Formal Consultation Responses – 191 to 210, not all in number order.



**Response 195**

To whom it may concern,

I was surprised and saddened to learn about the public consultation on proposed amendments to existing commercial and recreational Netting Permit Conditions. I am writing to strongly object to the proposed commercial fixed net fishery in the Salcombe Estuary (Topic 1).

I am a recreational angler who sometimes fishes in South Devon. I heard about this consultation on various Forums, including WSF, Henry Gilbeys blog, 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 **WILL NOT BE** replicated under commercial working conditions where mortality **WILL BE** much higher.

During the trial, Net soak times were as little as 12mins long, Fish were carefully removed – at times being cut out, and then put in recovery tanks. This WILL NOT be the case in real world conditions. TBH the Net Trials carried out were laughable.

· The declining profitability of the pot fishery does not justify opening a new net fishery. Back in 2021, one Commercial was publicly stating how sustainable the Crab Fishery was, and then claiming to shoot up to 1200 pots a day. This, on the contrary, provides an argument against it: we can’t expect the commercial sector to run a net fishery sustainably when they have miserably 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 needs to be good reason 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.

The proposed target for this new net fishery is supposedly Mullet. Looking at the landing data and Mullet prices quickly shows that a Mullet fishery would be extremely low value and unable to provide even a very small amount of fisherman with a living. A bycatch of Bass and Gilthead Bream however, is a different story. Both of these species, along with the Mullet, would be quickly fished out, doing years and years of damage in just a few months – let's not forget that the Salcombe Estuary is currently a Bass Nursery Area too – another **MAJOR** reason to oppose this!

· Sea trout stocks have plummeted recently. Their presence in the estuary, along with Shad, is another argument against netting it.

**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.
According to a report by the Blue Marine Foundation is Sussex, the economic value (revenue and jobs) of recreational bass fishing is 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.

Holidaying Recreational Sea Anglers typically spend hundreds of 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.

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 this Netting proposal.

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

The following wild creatures are all potentially at risk – seals, otters, herons, kingfishers, cormorants. These species are all capable of being caught up in nets too!

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 wild llife and the environment
* Ensuring that economic exploitation is sustainable
* Looking after the interests of the whole community (see APPENDIX)

For the reasons already given, and looking at the three public commitments above, I find it astounding that this proposal has even been considered, let alone pushed forwards for Public Consultation. In my opinion, this proposal by the Sub Committee reflects very poorly on the main D&SIFCA , and must be rigorously opposed.

 I believe 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,

Martin Waller