Formal Consultation Responses – 161 to 168, not all in number order.

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**Response 161**

Dear Sir or Madam,

In response to the public consultation on proposed amendments to existing commercial and recreational Netting Permit Conditions, I am writing to object to the proposed commercial fixed net fishery in the Salcombe Estuary (Topic 1).

I am a recreational angler and I sometimes fish in South Devon. I heard about this consultation on the angling forum *worldseafishing.com* and through the Angling Trust.

My reasons for opposing the proposed new net fishery are as follows:

**1 - IFCA’s own rationale does not stand up to scrutiny:**

·       The 18% bass mortality recorded in trials is unlikely to be replicated under commercial working conditions where mortality is likely to be much higher. Also, given the limited enforcement resources, the temptation will exist for some to take bass and sea trout illegally under cover of the new net fishery.

·       The declining profitability of the pot fishery does not justify opening a new net fishery. On the contrary, it provides an argument against it: we can’t expect the commercial sector to run a net fishery sustainably when they have failed to do it with pots.

·       Again, wanting to help commercial fisherman boost their winter income is not enough to justify opening a new fishery. There need to be good reasons to believe that a net fishery can be operated sustainably, however netting in similar places like Teignmouth and Poole has done significant damage to fish populations e.g. flounders.

·       Sea trout stocks have plummeted recently. Their presence in the estuary is an argument against netting it. When fishing ‘catch and release’ for trout you need to return them to the water within 15 seconds, so it seems unlikely they will survive being netted.

**2 – Commercial netting will harm the local economy**

Recreational angling benefits the local economy much more than commercial fishing does. When anglers travel to the coast to go fishing, they spend money on tackle, bait, charter boats, fishing guides, food, drink, accommodation, petrol etc.

The economic value (revenue and jobs) of recreational bass fishing in Sussex has been estimated to be more than 3 times that of the commercial bass fishery, even though the commercial fishery kills 16 times more bass for food than the recreational anglers do *(see attached 2014 report from the Blue Marine Foundation)*.

I typically spend several hundred pounds in Devon for a week’s fishing holiday. Bass fishing seems to have deteriorated over the last few years; a new net fishery in a bass nursery area can only damage it further, making it less likely that I or others will fish there again.

**3 – Commercial netting will take away the social, leisure, health and wellbeing benefits that angling provides**

Angling is an important leisure activity for hundreds of thousands of people, providing them considerable social, mental and physical benefits *(see attached 2022 report from the Angling Trust on the socio-economic value of angling)*.

Angling can help keep young people out of trouble and make them more likely to respect the environment. That is why it has been used by educational charities to help youngsters who are struggling in school.

These benefits to the wider community will be lost if angling in Salcombe suffers as a result of damage to fish stocks caused by commercial netting.

**4 – Commercial netting will have a negative impact on birds and wildlife**

The following wild creatures all depend on fish – seals, otters, herons, kingfishers, cormorants. These species all stand to lose out if commercial netting damages fish stocks in the estuary.

All the organisations involved in this proposal (the Devon and Severn Inshore Fisheries and Conservation Authority, the Marine Management Organisation, the Environment Agency and Natural England) are publicly committed to:

·       Protecting wildllife and the environment

·       Ensuring that economic exploitation is sustainable

·       Looking after the interests of the whole community (see APPENDIX)

For the reasons I have given, I think a new net fishery will be a failure in all these respects.

I very much hope that the IFCA will recognise that the right approach is to look after the fish and other wildlife in Salcombe and to promote the economic and social benefits of recreational sea angling.

Yours sincerely,

Matthew Pierce

**APPENDIX – quotes from the websites of public bodies involved in the proposed Salcombe net fishery:**

The Devon and Severn Inshore Fisheries and Conservation Authority:

*“D&S IFCA will lead, champion and manage a sustainable marine environment and inshore fisheries, by successfully securing the right balance between social, environmental and economic benefits to ensure healthy seas, sustainable fisheries and a viable industry”*

The Marine Management Organisation:

*“We must protect and enhance nature and our seas and use them wisely for the benefit of society and the economy – we need to deliver win-win outcomes, with a thriving environment supporting a thriving economy.”*

The Environment Agency:

*“Our priorities are to… protect and improve water, land and biodiversity … improve the way we work as a regulator to protect people and the environment and support sustainable growth”*

Natural England:

*“We aim for a well-managed Nature Recovery Network across land, water and sea, which creates and protects resilient ecosystems rich in wildlife and natural beauty, enjoyed by people and widely benefiting society”*

ENDS===