

Cynulliad Cenedlaethol Cymru

Y Pwyllgor Amgylchedd a Chynaliadwyedd

NRW 2015 – 09

Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015

Ymateb gan Prince Albert Angling Society (Saesneg yn Unig)

This response is submitted on behalf of the management committee and 9,000 members of Prince Albert Angling Society, who own, rent and manage numerous waters on the following rivers within Wales:

Conwy (including Lledr), Dee, Dyfi (including Cleifion, Dulas North, Dulas South & Twymyn), Dysinni, Mawddach, Severn (including Banwy, Gam & Vyrnwy), Teifi, Tywi (including Cothi) and Wnion.

Hatchery Closures

1. Our biggest concerns centre on the decision by NRW in 2014 to close all but one of the hatcheries in Wales and bring to an end third party stocking.
We submitted our response as part of the consultation process but were concerned at the very beginning when at a meeting between NRW, Gwynedd Local Fisheries Advisory Group and the Dee Local Fisheries Advisory Group at Coed-y-Brenin Visitor Centre on 2 April 2014 we were told by Tim Jones that NRW *'would not be bound by any findings from the consultation exercise'*. It felt even more that we had participated in an exercise to ensure that all the correct boxes had been ticked when I spoke to Mike Evans before the start of the NRW Board Meeting at Menai Bridge on 2nd October 2014. When I spoke about the need to be able to restock streams as part of a regeneration process (we have identified several areas when participating in habitat surveys in conjunction with Afonydd Cymru within the Mawddach catchment) I was treated with disdain receiving replies such as *'what makes you think you know better than the fish'* and *'what's the point in putting fish where they clearly can't survive'* even though one particular stream has excellent habitat and a wealth of invertebrate life, though sadly a complete lack of fish.
2. We believe that the information presented to the NRW Board Members was deliberately phrased to achieve NRW's preferred outcome. The following is evidence of this:
 - Peter Gough addressed the board members and stated that they had *'they had only received 109 responses to the consultation'* and then compared this with the number of rod licences sold in Wales inferring that angling organisations in Wales were supportive of hatchery closures. This completely ignored the fact that many of these responses were from clubs and organisations and were on behalf of thousands of anglers.
 - To suggest that those responses *'did not tell us anything that we were not already aware of'* is hugely dismissive of some very detailed and knowledgeable responses (we have read too many of these to think otherwise).
 - He also used the phrase *'this is what we believe'* when speaking of the supposed harm caused by hatcheries. There is a clear distinction between belief and hard evidence.
 - Mr Gough also described to board members how the rivers were being deprived of spawning fish by the hatcheries, using this to infer that hatcheries cause harm to the river systems of Wales. This clearly is not the whole picture and disregards the fact that many of the broodstock are angler caught and as such are donated to the hatcheries by those anglers.
3. When we originally responded to the consultation document on the closure of hatcheries we were concerned that the phrase *"there is little evidence available to allow NRW to determine whether salmon stocking*

has been effective at achieving the objectives of mitigating for lost habitat or improving rod catches” appeared to be used as a reason to close all but one of the hatcheries in Wales. We stressed that as strong supporters of partnership projects, we would offer the support of our members in a voluntary capacity to work alongside NRW staff to collect such evidence. To make a decision based on *‘little evidence’* gives us little confidence in the ability of NRW to manage and protect the rivers of Wales. We say this as a club which has been investing £4000 p.a. to sponsor the stocking of the Mawddach and Wnion through the Mawddach Hatchery. We wish our members’ money to be invested wisely but until there was conclusive evidence no decision on the future of hatcheries and stocking should have been made by NRW.

4. In their consultation document NRW also made the statement that *“Some of the recent scientific literature demonstrates that stocking hatchery-reared salmon can potentially result in adverse impacts on the long term population fitness of wild salmon populations.”* - Presumably therefore other studies suggested otherwise!
We are also aware that much this evidence came from Kyle Young (no longer with NRW) and was based on American studies of Pacific Salmon and Steelhead (migratory rainbow trout). It is simply unacceptable to use such studies to inform decisions on our own native Atlantic Salmon and Sea Trout.
5. In the same consultation document we were asked if we agreed or disagreed *‘that NRW should focus its efforts and resources on improvements to habitat?’* We believe that habitat improvement has a key role to play in the future of the rivers of Wales (our members actively participate in the work of the Dee Rivers Trust and have taken a lead role alongside Afonydd Cymru in habitat survey work on the Mawddach).
6. We categorically do not believe that habitat improvement and mitigation stocking are mutually exclusive. However given that returning numbers of sea trout are classified as *‘not at risk’* across most Welsh rivers (see NRW’s ‘Know Your River’ documents) it rather suggests that much of the habitat is good and therefore what dramatic improvements can we expect in the case of salmon without the assistance of stocking?
7. In November 2013 the IBIS-AST Salmon Stocking Conference was held at the Marriott Hotel in Glasgow with the agenda being *‘Boosting salmon numbers: is stocking the answer or the problem?’* Keith Scriven (then hatchery manager at both Mawddach and Maerdy) and the hatchery manager of Cynrig were refused permission by NRW to attend this conference. It is hardly surprising that given such bias there was no balanced outcome to NRW’s decision making regarding hatcheries.
8. The Environment Agencies document ‘Salmonid & Freshwater Fisheries Statistics for England & Wales, 2013’ provides the following information *“The river with the highest declared rod catch of salmon in 2013 was the Tyne (3,874). 25% of the total England and Wales rod catch of salmon was recorded on the Tyne in 2013, this shows an increase of 3% from 2012”*. (The total rod catch for the whole of Wales in 2013 was only 3114). It beggars belief that the river that has 25% of the total rod catch for England & Wales received 28.86% of all the 0+ parr stocked in England and Wales and 99.99% of all the 1+ parr and yet NRW management can paint a picture to the NRW board members of the supposed harm caused by stocking (and yes we are quite aware of the clean-up of the Tyne estuary in the past 40 years and other contributory factors).
9. The Environment Agencies document ‘Salmonid & Freshwater Fisheries Statistics for England & Wales, 2013’ also tells us that *‘The river with the highest declared rod catch of sea trout in 2013 was the Dyfi.....’*. The New Dyfi Fisheries Association has been stocking the Dyfi since the 1980’s, compensating for areas of depleted habitat using angler caught broodstock and rearing the fish in a private hatchery before stocking the parr out into carefully selected areas. I pointed this out to NRW’s Ceri Davies during the coffee break at the October 2014 Board Meeting but she was unable

to enlighten me as to how much better the river would have been if this ‘supposed harm’ had not been carried out since the 1980’s.

10. In the pursuit of this anti stocking ideology the benefits of angling tourism appear to have been completely ignored. A questionnaire survey of 70 anglers was conducted on the Mawddach in 2010. 62.8% stated that they would no longer fish the river if mandatory catch and release was to be introduced. The same situation will arise if we do not take action to maintain our migratory fish stocks. Many anglers have holiday accommodation in the area (one small caravan site alone has 33 out of 60 static/permanent caravans occupied by fisherman) and they and their families make a substantial contribution to the local economy. The EA’s own figures show that angling effort on the Mawddach in 2009 was only 27% of what it was in 1995 and even the perception that fish numbers are declining because of a lack of stocking may further damage angling tourism throughout Wales with a financial cost far greater than any savings made through the closure of hatcheries. Given the figures for the Tyne shown in paragraph 8 above it is easy to see why there is a growth in angling tourism in North East England and a decline in Wales

Reorganisation and the creation of NRW

1. We feel that the creation of NRW a single body has not been handled effectively. We have always had support from, and had developed effective working relationships, with many of the former Environment Agency Staff who were based both at Parc Menai in Bangor and in North Wales in general. To lose the knowledge and experience of people such as Alan Winstone, Julian Bray, Matthew Hazlewood and the Mawddach Hatchery Manager, Keith Scriven is something which NRW could ill afford to do. Fisheries within North Wales are all the poorer for this.
2. We have the utmost respect for the members of the Enforcement Team and to expect them to protect the fisheries of North Wales effectively with such depleted numbers is both unreasonable and impossible.
3. To time the review of hatcheries and stocking during this reorganisation period was ill-judged. However given that NRW management had made their decision to ‘impose this upon us’ long before the consultation period had begun it is hardly surprising.

A level playing field?

As an angling organisation we have worked in co-operation with both Environment Agency Wales and CCW prior to this prior to the formation of NRW. Typical examples of this would include our participation in broodstock collection, assisting in the stocking out of juvenile fish, habitat survey work in conjunction with Afonydd Cymru and the Water Framework Directive Partnership Project to eradicate invasive species within the Aber Mawddach SSSI. In all of these we have freely given both our labour and financial backing because of our passion for angling, our concerns for the environment within which it takes place and our desire to hand this on to future generations in a fit and healthy state.

However too often we feel that we have to abide by rigid guidelines whilst having to accept that there are seemingly unfair situations within the same catchment which cannot be rectified. This can be illustrated by the following examples (there are many more across Wales)

1. The creation of Llyn Celyn on the headwaters of the Afon Tryweryn denied access for migratory fish to miles of spawning territory yet we cannot compensate for this by using hatchery reared fish.
2. The Ardudwy Leat. This captures the waters of every tributary of the Afon Eden (Principle tributary ofn the Afon Mawddach) on the western side of its catchment and diverts it to the neighbouring Dwyryd catchment via Llyn Trawsfynydd, leaving the Eden with the water from 3x 4” pipes. Worse

still is the fact that any migratory fish which did ascend the dams on the North and South Crawcellt would have to leave those streams, along with all of their offspring, via the leat and enter Llyn Trawsfynydd. This is evidenced by the capture of sea trout from the lake. (There are witnesses who will vouch for all of the above).

The situation is further exacerbated during spate conditions when the moment that the water levels fall and can no longer flow over the 3 dams, the flow reverts immediately to the 3 pipes resulting in an instant fall in river levels in the Afon Eden. As a result migratory fish have difficulty in negotiating the river.

However suggestions that we could compensate for this situation by opening up other parts of the catchment to migratory fish are stalled by suggesting that this would compromise the existing ecosystems.

3. Much of Wales suffers from habitat that has been damaged by generations of mining. In the area of Mynydd Penrhos between the Afon Mawddach and Afon Wen, Forestry Commission Wales (immediately prior to the creation of NRW) were working to filter the outflow from a copper bog in order to improve the water quality of the Afon Mawddach. However when CCW detected the presence of a rare plant that thrives in a copper rich environment the whole project was suspended.

In conclusion we, as representatives of a major angling organisation, feel extremely let down by the way that NRW, without due research and without paying heed to so many experienced voices, has used such heavy handed tactics to impose these draconian measures on the fisheries of Wales. Furthermore, from listening to so many other angling representatives at the many meetings which our representatives attend, we are aware that our view is shared by the vast majority of anglers within Wales. We trust that the Environment and Sustainability Committee will raise our concerns during the 2015 Annual Scrutiny.

John Eardley

Gwynedd LFG Representative – Prince Albert Angling Society

26th March 2015