

**Cynulliad Cenedlaethol Cymru**  
**Y Pwyllgor Amgylchedd a Chynaliadwyedd**  
**NRW 2015 – 02**  
**Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015**  
**Ymateb gan Robin Simms (Saesneg yn Unig)**

**Examination of Chief Executive and Chairman of Natural Resources Wales**

As an angler who has fished the rivers of Wales for over 50 years I submit below my views on the first year of activity of Natural Resources Wales. My views are my own but I suspect they would be shared by most anglers of my generation and by many of those of lesser vintage.

1. Wales has in the opinion of many salmon and sea trout anglers been, for many years, the equal of Scotland as an angling holiday destination. In the eyes of many anglers of lesser means, (I include myself in that category), the vast availability of quality angling opportunities provided by the hundreds of angling clubs within the Principality has made Wales an angling paradise for the working man who wants a taste of the delights enjoyed north of the border only by those with deep pockets or the landed gentry.
2. Over the years, the clubs, and individual anglers, have been assisted and supported in their innocent and legitimate pursuits, to a greater or lesser extent, by a variety of public bodies. My own recollections encompass District Fishery Boards with individual catchment responsibilities, the Water Authorities with wider jurisdictions, the National Rivers Authority, the Environment Agency and now Natural Resources Wales with its apparently symbiotic responsibility for not only rivers but also the countryside and forestry in Wales.
3. 4 I would suggest that through the changes, the assistance and support provided by the various statutory bodies to the hardworking club members striving to improve the facilities available to their members and guests, has in fact progressively trended towards the "lesser extent" end of the spectrum and is now, with the advent of the NRW, at an all-time low. Certainly if a vote were taken as to whether the NRW was helpful to the preservation of Wales reputation((and reality) as an exceptional holiday angling destination, or indeed as an area providing excellent angling opportunities, the answer would be a resounding "No"!
4. I have read, with growing disbelief and despair a welter of "Business Plans", "Management Strategies" and the like, gushing out of NRW with volcanic energy. I have been looking for some recognition of the massive value to the working people of Wales and to tourism in Wales, of the angling heritage of the country. My searches have been virtually fruitless. The documents appear to focus almost entirely on process rather than beneficial results.
5. For years Wales has been a mecca for anglers interested in the pursuit of sea trout, or sewin as they are better known in Wales. These fish in rivers such as

Twyi, Dyfi, and Conwy are iconic, for many, the Holy Grail of angling. NRW (and EA Wales before it) have presided over a massive decline of river populations of these once prolific migratory fish, while licensed and unlicensed estuarial and unlicensed inshore coastal nets have almost certainly, raped the stocks. Enforcement capability in NRW is now so low as to be virtually non-existent in the face of criminal gangs which are believed to exist, and which are making a fortune from high-end restaurants in London and on the continent through the sale of illegally obtained fish. It is highly likely that further depredations are occurring offshore, beyond the jurisdiction of NRW but not beyond the jurisdiction of Welsh Assembly's little recognised, and probably largely ignored, sea fisheries enforcement responsibility.

I would suggest that the Environmental and Sustainability Committee should investigate diligently with the Chief Executive and Chair of NRW:-

- 1. the activities of NRW in pursuing and fulfilling its responsibilities under the Salmon and Freshwater Fisheries Act 1975 in relation to migratory fish, with a special emphasis on sewin.**
- 2. the relationship between NRW fisheries staff and the enforcement capacity/activity of the Assembly's sea fisheries staff, particularly in the area of overlap between offshore drift netting for bass and "accidental" by-catch of salmonids, particularly sewin.**
- 3. the awareness of NRW of significant organised criminal activity in the exploitation of Welsh salmonid, and particularly sewin, stocks and the adequacy of its resources to deal with the situation.**

Robin Simms

05.03.2015

## **Robin Simms – Second Response**

Further to my previous submissions dated 5<sup>th</sup> March 2015 dated and submitted on 5<sup>th</sup> March 2015 and acknowledged on 6<sup>th</sup> March 2015 I would like to make the following further submissions as to more specific matters which should be examined by the Committee and elucidated by the Chief Executive and Chairman of NRW:

1. Against the background of declining stocks of migratory salmonids, especially sewin in Welsh rivers, particularly Afon Twyi, is any consideration being given to the termination or reduction of the currently permitted commercial exploitation of those species?
2. How, and how often, is the physical monitoring of licensed commercial exploitation undertaken by NRW staff?
3. Do staff undertaking monitoring have any vessels at their disposal to permit spot-checking of commercial activity?
4. What measures are taken to ensure the accuracy of catch returns submitted by licensed commercial operators?
5. How is the tagging system which commercial netmen are required to comply with, supervised?
6. What numerical limitations are placed on the number of tags issued to any single commercial net operator and to the total number of tags issued to all commercial netmen in any fishing season?
7. What monitoring of wholesale and retail fish suppliers in Wales and elsewhere is undertaken to ensure that all wild salmonids on sale claiming to be of Welsh origin have been obtained from legitimate sources.
8. What measures/systems/resources are available to NRA staff to ensure that there is no unlawful taking of salmonids in areas such as Carmarthen Bay by local vessels or vessels from other areas such as the south west of England or European ports under the guise of drift netting for bass.
9. What assurances can be given that salmonids illegally taken from Welsh waters are not landed in the south west of England or elsewhere where there is no requirement for carcasses to be tagged.
10. Is any consideration being given to limitations on methods and tackle used by anglers to catch fish which militate against increased successful Catch and Release, such as worm fishing as a permissible method, use of Circle hooks when worm fishing, single hooks only on lures such as Flying C
11. Has NRW considered the introduction of a tagging scheme for anglers ?
12. What monitoring of numbers of fish eating birds in Welsh rivers is undertaken by NRA staff and why is responsibility for this activity left to the fragmentary efforts of fishery owners ?
13. How many applications for licences to control numbers of fish eating birds have been received by NRW since its inception ?

14. How many licences to control fish eating birds have been issued ?
15. Has NRW any plans to introduce a Voluntary Bailiff Service similar to that introduced by the Environment Agency in England where over 400 anglers have volunteered ?
16. Is Cypermethrine still being used in forestry management in Wales and particularly those areas of forestry under NRW supervision/control in order to control pine weevils ?
17. What is the annual cost of damage to forestry in Wales attributable to pine weevil infestation given that the cost estimate for the whole of the UK is £2 million .

The questions/comments in this paper and my earlier one dated 5<sup>th</sup> March relate almost entirely to NRW's duty, enshrined in Section 6 of the Environment Act 1995, to "maintain, improve and develop salmon fisheries, trout fisheries, freshwater fisheries and eel fisheries", rather than to preside over the catastrophic decline of those fisheries. I could have raised other issues such as the decline of once common bird species such as barn owls and lapwings (alongside the rapid increase in fish eating birds such as goosanders and inland cormorants), plant life (3.4% of species in Wales critically endangered compared with 1.9% across the UK as a whole), fungi – field mushrooms are becoming "as rare as hens' teeth, animals, the pine marten for instance, but I leave it to others to comment on these.

I trust that the Committee will explore the questions which I have raised in both this and my earlier response to consultation, vigorously with the Chief Executive and Chairman. I may wish to raise further issues before the close of consultation.

Robin Simms

28.03.15