

**Request to Welsh Government for approval of the fixed salmon and sea trout net licence duties for the 2024 fishing season supporting information.**

**Appendices**

- Appendix 1 NET FISHERIES: 2024 NET DUTIES AND INTRODUCTION OF HERITAGE LICENCE reference FSG2311\_03
  
- Appendix 2 Voucher copy of statutory notice placed in the London Gazette 15<sup>TH</sup> December 2023
  
- Appendix 3 Notification to netsmen
  
- Appendix 4 Copies of Objections to advertised duties and NRW responses.
  
- Appendix 5 Options for sustaining net fisheries in Wales Netsmen Liaison meetings February 2023

**Appendix 1 NET FISHERIES: 2024 NET DUTIES AND INTRODUCTION OF HERITAGE LICENCE Governance paper**

## **Fisheries Strategy Group (FSG)**

<b>Paper title:</b>	<b>NET FISHERIES: 2024 NET DUTIES AND INTRODUCTION OF HERITAGE LICENCE</b>
<b>Paper Reference:</b>	<b>FSG2311_03</b>
<b>Paper sponsored by:</b>	<b>[REDACTED]</b>
<b>Paper Presented by:</b>	<b>[REDACTED]</b>
<b>Purpose of the paper</b>	<p>FSG to note feedback from engagement with netsmen in 2023</p> <p>FSG to approve decision to advertise duties for 2024 with a 4% increase on 2023</p> <p>FSG to note and endorse the approach to establishing a heritage licence for 2023</p> <p>FSG to note likely extensive revisions of stock assessments due in 2024, whilst we continue to develop the approach</p>

### **Issue:**

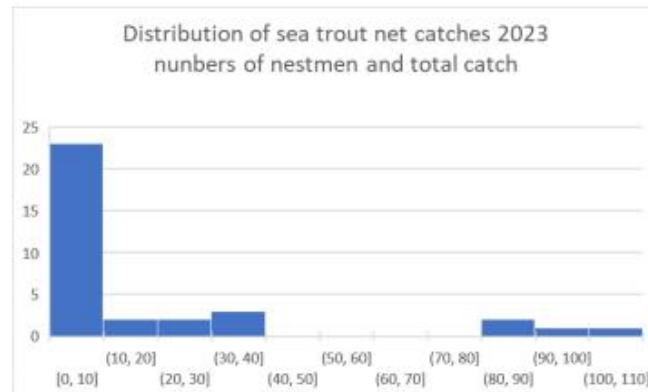
1. NRW needs to advertise new net licence duties each year in time for them to be advertised and approved prior to the start of the net season.

Until 2023 licence duties have remained unchanged for 12 years. In 2023 we raised all licence duties by 5% (Annex 1), in-line with the agreed increases to the salmon and migratory trout rod licence. A total of five objections were received during the consultation period, all from fisheries located in the South West of Wales (Tywi and Taf coracle 2, Teifi coracle 2, Dyfi Seine 1).

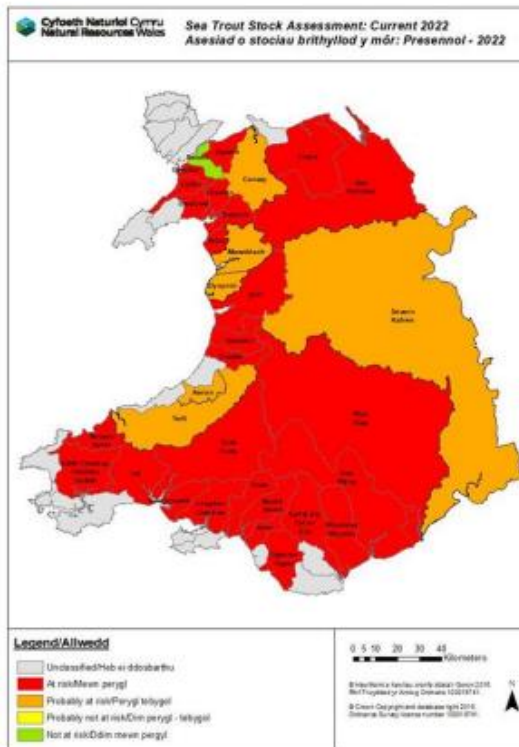
2. A proposal to revise duties was submitted to WG in 2020, however the decision was deferred by WG pending further work on a review of the sustainability of sea trout fisheries and recommendations for how they could be better managed.
3. NRW has progressed with developing options, however final options have been deferred as they will be steered by the ongoing revisions to the salmon stock status assessment and decision structure due to be concluded in 2024.
4. We are assuring WG that we have continued to develop our proposed approach and engagement with netmen, however acknowledging the new proposed approach and further development of our stock assessment methodologies in 2024/25, will mean that we are unlikely to finalise them in time before the commencement of the 2024 season.

## Background

5. NRW licences net fishing on 10 estuaries in Wales (Cleddau, Conwy, Dyfi, Dysynni, Mawddach, Nevern, Taf, Teifi, Tywi, and Wye).
6. All net fisheries (with the exception of the Wye Black rock lave nets and Lledr trap) are managed via Net Limitation Orders (NLOs generally reviewed and renewed every 10 years) which set the number of licences. Byelaws, some of which are time bound, prescribe the fishing seasons, weekly periods, methods and logbooks (reporting) & carcass tagging. The Wales NLO was reviewed and renewed in 2017 and is due for renewal in 2027.
7. The maximum number of net licences that can be issued is 53, with a total charge income of £17,420 per year. Participation in the fisheries and take up of licences has reduced in recent years, in 2023 – 48 licences were allocated, although only 35 net licences were taken out by netmen, raising a charge income of £10,505.
8. The income from net licences does not cover the administrative and compliance costs estimated to be £21K per annum.
9. Catches of sea trout in the net fisheries are highly variable both between fisheries and by individual licencees within fisheries. The total net catch in 2023 was 610 sea trout. The two main fisheries are the Tywi (165 sea trout) and Teifi (419 sea trout) account for some 96% of the total Welsh net catch.



10. Under the current 'All Wales' byelaws introduced in 2020, no net fisheries are permitted to take salmon, however they can take sea trout. The same byelaws however prevented nets from fishing early in the season (April), providing some additional protection for the earlier running, typically larger, sea trout. Commensurate restrictions on the rod fisheries require all larger (>6lb) fish to be returned. In addition nets seasons were curtailed at the end of July primarily as a salmon measure as few sea trout were generally caught by nets during August.
11. The principle of fish stock sustainability. NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. In evaluating management options, the sustainable management of the natural resource should take precedence.
12. Sea trout stocks however remain vulnerable and in decline and we consider that additional measures are required to provide increased protection. 79%, 26 sea trout rivers in Wales are now classed as being "At Risk", 15%, 5 rivers "Probably at Risk". 3% 1 river Probably Not at Risk and 3% 1 river was categorised as "Not at Risk". Downward trends in stock abundance are generally noted with large egg deficits compared to the management target. Note - all of the rivers with a net fishery are either A Risk or Probably At Risk



## Engagement with netsmen in 2023

13. Following the endorsement by FSG in November 2022 of our approach and recommendation of the 2023 Duties, in February 2023 we held 3 engagement sessions and invited netsmen to attend, 1) In North Wales near Dolgellau, 2) In South Wales at Haverfordwest and 3) an online Teams meeting with those unable to attend.
14. Both in person meetings were well attended, some 45 netsmen including endorsees and past netsmen attending the meetings.
15. The discussions including the current status of stocks also included the introduce of a heritage licence category that would allow netsmen to take out their licence and fish with licence conditions restricting the number of sea trout that could be taken using the carcass tags.
16. The number of tags available was not suggested, though on feedback if this were suggested 10 sea trout per annum could be considered appropriate.
17. Uptake of the 'Heritage licence' would be voluntary basis.



18. This would only restrict 11 netsmen who caught more than 10 sea trout in 2023
19. Feedback from the 1st meeting with North Wales nets (Conwy and Dyfi) was broadly supportive and would have little if no impact on current net catches in North Wales.
20. Feedback from the 2<sup>nd</sup> meeting with the South Wales nets (Teifi, Tywi, Cleddau and Taf) however were vehemently against any changes. Their objections stemmed from.
  - Rejection of a heritage licence category, previously consulted on some 15 years ago.
  - A desire for netting to a commercial activity
  - Criticism of NRW's stock assessments of both salmon and sea trout
  - That nets had already been subject to reductions in seasons both recent and historic
  - The loss of salmon catches due to byelaws restrictions had not been reflected in licence duties in any reduction

## Heritage Licence

21. NRW has the legal vires to introduce a "heritage licence" without formal consultation.
22. In recognition of the heritage and cultural values of these net fisheries, we will offer all netters the opportunity to apply for "Heritage Licence". This will have a nominal cost equivalent and will allow them to take a small number of fish proposed to be 10 sea trout per year.
23. On most fisheries, these proposals will have minimal impact on the currently low level of fishing and take.
24. On two fisheries, the Tywi and Teifi, their level of fishing and take is higher, and so the impact on their permitted catch could be greater.
25. Uptake of a Heritage licence would be voluntary, netsmen would still be able to take out a full licence with unlimited catch. Once the netsmen had reached their catch limit they would be expected to stop fishing.
26. The Heritage licence has the advantage of acknowledging the cultural value of our long standing net fisheries. It allows most netsmen that catch less than 10 sea trout per year to continue netting activities, restricting any potential excessive harvest.
27. Not all netsmen are likely to take up the offer of a Heritage licence. There remains a substantial vocal minority that are opposed to any change and the availability of a different licencing scheme.

## Future developments

28. We aim to complete the revised stock assessment methodologies and compliance in 2024 for salmon. Following that we would wish to apply these where appropriate to our approach to sea trout.
29. A revised decision structure and proposal for implementation will be presented to FSG in during 2024.
30. We note that the net licence income falls substantially short of paying for the current service of administration and compliance. The 2000 Salmon And Freshwater Fisheries Review remarked that the licence duties should not be used to close fisheries.

## Summary

31. FSG are asked to note that extensive revisions of stock assessments are due in 2024, whilst we continue to develop the approach.
32. Given the need to advertise net license duties prior to the 2024 season FSG are asked to approve decision to advertise at one of the following rates:
  - a. Current levels (Annex 1)
  - b. with a 4% uplift in line with inflation and to match the increase in rod licence duties
  - c. with a 4% uplift in line with inflation and to match the increase in rod licence duties and the introduction of a 'Heritage licence' Limiting the catch to 10 sea trout per year, and setting the duty equivalent to the salmon and migratory trout licence. Uptake of the heritage licence will be voluntary. (Annex 2) (preferred option)

## Key Risks

33. Environmental: Failure to provide to provide adequate protection to increasingly vulnerable sea trout stocks, may hinder the recovery of exacerbate decline.
34. Financial
  - a. The licence duties is unlikely cover NRW costs (hence net licence administration and compliance will remain part funded by GiA)

- b. Widespread uptake of heritage licence could further reduce income from £10.5K to £8K

#### 35. Reputational

- a. Failure to implement additional controls on nets may cause reputation damage with angling groups.
- b. Implementation of measures may cause reputational damage with netting groups.
- c. Welsh Government – advertising duties again whilst not having concluded the stock sustainability proposals in time for the 2024 season is slow that WG expectation on this matter.

### Next Steps

1. Exec Dir EPP sign of proposed duties
2. Advertise net duties December 2023
3. Further develop our approaches to stock performance during 2024/25 with FDSG approval of Decision Structure



## Annex 1

### 2023 Net Licence Duties

<b>Fishery</b>	<b>Instrument Type</b>	<b>Duty (£)</b>	<b>Start date</b>	<b>End date</b>
Teifi	Seine	611	1 <sup>st</sup> May	31 <sup>st</sup> July
Teifi	Coracle	260	1 <sup>st</sup> May	31 <sup>st</sup> July
Towy	Seine	611	1 <sup>st</sup> May	31 <sup>st</sup> July
Towy	Coracle	583	1 <sup>st</sup> May	31 <sup>st</sup> July
Taf	Coracle	260	1 <sup>st</sup> May	31 <sup>st</sup> July
NeVERN	Seine	274	1 <sup>st</sup> May	31 <sup>st</sup> July
Taf	Wade	83	1 <sup>st</sup> June	31 <sup>st</sup> July
Cleddau	Compass	101	1 <sup>st</sup> June	31 <sup>st</sup> July
Dyfi	Seine	611	1 <sup>st</sup> May	31 <sup>st</sup> July
Mawddach	Seine	274	1 <sup>st</sup> June	31 <sup>st</sup> July
Dysynni	Seine	391	1 <sup>st</sup> June	31 <sup>st</sup> July
Conwy	Seine	391	1 <sup>st</sup> June	31 <sup>st</sup> July
Conwy	Lledr Trap	138	1 <sup>st</sup> June	31 <sup>st</sup> July
Wye	Lave Net	83	1 <sup>st</sup> June	31 <sup>st</sup> August

## Annex 2

Proposed duties for 2024 - 4% increase on current net licence duties in line with increase in salmon and migratory trout licence. Introduction of a new 'heritage' licence category

Fishery	Instrument Type	Duty (£)	Start date	End date
Teifi	Seine	£635	1 <sup>st</sup> May	31 <sup>st</sup> July
Teifi	Coracle	£270	1 <sup>st</sup> May	31 <sup>st</sup> July
Towy	Seine	£635	1 <sup>st</sup> May	31 <sup>st</sup> July
Towy	Coracle	£606	1 <sup>st</sup> May	31 <sup>st</sup> July
Taf	Coracle	£270	1 <sup>st</sup> May	31 <sup>st</sup> July
NeVERN	Seine	£285	1 <sup>st</sup> May	31 <sup>st</sup> July
Taf	Wade	£90	1 <sup>st</sup> June	31 <sup>st</sup> July
Cleddau	Compass	£105	1 <sup>st</sup> June	31 <sup>st</sup> July
Dyfi	Seine	£635	1 <sup>st</sup> May	31 <sup>st</sup> July
Mawddach	Seine	£285	1 <sup>st</sup> June	31 <sup>st</sup> July
Dysynni	Seine	£407	1 <sup>st</sup> June	31 <sup>st</sup> July
Conwy	Seine	£407	1 <sup>st</sup> June	31 <sup>st</sup> July
Conwy	Lledr Trap	£144	1 <sup>st</sup> June	31 <sup>st</sup> July
Wye	Lave Net	£90	1st June	31st August
Heritage Licence	Catch restricted to 10 sea trout per season	£90		

**Appendix 2. Voucher copy of statutory notice placed in the London Gazette 15<sup>th</sup>  
December 2023**

**Appendix 3 Notification to Netsmen, example of email/letter sent to all salmon and sea trout licencees.**

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**Appendix 4. Copies of Objections to advertised duties and NRW responses.**

Objection [REDACTED] Tywi [REDACTED] Reference ND2024, [REDACTED]

Subject	<b>License fee objection.</b>
From	[REDACTED]
To	Fisheries@gov.wales; Fisheries Wales
Sent	23 January 2024 19:54

Dear Sir / Madam,

As a Coracleman on the River Towy [REDACTED] I object to the NRW's proposed duties in relation to the increase in fishing licence fees. My reasons are as follows;

At present we are paying the full licence fee, yet our fishing season has been slashed by the NRW by 2 whole months. Please note, the two months they have taken away from us, are in fact the best 2 months to fish for sea trout on the River Towy.

NRW have also taken away our rights to fish for salmon.

We the Coraclemen on the River Towy pay substantially more - £336 to be exact - than those who fish on the river Teifi. We feel that our licence fee should be reduced to reflect the deduction in fishing season length, as well as the loss of salmon.

Welsh Water have polluted our rivers for years, yet they have faced no real consequences. Instead, we the lay people, feel are punished for this. Welsh Water should replenish the rivers which would increase life in the water, and look into restocking the fish.

NRW having the audacity to increase our fees, is an insult.

I eagerly await your reply.

Your Sincerely,

[REDACTED]



Response to [REDACTED] Objection Reference ND2024-[REDACTED]

[REDACTED]

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**From:** Fisheries Wales  
**Sent:** 01 March 2024 10:40  
**To:** [REDACTED]  
**Subject:** Objection to the Net licence duties for 2024

Our Ref:ND2024-[REDACTED]  
Your Ref:

By email. [REDACTED]

Date 1<sup>st</sup> March 2024

Dear [REDACTED]

**Objection to the Net licence duties for 2024**

Thank you for your two responses to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This has been given the reference ND2024-[REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure

to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

#### **Other Points raised**

##### **Recent byelaw constraints not taken into account**

Following the outcome of the 2019 Inquiry – where the Inspector concluded “the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales.” The salmon and sea trout byelaws received Ministerial approval and came into effect on 1<sup>st</sup> January 2020 in Wales.

NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of both salmon and sea trout (particularly early running sea trout) have been in decline for several years and it is now important that spawning escapement is protected.

The two months that were removed (March and April) from the Tywi and Taf net fisheries were not the two best months for fishing. The entire catch of the Taf and Tywi net fisheries in 2017 was 10 sea trout, 2018 11 sea trout and 2019 8 sea trout and accounted for between 3-7% of the total annual reported catch by the nets.

The Byelaws have a ‘sunset’ clause and will expire in 10 years. We are committed to a review of the byelaws after 5 years.

#### **Water Quality/ Pollution**

Addressing Water Quality remains a priority for NRW.

Water quality issues continue to be the subject of intense public and political scrutiny, and we have had to significantly re-prioritise and adjust our workplan priorities to respond.

For example, we have set up a programme to address the problem of phosphates in SAC rivers, with detailed plans to bring failing catchments back to favourable condition.

We are reviewing our regulatory position on storm overflows and how and if NRW needs to develop its regulatory response. NRW is chair of the Task force set up between Water Companies, Ofwat, Welsh Government and NRW, who have developed a storm overflow roadmap and action plan to drive forward improvement in the performance of storm overflows in Wales.

The Investment Water Companies make through Ofwat’s Price review will be critical to addressing the Nature Emergency, alongside action by others.

We continue to work with others to take forward action in the storm overflow Roadmap to review our approach to the regulation of storm overflows and to drive forward the Actions NRW committed to take in the SAC Rivers action plan.

We welcome the continued capital funding from WG which means that we’ll be able to continue investing in our Nature and Climate Emergencies capital programme which includes water quality, metal mine remediation, peatland restoration and nature projects.

**Hatcheries and Stocking:**

NRW's objective for the management of salmon and sea trout stocks is the restoration and protection of sustainable and productive wild salmon and sea trout stocks in Wales. We believe that protecting wild stocks and their habitat is the key to their future.

The use of artificial rearing and stocking of salmon and sea trout in an attempt to restore (or enhance) stocks has a long history and has been raised again as a possible solution to the current declines. Although stocking can in theory increase the numbers of fish available to be caught (though that is debatable), recent evidence strongly indicates that hatchery interventions at this time could only provide short term benefits at best and would likely erode the natural productivity and resilience of stocks in the long term.

A full review of stocking practices, their costs, benefits and potential risks, was carried out by NRW in 2014. The report highlighted the emerging scientific consensus around the population viability (genetic) risks associated with stocking. In summary, the evidence suggests that the artificial selection and rearing of hatchery salmon creates poorly adapted individuals which, if they breed in the wild, go on to weaken the wild stocks (even when local wild brood stock are used).

In reviewing the risks posed by stocking on rivers designated as Special Areas of Conservation under the EC Habitats Directive we concluded that such interventions would likely be harmful to wild stocks and should not be permitted. By extension, we determined that the same principle should be applied to protect all salmon and sea trout stocks in Wales.


The review was also guided by the Environment (Wales) and Well-being of Future Generations (Wales) Acts, which required all public bodies in Wales to follow the principles of Sustainable Management of Natural Resources (SMNR). These principles require us to take a long term, evidence based, approach and to address the underlying factors, instead of taking short term measures.

Based on this review, the conclusion reached by the NRW Board was that all salmon and sea trout stocking in Wales should end. No further stocking, other than research and, in very extreme cases, restoration would be permitted.

I include a link here to the full review ([Review NRW salmon stocking fish hatcheries \(naturalresources.wales\)](#))

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

  
Natural Resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain. We will then seek Ministerial approval.

Yours sincerely



[REDACTED]  
[REDACTED] Freshwater Fisheries Management

[REDACTED]  
[REDACTED]

**Tystiolaeth, Polisi a Thwyddedu** / Evidence, Policy and Permitting

**Dyddiau gweithio (Llun – Gwener)** / Working days (Monday – Friday)

**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



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

Byd natur a phobl yn ffynnu gyda'n gilydd  
Nature and people thriving together

[cyfoethnaturiol.cymru](http://cyfoethnaturiol.cymru)  
[naturalresources.wales](http://naturalresources.wales)





Objection [REDACTED] Tywi [REDACTED] Reference ND2024 [REDACTED]

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Response to [REDACTED] Reference ND2024-[REDACTED]

**From:** Fisheries Wales  
**Sent:** 01 March 2024 11:26  
**To:** [REDACTED]  
**Subject:** Objection to the Net licence duties for 2024

Our Ref:ND2024-[REDACTED]  
Your Ref:

By email [REDACTED]

Date 1<sup>st</sup> March 2024

Dear Mr [REDACTED]

**Objection to the Net licence duties for 2024**

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NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

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Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

#### **Other Points raised**

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NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of both salmon and sea trout (particularly early running sea trout) have been in decline for several years and it is now important that spawning escapement is protected.

The two months that were removed (March and April) from the Tywi and Taf net fisheries were not the two best months for fishing. The entire catch of the Taf and Tywi net fisheries in 2017 was 10 sea trout, 2018 11 sea trout and 2019 8 sea trout and accounted for between 3-7% of the total annual reported catch by the nets.

The Byelaws have a ‘sunset’ clause and will expire in 10 years. We are committed to a review of the byelaws after 5 years.

The removal of August from the Tywi net fishery dates back before 2010 and was brought in as a measure to help protect salmon. August was removed from the other net seasons in 2020 as nets only were able to take sea trout, and the catch of sea trout in August was very low.

Implementing a common 31st July end to the season across all net fisheries (previously 31st August) was estimated to prevent capture of approximately 19% of the salmon catch, thereby avoiding any risk of C&R mortality. This measure should also have little effect on sea trout net catches – with less than 2% of the 5-year average catch for all net fisheries in Wales taken in August. For further detail please see the technical case supporting the introduction of the 2020 restrictions, [Technical case supporting a public consultation on proposals for new fishing controls to protect salmon and sea trout stocks in Wales \(cyfoethnaturiol.cymru\)](#).

#### **Water Quality/ Pollution**

Addressing Water Quality remains a priority for NRW.

Water quality issues continue to be the subject of intense public and political scrutiny, and we have had to significantly re-prioritise and adjust our workplan priorities to respond.

For example, we have set up a programme to address the problem of phosphates in SAC rivers, with detailed plans to bring failing catchments back to favourable condition.

We are reviewing our regulatory position on storm overflows and how and if NRW needs to develop its regulatory response. NRW is chair of the Task force set up between Water Companies, Ofwat, Welsh Government and NRW, who have developed a storm overflow roadmap and action plan to drive forward improvement in the performance of storm overflows in Wales.

The Investment Water Companies make through Ofwat's Price review will be critical to addressing the Nature Emergency, alongside action by others.

We continue to work with others to take forward action in the storm overflow Roadmap to review our approach to the regulation of storm overflows and to drive forward the Actions NRW committed to take in the SAC Rivers action plan.

We welcome the continued capital funding from WG which means that we'll be able to continue investing in our Nature and Climate Emergencies capital programme which includes water quality, metal mine remediation, peatland restoration and nature projects.

#### **Heritage Licence**

NRW recognises that some fishing methods, including some which have been in existence for several hundred years, represent traditional activities and may therefore have heritage value. These fisheries include the well-known coracle net operations on the Tywi and Teifi, but also the Cleddau compass nets and the Black Rock lave net fishery. This view has been supported in a report commissioned by the Environment Agency (2004): -

[Microsoft Word - Science Report SC030212 FINAL.doc \(publishing.service.gov.uk\)](#)

NRW's purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. In this context sustainability means with a view to benefiting, and in a manner designed to benefit, the people, environment and economy of Wales now and in the future.

Importantly we are proposing a new category of licence for 2024

Recognising that stocks and catches have markedly decreased in recent years this will allow netmen to continue to participate in the fisheries, whilst helping protect stocks maintaining many of their heritage and cultural values whilst restricting the catch to less 10 sea trout. Only 11 netmen in 2023, caught more than 10 sea trout, the average median catch of sea trout was 8 in 2023.

The Heritage licence category is voluntary. Netmen can either pay the full amount for their particular licence without any catch limits on the numbers of tags, or apply for a Heritage licence that will be capped at a maximum of 10 tags. The cost of the Heritage licence has been proposed as £90, the same as a full rod licence.

There are no limits on the number of Heritage licences available in each fishery, up to the maximum set within the Net Limitation Order, for the Tywi [REDACTED] this is 8.

In every other way, other than the total permissible catch and that once the Licencee has caught their maximum number of 10 fish they must cease fishing the licence is identical to the full licence. They must adhere to the same byelaws and NLO restrictions as the full Licence.

Once a netmen has taken out a Licence with the catch restrictions, they would not be able to revert to a full licence in the same season. It would however not stop them for applying for a full licence in future.

I include a link here to the full review ([Review NRW salmon stocking fish hatcheries \(naturalresources.wales\)](#))

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

[REDACTED]



Natural Resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain.  
We will then seek Ministerial approval.

Yours sincerely

[Redacted signature]

[Redacted name] Freshwater Fisheries Management

[Redacted address line 1]

[Redacted address line 2]

**Tystiolaeth, Polisi a Thrwyddedu/ Evidence, Policy and Permitting**

[Redacted address line 3]

**Dyddiau gweithio (Llun – Gwener) / Working days (Monday – Friday)**

[Redacted address line 4]

**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



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yn ffynnu gyda'n gilydd**  
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 [cyfoethnaturiol.cymru](http://cyfoethnaturiol.cymru)  
[naturalresources.wales](http://naturalresources.wales)



Objection [REDACTED]

Reference ND2024 [REDACTED]

[REDACTED]

Our Ref . Duties prop. 2024  
Your REF. NL/2024 [REDACTED]

19<sup>th</sup> Jan. 2024

Dear sir / madam

As an association [REDACTED] fishery wish to object most strongly to the NRW proposed increase to the licence duties , 2024 for the following reasons.

1/ NRW once again link the proposed increase to their "increased costs of licence administration "

In the 2021 / 2022 licence duty consultation the minister fully rejected this proposal by NRW.

Are NRW ignoring the minister.

2/ The traditional fisheries licence duties were increased by NRW in 2023.

3/ NRW's statement that the proposed increase in duties is cover increased admin. costs makes no sense at all considering it's other proposal is to offer a "heritage licence " which in some cases ( if accepted ) would equate to a loss of revenue of well over £500 per licence.....The proposed licence duty increase is obviously not about finance.

4/ We are paying at present for a full licence yet the season has been cut and extra catch restriction placed on the fishery . We feel that our licence fee far from being increased should be substantially reduced to reflect it's current state.

5/Once a gain NRW attempt to compare our traditional fishery with angling. There is a vast difference between the two .

The anglers season is far longer , no restriction on numbers of fishermen , little if any restriction on the number of salmon / sewin caught , able to fish weekends and no Habitats regulations assessment (which our fishery is now subject to ).

Whilst at present traditional salmon / sewin fishermen have to return salmon if when caught anglers continue to kill them during the process of catching , playing and

and handling these fish in the process of release, high numbers in some conditions.

[REDACTED] have not caught a salmon since 2019 ( when we caught two )

There is no comparison between the two types of fishing , impact on stock , season , number of fishermen , catch & number of salmon / sea trout all differ.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

Objection [REDACTED] Reference ND2024 [REDACTED]



Our Ref:ND2024/[REDACTED]  
Your Ref:2024/[REDACTED]  
Duties prop. 2024

[REDACTED]

Date 29<sup>th</sup> February 2024

Dear [REDACTED]

**Objecting to the Net licence duties for 2024**

Thank you for your two responses to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. These have been given the reference ND2024/[REDACTED] and ND2024/[REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and

gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

#### **Other Points raised**

##### **Recent byelaw constraints not taken into account**

Following the outcome of the 2019 Inquiry – where the Inspector concluded “the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales.” The salmon and sea trout byelaws received Ministerial approval and came into effect on 1<sup>st</sup> January 2020 in Wales.

NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of both salmon and sea trout (particularly early running sea trout) have been in decline for several years and it is now important that spawning escapement is protected.

The Byelaws have a 'sunset' clause and will expire in 10 years. We are committed to a review of the byelaws after 5 years.

We do not therefore consider it appropriate to change the duties now.

You also challenge around the use of Habitat Risk Assessments: Rod Licences are not in themselves subject to the HRA process as they are not site specific i.e. you can use a rod licence anywhere within England and Wales. Net Licences are subject to an annual HRA as they are site specific.

The All Wales Rod and Net byelaws that were introduced in 2020 and the specific River Wye Rod and Line (Salmon and Sea Trout) (Wales) Byelaws 2021 were however subject to the HRA process.

We acknowledge that there will be a mortality of salmon as a result of continued fishing even under catch and release restrictions both with nets and rods. Survival following angling is greater than 90%, over 96% for fly fishing. We have introduced restrictions to improve survival including the banning of bait fishing for salmon, the use of barbed hooks and treble hooks. The most important factor influencing the survival of released salmon is water temperature, we have released a protocol for angling to cease at water temperatures above 20°C and note that the Wye have regularly closed their fisheries when water temperatures have reached and exceeded these levels over the past 2 years.

#### **"Heritage Licence" category**

NRW recognises that some fishing methods, including some which have been in existence for several hundred years, represent traditional activities and may therefore have heritage value. These fisheries include the well-known coracle net operations on the Tywi and Teifi, but also the Cleddau compass nets and the Black Rock lave net fishery. This view has been supported in a report commissioned by the Environment Agency (2004): -

[Microsoft Word - Science Report SC030212 FINAL.doc \(publishing.service.gov.uk\)](#)

NRW's purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. In this context sustainability means with a view to benefiting, and in a manner designed to benefit, the people, environment and economy of Wales now and in the future.

We are proposing a 4% increase in net duties, in line with the already agreed increase to the rod licence.

Importantly we are proposing a new category of net licence next year a "heritage licence"

Recognising that stocks and catches have markedly decreased in recent years, this will allow netmen to continue to participate in the fisheries, whilst helping protect stocks, maintaining many of their heritage and cultural values whilst restricting the catch to less than 10 sea trout. Only 11 netmen in 2023, caught more than 10 sea trout, the average median average catch of sea trout was 8 in 2023.

Both salmon and sea trout stocks are threatened. Almost all of our stocks in Wales, are below sustainable levels where unrestricted catch may cause additional pressures.

Allowing both nets and rod fisheries to fish whilst restricting the take of fish helps to maintain many of the socio economic values of these important fisheries, whilst giving stocks a chance to recover.

During 2023 we hosted engagement sessions with NLO net licensees to discuss measures to sustain fish stocks and the skills and tradition of the fisheries.

Discussions included the current status of stocks and a proposal to introduce a new "heritage" licence category that would allow netmen to take out their licence and fish with tighter licence conditions, restricting the number of sea trout that could be taken using the carcass tags.

Although feedback from the sessions was mixed, we believe that this licence mechanism offers netters the opportunity to maintain their involvement in the fishery, without over exploiting the stocks.

Uptake of the 'Heritage licence' is on a voluntary basis.

Inevitably there will be potential reduction in net licence income. For 2024, total income from net licences if all allocated net licences were taken out would reduce from £13,734 to £12,279 following the 6 applicants to take a Heritage licence..

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

[REDACTED]  
Natural resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain. We will then seek Ministerial approval.

Yours sincerely

[REDACTED]  
[REDACTED]  
[REDACTED] Freshwater Fisheries Management



Objection [REDACTED] Teifi [REDACTED] Reference ND2024 [REDACTED]

Response to [REDACTED] Teifi [REDACTED] Reference ND2024 [REDACTED]

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**From:** Fisheries Wales  
**Sent:** 01 March 2024 11:49  
**To:** [REDACTED]  
**Subject:** Objection to the Net licence duties for 2024

Our Ref: ND2024 [REDACTED]  
Your Ref: [REDACTED]

By email: [REDACTED]

Date 1<sup>st</sup> March 2024

Dear Mr [REDACTED]

#### **Objection to the Net licence duties for 2024**

Thank you for your response to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This have been given the reference ND2024-[REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource

implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

#### **Other Points raised**

##### **Recent byelaw constraints not taken into account**

Following the outcome of the 2019 Inquiry – where the Inspector concluded “the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales.” The salmon and sea trout byelaws received Ministerial approval and came into effect on 1<sup>st</sup> January 2020 in Wales.

NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of both salmon and sea trout (particularly early running sea trout) have been in decline for several years and it is now important that spawning escapement is protected.

The Byelaws have a ‘sunset’ clause and will expire in 10 years. We are committed to a review of the byelaws after 5 years.

#### **Water Quality/ Pollution**

Addressing Water Quality remains a priority for NRW.

Water quality issues continue to be the subject of intense public and political scrutiny, and we have had to significantly re-prioritise and adjust our workplan priorities to respond.

For example, we have set up a programme to address the problem of phosphates in SAC rivers, with detailed plans to bring failing catchments back to favourable condition.

We are reviewing our regulatory position on storm overflows and how and if NRW needs to develop its regulatory response. NRW is chair of the Task force set up between Water Companies, Ofwat, Welsh Government and NRW, who have developed a storm overflow roadmap and action plan to drive forward improvement in the performance of storm overflows in Wales.

The Investment Water Companies make through Ofwat’s Price review will be critical to addressing the Nature Emergency, alongside action by others.

We continue to work with others to take forward action in the storm overflow Roadmap to review our approach to the regulation of storm overflows and to drive forward the Actions NRW committed to take in the SAC Rivers action plan.

We welcome the continued capital funding from WG which means that we’ll be able to continue investing in our Nature and Climate Emergencies capital programme which includes water quality, metal mine remediation, peatland restoration and nature projects.

##### **As an example NRW has started a new project on the Teifi – landowners, industries and regulators join forces for pilot ‘demonstrator catchment’ project**

The Afon Teifi is one of our nine Special Area of Conservation (SAC) Rivers in Wales, designated due to the rare species it supports, including lamprey, Atlantic salmon, otter and floating water-plantain.

It meanders 122km through three local authorities - Ceredigion, Carmarthenshire and Pembrokeshire - as well as through National Nature Reserves and Sites of Special Scientific Interest.

Like many of our other SAC rivers, sadly the Telfi is in an unfavourable condition, and in 2021 it was reported that it was exceeding acceptable water quality targets for phosphorus.

This project will involve partners, land and water management sectors and others, to showcase collaborative approaches to water quality and water resource improvements and building riverine habitat resilience through sustainable land and water management.

Within this project we will adopt agile and innovative approaches and the learning developed will be scaled up and out across Wales bringing multiple benefits to other river systems.

This is a great opportunity to act now to work with land management and water sector partners and communities to reverse the trends we are seeing and to improve water quality, ecology and habitat, and support the resilience of local communities and the benefits that come from their natural environment.

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

[REDACTED]  
Natural Resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain. We will then seek Ministerial approval.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Freshwater Fisheries Management  
[Tystiolaeth, Polisi a Thrwyddedu](#)/ Evidence, Policy and Permitting

[REDACTED]  
[Dyddiau gweithio \(Llun – Gwener\)](#) / Working days (Monday – Friday)

[REDACTED]

**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



**Byd natur a phobl yn ffynnu gyda'n gilydd**

**Nature and people thriving together**

 [cyfoethnaturiol.cymru](http://cyfoethnaturiol.cymru)  
[naturalresources.wales](http://naturalresources.wales)



Objection by [REDACTED] Reference ND2024 [REDACTED]



25 January 2024

Welsh Government  
Marine and Fisheries Division (net duties)  
Cathays Park  
Cardiff CF10 3NQ  
Ref: NL/2024 [REDACTED]

To whom it may concern

I am a former second-generation seine net licence holder on the Dyfi and I am currently an endorsee on my son's licence.

I strongly object and reject the rise in the licence fees. It is unacceptable in relation to the annual figures of "fish taken" over the last few years.

The fishing season for the net licence holders has been reduced by two months, but the licence duty has continued to increase.

The reduction in the fishing season has resulted in real terms of a much greater rise in duty than the figures you attribute to inflation.

The letter dated the 15<sup>th</sup> December states the increase is to cover increased administration costs.

I would be interested to see why the administration costs are so high.

I feel sure administration costs are higher than they need to be.

NRW arrange meeting with the Net licence holders periodically across Wales.

1. These meetings are usually held at expensive hotel venues.  
No minutes are recorded and there is never any feedback.
2. Over the years ideas have been raised by the net licence holders to encourage and improve more sustainable fishing, again there is never any feedback, comments or action.  
These meetings could and should be so much more productive and progressive.  
There appears to be a complete lack of commitment by NRW to fully engage with the Net licence holders.
3. I'm sure the NRW Fisheries division could embrace the digital age to lower costs when issuing and recording a change in licence details.

In the meetings migratory fish stock numbers and their decline is the biggest topic and issue. This of course is a concerning issue to all.

It appears that any changes directed at the net licence holders, has little to do with sustainability of migratory fish stocks.

If sustainability was at the core of any changes, there would be greater parity. The rod licence regulations would be under far greater scrutiny and inclusion.

The lack of scrutiny of rod licences in relation to sustainability of migratory fish is worrying.

The figures on migratory fish catches on the rivers and estuaries in Wales, by the net licence holders has far less of an impact on fish stocks in comparison to the rod caught fish numbers - some kept, some released exhausted and injured, of which a significant percentage die as a result.

A Heritage Licence with a duty of £90 has been offered.

There has been no information given on what this means to the licence holder, other than a restriction on the number of fish that can be taken.

1. How can a licence holder make an informed decision with little to none information available?
2. Will the licence holder be able to revert to the current licence if they wish to?
3. How many Heritage licences will be available?  
Will they match the current available licence allocation to all net, coracle, river and estuary areas?
4. What are the full Terms & Conditions and By-laws of the Heritage Licence?
5. Why is the Heritage licence being offered at a duty so much less than the current licence duty?
6. Will we be able to fish for sustainable non migratory fish?

Yours sincerely





Response to [REDACTED] Reference ND2024/[REDACTED]



Our Ref: ND2024/[REDACTED]  
Your Ref: [REDACTED]

[REDACTED]

Date 29<sup>th</sup> February 2024

Dear Mr [REDACTED]

**Objecting to the Net licence duties for 2024**

Thank you for your two responses to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This have been given the reference ND2024/[REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

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We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

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The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

### Other Points raised

#### Administration costs are so High

The Table below sets out the estimated administration costs.

				Man days	at £60K/FTE
Annual allocation of licences, appeal,				20	£5,455
Issuing of Licence/tags/logbook CCC				3	£818
Appeals (managers and legal)				3	£818
Collating catches/reporting				2	£545
Annual advertising of duties and application				10	£2,727
Total annual Allocation man power costs				38	£10,364
Tags and Logbooks					£700
Posting of Licence log book and tags					£500
Posting of Application					£60
Posting Reminder					£35
Advertisement cost					£1,000
Sub Total					£2,295
Estimated administration costs					£12,659

Note the costs do not include Compliance costs, checks by enforcement staff

#### Costs of Netsmen's meetings held at expensive hotels, lack of commitment by NRW to nets, embrace the digital age.

We held 3 meetings with netsmen in 2023, to explain our approach. The meeting for the North Wales nets meeting was held at Oakley Arms, a venue that was relatively central to the bets form the Conwy, Mawddach and Dyfi the room hire was less than £100 for the evening. Similarly the meeting at the Mariners Hotel in Haverfordwest for the Tywi, Taf, Cleddau and, Nevern and Teifi nets was again less than £100. The Third meeting was held online for those unable to attend and had no associated room costs.

Our salmon and sea trout fisheries remain a priority for NRW. We welcome input from both netsmen and rod anglers alike. We run a number of Local Fishery Groups at which netsmen attend both the West Wales and Ceredigion Local Fishery Groups. It is unfortunate that there is not an overall netsmen's group that could attend the Wales Fisheries Forum.

The Wales Fisheries Forum is made up of a wide range of stakeholders who are coming together to share ideas and act as ambassadors for Welsh fisheries. The goal is to ensure our freshwater and migratory fish stocks are protected for generations to come.

We want this group to represent everyone who cares about fish, not just rod and net licence holders; angling clubs; fishery and riparian owners, but also conservation

organisations; rivers trusts; volunteers and other fish and fisheries-related businesses and professionals.

There is no one silver bullet to solve the many issues and challenges facing fisheries, the solutions can be found in a combination of different changes, all of which need to be supported by new ways of thinking.

By working together, the forum will be a channel for the exchange of ideas and best practice and will help inform NRW's fisheries work on, among other areas, strategy, promotion and partnership working.

We note your request to embrace the digital age when issuing and recording a change in licence details. Whilst the application process is on paper, you can of course call or email for a change in licence details, the costs associated with this were abolished some 15 years ago. We will look to issue application forms via email in future however please note less than 80% of netmen have an email address.

#### **Status of stocks and scrutiny of rod fisheries and their regulation.**

As you are aware in 2019 a Local Inquiry examined NRW's approach to salmon and sea trout stocks and our proposals.

The Inspector's report and the Ministers' response can be found here: [Written Statement: Outcome of the Local Inquiry on Natural Resources Wales' proposed 'All Wales Salmon and Sea Trout Byelaws' \(16 July 2019\) | GOV.WALES](#)

The Inspector found them to be necessary, proportionate and reasonable in view of the decline of salmon and sea trout stocks throughout Wales. The measures introduced by the byelaws had a similar effect on both nets and rods. The degree of scrutiny for the rod fishery has been the same.

We acknowledge that there will be a mortality of salmon as a result of continued fishing even under catch and release restrictions both with nets and rods. Survival following angling is greater than 90%, over 96% for fly fishing. We have introduced restrictions to improve survival including banning bait fishing for salmon, the use of barbed hooks and treble hooks.

We have never sought to blame either netmen or anglers for the decline in stocks, however continuing to kill fish when there is such a large deficit in the number of spawners required to maintain populations is not sustainable. It's important to note that any additions to the spawning stocks are particularly valuable when stocks are at low levels. Even relatively small numbers of fish are crucial to recover stocks in as short a time as possible. Every spawner matters.

### **Heritage Licence**

NRW recognises that some fishing methods, including some which have been in existence for several hundred years, represent traditional activities and may therefore have heritage value. These fisheries include the well-known coracle net operations on the Tywi and Teifi, but also the Cleddau compass nets and the Black Rock lave net fishery. This view has been supported in a report commissioned by the Environment Agency (2004): -

[Microsoft Word - Science Report SC030212 FINAL.doc \(publishing.service.gov.uk\)](#)

NRW's purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. In this context sustainability means with a view to benefiting, and in a manner designed to benefit, the people, environment and economy of Wales now and in the future.

Importantly we are proposing a new category of licence for 2024

Recognising that stocks and catches have markedly decreased in recent years this will allow netsmen to continue to participate in the fisheries, whilst helping protect stocks maintaining many of their heritage and cultural values whilst restricting the catch to less 10 sea trout. Only 11 netsmen in 2023, caught more than 10 sea trout, the average median catch of sea trout was 8 in 2023.

The Heritage licence category is voluntary. Netsmen can either pay the full amount for their particular licence without any catch limits on the numbers of tags, or apply for a Heritage licence that will be capped at a maximum of 10 tags. The cost of the Heritage licence has been proposed as £90, the same as a full rod licence.

There are no limits on the number of Heritage licences available in each fishery, up to the maximum set within the Net Limitation Order, for the Dyfi this is 3.

In every other way, other than the total permissible catch and that once the Licencee has caught their maximum number of 10 fish they must cease fishing the licence is identical to the full licence. They must adhere to the same byelaws and NLO restrictions as the full Licence.

Once a netsmen has taken out a Licence with the catch restrictions, they would not be able to revert to a full licence in the same season. It would however not stop them for applying for a full licence in future.

### **Captures of sea fish should be allowed**

The net licence issued by NRW is a "Licence to fish for Salmon and Migratory Trout with an instrument other than rod and line". It does not entitle licence holders to take sea fish.

We note that a number of the salmon and sea trout net fisheries are within areas designated by Welsh Government Sea Fisheries as a Bass Nursery Area, in which their Byelaw 29 states;

"No person shall fish for sea fish either from or by using a boat..."

Please access these links via electronic devices to see Welsh Government Sea Fisheries

<https://gov.wales/sites/default/files/publications/2018-05/south-wales-inshore-fishery-legislation.pdf>

bylaw 29 (c) shows a map and describes the restriction.

Marine Management Organisation Bass Fishing  
Guidance <https://www.gov.uk/government/publications/bass-industry-guidance-2020/bass-fishing-guidance-2020>

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

[REDACTED]  
Natural Resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain. We will then seek Ministerial approval.

Yours sincerely

[REDACTED]

[REDACTED] Freshwater Fisheries Management

Support by [REDACTED] reference ND2024, [REDACTED]

Objection by [REDACTED] Reference ND2024 [REDACTED]



24 January 2024  
Welsh Government  
Marine and Fisheries Division  
Cathays Park  
Cardiff  
CF10 3NQ

Ref: NL/2024 [REDACTED]  
[REDACTED] Net licence holder Dyfi

To whom it may concern

I am writing to object and reject the increase in cost to the [REDACTED] net licence on the Dyfi.

The cost of the licence had remained the same for a number of years, and in more recent years increased despite that the fish numbers being caught and kept are significantly lower than in the past.

I have always understood that the cost of the licence was based on the amount of fish caught on each river.

The fishing season has been cut by 2 months over the last couple of seasons for the net licence holders. The reasons given for this reduction was – to preserve fish stocks.

No reduction was made on the rod fishing season. As the figures show, they have a far greater impact on the migratory fish stocks, I can't understand this.

- Would you please explain to me why?

I note in the letter dated 15<sup>th</sup> December 23., that there is a 'proposed' increase to the cost of the rod licence.

- I am interested to understand why the net licence is to increase and yet the rod licence is only proposed. Would you please explain why?



This year you have offered us a Heritage Licence.

There are no details given as to what the Heritage Licence means, other than limiting the numbers of fish that can be taken and no fishing will be allowed once that number has been reached.

I understand that a net licence holder contacted [REDACTED] to request more information. He has told me that [REDACTED] said, there is no information available.

There must have been a consultation, policies decided upon and regulations agreed on and passed, before a Heritage Licence could be offered.

1. How can we be expected to make such an important decision with such little information?
2. Why is the cost of the Heritage Licence able to be so much cheaper than the current licence?
3. If we take up the Heritage licence, will we be able to return to the current licence should we chose to? (According to the net licence holder referred to above, [REDACTED] said we could)
4. Will we be allowed to fish/take other fish, such as sustainable Grey mullet and Flounder?
5. Why is the Dyfi licence duty at the top of the scale when the catch numbers are some of the lowest?

It has been stated by yourselves that the increase in licence duties is to cover increasing administration costs.

It appears to me that the administration costs could be reduced considerably and become more efficient.

Currently if a net licence holder makes changes with regards to endorsees, the licence has to be updated. A new updated licence is then sent out, incurring time and costs.

This is a waste of resources. If changes are made and recorded via email, passed on to the Bailiffs, recorded by the licence holder on their licence, this should be sufficient to all parties.

This system of recording changes to a shotgun licence is sufficient and acceptable to the firearms department. I am therefore sure this easier system should be acceptable to NRW fisheries division.

Yours sincerely

[REDACTED]

Response to [REDACTED] Reference ND2024 [REDACTED]



Our Ref:ND2024/[REDACTED]  
Your Ref:

[REDACTED]

Date 29<sup>th</sup> February 2024

Dear Mr [REDACTED]

**Objecting to the Net licence duties for 2024**

Thank you for your two responses to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This have been given the reference ND2024/[REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

## **Other Points raised**

### **Status of stocks and scrutiny of rod fisheries and their regulation.**

As you are aware in 2019 a Local Inquiry examined NRW's approach to salmon and sea trout stocks and our proposals.

The impact of the Bylaws brought in in 2020 had broadly similar impacts on the net and rod fisheries in terms of the numbers of fish and the eggs saved as a result. The technical case can be found here on the NRW website which gives greater detail.

<https://cdn.cyfoethnaturiol.cymru/media/684367/technical-case-structure-final.pdf?mode=pad&rnd=131654078133270000>

7.6. Allocating catch between net and rod fisheries .....	122
7.6.1. Analysis of impact on net fisheries .....	124
7.6.2. Analysis of impact on rod fisheries .....	127

The Inspectors report and the Ministers response can be found here:

<https://www.gov.wales/written-statement-outcome-local-inquiry-natural-resources-wales-proposed-all-wales-salmon-and-sea>

The Inspector found them to be necessary, proportionate and reasonable in view of the decline of salmon and sea trout stocks throughout Wales. The measures introduced by the byelaws had a similar effect on both nets and rods. The degree of scrutiny for the rod fishery has been same.

We acknowledge that there will be a mortality of salmon as a result of continued fishing even under catch and release restrictions both with nets and rods. Survival following angling is greater than 90%, over 96% for fly fishing. We have introduced restrictions to improve survival including banning bait fishing for salmon, the use of barbed hooks and treble hooks.

We have never sought to blame either netmen or anglers for the decline in stocks, however continuing to kill fish when there is such a large deficit in the number of spawners required to maintain populations is not sustainable. It's important to note that any additions to the spawning stocks are particularly valuable when stocks are at low levels. Even relatively small numbers of fish are crucial to recover stocks in as short a time as possible. Every spawner Matters.

### **Rod licence increases**

Please note that the salmon rod licence increase for 2024 and 2025 have already been advertised and agreed in 2023.

The full salmon licence will rise from £86.10 in 2023 to £90.40 in 2024 and £93.10 in 2025.

#### **Heritage Licence**

NRW recognises that some fishing methods, including some which have been in existence for several hundred years, represent traditional activities and may therefore have heritage value. These fisheries include the well-known coracle net operations on the Tywi and Teifi, but also the Cleddau compass nets and the Black Rock lave net fishery. This view has been supported in a report commissioned by the Environment Agency (2004): -

[Microsoft Word - Science Report SC030212 FINAL.doc \(publishing.service.gov.uk\)](#)

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Importantly we are proposing a new category of licence for 2024

Recognising that stocks and catches have markedly decreased in recent years this will allow netsmen to continue to participate in the fisheries, whilst helping protect stocks maintaining many of their heritage and cultural values whilst restricting the catch to less than 10 sea trout. Only 11 netsmen in 2023, caught more than 10 sea trout, the average median catch of sea trout was 8 in 2023.

The Heritage licence category is voluntary. Netsmen can either pay the full amount for their particular licence without any catch limits on the numbers of tags, or apply for a Heritage licence that will be capped at a maximum of 10 tags. The cost of the Heritage licence has been proposed as £90, the same as a full rod licence.

There are no limits on the number of Heritage licences available in each fishery, up to the maximum set within the Net Limitation Order, for the Dyfi this is 3.

In every other way, other than the total permissible catch and that once the Licencee has caught their maximum number of 10 fish they must cease fishing the licence is identical to the full licence. They must adhere to the same byelaws and NLO restrictions as the full Licence.

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<https://gov.wales/sites/default/files/publications/2018-05/south-wales-inshore-fishery-legislation.pdf>

bylaw 29 (c) shows a map and describes the restriction.

Marine Management Organisation Bass Fishing

Guidance <https://www.gov.uk/government/publications/bass-industry-guidance-2020/bass-fishing-guidance-2020>

### **Changes to the Licence and efficiency**

Changes were made to the administration of licences following the introduction of the Marine and Coastal Access act in 2009.

You can simply call or email us with changes to your endorsees, address etc during the season with no additional cost. We simply then update your licence with the updated details and reissue the licence.

You are bound by the conditions of the licence and you must be able to produce your licence for inspection are bound to produce the licence for inspection by a Natural Resources Wales Officer or a Police Constable or any other authorised person.

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

[REDACTED]  
Natural Resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain. We will then seek Ministerial approval.

Yours sincerely

[REDACTED]

[REDACTED] Freshwater Fisheries Management

Objection by [REDACTED] Teifi [REDACTED] Reference ND2024/[REDACTED]

Response to [REDACTED] Teifi [REDACTED] Reference ND2024 [REDACTED]



Our Ref: ND2024 [REDACTED]  
Your Ref: [REDACTED]

By email: [REDACTED]

Date 1<sup>st</sup> March 2024

Dear Mr [REDACTED]

**Objection to the Net licence duties for 2024**

Thank you for your response to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This have been given the reference ND2024 [REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some



47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

#### **Other Points raised**

##### **Recent byelaw constraints not taken into account**

Following the outcome of the 2019 Inquiry – where the Inspector concluded "the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales." The salmon and sea trout byelaws received Ministerial approval and came into effect on 1<sup>st</sup> January 2020 in Wales.

NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of both salmon and sea trout (particularly early running sea trout) have been in decline for several years and it is now important that spawning escapement is protected.

The Byelaws have a 'sunset' clause and will expire in 10 years. We are committed to a review of the byelaws after 5 years.

### **Heritage Licence**

NRW recognises that some fishing methods, including some which have been in existence for several hundred years, represent traditional activities and may therefore have heritage value. These fisheries include the well-known coracle net operations on the Tywi and Teifi, but also the Cleddau compass nets and the Black Rock lave net fishery. This view has been supported in a report commissioned by the Environment Agency (2004): -

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Importantly we are proposing a new category of licence for 2024

Recognising that stocks and catches have markedly decreased in recent years this will allow netmen to continue to participate in the fisheries, whilst helping protect stocks maintaining many of their heritage and cultural values whilst restricting the catch to less than 10 sea trout. Only 11 netmen in 2023, caught more than 10 sea trout, the average median catch of sea trout was 8 in 2023.

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There are no limits on the number of Heritage licences available in each fishery

In every other way, other than the total permissible catch and that once the Licencee has caught their maximum number of 10 fish they must cease fishing the licence is identical to the full licence. They must adhere to the same byelaws and NLO restrictions as the full Licence.

Once a netmen has taken out a Licence with the catch restrictions, they would not be able to revert to a full licence in the same season. It would however not stop them from applying for a full licence in future.

Inevitably there will be a potential reduction in net licence income. For 2024, total income from net licences if all allocated licences are taken out would reduce from £13,734 to £12,279 following the 6 applications to take a 'Heritage Licence'.

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

[REDACTED]  
Natural Resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain.  
We will then seek Ministerial approval.

Yours sincerely

[REDACTED]

[REDACTED] Freshwater Fisheries Management

Objection by [REDACTED] Reference ND2024 [REDACTED]

Response to [REDACTED] Reference ND2024/[REDACTED]



Our Ref: ND2024/[REDACTED]  
Your Ref: [REDACTED]

[REDACTED]

Date 29<sup>th</sup> February 2024

Dear Mr [REDACTED]

**Objecting to the Net licence duties for 2024**

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NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

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We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

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It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

#### **Other Points raised**

##### **Water Quality/ Pollution**

Addressing Water Quality remains a priority for NRW. Water quality issues continue to be the subject of intense public and political scrutiny, and we have had to significantly re-prioritise and adjust our workplan priorities to respond.

For example, we have set up a programme to address the problem of phosphates in SAC rivers, with detailed plans to bring failing catchments back to favourable condition.

We are reviewing our regulatory position on storm overflows and how and if NRW needs to develop its regulatory response. NRW is chair of the Task force set up between Water Companies, Ofwat, Welsh Government and NRW, who have developed a storm overflow roadmap and action plan to drive forward improvement in the performance of storm overflows in Wales.

The investment Water Companies make through Ofwat's Price review will be critical to addressing the Nature Emergency, alongside action by others.

We continue to work with others to take forward action in the storm overflow Roadmap to review our approach to the regulation of storm overflows and to drive forward the Actions NRW committed to take in the SAC Rivers action plan.

We welcome the continued capital funding from WG which means that we'll be able to continue investing in our Nature and Climate Emergencies capital programme which includes water quality, metal mine remediation, peatland restoration and nature projects.

### **Predation**

A 'Fish-Eating Birds external Advisory Group' was commissioned by Natural Resources Wales in 2020 to examine the extent to which fish-eating birds were implicated in (i) the decline or the suppressed recovery of wild fish populations and (ii) damage to still water fisheries. Depending on the findings of the above (iii) options would be explored to manage the impact of predation by fish-eating birds.


The key outputs of the Advisory Group were ten evidence reports that informed the development of a Final Report and a set of recommendations, submitted to NRW (May 2022).

Based on the recommendations from the Advisory Group, NRW proposed a set of 39 actions. This framework was approved by NRW Board (July 2022).

In June 2023 NRW appointed a Freshwater Fish Lead Specialist to progress the FEB framework. NRW have initiated a formal project to implement the actions, with the initial focus on a catchment-based pilot on the river Usk, that aims to apply and test the advisory group recommendations on a local scale. The first phase of the pilot will run in early spring of 2024 and findings from the overall pilot will be captured in an evidence report that will inform NRW's future approach to the licencing of Fish-Eating Bird's in Wales.

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

  
Natural resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain. We will then seek Ministerial approval.

Yours sincerely

[Redacted signature]

[Redacted name] Freshwater Fisheries Management



Objection by [REDACTED] Teifi [REDACTED] Reference ND2024/[REDACTED]

Response to [REDACTED] Teifi [REDACTED] Reference ND2024/[REDACTED]

Our Ref:ND2024/[REDACTED]  
Your Ref: [REDACTED]

[REDACTED]  
By email: [REDACTED]

Date 1<sup>st</sup> March 2024

Dear Mr [REDACTED]

#### **Objection to the Net licence duties for 2024**

Thank you for your response to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This have been given the reference ND2024/[REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

**Other Points raised.**

**Recent byelaw constraints not taken into account.**

Following the outcome of the 2019 Inquiry – where the Inspector concluded “the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales.” The salmon and sea trout byelaws received Ministerial approval and came into effect on 1<sup>st</sup> January 2020 in Wales.

NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of both salmon and sea trout (particularly early running sea trout) have been in decline for several years and it is now important that spawning escapement is protected.

The Byelaws have a ‘sunset’ clause and will expire in 10 years. We are committed to a review of the byelaws after 5 years.

**Heritage Licence**

NRW recognises that some fishing methods, including some which have been in existence for several hundred years, represent traditional activities and may therefore have heritage value. These fisheries include the well-known coracle net operations on the Tywi and Teifi, but also the Cleddau compass nets and the Black Rock lave net fishery. This view has been supported in a report commissioned by the Environment Agency (2004): -

[Microsoft Word - Science Report SC030212 FINAL.doc \(publishing.service.gov.uk\)](#)

NRW's purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. In this context sustainability means with a view to benefiting, and in a manner designed to benefit, the people, environment and economy of Wales now and in the future.

Importantly we are proposing a new category of licence for 2024.

Recognising that stocks and catches have markedly decreased in recent years this will allow netmen to continue to participate in the fisheries, whilst helping protect stocks maintaining many of their heritage and cultural values whilst restricting the catch to less than 10 sea trout. Only 11 netmen in 2023, caught more than 10 sea trout, the average median catch of sea trout was 8 in 2023.

The Heritage licence category is voluntary. Netmen can either pay the full amount for their particular licence without any catch limits on the numbers of tags, or apply for a Heritage licence that will be capped at a maximum of 10 tags. The cost of the Heritage licence has been proposed as £90, the same as a full rod licence.

There are no limits on the number of Heritage licences available in each fishery.

In every other way, other than the total permissible catch and that once the Licencee has caught their maximum number of 10 fish they must cease fishing the licence is identical to the full licence. They must adhere to the same byelaws and NLO restrictions as the full Licence.

Once a netman has taken out a Licence with the catch restrictions, they would not be able to revert to a full licence in the same season. It would however not stop them from applying for a full licence in future.

Inevitably there will be a potential reduction in net licence income. For 2024. Total income from net licences if all allocated licences are taken out would reduce from £13,734 to £12,279 following the 6 applications to take a 'Heritage Licence'.

**No Anglers have been asked to accept such limited fishing conditions.**

The current byelaws were designed to have similar impacts on both rod and net anglers. Neither the rod or net fisheries can take a salmon, all have to be returned.

The net fisheries start was put to 1<sup>st</sup> April to save large sea trout.

Commensurate restrictions were also placed on anglers who cannot take or kill a sea trout before the net fishery opens on 1<sup>st</sup> April. Method restrictions are also in place to ensure released fish have the best chance of survival.

For Anglers there is an additional requirement for all sea trout over 60cm (approximately 5lb 8oz) to be returned throughout the season, whilst there is no size limit for sea trout in the net fishery.

The Local Inquiry Inspector concluded "the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales."

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

[REDACTED]  
Natural Resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain.

We will then seek Ministerial approval.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Freshwater Fisheries Management

Objection by [REDACTED] Black Rock lave net Reference ND2024, [REDACTED]

Response to [REDACTED] Black Rock lave net Reference ND2024, [REDACTED]

Our Ref: ND2024, [REDACTED]  
Your Ref

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

By email [REDACTED]

Date 1<sup>st</sup> March 2024

Dear Mr [REDACTED]

**Objecting to the Net licence duties for 2024**

Thank you for your two responses to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This have been given the reference ND2024, [REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

NRW is the responsible body for the administration of fishing licence duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any duty, NRW is under a statutory obligation to advertise the proposed duties, inviting written representations to be made to the Welsh Minister. The Minister then has the power to approve the duties with or without modifications, or to refuse to approve any duty submitted by NRW for approval (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.



The existing net duties structure were set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%, it has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we properly manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst relatively high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural resources are sustainably maintained, enhanced and used, now and in the future. The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

**Other Points raised.**

**Reduce the size of the logbooks.**

Yes we will look to reduce the size of the logbooks for fisheries that fish less. The logbooks cost less than £10 each, we enquired last time about a reduced size logbook with the printers and there was no reduction in price. Once the current stock is used probably this year, we will again look to see if we can make efficiencies.

**Recent constraints not taken into account.**

Following the outcome of the 2019 Inquiry – where the Inspector concluded “the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales.” The salmon and sea trout byelaws received Ministerial approval and came into effect on 1<sup>st</sup> January 2020 in Wales. Although we acknowledge that the Black Rock fishery is not subject to these particular restrictions, the current status of salmon stocks including the Wye are not sufficiently robust to allow addition fishing pressure.




NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of salmon have been in decline for several years and it is now important that spawning escapement is protected.

The current season length for the black Rock fishery has been in place for some 25 years and was set in 1999 with the introduction of National Salmon Byelaws to stop the take of salmon by nets before 1<sup>st</sup> June across England and Wales. Black Rock lave net fishery already has a season one month longer than any other net fishery in Wales. There are currently no plans to review these restrictions.

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.




You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

  
Natural resources Wales  
Maes Newydd  
Llandarcy  
Neath Port Talbot  
SA10 6JQ

If we do not hear from you by 8<sup>th</sup> March 2024, we will assume that your objections remain.

We will then seek Ministerial approval.

Yours sincerely

  
  
 Freshwater Fisheries Management

Objection by [REDACTED] Black Rock lave net Reference ND2024/[REDACTED]

Response to [REDACTED] Black Rock lave net Reference ND2024, [REDACTED]



Our Ref:ND2024 [REDACTED]  
Your Ref:2024

[REDACTED]

Date 29<sup>th</sup> February 2024

Dear Mr [REDACTED]

**Objecting to the Net licence duties for 2024**

Thank you for your two responses to the statutory advertising of the salmon and sea trout net fishing licence duties for 2024. This have been given the reference ND2024, [REDACTED]. The duties were advertised from 15<sup>th</sup> December 2023 to 26<sup>th</sup> January 2024. We received 13 responses to the advertisement.

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The advertised increase in Net Licence duties for 2024 are relatively modest, and in line with other increases in fees proposed by NRW.

#### **Other Points raised**

##### **Water Quality/ Pollution**

Addressing Water Quality remains a priority for NRW.

Water quality issues continue to be the subject of intense public and political scrutiny, and we have had to significantly re-prioritise and adjust our workplan priorities to respond.

For example, we have set up a programme to address the problem of phosphates in SAC rivers, with detailed plans to bring failing catchments back to favourable condition.

We are reviewing our regulatory position on storm overflows and how and if NRW needs to develop its regulatory response. NRW is chair of the Task force set up between Water Companies, Ofwat, Welsh Government and NRW, who have developed a storm overflow roadmap and action plan to drive forward improvement in the performance of storm overflows in Wales.

The Investment Water Companies make through Ofwat's Price review will be critical to addressing the Nature Emergency, alongside action by others.

We continue to work with others to take forward action in the storm overflow Roadmap to review our approach to the regulation of storm overflows and to drive forward the Actions NRW committed to take in the SAC Rivers action plan.

We welcome the continued capital funding from WG which means that we'll be able to continue investing in our Nature and Climate Emergencies capital programme which includes water quality, metal mine remediation, peatland restoration and nature projects.

We are required to invite you to withdraw your objection to the new net licence duties based on the information in this response.

You can respond by email to [Fisheries.wales@cyfoethnaturiolcymru.gov.uk](mailto:Fisheries.wales@cyfoethnaturiolcymru.gov.uk) or in writing to

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Yours sincerely

[REDACTED]

[REDACTED] Freshwater Fisheries Management

## Options for sustaining net fisheries in Wales

Netsmen Liaison meetings  
February 2023



1

### Introduction

- **This evenings Agenda**
- The Fisheries
- The status of sea trout and salmon stocks
- Current participation in the fisheries and catches
- Regulation of net fisheries: current and future options
- How could we structure the licences in the future including potential for Heritage licences?
- Your views on how we can better protect stocks

2

## Background



- **2020 review proposed new net licence structure –**
  - aim of ensuring duties reflected the principles of cost recovery. Deferred pending further work on sea trout sustainability.

The principle of fish stock sustainability.

- The first principle in managing fish stocks must be that any exploitation and harvest of fish should only take place when the stock is within sustainable limits.
- In evaluating management options, the sustainable management of the natural resource should take precedence.

3

## The Fisheries



- 10 catchments with net fisheries in Wales
- 53 licences available
  - Potential income £16.6K
  - 39 Licences issues in 2022 - income circa £11K
- 3 main methods of controlling exploitation by net fisheries
  1. Net Limitation Order
  2. Byelaws
  3. Licence conditions
- Current NLO 2017, Byelaws reviewed 2017 – implemented in 2020

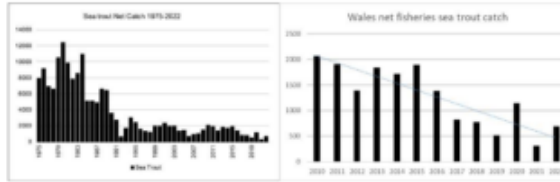
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## Sea trout net catch



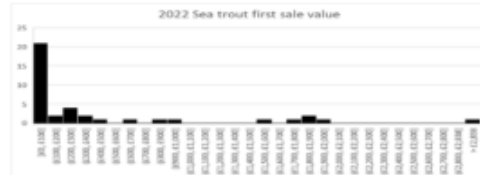
Provisional net catch 2022 - 688

The two main fisheries are the Tywi (201 sea trout) and Telfi (457 sea trout), which account for ca. 96% of the total Welsh net catch.



5

## Estimates of first sale value of sea trout 2022



**Distribution of catches varies markedly between fisheries and individual licences**

- 18 of 39 licences taken out, recorded no catch
- The average mean catch was 18 sea trout, whilst just 6 netsmen recorded catches of over 50.
- 6 recorded catches of sea trout with a value greater than £1,000

6



## Measuring stock performance



- **23 Principal salmon rivers and 33 main sea trout rivers**
  - Made under Ministerial direction
  - International commitments North Atlantic Salmon Conservation Organisation NASCO
- **Stock recruitment curve**
- **Reference points: Conservation Limit and Management Target**
- **Modelled using catch data, exploitation rates and various biometrics each year**
  - Reported to NASCO and ICES

7

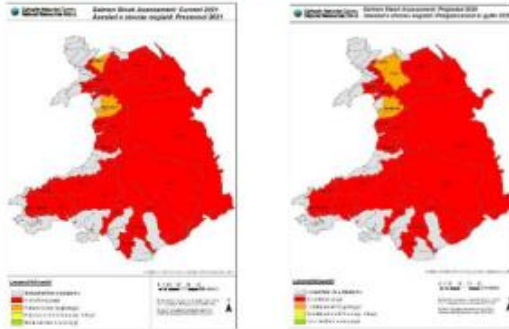
## Stock recruitment and Conservation Limit



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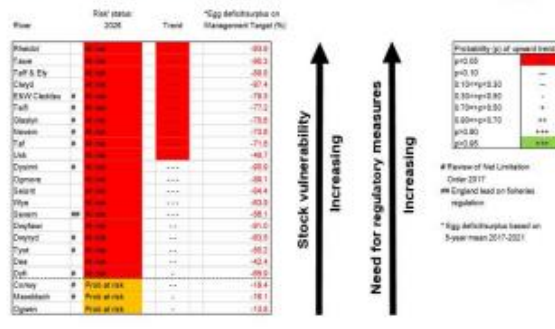
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## Salmon stock performance: Current 2021 and Projected 2026

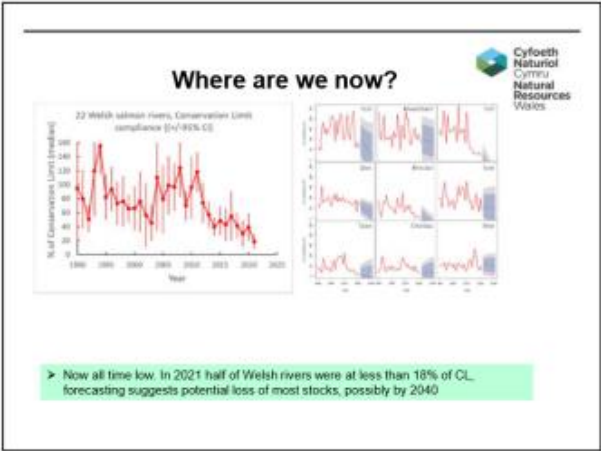


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## Overview of salmon stock status in Wales: 2021 assessment



10



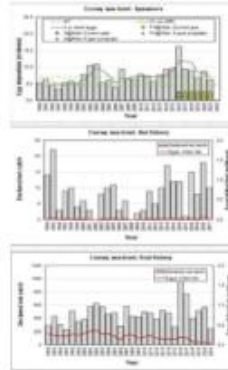
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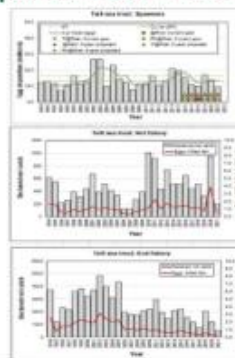


### Conwy egg deposition estimates



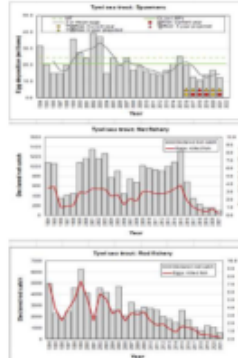
15

### Teifi egg deposition estimates



16

## Tywi egg deposition estimates



17

## Considerations



We continue to have growing concerns about the status of both salmon and sea trout stocks.

Stocks are below safe biological limits and are vulnerable.

Further exploitation controls are required to safeguard spawning adult sea trout stocks.

NRW are conscious that the viability of net fisheries is challenged due to the current status of stocks and the need for further exploitation controls.

### Three options for managing exploitation

- Net Limitation Order (number of licences and area of operation)
- Byelaws (seasons, closed times, carcass tags, nets)
- Licence Conditions

18

## Current regulation controls



2020 byelaws introduced C&R for Salmon all nets and rods

### Sea trout net restrictions

Shortened seasons for sea trout  
Delayed start to protect early running large sea trout  
Season ended 31<sup>st</sup> July to protect salmon

### Sea trout rod restrictions

Size limit 60cm  
method restrictions to facilitate better C&R and fish survival  
C&R of sea trout before 1<sup>st</sup> May

NRW committed to 5 year review

Continuing to work with CEFAS and EA on revising assessment methodology and a more dynamic regulatory scheme in response to annual assessments for both net and rod fisheries

19

## Discussion



Salmon and sea trout stocks are increasingly vulnerable from a range of pressures

- How can we better protect stocks?
- What are your thoughts?

20

## What can we do now? Licence Conditions - TACs



- 'Not at Risk' - we would issue a TAC that would maximise allowable harvest, whilst minimising the risk of failing to meet future conservation limit or management target.
- 'Probably Not at Risk' – a TAC equivalent to between 50 - 100%ile of previous catches
- 'Probably at Risk' a TAC equivalent to between 25%ile of previous catches
- 'At Risk' – we propose to set a zero harvest TAC. We note however that a heritage catch would permit some limited harvest.
- TACs could be based on the percentile distribution of historic catches between 2000 and 2021.

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## 'Heritage Fisheries'



We recognise the heritage and cultural value of these net fisheries. We also note that the application of a minimal or zero TAC may result in fewer netsman taking out licences. This may threaten the future participation in the fisheries.

Hence, we also propose to offer netsmen the opportunity to apply for a "Heritage Licence."

A Heritage Licence would have a nominal cost (to be determined) and would allow licencees to maintain the practice of fishing, whilst only allowing a minimal take of fish.

On most fisheries, these proposals to implement a TAC, will have a relatively low impact on the current level of fishing and take.

On two fisheries, the Tywi and Teifi, their level of fishing and take is higher, and so the impact on their permitted catch will be greater.

22



## Outline summary of proposed sea trout TAC scheme



Current stock status	Stock assessment	Harvest	Heritage fisheries	TAC allocation	Current fisheries affected	Current TAC
High management target (High conservation unit)	Highly vulnerable	No harvest	Heritage fisheries with maximum take to maintain heritage participation in the fishery	Heritage fisheries participate in the fishery - maximum take to be determined	Full TAC (includes some CYR system)	Heritage fisheries harvest to allow heritage value of fishery to be conserved
Probably at risk (High management target) (High conservation unit)	Vulnerable	TAC restricted (25% catch or higher?)	Heritage fisheries and restricted TAC to 25% level (2000-2012)	maintain heritage participation in the fishery, plus allocate TAC on the remaining proportion of TAC	Full	Full 25% TAC 23
Probably at risk (High management target) (High conservation unit)	Stable	TAC restricted (20% catch or 10%ile)	Heritage fisheries and restricted TAC to 10%ile level (2000-2012)	maintain heritage participation in the fishery, plus allocate 20%ile TAC on the remaining proportion of TAC	Mostly in Cymru	Heritage - 4 Cymru - 18
Not at risk (High management target) (High conservation unit)	Healthy and sustainable	No TAC or TAC to prevent fishery reducing in size and failing the management target	Heritage fisheries with minimal TAC (see for restricted)	TAC to prevent fishery reducing in size and failing the management target	Some	

23

## You are asked to consider the proposals and to:



1. Comment on the need and approach proposed to limiting sea trout catches
2. Comment on the need and approach to establishing a heritage licence
3. How could we structure the licences in the future including potential for Heritage licences?

24

**You may wish to comment further on:**



Heritage licence availability. Should all fisheries have heritage status to reflect place as well as method?

What might the allowable harvest be to conserve an individual Heritage/cultural licence and fishery?

Should there be a Heritage licence category in non-vulnerable stocks?


How should the remaining TAC be allocated between licencees?

Equal pro-rated TAC allocation (all have same opportunity)

Allocated as proportion of TAC according to proportion the Licencee has reported caught in past?

Should different fishing techniques e.g., seines and coracles, be treated equally within the same catchment?

25



Ardal Bywyd Fishing Area	Dull Ffynsfa Fishing Method	Tâl TDR
Dyff	Sêl/Seine	6011
Tywl/Towl	Sêl/Seine	6011
Tywl/Towl	Corngl/Coracle	6063
Talk	Sêl/Seine	6011
Talk	Corngl/Coracle	6280
Dysym	Sêl/Seine	6381
Taf	Corngl/Coracle	6280
Taf	Braso/Wade	683
Comy	Sêl/Seine	6381
Comy	Bydagi/Trap	6138
Nantylen/Neven	Sêl/Seine	6274
Mawddach	Sêl/Seine	6274
Cleddau	Corngl/Coracle	6101
Dyff/Wye	Gwl/Lawe	683

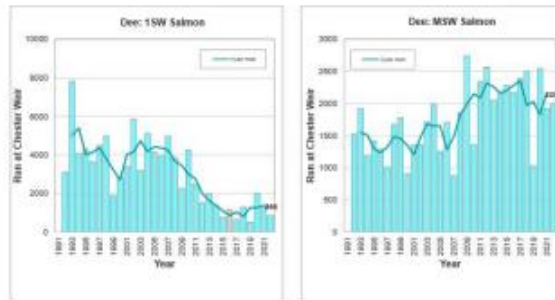
26

## Ancillary information



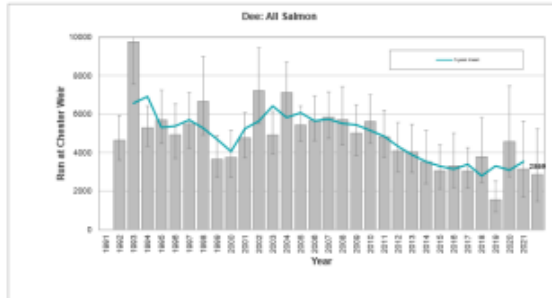
27

## Dee salmon run estimates



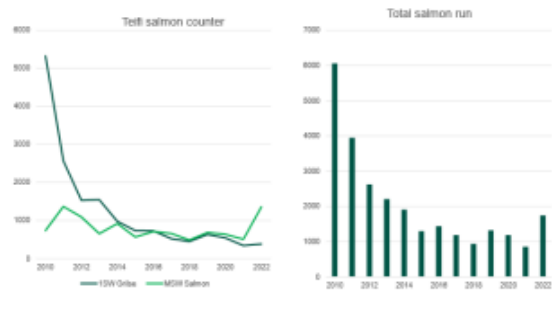
28

## Dee salmon run estimates



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## Teifi fish counter salmon run estimates 2010 – 2022



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