











Richard Benyon Esq MP
Parliamentary Under-Secretary for Natural Environment and Fisheries
Defra
Nobel House
17 Smith Square
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Dear Minister,

We wrote to you on 27 May 2011, in advance of last year's NASCO meeting in Greenland, to urge the UK Government to address the threat to salmon management and conservation posed by coastal mixed stock fisheries. We said that we were concerned that if this was not done the Greenland and Faroese governments would come under pressure from their fishermen to permit the resumption of commercial salmon fishing in their waters. We feared that this would undo the progress that had been made over the last twenty years to reduce the exploitation of salmon, which in turn had been critical in limiting the impact of lower levels of survival at sea on the number of salmon that survived to spawn.

At the NASCO meeting local fishermen demonstrated in favour of resuming commercial fishing for salmon, and the pressure on the Greenland and Faroese governments was very evident. In recent years ICES has advised that mixed stock fisheries, including distant water ones, 'represent particular threats to stock status'. However, even if ICES continues to advise against the resumption of the Greenland and Faroese commercial salmon fisheries, we cannot count on these governments continuing to follow this advice while the UK and other governments continue to ignore it in their own coastal waters.

More broadly, the scale of the threat to salmon stocks was highlighted by the Salmon Summit organised by NASCO in La Rochelle in October to assess the results of the Salsea Merge programme of research into salmon at sea. The Summit confirmed that salmon are dying at sea in alarming numbers, and warned that southern stocks, including those from the UK, are threatened with extinction.

In these circumstances, it is encouraging that the Government of Northern Ireland has concluded that 'the current exploitation of salmon within the DCAL jurisdiction (ie the fisheries in Northern Ireland not regulated by the cross-border Loughs Agency) is currently untenable.' It is seeking a voluntary cessation of commercial netting, with catch and release by anglers, in 2012 while it considers options for the future. The statement said

that if the department did not ask for voluntary action it would be in breach of the EC Habitats Directive and NASCO guidelines.

Given this background, we believe that it is time for Governments throughout the UK to close all net fisheries that exploit mixed stocks and do not satisfy the EU and NASCO criteria that all stocks in such fisheries must be at full reproductive status and meet diversity criteria. The Irish Government has shown how this can be done by closing the Irish coastal mixed stock drift net fishery, with proper compensation paid to netsmen. Similar action should be taken across the UK.

In England this is likely to mean closure of the North-East Coast net fisheries, as we do not believe that it is possible for these to satisfy the EU and NASCO criteria. The drift net element of these fisheries is, of course, already being phased out, but while this has led to a substantial reduction in licence numbers the timescale for the completion of this process is too long and should be very significantly accelerated. Moreover, T and J nets, the element of these fisheries that is now responsible for the majority of the catch, are not at present treated as mixed stock fisheries. In our view, this position is no longer tenable. We expect the results of the genetic studies undertaken on behalf of the Environment Agency to confirm that T and J nets take fish from many different rivers, including Scottish rivers designated as SACs for Atlantic salmon, and if this is the case we look to the Government to treat T and J nets in the same way as drift nets and close these fisheries as soon as is feasible.

The Environment Agency is, of course, currently reviewing the existing North-East coast Net Limitation orders, and we are contributing to this process. But we do not consider that a renewal, or even substantial tightening, of the current regulations will be adequate, and wider issues of policy on mixed stock fisheries are for ministers.

The decision by the then Government in 1992 to phase out the North-East coast drift net fishery demonstrated that the UK was prepared to apply up to date scientific advice to the management and conservation of salmon stocks. However, in the intervening twenty years science has advanced, particularly in the field of genetics, and there is now a clearer understanding of the threat that mixed stock fisheries can pose to individual, genetically valuable, salmon populations. As a result, the scientific advice that the great majority of such fisheries should be closed has strengthened. Given the wider problems faced by salmon, which were clearly identified by at La Rochelle, decisive action by the UK, and Scottish, Governments to close mixed stock fisheries is overdue.

Yours sincerely

Ivor LlewelynPaul KnightMark LloydAtlantic Salmon TrustSalmon and Trout AssociationAngling Trust

Arlin Rickard Alan Wells Andrew Wallace

The Rivers Trust

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Boards

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