a nationally derived correction factor to produce total rod catch estimates for individual rivers from their declared catch figures. These total catch estimates are used in deriving annual egg deposition figures for assessment of compliance with Conservation Limits.

While no catch recording system is perfect it is clear that catch statistics provide some of the most valuable indicators of stock and fishery performance available. This is evident from (i) the common patterns present in sometimes disparate catch records collected over many years and (ii) the strong relationships that exist between rod catches and the fishery-independent estimates of run size obtained on our monitored rivers.

As such catch records can and do provide unique historical insight into the abundance and composition of salmon and sea trout stocks (e.g. required to explore and understand the effects of long-term processes – such as climate change – which may play out over decades) but are also clearly vital to current stock assessment procedures.

It is thus essential that catch recording systems remain as consistent and effective as possible in order to maintain the quality of data collected and ensure that the accuracy of associated assessments is not compromised. Maintaining the quality of catch records is not only the responsibility of the organisations charged with collecting catch data but also of fishermen who have a statutory duty to provide accurate catch information.



### **Q3 Is the Conservation Limit (CL) ambitious enough?**

#### **Answer**

Figure 1 in the technical report refers to three Biological Reference Points:

- Conservation Limit
- Management Target
- Maximum Smolt output:

The CL is set at the point of 'Maximum Sustainable Yield'; i.e. the point at which (for a given stock-recruitment (SR) curve and replacement line – see Fig 1) catches to the fisheries can be maximised.

Below the CL (a 'limit' reference point) stocks become increasingly vulnerable and risk collapse. Hence our 'management objective' is precautionary and aims to ensure that stocks remain above the CL four years out of five, on average. This equates to the Management Target – a point on the SR curve someway above the CL which is suitably protective of stocks (see Fig 1). Our statistical compliance procedures are designed to identify the status of stocks against the management objective.

The third reference point - Maximum Smolt output – could also have been used for stock assessment. This is the most protective of the three reference point as it seeks to allow sufficient fish to spawn to maximise the smolt output from a catchment; hence managing toward this point would require greater constraints on the fisheries.

### **Q4 What is the Decision Structure?**

#### **Answer**

The Decision Structure (Annex I) is a simple flow diagram to help identify the level and type of fishery management intervention required to address stocks assessed as formally passing ('not at risk') or failing ('at risk') their Conservation Limits, or in some intermediate position ('probably not at risk', 'probably at risk').

The Decision Structure has been used in salmon fishery management in E&W for many years now and so will be familiar to most external fisheries interests.



**Q5 Why are catches not as high as they used to be despite using CL to manage salmon stocks?**

**Answer**

Two main factors are likely to be suppressing salmon populations below the levels we have seen historically:

- (i) Poor marine survival – current survival rates are the lowest on record (Section 4.1) and less than a third of the rate evident ~30 years ago. This means, for example, that for every 100 smolts leaving the river, ~5 would survive to return as adults today compared to ~15 three decades ago. The decline in marine survival has affected salmon stocks across the North Atlantic range, and particularly fish in the southern north-east sector, including E&W.
- (ii) Poorer environmental quality than predicted by our salmon CL model (which assumes a pristine freshwater environment); i.e. the ‘carrying capacity’ of catchments in terms of smolt production is less than the ‘pristine’ benchmark. This is likely to be less universal as a factor than marine survival but could be locally important.

The reduction in marine survival is likely to be driven by adverse environmental conditions at sea which are probably linked to climate change. This is the subject of extensive research across the North Atlantic, including the NASCO SALSEA programme (see: <http://www.nasco.int/sas/salsea.htm>). Of course, there is not much we can do to remedy changing marine environmental conditions (aside from protecting estuarine and in-shore waters from harmful developments or illegal fisheries, etc.), so the increased restrictions on fisheries over the past 10-20 years have partly been required to compensate for the reduced marine survival of fish.

Factors which may be suppressing the production of fish in freshwater are examined in detail in Section 4; this includes reference to some of the management measures undertaken to address these.

**Q6 Why are you including non-principal and recovering salmon rivers in the proposals where you have not set or assessed CL or MT?**

**Answer**

Recovering rivers that do not yet have CL set are deemed to be ‘at risk’. This is because the main factors affecting returning adult salmon, particularly marine survival, affect all stocks in Wales.



There is no evidence that the stocks on these rivers are in any better shape than the principal salmon rivers. In fact due to the small size of the stocks they are probably far more vulnerable than the stocks in the salmon main rivers

**Q7 How will NRW account for the decline in anglers in the stock assessments after C&R? Less fishing = less fish = worse stock assessment**

**Answer**

There is a risk that the introduction of mandatory C&R and additional method controls will deter anglers from fishing - hence effort, and catches, will fall.

In part, methods used to estimate angling exploitation rate (used to derive run size from catch on rivers where there is no fishery independent count of the numbers of returning fish) take account of fishing effort – but it is widely recognised that these methods need to be improved. Work in this area is being progressed.

A second concern is that, on rivers where catches fall to very low levels – either because fewer anglers are fishing and/or because stocks continue to decline, then our assessment methods – which are so dependent on catch – could become very unreliable.

One way to address this is to make better use of other, fishery independent, information in the stock assessment process – namely electrofishing (EF) survey data on juvenile abundance. This is the approach used in Ireland, where results from low effort (5-minute) timed EF surveys – which allow a number of sites to be fished on the main catchments each year – are used to trigger the re-opening of fisheries which have been closed due to the poor status of stocks. In this case, a specified threshold (average) count of juvenile fish must be reached before a fishery can be reopened (and catch data become available again for use in stock assessment).

We will be exploring options for formally incorporating juvenile EF data in stock assessment procedures in the coming months. This is likely to involve the routine use of such data alongside catch data – not just when catches fall to very low levels or are even absent.



## **2. Sea trout 'SR stock-recruitment' approach**

### **Q8 Why have you brought in a new assessment method for sea trout?**

#### **Answer**

The method we have been using (for several years now) to assess sea trout has not been based on the performance of the stock but the performance of the fishery (angling 'catch per unit effort' or CPUE).

This has been the case because, in contrast to salmon, no established methods of setting Conservation Limits or similar 'Biological Reference Points' (BRPs) for sea trout have been available in E&W (or elsewhere). However, the need to develop such stock based methods for sea trout has long been recognised by fisheries biologists and managers, and this year an ICES Working Group has been established with that aim (this groups is set to report in 2019).

Prior to the start of the Working Group, NRW had already begun developing a stock-based assessment method for sea trout. This utilises angling catch data to derive run and egg deposition estimates for sea trout in much the same way that the similar data sets are used in Conservation Limit compliance procedures for salmon assessment in E&W. For example, applying assumed angling exploitation rates to catch data to derive run estimates; adopting standard sex ratios and weight-fecundity relationships to generate egg deposition figures.

These data sets are used to generate 'pseudo' stock and recruitment (SR) relationships for individual river stocks of sea trout, deriving from these relationships reference points that are broadly equivalent to the Conservation Limits and Management Targets used in salmon assessment and which allow use of the same trend-based statistical compliance procedures to assess the 'risk' status of the stock. The details of this method are described in Section 2.4.

As such, the 'pseudo' stock based approach is likely to provide a more biologically meaningful assessment method than the CPUE method, particularly as it estimates the sea trout production potential or 'carrying capacity' of each river catchment, and sets and evaluates related reference points which are protective of the stock. In addition, the units of assessment – as spawners or eggs – are more straight forward to interpret than CPUE when determining appropriate management responses.

For these reasons, the 'pseudo' stock based assessment has been applied in this Technical Case. As the first broad scale application of this approach, outputs should be closely scrutinised and interpreted carefully. Future refinements are likely. The 'pseudo' stock based method, among others, is being examined by the ICES Working



Group and new or modified assessment methods are expected to result from the work of this group.

### **3. Juvenile salmon and trout**

#### **Q9 What has caused the sudden decline in the number of juvenile salmon and trout?**

##### **Answer**

Our annual fish monitoring in 2016 showed a marked reduction in the numbers of salmon and trout fry derived from spawning in the winter of 2015/16. There was also a broad reduction in numbers of older fish derived from spawning in 2014/15.

The results are unprecedented. The effect is wide scale across Wales and is also evident, to a variable extent, in England, Ireland and France. This implies that a broad-scale common factor is implicated, however other issues may well be of significance on a more local scale.

2015 was the warmest year on record (2016 has since beaten that) and, specifically, the year saw the warmest spawning season on record by some margin with record temperatures for December. This resulted in water temperatures that have previously been widely reported in the literature to cause spawning failure.

Although high temperatures are implicated, other more localised factors including damage arising from very high December flows and in some cases a shortfall in numbers of spawning fish, might also be involved.

The significant and wide scale effect of this will be poorer returns of adult salmon and sea trout in many rivers in 2018-2021, but particularly so in 2019 and 2020.

#### **Q10 What will be the outcome of the reduction in numbers in juvenile fish?**

##### **Answer**

The significant and wide scale effect of the reduction in juvenile fish are anticipated to result in poorer returns of adult salmon and sea trout in many of our rivers between 2019-2021,

We would expect particularly low runs of fish in 2019 and 2020.



**Q11 You are over-reacting to one bad year of juvenile data.**

**Answer**

Although the juvenile data from 2016 were unprecedented in the scale of salmon fry in particular, there are worrying downwards trends in juvenile salmon and trout in many of our rivers. The results for 2015 also showed a decline in the majority of our rivers.

Juvenile data is just part of the evidence base supporting this consultation. Much of the evidence to back up this consultation is based on adult return rates and rod catches.

**Q12 Why act now, shouldn't we wait until 2019?**

**Answer**

No - we must not delay. Our current assessments have shown that salmon stocks and some sea trout stocks are already under a great deal of stress and increasingly vulnerable.

This additional evidence indicates we need to take urgent action to ensure stocks are not made increasingly vulnerable by allowing an unsustainable harvest of fish when there are currently not enough fish returning to spawn to sustain current populations.

**4. Nets, Net Limitation Orders and byelaws**

**Q13 Why are you not reducing the number of nets?**

**Answer**

Net Limitation Orders (NLO's) are a relatively blunt regulatory tool, and only restrict the number of nets that may fish. Our previous experience is that even when reducing the number of licences available, netsmen are legally afforded certain protection as long as they continue to take out their licence each year.

Many current licencees do not elect to fish very frequently.

Therefore a reducing NLO always takes a long time to take effect (it previously took some 6-8 years to reduce the number of licences on the Cleddau from 8 to 6 following the 2007 NLO).

We believe it will be much more effective to control catch by the introduction of byelaws to control catches.

Maintaining the numbers of licences available does afford some protection to the heritage fisheries by maintaining current numbers of participation by licencees.





**Q14 C&R of fish from nets is a nonsense, survival will be very low.**

**Answer**

If handled appropriately survival of fish caught in nets can be high.

Salmon and sea trout used in tracking studies on the Tywi and Dee in the 1980's and 1990s were caught by licenced nets men in the estuary. These fish survived and were tracked throughout the river system to the spawning season commenced.

It has been suggested that coracle fish are 'gilled' and won't survive. However coracle nets are more similar to trammel nets rather than gill nets in how they work, and so capture fish are 'bagged' rather than 'gilled'.

Once a fish is in the net, it is retrieved to the coracle, and is not left in the net where it may become meshed and might suffocate.

It is also important to note that the coracles and seine nets have been practicing C&R since the introduction of the National Spring Salmon Byelaws in 1999, from which a number were exempted. This is an important precedent.

**Q15 There's no place for netting whilst stocks are 'at risk'.**

**Answer**

We agree. Only sustainable stocks may be fished without any over constraint or limitation.

Our approach is that we urgently need to reduce exploitation to zero for salmon whilst stocks are at risk.

The total catch of salmon by Welsh nets is low, and on average over the last 5 years is less than 200. The nets are mainly targeting sea trout of which the average catch is around 1,600.

Whilst we also have concerns about many of our sea trout stocks they are not presently as vulnerable as those of salmon, and therefore some harvest can take place. However many need to be restored to sustainability and so some control is required.

In considering our overall approach we have attempted to treat both rod and net fisheries equitably.



We have proposed measures to contribute to a return to sustainability. Under these:

- a. all salmon are to be released
- b. the delay in season opening until 1<sup>st</sup> May will protect early running generally larger multiple spawning sea trout. Salmon which would have been caught and released will not now be caught at all.
- c. all netting will cease on 31<sup>st</sup> August, after which the catch of salmon has been generally similar to the low number of sea trout caught.

Closing both rod and net fisheries is an option we have considered, however we are mindful to maintain the socio economics associated with these fisheries.

#### **Q16 How will this affect heritage net fisheries?**

##### **Answer**

We have been mindful during our approach of the interest in maintaining the heritage of unique fishing methods and fisheries

Stock sustainability will take precedence over maintaining any fishing method.

The maintenance of heritage however is not necessarily dependant on continuing the recent levels of catch.

In our approach we believe we have maintained a balanced approach so that some harvest can take place whilst making a significant commitment to increasing spawning escapement

#### **Q17 Will the net licence fee be reduced to reflect the release of salmon and the reduction in sea trout season?**

##### **Answer**

Net duties will remain unchanged for 2018. There are no current plans to undertake a comprehensive review of existing net duties.

Net licence duties were last changed in 2007, and they currently bring in an annual licence income of around £16,000 per year in Wales. The fees do not currently cover the costs of the services they receive (and neither does the rod licence cover those respective costs).

There is a marked difference between the costs of individual licences in the various net fisheries, ranging from £79-£582 per licence. Net duties were originally set based on average catch per licensee in the individual fisheries.



We will consider how new fishery restrictions will impact average catch per licensee in the various fisheries before reviewing.

**Q18 Will a net buyout be offered?**

**Answer**

No it will not be offered by NRW as there is an established principle of not using public money to fund the buyout of net fisheries.

Where private fishing interests are willing to seek such closure, perhaps by compensating netsmen to stop netting, we may offer to facilitate discussions in order to assist parties to reach a mutually acceptable agreement. No public money should be used to compensate netsmen.

**5. Rod fishery, Catch and Release & Method control byelaws**

**Q19 How long will the proposals last for?**

**Answer**

We have proposed that the new measures should be in place for 10 years, with a review after 5 years. The 10-year period is approximately equal to 2 full generations of salmon.

We would like to explore options in the future to implement more considered changes on an annual basis where fishing controls could potentially change on an annual basis (such as that seen in Ireland and Scotland).

**Q20 Why are border rivers (e.g. Dee, Severn and Wye) not included in the proposed 'All Wales' catch controls?**

**Answer**

We are mindful that the Wye already has a set of measures (including statutory C&R to protect salmon) scheduled to run until 2021 and our previous commitments to these. The Severn salmon fishery is predominantly in England and the Environment Agency will take the lead for measures on the Severn catchment following their '5 point approach'. Whilst on the Dee salmon fishery is predominantly in Wales there are some parts of the river in England and NRW takes the lead on the integrated approach.

We propose to include catch control measures in a joint "Border rivers byelaws" with the Environment Agency, which will be subject to a joint consultation with the Environment Agency later this year.



**Q21 Why is the Usk included in C&R when the stock assessment is probably 'Not at Risk'?**

**Answer**

Whilst the Usk is just achieving 'Probably Not at Risk', albeit by a very fine margin, it has dropped in and out of compliance and achieving its management objective and only marginally passes.

More importantly however, we believe that the risks around the reductions in juvenile salmon numbers is so great as to warrant introducing the measures to the Usk.

**Q22 Why ban bait fishing for salmon?**

**Answer**

Bait fishing has been shown to result in a relatively high level of mortality post release compared to that of other forms of salmon angling. Banning bait fishing ensures only methods commensurate with successful catch and release are used for salmon and in some cases sea trout fishing.

In our experience, anglers using worm generally intend to kill their catch.

**Q23 Why have you not banned bait fishing for sea trout?**

**Answer**

Listening to the feedback received from some of our public engagements, we are aware that many fisheries are primarily focused on sea trout. They may be difficult to fish with other methods such as fly and spinning except in high flows, and in several cases the stocks they are fishing for are sustainable. It is therefore a compromise to allow these methods to continue.

We believe that introducing measures to restrict the size of hook and to single worm will help reduce the bycatch of salmon. This will allow sea trout fisheries to effectively continue for sea trout whilst reducing the risks to salmon.



**Q24 Why exclude prawn from permissible bait fishing rules?**

**Answer**

Through discussions and feedback with stakeholders and evidence gathered, it is clear that fish caught on prawns are in the vast majority of cases hooked in the front of the mouth and therefore have a high chance of survival once released. However, we are also mindful that prawn fishing can be particularly effective in low water conditions during the summer when water temperatures are generally above 18 degrees Celsius. Salmon caught at these temperatures and above have a significantly reduced probability of surviving C&R.

**Q25 Are there proposals for a limit to the number of hook points on a lure or fly?**

**Answer**

Yes we propose to ban the use of treble hooks, whether used in bait, spinning or fly fishing.

There is a risk of 'bad' hooking of fish when using treble hooks. The hook points of a treble cannot be easily manipulated and removed from tissues independently. Therefore, the removal of treble hooks may require longer handling times. Use of single or double hooks may be considered a means of facilitating easier removal and reduced handling times.

**Q26 Will I be allowed to use sea trout surface lures and tubes with trebles as very few salmon are caught at night?**

**Answer**

The proposal is to ban the use of trebles for both salmon and sea trout.

Not using treble hooks is accepted good practice for C&R fishing. This proposed measure will help reduce the time required to unhook fish and handling times thereby aiding release by reducing the time that the fish is potentially out of the water.

Double hooks are not banned and we are aware that there are double hook designs now readily available for flies such as tubes.



**Q27 Why is there a 60cm slot limit (maximum landing size) proposed for sea trout?**

**Answer**

A sea trout of 60cm is just under 6lbs, these are normally multiple spawning. Using the Future Lifetime Egg (FLE) method, developed as part of our approach, these fish can be seen to be a valuable component of the spawning stock.

Reducing the kill of these fish in the rod fishery is proportionate with the proposed reductions in the net fisheries. It also targets the fish that have been saved as a result of the reductions in net catch

It is accepted that a 60cm limit will not affect many rivers, and has been suggested that 50cm may be appropriate in some catchments. We wanted to propose an all Wales measure for all sea trout stocks that would reflect the general concerns about spawning stocks. A 50cm would disproportionately target rivers such as the Tywi. Fisheries may of course voluntarily introduce their own more stringent measures.

**Q28 Catch and Releases won't make any difference, for example there is no evidence that the national spring salmon byelaws have worked.**

**Answer**

The National Spring Salmon Bylaws were part of a number of measures put in place in 1999 to halt the decline in the numbers of spring salmon in our rivers.

Since then some rivers are showing a slight increase in the number of spring fish returning (for example the Dee, Severn and the Wye), indicating that this appears to have been a success.

There is equally no evidence to suggest that it has not been of a benefit to salmon populations.

It is recognised that fisheries may not be the only or main driver of change in salmon stocks, nor will a reduction in exploitation on its own necessarily lead to Conservation Limits and Management objectives being attained quickly. However, it is clear that when stocks are below their conservation limit, reducing exploitation by fisheries will help towards more sustainable fisheries in the future



**Q29 If conditions continue to get worse do you envisage closing fisheries?**

**Answer**

Closure of fisheries is considered as an option within the technical case, however this is not a preferred option at the present time. In our approach we have been mindful to maintain socio-economic benefits that would be lost if fisheries were closed.

**6. Other issues**

**Q30 Why compulsory – surely voluntary measures would be best?**

**Answer**

We have been voicing and discussing the concerns about stocks and returning adult salmon and in some cases sea trout for a number of years, impressing the need for urgent voluntary measures.

During this time, there has been an increase in the number of fish being returned. There are some good examples where individual fisheries and some rivers have made significant efforts, however there are notable examples where this is not the case and it is not at an acceptable level.

On some of our 'At Risk' rivers, voluntary C&R rates are less than 60%.

Discussions and feedback suggest that clubs have taken voluntary measures as far as they can and it is up to NRW to bring in further measures if required.

It has also been suggested that we should bring in a level playing field for rivers. It should be noted that there is nothing preventing fishery owners taking additional more precautionary measures, and we certainly applaud the efforts of those that have already done so.

**Q31 What information will you use for the mid-term review? Will you abolish measures if stocks improve?**

**Answer**

We undertake and report annual reviews of stocks. We propose that a full review after 5 years would review the stock status, the effectiveness and the impact of measures.

In the meantime, there are no proposals for any review that might bring about cessation of measures within 5 years. This is because this is considered the minimum time period for a good outcome in terms of extra number so fish spawning.



We would also like to potentially look at options for annual reviews being able to 'switch on and off' rivers similar to the approaches now being taken in Ireland and Scotland

**Q32 Why are we not proposing bag limits?**

**Answer**

We believe there is currently no harvestable surplus of salmon and therefore a bag limit of even one fish would not fulfil our commitments and objectives.

Introduction of a bag limit can give the impression that there is an acceptable take of fish and create a target to aim for, potentially therefore encouraging more fish to be killed.

For it to be effective, we would also need to bring in a carcass tagging scheme, and we believe that this would be unnecessarily bureaucratic and expensive at the current time.

**Q33 If you introduce compulsory Catch and Release – won't I just need a trout and coarse licence?**

**Answer**

If you are targeting salmon or sea trout then you require a migratory rod licence.

Whilst we are proposing mandatory 100% C&R for salmon, there are extensive periods where sea trout can be taken, albeit that large sea trout must be released.

Cases have been successfully brought against anglers who have claimed to be fishing for brown trout or coarse fish, when they have actually been targeting salmon or sea trout.

The current rod licence covers fishing throughout England and Wales and whilst these measure are only for Wales, England is considering a different approach.





**Q34 You won't be able to enforce these controls with the lack of bailiffs.**

**Answer**

One of our three key priorities is 'A targeted approach to ensuring compliance with relevant legislation including byelaws, in our licenced net and rod fisheries'.

The present fisheries enforcement resource in Wales is 16.4 FTE fully warranted staff. We will take a targeted enforcement approach in response to the risks to fisheries and information received on illegal activity.

We are prepared to use the full range of our powers to tackle illegal fishing, although we must also consider and balance our actions with our responsibility as a proportionate and accountable regulator.

**Q35 Will licence sales go down as a result of these changes?**

**Answer**

Given information from other locations, we are aware that there may be a short term reduction in the number of licences sold. We must however balance this against the threat to stocks overall, and it is our position that a short term decline may be an essential step towards restoring stocks to sustainability.

We will continue to monitor both sales and fishing effort annually, and will include this in our review.

**Q36 Other issues are threatening fish abundance what are you doing to tackle these?**

**Answer**

It is acknowledged that catches are not the causative issue around poor and vulnerable stocks. However killing of fish whilst stocks are unsustainable cannot be allowed to continue and threaten stocks further.

We have therefore followed international advice on managing fish stocks.

Section 5, "Challenges to stocks" gives more information on the factors affecting stocks and how we are tackling them. They are considered to illustrate that we acknowledge their importance, and that we have considered these issues in formulating our proposals for catch controls.

The challenges considered are: Marine survival of salmonids, Water quantity, Water quality, Agricultural pollution, The Wales Land Management Forum, Forestry, Predatory birds, Disease and Parasites, Illegal fishing



**Q37 Stocking would increase the number of fish returning to Welsh rivers, so why did NRW ban stocking?**

**Answer**

A full review of stocking and its impacts and potential risk was carried out by NRW and as a result of the potential negative impacts all salmon and sea trout stocking was brought to a close. No further stocking schemes, other than those confirmed to be required for closely specified and targeted research and, in very extreme cases, restoration will be permitted.

**Q38 What is the point in responding to the consultation when you have already made up your minds?**

**Answer**

We will consider and respond to any representations received in response to our proposals. We will seek to encourage objections to be withdrawn. All extant objections will be included in our report and recommendations for approval submitted to the WG Cabinet Secretary.

We have already had a year or so of discussions with fisheries groups and analysed the answers from a questionnaire about exploitation controls. During this process we have listened to the views expressed and amended our approach and proposals.

**Q39 Will clubs be paid compensation for loss of members?**

**Answer**

No. As with net buyouts, public money will not be used to compensate for reductions in membership of clubs. Some clubs have seen a reduction over the past decade or so, whilst others have reversed the trend and have seen an increase in membership, especially juniors.

We are mindful of this potential effect and will direct the work of our Sustainable Fisheries Programme to help clubs and associations in maintaining participation levels.



**Q40 Bag limits and tags. Why couldn't you introduce a tagging system and allow one tag?**

**Answer**

Bag limits can in many circumstances help to ensure our resources remain sustainable for future generations. However while bag limits assist in sharing the resource we believe that none of our salmon stocks are currently in a state to sustain a harvestable surplus.

It would be difficult to issue tags with the current rod licence system which covers England and Wales, and we would need to consider a separate system.

Issuing a single tag would give the impression that stocks were sustainable and surplus of spawners. We do not believe that any of the salmon stocks currently have a harvestable surplus.

**Q41 What do I do with a dead or dying fish?**

**Answer**

It is unfortunately an inevitability that there will occasionally be a mortality from angling. This is an accepted consequence, although we hope that the frequency of this will be very low – especially given the requirements of method control.

Our experience on the Wye is happily that mortality of rod-caught fish is low.

The risks around keeping rivers open and allowing fishing to continue maintains the social and economic benefits whilst trying to protect stocks in the river.

If a fish dies after capture the fish should be left in the river and the angler should phone our customer care centre (0300 0653000). If we can, we will collect the carcass from the river. We may be able to get valuable biological information from the carcass.

## **7. Timetable**

**Q42 Will any changes be brought into effect for the 2018 fishing season?**

**Answer**

The aim is for the measures to be in place for the start of the 2018 season.



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

Frequently asked questions.

**Q43 Where can I get more information?**

Answer

If you have any queries, please contact us on 0300 065 3000 or by emailing [Fisheries.Wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.Wales@cyfoethnaturiolcymru.gov.uk)