

Appendix 1: question and response form

Section 1: Your details

We would like to find out about where you fish and/or the type of salmon fisheries you are engaged with or have an interest in. By giving us this information we will be able to better understand the answers you have provided to the consultation questions. This information will also help us to record accurately those who have responded to this consultation and ensure that we have received responses from all sectors which may be affected by any new salmon fisheries management approaches. Your details will only be kept for this consultation and any future work directly related to this.

Q. 1a) - about yourself

Please tell us which one of the following categories best describes your **primary** interest in salmon/sea trout. Please select one option.

- I am a licensed salmon/sea trout net fishermen or operate a fixed engine to catch them.
- I am a salmon/sea trout rod and line angler.
- I represent a group of individuals who fish for salmon/sea trout (please tell us the name of the group)
- I own or lease salmon/sea trout fishing

X **I represent a salmon/sea trout conservation or environmental conservation organisation (please tell us the name of your organisation)...**

The Angling Trust, the recognised National Governing Body of angling, which represents 1,700 angling clubs, 350 fisheries/riparian owners and 12,000 individual anglers. The Trust is actively involved with Defra and the Environment Agency in identifying ways to deliver the 5PA to restoring salmon stocks in England, and has been involved in preparing proposals to reduce exploitation by rods and nets.

- I am involved in the catering industry and buy/sell wild salmon/sea trout (fish retailer, fishmonger, restaurateur, etc.)
- I am involved in the tackle trade for salmon/sea trout angling
- Response from Defra family/Non-Governmental Organisation
- Other (please specify)

If more than one of these categories applies to you please tell us which of the others do.

Q. 1b) - What part of the country do you have an interest in?

Please tell us where you **primarily** fish for salmon/sea trout or where the salmon/sea trout that support your business are from. You can select more than one option if you wish.

X The North East (Northumberland and Yorkshire)

Managing salmon fisheries in England and on the Border Esk

- X The East, Thames and South East
- X The Southern Chalkstreams (Itchen, Test, Hampshire Avon, Dorset Stout, Dorset Frome and Piddle)
- X The South West (Devon and Cornwall plus West Somerset)
- X The Severn
- X The North West (Lancashire, Cumbria and Border Esk)
- X National
- X Other e.g. Ireland / Wales (please specify) ...Wales and Scotland.....

If you are a member of a salmon and/or sea trout fishing club/organisation or an organisation that represents anglers, net and fixed engine fishermen or the interests of salmon/sea trout/wider conservation; then please tell us which organisation you are a member of. ... Fish Legal

Please tell us if you would like to (tick all that apply):

- Receive an email acknowledging your response
- Receive an email to let you know that the summary of responses has been published

If you have ticked any of the boxes above, please provide us with your email address:

Email: ...mark.lloyd@anglingtrust.net.....

Can we publish parts of your response that are not personally identifiable or contain financial information?

Please select only one item

Yes

If no, please explain why.

Please tell us how you found out about this consultation:

- X From the Environment Agency
- From another organisation
- Through an organisation you're a member of
- Press article
- Social media e.g. Facebook, Twitter
- Through a meeting you attended
- Other (please specify)

How we will use your information

- The Environment Agency will look to make all responses publicly available during and after the consultation, unless you have specifically requested that we keep your response confidential.
- We will not publish names of individuals who respond.
- We will not disclose financial or other individual specific information that could inadvertently identify an individual or his / her business.
- We will also publish a summary of responses on our website in which we will publish the name of the organisation for those responses made on behalf of organisations.
- In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

Returning your response

Your response to this consultation needs to be returned by Monday 9 October 2017.

We would like you to use this form if you are not submitting your response online. You can add extra documents supporting any responses that you make, but please make it very clear as to which question this additional information is for. You can return it by email to S5PA@environment-agency.gov.uk. Please use this email address if you have any questions regarding this consultation.

Or by post to:

FAO Salmon Consultation Team
Environment Agency
Rivers House
Sunrise Business Park
Higher Shaftesbury Road
Blandford Forum
DT11 8ST

Section 2: introduction to the Salmon Five Point Approach

Q. 2.2a) - refers to our technical case that supports this consultation

To what extent do you agree with the summary of the current state of salmon stocks and the supporting information provided in Appendix 2?

- Wholly
- Partially
- Not at all

Please give your reasons and any evidence you have to support your answer.

We believe that the stock assessment methodology should be reviewed after this consultation is complete and the recommendations arising from it have been implemented to explore the possibility of modifying the methodology to provide more confidence in it among anglers, and a clearer understanding of the basis for the assessment.

3: deciding which salmon stocks need further protection

Q. 3.2a) - this question is asking for your views about taking salmon from rivers that are failing to produce enough salmon to maintain populations

To what extent do you agree that a salmon stock should be subject to additional protection from net/fixed engine and rod exploitation if it is classified as either At Risk or Probably at Risk of failing to meet its Management Objective?

- X Wholly
- Partially
- Not at all

Please give your reasons and any evidence you have to support your answer. If you would like to provide us with an alternative approach then please do so.

We believe that both net and rod exploitation should be reduced on these categories of rivers but that nets should be mandatory and rods should be on a voluntary basis to reflect that fact that nets kill more than ten times the number of fish that anglers do and yet the rod fishery provides socio-economic benefits which far outweigh those of the net fishery. Voluntary catch and release is also clearly not a viable option for the nets.

Anglers make a huge contribution in time and money to voluntary conservation and river improvement initiatives, as well as reporting pollution, poaching and other incidents on rivers. Imposition of mandatory measures could damage this good will and would drive anglers away from fishing, even if they already release all the fish they catch.

Section 4: review of existing National Salmon Byelaws

This section looks at the existing National Salmon Byelaws which protect spring salmon stocks, these were first made in 1999 and renewed for a further 10-year period in December

2008. Government has asked us to review these every 10 years, so this is a good opportunity to ask for views on whether you feel that the current measures should continue, stop or be amended.

The measures to protect spring salmon were introduced in response to a widespread decline in stocks of large, early-running, multi-sea-winter salmon in the 1980s and 1990s. It was determined that exploitation needed to be significantly reduced in order to better protect this important stock component. In summary, the byelaws prevent netsmen from killing, and in most cases fishing for, salmon before June 1; derogations are applied to some fisheries where netting is predominantly for sea trout, on the basis that any salmon caught are returned alive. For rod fisheries, the measures require any fish caught by rod and line before 16 June to be returned, and also restrict the methods that anglers can use at this time to artificial flies or lures. These byelaws also set out the end of the close season for fishing for salmon and migratory trout other than with rod and line.

Q. 4.2a) - this question is about the current (spring) salmon byelaws

Do you agree with the proposal to renew without amendments the existing National Salmon Byelaws to protect spring salmon stocks?

- Wholly
- Partially
- Not at all

Please give your reasons and any evidence you have to support your answer.

We fully support retention of the current (spring) byelaw in relation to rod fishing but disagree with the retention of pre-1 June netting for sea trout on two counts:

1. The early run large sea trout which are targeted by nets pre-1 June are mostly female and a major contributor to egg deposition. They are also highly prized by anglers and make an important socio-economic contribution which outweighs that from net-caught fish. On many rivers there are voluntary measures by anglers to conserve these valuable fish.
2. Any salmon caught in a pre-1 June 'sea trout fishery', the stock which the National Byelaw is designed to protect, are likely to be damaged with decreased probability of survival to spawn.

Section 5: possible options for salmon net and fixed engine fisheries

Questions 5.2a – 5.2n relate to net and fixed engine fisheries in England and on the Border Esk, except the North East Coast Net Fishery. These questions are directed at those who fish in, or whose business is supported by, these fisheries.

Questions 5.3a – 5.3l relate to the North East Coast Net Fishery. These questions are directed at those who fish in, or whose business is supported by, the North East Coast Net Fishery.

Questions 5.4a - 5.4e give the opportunity for all consultees to provide their views on the options for net and fixed engine fisheries.

Section 5.2: possible options for salmon net and fixed engine fisheries in England and on the Border Esk, except the North East Coast Net Fishery

Questions 5.2a, 5.2b, 5.2e to 5.2k are for net and fixed engine fishermen.

Questions 5.2c and 5.2l are for businesses that are supplied with wild salmon and sea trout from English and Border Esk fisheries.

Questions 5.2d, 5.2m and 5.2n are for net and fixed engine fishermen and the businesses that they supply to.

Q. 5.2a) – this question is for net and fixed engine fishermen.

If you were no longer able to fish for salmon or sea trout, what would be the consequences for you?

Please provide us with details of both financial and cultural (i.e. traditions within your community and/or how you spend time within your local environment). Ideally, please use the last 5 years of income to support your answer.

Q. 5.2b) – this question is for net and fixed engine fishermen, it relates to other fishing prospects

What are the opportunities for you to fish for other species if you could no longer fish for salmon or sea trout (e.g. white fish or crustaceans)?

If there are any please provide us with an estimated breakdown of the costs you would incur to switch to a different target species. Please indicate whether you would need to purchase quotas/different equipment.

Q. 5.2c) – this is for businesses that are supplied with wild salmon and sea trout from English and Border Esk fisheries

Please provide details of the impact of stopping the supply of salmon and sea trout from the English and Border Esk fisheries that you buy from.

These impacts could be either financial and/or social. Ideally, please use the last 5 years of income to support your answer.

Q. 5.2d) – this is for net and fixed engine fishermen and the businesses that they supply to

Please provide any other options for reducing the exploitation of salmon by your fishery that you would like us to consider.

Please provide details of these and why you would find them preferable to the possible options set out in Section 5.2: Table 2.

These questions are exploring future sea trout fishery options for net or fixed engine fishermen (except the North East Coast Net Fishery).

Q. 5.2e) – this question is for net and fixed engine fishermen

Do you consider that your fishing gear and how it is fished enables salmon to be released alive immediately after capture?

- Yes
- No
- I don't know

If you wish, please provide us with your reasons for this answer.

Q. 5.2f) – this question is for net and fixed engine fishermen

Do you fish in attendance with your nets or do you set them and return?

- Yes – in attendance
- No – set and return

Q. 5.2g) – this question is for net and fixed engine fishermen

Do you currently release salmon as a result of existing controls on your fishery?

- Yes
- No

If yes, please provide us with details of why this is.

Q. 5.2h) – this question is for net and fixed engine fishermen

What type of gear do you use when fishing for salmon and/or sea trout? Please provide details.

Q. 5.2i) - this question is for net and fixed engine fishermen

Do you consider that your fishing gear and how it is fished enables salmon to be released with minimal damage?

- Yes
- No
- I don't know

Please provide us with information of the type of damage (e.g. scale loss or fin damage) that you see on the fish that you catch.

Q. 5.2j) - this question is for net and fixed engine fishermen

Would altering your gear make it easier to release and/or cause less damage to salmon?

- Yes
- No
- I don't know

Please provide details and an estimate of the cost if you consider this an option.

Q. 5.2k) - this question is for net and fixed engine fishermen

If you could release salmon and continue to take the sea trout that you catch would you continue to fish for sea trout?

- Yes
- No
- I don't know

If you wish, please provide us with your reasons for this answer.

Q. 5.2l) - this is for businesses that are supplied with wild salmon and sea trout from English and Border Esk fisheries

Please provide details of the impact of stopping the supply of salmon only from the English and Border Esk fisheries that you buy from.

These impacts could be either financial and/or social/cultural. Ideally, please use the last 5 years of income to support your answer.

These questions relate to the impact of the proposed timescale of the measures for net and fixed engine salmon and sea trout fisheries in England and on the Border Esk (except the North East Coast Net Fishery).

Q. 5.2m) - this question is for net and fixed engine fishermen and the businesses that they supply to

If fishing for salmon was required to cease, is there a date later than 2018 that would be economically easier to work towards?

Managing salmon fisheries in England and on the Border Esk

- Yes Date?
- No
- I don't know

Please provide details of why a later date would reduce the impact of closure. These impacts could be either financial and/or social/cultural.

Q. 5.2n) - this question is for net and fixed engine fishermen and the businesses that they supply to

How long do you consider the measures covering a fishery should be in place for?

- 5 Years
- 10 Years
- Other – please give details

Please provide details of why you have given this answer.

Section 5.3: this section is specifically for the North East Coast Net Fishery

Questions 5.3a and 5.3b are for North East Coast drift net licence holders.

Questions 5.3c to 5.3i are for North East Coast beach net licence holders.

Question 5.3j is for businesses that are supplied with wild salmon and sea trout from the North East Coast Net Fishery.

Questions 5.3k and 5.3l are for North East Coast drift and beach net licence holders and the businesses that they supply to.

Q. 5.3a) - this question is for North East Coast drift net licence holders

What implications would the closure of the drift net fishery prior to the end of the 2022 season have for you?

Please provide details of the impact (whether this is financial and/or social) on an annual basis. Ideally, please use the last 5 years of income to support your answer.

Q. 5.3b) - this question is for North East Coast drift net licence holders

Are there opportunities for you to fish for other species (e.g. white fish or crustaceans) if the drift net fishery closed prior to the end of the 2022 season?

- Yes
- No
- I don't know

If there are please provide us with an estimate of the cost you would incur to switch to a different target species. Please indicate whether a change would require you to purchase quotas as well as any expenses around equipment.

Q. 5.3c) - this question is for North East Coast beach net licence holders

Do you consider that your fishing gear and how it is fished enables salmon to be released alive immediately after capture?

- Yes
- No
- I don't know

Please provide details of the gear that you use and whether you currently release salmon as a result of existing controls on your fishery.

Q. 5.3d) - this question is for North East Coast beach net licence holders

Do you consider that your fishing gear and how it is fished enables salmon to be released with minimal damage?

- Yes
- No
- I don't know

Please provide us with information of the type of damage (e.g. scale loss or fin damage) that you see on the fish that you catch.

Q. 5.3e) - this question is for North East Coast beach net licence holders

With regard to the release of salmon and any damage that is caused, is there a difference in damage if it is grilse or multi sea winter salmon that are caught?

- Yes, there is a difference in damage
- No, there is not a difference in damage
- I don't know

Please provide details if you have answered yes.

Q. 5.3f) - this question is for North East Coast beach net licence holders

Would altering your gear or the way it is fished make it easier to release and/or cause less damage to salmon?

- Yes
- No
- I don't know

Please provide details and an estimate of the cost if you consider this an option.

Q. 5.3g) - this question is for North East Coast beach net licence holders

If you could release salmon and continue to take the sea trout that you catch would you continue to fish for sea trout?

- Yes
- No
- I don't know

If you wish, please provide us with your reasons for this answer.

Q. 5.3h) - this question is for North East Coast beach net licence holders

What implications would the closure of the beach net fishery have for you?

Please provide details of the impact (whether this is financial and/or social) on an annual basis. Ideally, please use the last 5 years of income to support your answer.

Q. 5.3i) This question is for North East Coast beach net licence holders

Are there opportunities for you to fish for other species (e.g. white fish or crustaceans) if the beach net fishery were to close?

- Yes
- No
- I don't know

If there are please provide us with an estimate of the cost you would incur to switch to a different target species. Please indicate whether a change would require you to purchase quotas as well as any expenses around equipment.

Q.5.3j) - this is for businesses that are supplied with wild salmon and sea trout from the North East Coast Net Fishery

Please provide details of the impact of the stopping of supply of salmon only from the North East Coast fishery.

These impacts could be either financial and/or social/cultural. Ideally, please use the last 5 years of income to support your answer.

Q. 5.3k) - this question is for North East Coast drift and beach net fishermen and the businesses that they supply to

If fishing was required to cease, is there a date later than 2018 that would be economically easier to work towards?

- Yes Date?
- No
- I don't know

Please provide details of why a later date would reduce the impact of closure. These impacts could be either financial and/or social/cultural.

Q. 5.3I) - this question is for North East Coast drift and beach net fishermen and the businesses that they supply to

Are there other options for reducing the exploitation of salmon by your fishery that you would like us to consider?

- Yes
- No
- I don't know

Please provide details of these and why you would find them preferable to the options that we have provided.

Section 5.4: seeking all consultees' views on the options for net and fixed engine fisheries in England and on the Border Esk and the options set out for the North East Coast Net Fishery

Questions 5.4a, 5.4b and 5.4c relate to all net and fixed engine fisheries in England and on the Border Esk, except the North East Coast Net Fishery.

Questions 5.4d and 5.4e relate to only the North East Coast Net Fishery.

Q. 5.4a) - seeking all consultees' views on the options for net and fixed engine fisheries in England and on the Border Esk (except North East Coast Net Fishery Options).

Which is your preferred option for net and fixed engine fisheries as set out in Section 5.2: Table 2?

- Option 1
- X Option 2
- Option 3
- Option 4
- I don't have a preferred option

Please provide details of why you have given this answer.

We believe that salmon fishery management should be on a river by river basis with the flexibility to distribute harvestable surplus between rods and nets with proper reference to their relative socio-economic value and contribution to wider environmental conservation, hence the support of Option 2 (National Byelaw prohibiting net fishing on all PaR rivers).

Option 3 (National Byelaw prohibiting netting on all AR rivers) does not go far enough to tackle the impact of the commercial exploitation of salmon in nets given that anglers are already releasing the vast majority (and no many rivers nearly 100%) of the fish that they catch on PaR rivers.

Option 4 (revised NLOs and catch/effort controls to reduce exploitation to zero) does not provide the rapid and urgent response needed to declining stocks. The current effort controls (NLOs, annual and weekly close times) are ineffective in managing exploitation because they are poorly enforced, require substantial investment of time to administer by a fisheries team

at the Environment Agency which has already been greatly reduced in number due to government funding cuts and requires several weeks of work by volunteers from river associations and consultatives to engage with the process. This regime allows far too many fish to be taken for commercial exploitation, which generates very little socio-economic value, in the context of declining stocks.

If you would like to suggest a different approach and your reasons for suggesting it, please do so here.

Q. 5.4b) – this question is for all consultees to answer and is in reference to the answer that you have given to Q. 5.4a

What are the benefits, if there are any, which you would see from your preferred option for net and fixed engine fisheries? These could be economic as well as social/cultural, please provide details if you are able.

Net fisheries on these rivers benefit a very small number of individuals and businesses, whereas the fish they catch would have far greater benefits to society, communities and a much larger number of individuals if the salmon they catch were allowed to return to their natal rivers.

The Angling Trust would like to see salmon and sea trout designated as sport fish because of their immense historic, cultural and economic importance for angling and its associated industries (e.g. hotels, pubs, tackle shops, fisheries). In 2006 Le Quesne and Selby produced a report for Westcountry Rivers Trust, 'The Economic Values of the Atlantic Salmon in Europe' which included: '*The recreational value of Atlantic Salmon is considerable. Assessments of the average Net Present Value per salmon caught annually vary between £5,800 and over £16,000*' and '*The total economic value of recreational angling far outweighs the total value of commercial exploitation. The disparity in average economic value per fish caught in recreational and commercial angling is striking and unambiguous. Salmon caught on rod and line are worth, on average, between 25 and 260 times as much as commercially exploited salmon*'.

Many of these benefits are being lost, or are at risk of being lost on At Risk and Probably At Risk rivers. Removing the nets on these rivers would provide an instant benefit in terms of the number of spawning adult salmon returning to rivers to give a boost to anglers' catches (the vast majority of which are released) and helping to restore sustainable stocks, particularly on rivers where habitat has been restored through the removal and easement of barriers to migration and improved catchment management. Many salmon-based angling clubs, some of which have been in existence for more than a century, are losing members and struggling to keep up payments for renting waters or servicing loans for waters they have purchased. Many of our angling club and riparian owner members have seen the capital value of their fishing eroded due to declining catches in recent decades and are desperate to see a concerted programme of action to address the underlying reasons for this decline.

Removing unsustainable netting was one of three elements to the Save Our Salmon campaign which was voted for by readers of *Trout & Salmon* magazine and supported with donations from the angling community. The other elements were to reduce widespread and endemic agricultural pollution and to allow fishery managers greater freedom to control cormorants and goosanders which eat juvenile salmon and sea trout. These were selected

because they would have rapid results, but these fish are also heavily impacted by water abstraction, barriers to migration, hydropower, sewage pollution, fish farming, illegal netting, marine by-catch, seal predation and a host of other threats. The full economic and social benefits of removing nets from these rivers will only be realised if the government invests in addressing these other issues, which would make a significant contribution to increasing the natural capital of the nation.

Reducing exploitation alone will be insufficient to restore stocks in the long term.

Q. 5.4c) - seeking all consultees' views on the options for net and fixed engine fisheries in England and on the Border Esk (except North East Coast Net Fishery Options)

How long do you consider the measures covering a net and/or fixed engine fishery should be in place for?

- 5 Years
- 10 Years
- Other – please give details Permanent.....

Please provide details of why you have given this answer.

The Angling Trust would like to see salmon and sea trout recognised as primarily sport fish because they have far greater socio-economic value if they are allowed back to their natal rivers. Anglers also make a much larger contribution to environmental conservation initiatives on rivers to help protect fish stocks and contribute to wider biodiversity objectives. This contribution is dependent on there being fish to catch.

Q. 5.4d) - seeking all consultees' views on the options for the North East Coast Net Fishery.

Which is your preferred option for the North East Coast Net Fishery as set out in Section 5.3: Table 3?

- X Option NE1
- Option NE2
- Option NE3
- I don't have a preferred option

Please provide details of why you have given this answer.

The NE Coast Net Fishery exploits mixed salmon and sea trout stocks, which is in breach of international agreements on Mixed Stock Fisheries and it should have been closed many years ago. The fact that it has continued until now has hampered international efforts to reduce exploitation in salmon feeding areas in the North Atlantic and Arctic. Objective 1 of the 5 Point Approach is to improve marine survival, including working with NASCO to manage fishing pressure outside UK waters. Continuation of the NE Coast Mixed Stock Fishery in any form undermines the UK's ability to achieve this objective and also has a

significant impact on Scottish rod fisheries, some of which are currently subject to mandatory catch and release.

If you would like to suggest a different approach and your reasons for suggesting it, please do so here.

5.4e) – this question is for all consultees to answer and is in reference to the answer that you have given to Q. 5.4d

What are the benefits, if there are any, which you would see from your preferred option for the North East Coast Net Fishery? These could be economic as well as social/cultural, please provide details if you are able.

Removal of these nets would strengthen the UK position on elimination of all Mixed Stock Salmon Fisheries in the North Atlantic which would potentially have benefits for Atlantic Salmon throughout their range and would therefore have an indirect benefit for all salmon rivers not only in England but also in Wales and Scotland. There would be particularly significant socio-economic and conservation benefits for society arising on all of the rivers in Table 4 of the Consultation document to which the fish caught in these nets would return – a benefit which would far outweigh the loss of economic benefit from the net fishery. The social, economic and environmental benefits of the closure of this fishery would therefore be even greater than we set out in our answer to question 5.4(b).

However, to realise the full benefits of the closure of this fishery, the government must also act to tackle the underlying causes of declining stocks which are related to deficient environmental water management, unsustainable predation and declining marine survival.

Section 6: our rod and line fisheries

This section explores the possible options to increase the levels of catch and release of rod caught salmon and whether further mandatory controls (i.e. byelaws) should be made to require or prohibit some fishing equipment. We are also seeking your views on best practice techniques that we might seek to promote in partnership with others including Angling Trust, landowners, river trusts and angling clubs.

Section 6.2: catch and release of salmon

Questions 6.2a to 6.2f are for all consultees.

Questions 6.2g and 6.2h are for salmon anglers.

Question 6.2i is for owners/lessees of salmon rod fisheries.

Q. 6.2a) - this question is for all consultees to answer and we are seeking your views on the possible options that have been developed

Which is your preferred option for the catch and release of salmon by rod fisheries from those that are set out in Section 6.2: Table 6?

- Option 1
- Option 2

Managing salmon fisheries in England and on the Border Esk

- Option 3
- Option 4
- I don't have a preferred option

Please provide details of why you have given this answer.

Option 4 is the only one which provides the local flexibility and commitment of rod fishing interests to contributing to reduced exploitation of salmon by rods and nets.

The Angling Trust has worked closely with the Agency, with support from an advisory group comprising representatives from rod fisheries around the country to develop this range of voluntary measures to increase rates of catch and release and survival of released salmon. Mandatory measures would have a significant negative impact on angling activity, rod licence income, and a willingness to work in partnership to meet the other objectives of the 5PA.

Anglers already release around 80% of the fish they catch, with much of the 20% which are retained coming from rivers which are defined as 'probably not at risk'. It is important to understand that many anglers will release all of the fish that they catch even when the voluntary target is below 100%; it is the principle of being allowed to retain the occasional fish which is often more important culturally than the reality.

Anglers would resent mandatory measures for 100% release when such zero tolerance of mortality is not being applied to polluters, abstractors, fish farmers, illegal nets or owners of barriers to migration. Anglers retaining a small number of fish is much less impactful on fish stocks than each of these impacts alone at a national scale. Regulation of these sectors is currently very light-touch and promised legislation to address them has been held up in government for many years (one for more than a decade) without being brought forward (e.g. general binding rules for agriculture, fish passage regulations and abstraction reform).

The Angling Trust is committed to using our network of angling clubs, fishery owners, river associations and consultatives to achieve levels of catch and release as close as possible to the targets and to improve catch and release techniques and hence the survival rates of released fish.

If you don't have a preferred option, please tell us if there is another approach that you consider that we should be taking and why.

Q. 6.2b) – this question is for all consultees to answer and is in reference to the answer that you have given to Q. 6.2a

What are the benefits, if there are any, which you would see from your preferred option for the catch and release of salmon by rod fisheries? These could be economic as well as social/cultural, please provide details if you are able.

See the response to 5.4 b) and 6.2 a) above.

Retaining the support of anglers and their representatives is vital to their willingness to work in partnership with the Agency/Defra on delivery of the 5PA. Losing that support will accelerate the decline in rod fishing for salmon and eventually leave salmon as just another species which the Agency and others has to conserve, but with little licence revenue to help pay for it, or economic benefit to justify conservation measures. Rod fisheries provide a return on natural capital, but over-regulation would diminish that return very substantially.

Q. 6.2c) - we would like to seek all consultees' views on the use of a voluntary (as opposed to mandatory) approach to deliver increased levels of catch and release

Do you agree with using a voluntary approach to deliver improved catch and release of salmon by rod fisheries?

- Yes
- No
- I don't know

If no or don't know, please explain your answer and include any dis-benefits that you consider the use of voluntary catch and release would bring.

Q. 6.2d) - if you answered yes to Q. 6.2c please answer these questions

Do you support the proposed levels of voluntary catch and release for rivers whose salmon populations are either At Risk, Probably at Risk or Probably Not at Risk (see Section 6.2: Table 6: Option 4)?

- Yes
- No
- I don't know

If no, do you think these levels should be higher or lower?

- Higher
- Lower

If you wish, please provide us with what you think the levels of voluntary catch and release should be and the reasons for your answers.

Q. 6.2e) – if you answered yes to Q. 6.2c please also answer this question

What are the benefits that you would see in voluntary catch and release? These could be economic as well as social/cultural, please provide details if you are able.

The key benefit would be the continued involvement and support of anglers in reducing exploitation and the other key objectives of the 5PA. Without this the political will to deliver the 5PA will reduce to the point where it no longer matters.

An unintended consequence could be a reduction of angling effort – the very effort on which the Environment Agency depends for its assessment of each river's stock.

Q.6.2f) – this question is for all consultees

Would you support the voluntary catch and release of all salmon caught (100%) on rivers whose salmon populations are either?

- X **At Risk**
- At Risk and Probably at Risk
- At Risk, Probably at Risk and Probably Not at Risk
- I would not support the voluntary catch and release of all salmon caught

If you wish, please provide us with the reason for your answer.

Salmon populations which are regarded as At Risk, i.e. the most endangered, deserve the greatest protection. However it must be recognised that very occasionally fish die in the process of being released and other things might happen to prevent perfect compliance in every year on every river. Compliance with a 100% mandatory release by-law would also be imperfect due to a severe lack of resources, and there would be fewer anglers on the bank to act as a deterrent and to report transgressions to assist with intelligence-led enforcement. Many would also be unwilling to assist with enforcement of a by-law that they would see as being unfair, but would be willing to help implement a voluntary approach to achieve the same ends.

Q. 6.2g) - this question is for salmon anglers

Would you stop fishing for salmon if the proposed levels of catch and release were implemented (see Section 6.2: Table 6)? Please tick all that apply.

- No, I wouldn't stop fishing whichever option was implemented
- X **Yes, if Option 1 was implemented**
- X **Yes, if Option 2 was implemented**
- X **Yes, if Option 3 was implemented**
- Yes, if Option 4 was implemented

Please tell us which river(s) you fish for salmon on.

Our members, who fish on all of the rivers referred to in the consultation, have informed us that they would fish less and/or stop fishing if catch and release was made mandatory on the rivers to which they have access. For members of local clubs with limited time and money, and for owners of fishing rights on stretches of river, they may not have the choice to fish elsewhere.

6.2h) – this question is for salmon anglers

Would you consider moving to a river where lower levels of catch and release were required?

- Yes**

Managing salmon fisheries in England and on the Border Esk

- No
- I don't know

If you wish, please provide us with your reasons for your answer.

Our members have informed us that this would be the case, for those who have the opportunity, otherwise they will be lost to the sport and to voluntary support for the Agency's statutory duties.

Q. 6.2i) - this question is for owners/lessees of salmon rod fisheries

What would the impact of these catch and release options be on your fishery (see Section 6.2: Table 6)?

- No impact as a result of any of the options
- A significant impact as a result of one or more of the options
- I don't know

Please provide us with details of which of the possible option(s) would result in a significant difference to your fishery. Please provide us with details of financial and social impacts.

Options 1, 2 and 3 would reduce angling effort and therefore have an unacceptable impact on the capital and socio-economic value of our member rod fisheries and angling clubs. Option 4 would also be likely to have some impact, but our representatives on the Angling Advisory Group were of the opinion that this impact would be tolerable in return for a moratorium on mixed-stock netting, and also on the netting of fish returning to At Risk and Probably at Risk rivers, coupled with concerted action to tackle the root causes of stock decline as set out, but not yet delivered, in the Salmon 5 Point Approach.

Section 6.3: questions relating to the best practice catch and release recommendations

Questions 6.3a and 6.3c are for all consultees.

Question 6.3b is for angling club and fishery owners.

Q. 6.3a) - this question is for all consultees to answer and is about the best practice recommendations for catch and release

Do you agree with the catch and release best practice recommendations?

- Yes, all of them
- Some of them
- None of them
- I don't know

If you would wish, please tell us which of them you agree/disagree with and provide us with further information to support your answer.

The Angling Trust was involved in the drafting of these recommendations which we have supported with the release of a video in conjunction with FishPal and the Atlantic Salmon Trust.

Q. 6.3b) - this question is for angling club and fishery owners

With reference to the catch and release best practice recommendations in Section 6.3 of the consultation document, which, if any, of these would you have difficulty applying to the waters under your control? Please tick as many that apply.

- Stopping angling at high water temperatures (where they exceed 18 °C in the mid-morning).
- Only allowing the use of single or double barbless hooks to minimise risk of injury.
- Stopping the use of large treble hooks, particularly on Flying 'C' spinners.
- Only allowing the use of the least harmful bait/lure type (e.g. artificial flies with minimal, appropriately sized, barbless hooks fished actively).
- Identifying safe landing areas and promoting their use to anglers before commencing fishing.
- Minimising air exposure, by promoting that fish are not removed from the water during landing, unhooking and photographing.
- Stopping fish being taken out of the river and onto the bank prior to release.
- Only allowing the use of fish-friendly landing nets.
- Stopping the practice of holding fish up clear of the water by the tail only.

Please provide us with the details of your reasons why.

We will leave our members to comment on these proposals to say how they would be affected as there are a wide range of views. Each river will have its own characteristics, angling culture and requirements. Despite being involved in drafting these best practice recommendations, we have only noticed now that there is a conflict between two of the items: "Only allowing the use of single or double barbless hooks to minimise risk of injury" seems to be a higher standard than "Stopping the use of large treble hooks, particularly on Flying 'C' spinners". As best practice recommendations, this doesn't matter, but if any of these were considered as by-laws then there would be more precision required.

Q. 6.3c) - this question is for all consultees to answer and is about other ways that you might improve salmon surviving capture

Are there any other catch and release best practice recommendations that you feel should be included?

- Yes
- No
- I don't know

If yes, please provide us with the details of these and your reasons why.

The use of long forceps/disgorger to remove hooks easily (as in 6.3.3 of the Consultation Document).

Section 6.4: questions relating to whether specific types of tackle and fishing equipment should be banned or made compulsory

Questions 6.4a to 6.4g are for all consultees.

Q. 6.4a) - this question is for all consultees

Do you consider that having a landing net available to use should be required by byelaw whilst fishing for salmon or sea trout in England and on the Border Esk?

- Yes
- No
- X I don't know

If you wish, please provide us with your reasons for this answer.

There is a wide range of views among our membership about this requirement which would seem to have different impacts on different rivers. Whilst supportive of the principle that nets are the best way of landing salmon, we have concerns about making this a mandatory measure for a sport which is already very heavily regulated and question how many fish this will save nationally compared to those lost by other much more damaging activities which are regulated with a very light touch at present.

Q. 6.4b) - this question is for all consultees

Do you consider that a landing net used when fishing for salmon and sea trout should be required by byelaw to have a maximum mesh size of 20mm (as measured across the widest point of the stretched mesh)?

- Yes
- No
- X I don't know

Please tell us if you think this mesh size should be different from this and why.

As 6.4a

Q. 6.4c) - this question is for all consultees

Do you consider that the use of barbed hooks should be prohibited by byelaw when fishing for salmon or sea trout with flies, lures or bait?

- Yes
- X No
- I don't know

If you wish, please provide us with your reasons for this answer.

As 6.4a) and 6.4b, but we feel that this is a measure we would oppose because of the impact on anglers who have large collection of flies with barbs and the impact on sea trout angling techniques at night. Again, we would question how many fish this would save nationally compared to other activities. We would support the promotion of best practice to encourage the use of barbless hooks when appropriate however, as we already do.

What would the impact, if any, be for you or your business of prohibiting the use of barbed hooks when fishing for salmon or sea trout with flies, lures or bait?

Reduced angling effort with the unintended consequences described elsewhere and costs for our tackle trade members in discarding stock which cannot be sold.

Q. 6.4d) - this question is for all consultees

Do you consider that the use of treble hooks should be prohibited by byelaw when fishing for salmon or sea trout with flies, lures or bait?

- Yes, all should be banned
- Yes, but only large treble hooks greater than size 8 should be banned
- X **No, these should not be banned**
- I don't know

If you wish, please provide us with your reasons for this view and if you think that large treble hooks of a different size than greater than size 8 should be banned.

See answer to 6.4.c) above.

What would the impact be, if any, for you or your business of prohibiting the use of treble hooks (either completely or only large treble hooks) when fishing for salmon or sea trout with flies, lures or bait?

Reduced angling effort and wasted stock as described above.

Q. 6.4e) - this question is for all consultees

Do you consider that the use of circle hooks should be mandatory by byelaw when using worm as bait when fishing for salmon or sea trout?

- Yes
- X **No**
- I don't know

If you wish, please provide us with your reasons for this answer.

As answers 6.4a-d above. We have had representations from experienced anglers in the South West that they are not convinced that circle hooks deliver higher rates of survival of released fish. There is evidence to support this from salmon caught by rod and line as broodstock in a number of hatchery operations.

What would the impact be, if any, for you or your business of only allowing the use of circle hooks when using worm as bait when fishing for salmon or sea trout?

N/A

Q. 6.4f) - this question is for all consultees

Should there be restriction on the use of Flying 'Cs' when fishing for salmon or sea trout?

- Yes, Flying 'Cs' should be banned
- Yes, Flying 'Cs' should only be allowed with single hooks
- X No, restrictions should not apply to the use of Flying 'Cs'
- I don't know

If you wish, please provide us with your reasons for this answer.

See answers to previous questions. Voluntary measures to increase the survival of released fish caught on Flying C's would be appropriate, such as the promotion of the use of single hooks as a voluntary measure.

What would the impact be, if any, for you or your business of prohibiting the use of Flying 'Cs' or only allowing their use with single hooks when fishing for salmon or sea trout?

N/A

Q. 6.4g) - this question is for all consultees

In your opinion, are there other types of equipment that should be prohibited by byelaw when fishing for salmon and sea trout?

- Yes
- X No
- I don't know

Please provide details of what these could be and why you think they should be prohibited or altered.

Additional views

Q. 7) - this question is for all consultees

Please tell us if you have any further comments that you would like to provide on this consultation.

The angling community works very closely in partnership with the Environment Agency and the river trusts to deliver very substantial investment of time and money into improving and protecting rivers and the fisheries they support, but there is a danger that the goodwill required for that relationship would be very significantly eroded or destroyed if too many new regulations are imposed on anglers. The impact of new mandatory regulations could be very

severe on levels of participation and hence rod licence income and the substantial economic and social benefits for society arising from salmon angling.

Angling clubs in particular, but also fishery and tackle shop owners, often operate with very slim financial margins and any loss of revenue or additional costs as a result of regulation could be critical for their survival at a time when they are already suffering due to poor catches in recent years.

We cannot stress too strongly the fact that managing exploitation is just one small part of the 5 Point Approach and we have yet to see evidence of the government or its agencies taking substantive action to tackle the other issues affecting our fisheries, namely:

- marine survival (including the impact of the freshwater environment on later survival);
- salmon farming in Scotland;
- pollution, especially from agriculture and to a lesser but significant extent sewage;
- abstraction which reduces migration flows, juvenile producing wetted area, and dilution of pollution;
- barriers to migration (which affect ability to reach spawning areas, facilitate predation on smolts, and divert smolts and kelts from their migration route)
- unsustainable predation from cormorants, goosanders and mergansers.

The government has repeatedly cut resources to support the Environment Agency's work to maintain, improve and develop salmon fisheries over the past decade or so and we believe that these cuts should be reversed as a matter of urgency. The costs of managing salmon cannot nearly be met by rod licence fees and salmon have a great value to the nation and to biodiversity beyond their economic and cultural importance as a highly prized quarry for anglers.

Our commitment to help implement the voluntary measures for catch and release is contingent on Option 2 for estuary netting and Option NE1 both being implemented. If they are not, then anglers would be much less willing to release more fish voluntarily.

It is important to point out that the perception of salmon anglers by the general public, which will include many decision-makers, is often inaccurate. They are too often characterised as predominantly upper class and high income, when the reality is that many, if not most, salmon anglers in England are working men and women of modest means for whom salmon angling can be their main leisure activity, with enormous personal benefits. Many are advanced in years, have fished all their lives and care passionately about the liberties they have enjoyed for decades to be able to go and fish for salmon and to take the occasional fish home to eat. There is widespread low-cost salmon angling available through angling clubs and angling passport schemes. We would also like to emphasise that the impact of regulation on angling is not limited to affecting tens of thousands of individuals' enjoyment of a 'hobby', but it has a very real impact on employment, the value of private property and the very survival of angling clubs, many of which have been in existence for over a century.

We very much welcome the way in which the Environment Agency has worked closely with the Angling Trust to listen to the views from our member anglers, clubs, fisheries, river associations and trade members in drafting the proposals in this consultation. This approach

has avoided the situation in Wales where significant antagonism has developed between anglers and Natural Resources Wales arising from proposals which, despite our efforts, have not been developed with the same degree of sensitivity to the needs of a substantial community of people.