



SOUTH WEST RIVERS ASSOCIATION

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Devon and Severn IFCA Review of the Netting Permit Conditions

Response to Formal Consultation

[South West Rivers Association](#) is a representative body for its member river associations, which comprise riparian fishery owners & managers, anglers and environmentalists. As such it has an interest in all activities that can affect the fish stocks in the rivers of the South West, including netting around the coastline and in estuaries.

Our response below focuses on our concerns for the impact the proposed netting in the Salcombe Estuary will have on salmonids but we recognise that there would be other adverse impacts including effects on a variety of fish species, wildlife, the estuary environment, other stakeholders and businesses. The Salcombe Estuary does not have any tributaries that support runs of salmonids, but sea trout are present as evidenced by the netting trials and recognised by the IFCA's Byelaw and Permitting Sub-Committee. The sea trout in the Salcombe Estuary should not be considered in isolation. They form part of the stock that migrate and spawn in local rivers of the South West and in rivers further away.

We strongly object to the proposal to open a fixed net fishery in the Salcombe Estuary. It would be a regressive step that risks increasing mortality of sea trout in the marine environment and it risks creating a precedent that could be used to justify netting in other estuaries with consequent damage to stocks of salmonids.

Our concern for sea trout should also be considered in the context of evidence that numbers of sea trout have plummeted over the last decade in rivers throughout England and Wales as concluded at the Institute of Fisheries Management Sea Trout Symposium held in September 2023. Marine netting is recognised as one of the factors contributing to their decline. Within English waters, the IFCAs are one of the principal organisations that can help reduce marine mortality of salmonids.

IFCAs have responsibilities to consider the conservation of salmon and sea trout. The IFCA previously recognised this with protection of salmon and sea trout being one of the four key drivers in establishing its netting permit byelaw in 2018. The proposed netting would weaken the IFCA's previous commitment to the protection of salmonids when it is more important than ever to protect these stocks.

Apart from the sea trout present in the Salcombe estuary, there are also shad, a protected species. Repeated netting and catching of sea trout and shad will result in a significant percentage suffering cumulative damage. This is likely to lead to mortality or impair their ability to migrate and spawn successfully. The consultation does not provide any information or assessment of total mortality or cumulative damage to sea trout and shad stocks over the full season of proposed netting.

Overall, we find that the evidence and justification for the proposed netting is very weak. It fails to properly assess potential adverse environmental effects and the impacts on many

stakeholders. The numbers of commercial netters that may benefit is low and the total financial benefit from sales of the target species, mullet, appear to be small and likely unsustainable in the short to medium term. Proper socio-economic, environmental and ecological assessments are needed to allow informed judgements on the proposal, not only for IFCA Committee members but also for those responding to any consultation.

In our response to your preliminary consultation we said that we would support an expansion of areas where netting is restricted or prohibited. We are therefore very disappointed that the new netting proposal is a backward step from the protection provided by the existing restrictions and prohibitions.

Again, it must be noted that netting permit conditions are only of any use in protecting fish stocks if there are sufficient resources available to carry out effective enforcement. The current regulations prohibiting netting in the Salcombe Estuary are simple and clear. They encourage reporting of any offending and make enforcement easy compared to the conditions under the proposed byelaw that include restrictions on length of nets, seasons, return of bycatch and soak times. As netting will mostly take place at night, enforcement would be even more demanding.

Our understanding of the IFCA's resources is that that they are often insufficient to carry out its current enforcement responsibilities effectively. In these circumstances, and even with best available technologies being employed, the IFCA should not allow the proposed netting to proceed unless it is confident that it can commit the resources necessary to achieve effective enforcement without compromising its existing priorities.

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17 January 2024