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**Re: NRW fisheries bylaw proposals**

Dear Minister,

Thank you for your response LG/00305/18 (21/02/2018) on my suggestion of a way forward which does not require legislation.

I am aware that your Inland Fisheries are now in possession of the NRW proposals and I have no doubt that the recommendation to you will be that to prevent further decline in salmon stocks you must legislate to provide greater protection to the present salmon stock. However, the proposals do little or nothing to increase salmon stocks, this is just a sticking plaster to avoid dealing with the main issues, and even the NRW agree that anglers are not the problem but they neither have the staff or the funds to deal with the root causes.

It is possible to restore salmon stocks in our rivers and I will use the Conwy as an example of what can be achieved by local conservation organisations. For over 10 years I was secretary of the Conwy Valley Fisheries & Conservation Association and was responsible for managing a stocking program for the Conwy system. This was self funded, we could not stock on a large scale but could afford to purchase 8000 parr from the EA(W) hatchery, and these were from local broodstock donated by anglers to the stocking programme. The broodstock were taken to the EA(W) hatchery where eggs were stripped and, once the fish recovered, they were returned to the river. The hatchery incubated the eggs and grew on the fry until the resulting parr were big enough to be stocked into our three semi-natural rearing ponds. The parr were protected from predators until they were ready to migrate to the sea as smolts and were not fed more than twice a week and so had to forage for their food and were consequently as fit and healthy as any wild smolts. The Conwy is now seeing the benefit of this stocking program with electro fishing results showing the highest number of fry and parr ever recorded and yet NRW claims that the Conwy is 'probably at risk', however this is based on the poor recruitment in 2015 following the effects of Storm Frank which had a devastating effect on all UK rivers. During 2016 and 2017 we have seen more salmon and increased spawning activity, so the Conwy is not actually at risk. Similar successful schemes were carried out on other Welsh rivers such as the Dyfi. The NRW proposed bylaws are disproportionate as they are to be applied to all rivers regardless of present conditions.

The salmon season is now underway and the lack of a decision on the implementation of the NRW proposals has resulted in many anglers not renewing their club membership, the knock on effect is that clubs may not have sufficient funds to pay their rents. A statement deferring any implementation to 2019 (as per England) would be appreciated. This would then provide a breathing space during which alternatives to legislation can be explored in more detail.

Regards

Chris White

Conservation Officer: Campaign for the protection of Welsh fisheries