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De Cymru/South Wales:
secretary@ogmoreanglingassociation.com

17th December 2010

Messrs Julian Bray and Alan Winstone,
Environment Agency Wales
Head Office
Bangor

By email

Dear Sirs,

Re: Proposed amendments to the North Wales Fisheries Byelaws

I write to express the views of the Campaign for the Protection of Welsh Fisheries regarding the proposed changes to the North Wales Fisheries Byelaws, in the hope that these views may be taken into account during your deliberations on the matter.

You state that the byelaw changes proposed are intended to:

1. Protect migratory fish stocks, particularly salmon.
2. Increase angling and the revenue it generates
3. Simplify angling regulations

We are of the view that, given the level of enforcement staff currently available, consideration should reasonably be given to the deterrent effect of the presence of legitimate anglers on the riverbank and therefore applaud the proposed extension to the end of the current season. The loss of early season fishing, during a period when generally the run of fish on most rivers is limited, being considered a price worth paying for the proposed extension: however on rivers that boast an early run of fish this may not be the case.

Any loss of bait fishing, we believe to be a serious concern. For the following reasons:

- A) We believe it to be discriminatory against older or infirm anglers.
- B) Some of our rivers are considered unsuitable fly or spin fishing waters during normal summer water heights, the loss of bait fishing opportunities may well therefore have a serious detrimental effect on clubs and societies dependent upon such rivers.
- C) Potential loss of deterrent effect of anglers on the river bank when low water conditions are suitable for poaching.
- D) Bait fishing is practiced by younger anglers during their "introductory" period to the sport, before they learn to use the fly or spinner. Loss of any fishing that may encourage juniors to take up the sport may have serious long term consequences.

However we do acknowledge that the current high rate of fish mortality as a consequence of bait fishing as it is generally practiced is unacceptable and must be addressed. We feel that this could be achieved by the use of non offset circle hooks, with minimum hook sizes stipulated to minimise the risk of

"yr ymgyrch mater unigol ar ran genweirwyr Cymru: lleol ac ymwelwyr."
"The single issue campaign on behalf of the anglers of Wales: local and visiting"

damage to immature fish. We believe that research currently undertaken worldwide has reasonably established this. If byelaw changes to hook types would prove difficult, then they could be recommended and anglers encouraged to make the change voluntarily. We believe legitimate anglers would make this change willingly, those who are less scrupulous would perhaps be more readily identified by their hook usage, thus making targeted enforcement potentially easier. This approach could be taken for a trial period with anglers encouraged to participate by education.

In view of the above we would like to see bait fishing allowed from 1st April to the 31st October following.

We believe that fly and spin fishing should also be allowed during the aforementioned period. However we acknowledge that spin fishing can be the cause of severe damage to fish as a consequence of deep hooking or difficult hook removal. We therefore suggest that all spinners be mounted with a single hook.

Whilst it cannot be guaranteed, generally water conditions later in the year tend to be more suitable for both fly and spin fishing, so we would like to see both methods of fishing allowed from the period 1st November to the 15th November. We believe this will offer the following benefits.

- a) It will enable evidence to continue to be gathered regarding the later run of fish and thereby the health of the fish stocks in the river.
- b) The continued presence of anglers of the riverbank during this extended period will act as a deterrent to illegal fisheries activity and provide more “eyes on the ground.”

We acknowledge that increasing the levels of fish mortality by whatever means, including anglers killing fish to take for the table, is unacceptable and so would agree that catch and release should apply to period 1st to 15th November.

We make these suggestions on the basis that we feel the angling community has done all in its power to work with the Agency for a number of years and have participated in the following:

- i. Buying out nets
- ii. Agreeing to reduced seasons
- iii. Carrying out sampling
- iv. Producing river surveys
- v. Working hard to educate anglers to change attitudes.

We also acknowledge that the attitude currently prevalent amongst many anglers, when it comes to returning fish, is a disgrace to the sport. However attitudes have been changed markedly over the years and more and more anglers are coming to see that they cannot continue to kill salmon and sea trout at the rate currently applicable on many fisheries. Many anglers are not returning fish and the numbers continue to increase. We believe in the “carrot and stick”, in that by agreement to the suggestions above the Agency would be acknowledging the efforts made by many anglers to reduce their fish kill rate. The stick: that the byelaw changes be introduced for a five year trial period, during which time a target voluntary return target must be achieved.

There can be little doubt that the catch and return rate is much skewed by the fact that salmon are far from easily caught, as a consequence the individual anglers catch is somewhat limited and multiple catches in a year far less numerous than catches of just one or two fish. The consequence is that if one fish is kept from a catch of two then a 50% return rate is the consequence. It would seem therefore logical that the setting of any catch limit above zero can have little effect. That is to say a catch limit of two would appear to give permission to take two fish rather than to encourage the voluntary return of fish. The Campaign is therefore against the setting of any bag limit, as it believes this will be taken as the granting of permission to take fish.

We are of the view that anglers, or all kinds, generally have the interests of the environment as well as their quarry at heart. Not many years ago most trout anglers would have thought little of killing their catch for the pot. Today the reverse is the case: many rivers are becoming wild trout fisheries dedicated to the preservation of wild fish with perhaps the introduction of a few farmed fish for the occasional angler to take for the pot. Who could have envisaged such change? Similarly a few years ago, salmon anglers would have taken 100% of their catch, and boasted the fact among the salmon angling fraternity. Today salmon anglers are following a similar path to the wild trout anglers. Which of them today would proudly boast of killing a number of fish? More to the point perhaps, which of their fellows would applaud the act today? Education, education and education will address the issue and in the long term bring about the desired result: the saving of our salmon.

The Agency has made claim to working with the angling community and the angling community has, for the most part, risen to the challenge. We at the Campaign believe the time has come to put faith in the angling community to address this issue for itself as anglers will continue to fight ignorance with education. The Agency, through no fault of its own, lacks the resources to monitor or police these proposed changes and is increasingly seeking the willing assistance of anglers to protect **our** fisheries. The damage being done to our salmon and sea trout stock is not by legitimate and law abiding anglers who buy their rod licences, but by those who flout the law by purchasing the cheaper licence to fish for trout, but fish for salmon and sea trout unchallenged, or those criminals who take more from the river in a night of poaching than many an angler will take in years.

The proposed byelaw changes risk resentment and ill feeling at a time when we find ourselves in times that require co-operation and partnership. Whatever changes are made, legitimate anglers will comply: the same cannot be said of all that extract salmon and sea trout from our fisheries! Perhaps the time has come for the Agency to put some trust and faith in the law abiding anglers?

We hope you will give due consideration to our views and look forward to the outcome of your deliberation.

Yours faithfully,

Campaign for the Protection of Welsh Fisheries.