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George Eustice MP, Fisheries Minister, Defra
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Lesley Griffiths AM, Cabinet Secretary, Welsh Assembly Government
Correspondence.Lesley.Griffiths@gov.wales

Monday, 9 April 2018

Dear George & Lesley,

I am writing with regard to the decision you will be asked to take imminently about the regulation of exploitation of salmon by anglers. The Angling Trust had agreed after many weeks of discussion a package of voluntary measures with the Environment Agency (EA) which was acceptable to the stakeholder group we had formed. However these measures were rejected by Natural Resources Wales (NRW) and the EA in favour of 100% mandatory catch and release across Wales and on some rivers in England. Additional byelaws are proposed for the use of certain types of fishing tackle which have bought by anglers and tackle suppliers in good faith over recent years.

In that context, the North West Angling Trust Fisheries Consultative Council and the Campaign for the Protection for Welsh Fisheries, which are both affiliated to the Angling Trust, commissioned research from independent statisticians to consider the statistical basis for the implementation of these new regulations.

The Consultant Statisticians' enclosed Qualified Statement presents strong evidence that the River Status Classification System that frames the proposed English & Welsh salmon mandatory byelaw measures and voluntary C & R targets is formed on invalid statistical principles and uses modelling that has major flaws and weaknesses.

The report recommends alternate model applications to provide greater assurance, validity, consistency and interpretation. These models produce significantly different stock status predictions and trend forecasts which determine the "probability of achieving the Management Objective" in current (2016) & five year forward (2021) River Compliance Assessments.

The consultations and proposed introduction of 10 year mandatory byelaw measures have not considered fully the wider environmental, social and economic benefits that rod fisheries deliver. I have asked the Environment Agency on two separate occasions (8 March and 26 March) to see a copy of the economic impact assessment on which the byelaws are based, but have not yet received this.

We also continue to be frustrated that other actions to protect and restore salmon stocks, such as the control of predatory birds and regulation of polluters and owners of barriers to migration, are not being taken.

The current individual river classifications and national compliance assessment system cannot be used as a basis for mandatory byelaws which will have a very significant impact on anglers and the industry they support.

On behalf of the NWATFCC and CFPWF, we are writing to ask you to consider urgently the following draft proposals:

- Suspend the proposed 2018 EA & NRW mandatory byelaw measures;
- Agree interim proposals to achieve minimum voluntary catch and release targets using refined river classifications;
- Set and agree a timetable to consult on and deliver within 3 years a new harmonised English & Welsh system of stock reporting, river classifications and catch and release measures and targets.

We do not believe that this new information should delay the implementation of the regulation of mixed stock net fisheries, because the case for ending these is not reliant on river classification or stock reporting.

All our organisations are committed to the promotion and implementation of voluntary measures to reduce the impact of angling on fish stocks and have a strong track record in this regard.

We would be happy to discuss these proposals with you and your officials before you make the decision to regulate anglers with new byelaws.

Yours sincerely

A handwritten signature in cursive script that reads "Mark Lloyd". The signature is written in dark ink and is positioned above the typed name and title.

Mark Lloyd
Chief Executive