

P-05-810 Give Welsh Fishing Clubs and Salmon and Seatrout a Chance – Correspondence from Andy Nicholson to the Committee, 22.07.18

THE FUTURE OF WELSH GAME ANGLING

FACTS, FINDINGS, CONCLUSIONS AND SOLUTIONS

The following derived from the NRW proposals and technical case, interview with heads of NRW fishery team and the consequent request and received, evoking of the appertaining freedom of information act from NRW and CEFAS.

The Facts & Findings:

The promotion of the proposals' and consultation period was seriously flawed, no proof, has come forward, despite various requests,, that all anglers buying a licence, could not have been fully informed of the process, via the post when receiving their licences', despite Mr [name removed] stating there was proof, this could not been done.

The objecting respondents to the proposals', were and are seriously miscalculated, I.e. despite one angling club representing thousands of anglers and this was replicated countless times, each club and association were only counted as just one respondent. This was a serious and deliberate misrepresentation by the NRW, when putting the proposals' in front of the NRW board, this was a breach of trust, not only misrepresentation to the board, but also to the Welsh Government, on the decision making process.

The recorded interview, that took place on the 15th of Feb 2018, between A. Nicholson, John Eardely and the heads of NRW fishery's team, revealed countless, inaccuracies', falsehoods and a huge catalogue of contradictions and misinformation.

Despite at the start of the interview, Mr [name removed] stated that the NRW had nothing to hide, he however demanded, after 20 minutes, that the interview was terminated, as he did not like the searching questions posed, after a heated discussion, the interview was resumed.

Mr [name removed] refused to answer why hatcheries were closed, including privately funded ones and many questions, he either would not answer, nor could

answer, however stated they would be answered in the very near future, many months down the line we are still waiting for those answers.

It was conclusively proved that the NRW, management targets and conservation limits were up to 85% incorrect, along with the NRW freely admitting and accepting that catch returns were up to 65% incorrect.

The NRW team would not admit, nor accept that the net and coracle fees, appertaining to their catch returns, did not correlate, equate nor add up, in the way of massive lack of profitability for commercial fishing, in relation to the licence fees they were paying, taking all commercial fishing into loss making. It was obvious and pointed out, that the only way they could operate under these circumstances, that they were understating catch returns.

When the fishery team were asked, what did they do to protect the juveniles' in our Welsh river systems, against avian predation, they freely admitted that they do nothing and had no intention of doing so, now or at any time in the future. They further added that they did not see avian predation as a problem at all and they stated that avian predation as far as they were concerned was reducing (there are too few juveniles for them to eat).

These statements were made despite, John and I conclusively proving, via information from the web site Cormorant Watch, the Angling Trust initiative and various other proved statistics from around the country and other web site recording initiatives and scientific reports, showing conclusively millions of juvenile salmonids are slaughtered each year on our Welsh rivers, by these predatory birds, while the NRW sit back and do absolutely nothing to protect these stocks.

Furthermore we demonstrated that in the previous year, that NRW have, despite the proof of harm from avian predation, actually, reduced the numbers of fish eating birds on licence applications that were allowed to be control, they also freely admitted that the control of these predatory birds, was the total responsibility of angling stakeholders and that no other bodies, applied for licences' and that if a licence application was applied for late, they automatically reduced the numbers they could control.

We demonstrated that if predation by fish eating birds was brought under control, this one issue would go a long way in solving the entire problem and dramatically

increase the in-river survival of juveniles potentially resulting in more returning Salmon and sea trout stocks and there would be no need for the draconian incorrect measures NRW are proposing.

During the interview on several occasions, when the Fishery team were asked specific questions, they continually referred us to advice gained from CEFAS, without answering the questions. It has to be made abundantly clear, that on reading the CEFAS report (obtained from a freedom of information request), CEFAS quite categorically state that the NRW technical case was taken and read at “face value” THIS IS NOT ADVICE! Furthermore CEFAS stated that they believed the proposals will have little or no effect on improving stocks.

Despite what NRW fishery officers, state there is nowhere, in their technical report, nor in the CEFAS report, that shows any proof, nor any research or any scientific evidence to support, the angling ban methods, such as no worm fishing for Salmon (the NRW opinion is based on broodstock from the Taff which had been caught on worm but did not survive at the Cynrig hatchery) and the use of single worm for sea trout, along with hook restrictions use, as opposed to the methods operation now.

Therefore the angling restrictions they are proposing are purely and simply, their thoughts and personal opinions based on their observations of broodstock collection on the Taff. The NRW claims are totally unsubstantiated and should be discounted as broodstock caught on bait from other rivers (Mawddach, Dee and Conwy) not only survived to spawn but were returned to their rivers as kelts.

Despite the NRW claims, there is no provision in any of the reports for the 2010 equality's act, nor any reference and consideration for the aged and the disabled, along with indirect discrimination, these aspects have not been considered and the officers freely admit, there is no financial provision for any future subsequent disability discrimination compensation claims.

During the interview we requested that the decision was deferred, not only due to the imminent start of the season, but enabling further dialogue and consultation with stakeholders and WG. Mr [name removed] clearly and emphatically stated that no deferment could now take place and it was completely out of his hands now and the decision lay solely and entirely with WG. Mr [name removed] could do nothing.

We now have had the press release from Mr [name removed], stating “He” has deferred the decision until the season of 2019; this is consistent with the massive contradictions that come forth from NRW fishery team and even compounded more by the fact that WG sent a communiqué, stating they had made the deferment, there is no doubt now that Mr [name removed], was instructed to defer, even on this point there is a lack of openness and honesty coming forth from NRW team.

During the interview the officers added and freely admitted that the stakeholders know their rivers, best and better than anyone.

The officers also admitted that that they had nothing to do with Enforcement, nor could they tell us who was in charge of enforcement officers, another question they promised to answer, but have failed to do so, they however did admit that there were only 16 enforcement officers covering the entire country of Wales and had to concede Wales is massively undermanned on this point.

John and I pointed out that the vast majority of the angling community, stakeholders, angling bodies, the angling trusts, leading fishery scientists, prominent angling figures, several assembly members, totally disagreed with the NRW technical case, calling them draconian proposals and destructive to the Welsh economy and jobs within Wales. Despite this the fishery team insisted and maintained they were right and the collective above was wrong.

We went on to demonstrate that many rivers in Wales were actually increasing their runs of Salmon and Sea Trout, year on year and the NRW were using out of date figures to push through their proposals, this gave an incorrect picture of the present situation and was misleading.

We pointed out that the approach the EA was making, was to assess each river individually, on their merits and problems and act accordingly with by-laws appertaining to that specific rivers needs and introduce by-laws accordingly.

This approach was discounted by NRW, preferring to go for a wholesale approach and dictate and impose their personal preferences’ on all Welsh rivers claiming their approach was correct. Therefore they are totally disagreeing with the EA approach and their fishery scientist, we pointed out that this was lazy and bad science and methodology.

We highlighted the negative effect their proposals would have on the Welsh Economy and game angling in general and that the aged and disabled would no longer be able to fish for Salmon and that there would be a large reduction in members joining clubs and associations, along with a huge increase in poaching and this indeed was the effect, until the deferment was announced.

We pointed out that licence revenue would suffer, further depleting the little funds available to NRW, they freely admitted they anticipated that this would occur, but were still determined to push through the proposals, we stated that this was persecution of anglers, for little or no gain in stocks, they disagreed.

I finally asked Mr [name removed]; in hindsight what would he have done differently, regarding the proposals. He stated that he would have had a far greater and open dialog with stakeholders. This very statement sums up incredibly well, the vast contradictions that are endemic within the fishery team. As now in the Mr [name removed], deferment press release he firmly states that there will be no further dialogue with the angling community, this is a disgraceful indictment.

IN CONCLUSION

The facts and evidence make stark and disturbing reading, it is abundantly clear the NRW team have not listened, will not listen, nor have any intention to listen to the real concerns and have not read the professional objections, placed before them. They have not taken into account, sound advice and fact from leading fishery scientists and other official angling bodies and organisations.

The proposals are based on assumptions, presumptions, out of date and incorrect facts, figures and more importantly, their own personal opinions', thoughts and feelings that have already been disproved and discredited.

The NRW fishery team have mislead, misinformed, along with an attitude of total inflexibility, the inability to listen and have been totally dictatorial in their approach, process and lack of evidence, in creating these draconian proposals.

The NRW team have been without doubt disingenuous with the truth and therefore it is correct to state that the authors and architects of these proposals are not fit for purpose and their positions are untenable, as total confidence in any ability they have to run and control fishing in Wales has been completely lost.

The NRW fishery team has made it perfectly clear, now and as in the past there will be no further dialogue, with stakeholders. The only correct and right way forward now is, for there to be changes in the Fishery management team and structure to enable meaningful discussions with stakeholders to occur.

The Solution

The answer lies with the stake holders, as Mr [name removed] states they know their own river systems the best and are best placed, to implement, any restrictions, necessary appertaining to that particular rivers needs and requirements, rather than a complete Welsh blanket, wholesale ban and approach.

Welsh Government needs to provide legislation, funding and powers, to stake holders, in conjunction with the Angling Trust and help in creating angling trusts, for various river systems, for the tasks that NRW have failed to provide, denied and taken away, such as the policing of our rivers, this is already being undertaken by stakeholders as mentioned, there is no presence of enforcement officers who following reorganisation within NRW and new contracts of employment only work 8am to 5pm – poachers operate at night. Enforcement on our game angling rivers was poor before the reorganisation and is now totally ineffective.

The NRW have woefully failed in ensuring water quality is maintained, to the point they are being taken to the European courts, powers and funding need to be issued, allowing and ensuring culprits of pollution are taken to task and prosecuted.

Control for avian predation, appertaining to each river system, handed to the stake holders, this one act will protect and preserve far more juveniles than any measures the NRW have proposed.

Through the Angling Trust, local angling trusts, groups and stakeholders along with the NRW acting as technical advisors, permission must be granted for habitat improvements, on a far bigger scale than has been seen before, working hand in hand with the custodians of our Welsh rivers, that know them the best.

The culmination of the above, will result in improved water quality, better habitat, far greater and improved runs and stocks of Salmon and Sea trout, more effective control of avian predation and far better policing of our Game angling rivers, potentially eradicating poaching, along with improving the habitat and ensuring the future of our Welsh game angling rivers, for the present and future generations and

protecting the vital tourism and social economic value Game angling brings to Wales.

There is a real need and call for collective dialogue with Welsh Government

The time for change is now upon us and we can make a big difference.

Author Andy Nicholson, Independent Angling Consultant, member of the Welsh Game Anglers Action Group and the Anglers Writers Association.

The full NRW interview is available on drop box and by request, along with the freedom of information for CEFAS AND NRW

Coverage and Distribution, full media and press circulation, all AM,s all NRW board members, all members of the petitions committee and all official angling bodies.