



Association of Salmon Fishery Boards

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16th August 2012

Stewart Stevenson, MSP
Minister for the Environment and Climate Change
Scottish Parliament
Edinburgh
EH99 1SP

North East England Review of the Net Limitation Order

Dear Mr Stevenson,

Please find attached for your information the ASFB response to DEFRA on the North East Coast Net Limitation Order 2012. We are particularly concerned that the order, as drafted, does not adequately protect Atlantic salmon originating in Scottish rivers. As you are aware, Marine Scotland Science have demonstrated that 70-75% of the catch in the drift net fishery is of Scottish origin.

Whilst we welcome the inclusion of T & J licences within the draft order we object to the proposal to accept Option C2, (retain a reducing NLO for drift nets based on retirement). This aspect of the order is identical to the existing proposals which have resulted in an *increase* in both exploitation *and* effort in the fishery. Instead, ASFB wishes to see Option D adopted, (accelerate closure of the drift net fishery, in combination with other options for the T & J net fishery) resulting in the complete closure of the drift net fishery at the earliest possible opportunity. In addition, we believe that a maximum limit on net catches should be set and that a further round of buy outs, with appropriate compensation for closure, should be instigated.

The documents provided by the Environment Agency, in particular the Fisheries Assessment Report and the Habitats Regulations Assessment report and Habitats Regulations Assessment Supporting Technical Report do not show the full extent of the biological impacts of this fishery, either in Scotland or in NE England. We disagree with significant parts of the findings in these documents and recommend an urgent and more detailed reappraisal of some of these issues.

Finally, I was disappointed to learn that the Scottish Government were unwilling to intervene on this issue during the consultation period, particularly given that this method of fishing was banned in Scottish waters nearly 50 years ago. I would very much welcome the opportunity to meet with you to further discuss this issue.

Yours sincerely,

Dr Alan Wells
Policy & Planning Director