I am regarded by those who know me as a mild mannered, modest man, someone who will always give a carefully considered response and who during his working life was proud to be regarded by senior colleagues as “the voice of reason”. Today however I make my closing submission as an angry, frustrated and disillusioned man.

For someone who has always endeavoured to work alongside both NRW and its predecessors, it is that refusal to work with stakeholders in order to arrive at a voluntary solution that is central to my feelings. NRW may profess that it “aims to deliver widespread and positive partnership working” but at the moment those are very hollow words indeed for most of us in the angling community.

Whilst I referred in the main to the Afon Mawddach and Afon Wnion in Gwynedd in presenting my evidence, my concerns are common to many other rivers in Wales and can be summarised as follows:

A. The data used by NRW, EA and CEFAS to produce their Salmon Stock Assessments is not reliable and does not reflect the observations of those who spend time on the river

1. There has been a huge decline in angling effort. Official figures, (EA Wales) indicate a fall of 72.6% on the Afon Mawddach between 1995 and 2009. 75% of anglers participating in a recent survey felt that there had been a further fall of 50% – 75% during the last 5 years. The suggestion that 10% to 15% of the salmon in the river are caught by anglers, when so few are actually fishing, is an estimate that is so wide of the mark that it completely skews the resulting classification.

2. To use a heavily regulated river such as the Dee, to inform the migration pattern of any spate river does not reflect reality (P5 CPWF/INQ/6). Run patterns are complex and increasingly either out of season, or at a time when method restrictions and/or local conservation rules mean that salmon are unlikely to be caught on rod and line. The reported rod catch cannot lead to an accurate assessment of a river’s stock status and it should be noted that NRW had been made aware of this back in November 2014 (P6 CPWF/INQ/6).

3. Underreporting by anglers (49.5% on the Afon Dyfi in 2017) further skews the model and recent adjustments have not reflected changes in the real world.

4. No matter how sophisticated the statistical model it can only produce an “estimate” of the number of eggs deposited in a river. It is the actual number of juveniles that are present in our streams and rivers that shows reality (see C3 Below).

B. Is it necessary for every salmon caught by anglers in Welsh rivers to be returned if the species is to survive?
1. In many rivers the answer is a very clear no. The picture across Wales is not one of universal decline. 8 of the Principal Salmon Rivers in Wales show a year on year improvement in the 3 years 2015 - 2017. 4 of those rivers have exceeded their Conservation Limit in each of the last 3 years with 3 rivers achieving more than 200% of their CL in 2017. NRW claimed that due to poor fry and parr counts in 2015/6 the effects will be seen in 2020 i.e. years later. This is based upon the regression line projected forward by 5 years.

2. The comparison of catch returns from the 1950’s to current times for the River Tyne (P11 CPWF/INQ/6) supports the view that rivers can recover from dire circumstances without introducing Mandatory Catch Controls.

3. In his Proof of Evidence (Appendix F Ps 69& 70 CPWF/2), Laurence Hutchinson, an expert in the field of Aquatic Ecology states that removing fish from a river will take pressure off that river and give juveniles a greater chance of survival. In short each stream has a “carrying capacity” and, no matter how many salmon spawn, the number of juveniles in a stream cannot exceed its carrying capacity. It’s not the number of spawning fish which is the issue it is the number which survive from egg to smolts reaching the sea (CPWF/2 Fig 1 Page 7).

4. Given good habitat, and proper management of avian predation, a small number of adult salmon can easily produce enough juveniles to populate a stream. It simply is not necessary, particularly on those Welsh rivers that are regularly meeting or exceeding their Conservation Limits, for every salmon to be returned to the river in order for the species to survive.

5. What is absolutely crucial to the restoration of our stocks of migratory fish is ensuring that losses arising from avian predation and agricultural pollution are addressed as a matter of urgency. The Atlantic Salmon Trust’s “Missing Salmon Project” emphasises the need to “prioritise the causes for mortality”. Angling is not a priority, in fact it doesn’t even feature on their list!!!

6. Both Dr Mawle (P8 GM1) “The byelaws are therefore unlikely to achieve very much on their own to protect and improve the stock”, and Ian Russell (P11 NRW4) “the proposed measures will thus result in relatively modest increases in spawner numbers”, hardly make a compelling case for a mandatory solution, particularly on those rivers which are routinely exceeding their Conservation Limits.

C. Are rivers in Wales faring worse than those English counterparts who have been offered a voluntary solution?

1. In short, no. Whilst there may be a greater %age of rivers in Wales that are classified as “Probably at Risk” or “At Risk” than in England, the picture in Wales is not one of universal decline based upon a questionable methodology and the use of a forward projection of a regression line (as previously stated in B1 above).

2. The comparison of %age of Conservation Limit attained for 4 Welsh and 4 English rivers (P35 CPWF/INQ/6) clearly demonstrates that the 4 Welsh rivers are performing slightly better than their English counterparts. However those English in question are being offered the chance of a voluntary solution whilst in Wales the “Precautionary Principle” is cited as a reason to deny Welsh anglers a similar opportunity.

3. The Information from the January 2019 NRW Fisheries Bulletin (P22 CPWF/INQ/6) clearly demonstrates that a number of rivers in North Wales are currently faring very well from a juvenile
perspective. Indeed the results from the Mawddach and Wnion are described as “the best on record” with NRW adding that “Spawning would also have had to be successful to get such high densities”.

D. Are the proposed byelaws enforceable?

1. One of the risks highlighted by NRW in their initial discussion with their board back in July 2015 was the “Potential need to re-direct or increase fisheries enforcement resources to enforce any new regulation”.

2. At the Gwynedd LFAG on 5.12.18 we were told that the current 16.25 FTE Enforcement Officers will be re-organised into 10 teams (P46 CPWF/INQ/6)

3. Fewer anglers on the riverbank will result in less of a deterrent to illegal activity and reduced intelligence to inform the already understaffed enforcement team. This is being exacerbated by the alienation of anglers as a result of the current stance of NRW regarding the byelaw proposals

4. The statement “we hope that anglers will continue to phone in with intelligence” highlights concerns within NRW that a lack of intelligence may well prove to be more and more of an issue in the future.

5. In short without a meaningful partnership between NRW and angling stakeholders, the proposed byelaws cannot be effectively policed. The losses from poaching are potentially far greater than any marginal gains that may be achieved through imposing legislation on law abiding legitimate anglers and we are therefore likely to see greater loss of spawning stock.

E. Will “any decline in uptake of fishing be small and transient”?

1. The reaction of anglers to Mandatory Catch & Release is complex. There are many anglers who struggle to justify the actions of hooking, playing and landing a fish which they know that they will have to return to the river and their reaction becomes one of “I’d rather leave them alone”. For others this is less of a problem.

2. However we all know that unless we stop fishing altogether, eventually our actions will result in the death of a fish. To return it to the river dead in those circumstances makes no sense whatsoever as it will not contribute to the spawning stock.

3. Having the “option” of being able to retain a fish, even though the reality is that many anglers will not exercise that option, is what enables us to minimise both the reduction in membership of angling clubs and the threat posed by greater losses from illegal activity when fewer anglers are actually on our rivers.

4. The evidence from both angling clubs in North Wales and our colleagues on the Border Esk, a rural community with many similarities to parts of Wales suggests a much greater impact than that predicted by NRW (P37 & 38 CPWF/INQ/6)

5. Whilst we have highlighted the obvious risks to fragile rural economies posed by a decline in angling tourism, the impact on angler participation in working parties gives great cause for concern when it comes to habitat improvement work and river restoration plans

F. Do the proposed byelaws offer a proportional solution?
1. No. As previously highlighted there is a considerable variation in the status of salmon stocks across Wales and on that basis a one size fits all response is not appropriate.

2. The precautionary principle appears to be used as justification for not offering a Voluntary Solution as a first course of action for “Probably at Risk” in Wales. Whilst the Proposed Byelaws are ultimately a matter for Welsh Government, we cannot see why Wales would wish to take a harder line than that being taken in England, particularly when the EA and NRW work collaboratively with CEFAS on their salmon stock assessments.

3. Angling Clubs and Organisations across Wales have worked hard to achieve a voluntary return rate of 86% in 2017. On the Mawddach & Wnion the voluntary figure achieved in 2017 was 86.5% with a negligible contribution from the pre 16th June mandatory period. At this point, the introduction of Mandatory Catch & Release cannot realise any worthwhile benefits, particularly as an increase in illegal activity will result in greater losses.

4. To introduce mandatory measures for a 10 year period, particularly when stock levels are so variable and are currently showing a 3 year improvement in many rivers, is to introduce a life sentence which extinguishes all hope for many of anglers, particularly those who are past retirement age.

5. By its failure to engage with angling stakeholders in developing the proposed byelaws, as acknowledged by both the NRW Board and Executive at the January 2018 Board Meeting, it is hard to see where any support will come from within the angling community to help NRW achieve its objectives. Events during the last 12 months have further exacerbated the situation.

6. Without a workable partnership between NRW and angling stakeholders the current proposals are unworkable. That lack of cooperation is a simple human reaction to repeated rejection and not the “threat” suggested during discussions within this Inquiry.

G. Is there a better way forward?

1. Yes. There is a voluntary solution available, building on the format of the now defunct “fisheries surgeries” and working on an individual river basis, which offers a far more “resilient” and “sustainable” option to address the current situation. (P52 CPWF/INQ/6). This was put to NRW as an alternative approach as long ago as June 2016 but, despite being acknowledged as having “real merit” and receiving “very positive comments”, was rejected in the seemingly relentless pursuit of a legislative solution. Such a pragmatic and imaginative approach to what is undoubtedly a complex problem can help us avoid an unintended legacy that will last long after current employees have retired and my generation have hung up their rods for the last time.

2. Let us not forget that it is education, co-operation, empowerment and partnership which has seen Voluntary Return Rates rise year on year to an all-time high of 86% across Wales (P54 CPWF/INQ/6). Does a 21st century democracy really wish to turn its back on those values which have brought us so far, in the pursuit of an autocratic solution which alienates those very stakeholders whose knowledge of their own rivers is so necessary for their recovery?

3. There is an exciting opportunity here to build a better future for rivers and migratory fish stocks in Wales. We as anglers want to work in partnership with NRW, not in the constant opposition that we have been forced into.
4. As anglers with a vested interest in the future of our rivers we can but hope that the outcome of this Inquiry is to take us down the first steps towards a collaborative solution which secures the best possible future for our rivers, our stocks of migratory fish and the angling clubs and rural tourism which healthy rivers support.

John Eardley
Strategy Officer – Campaign for the Protection of Welsh Fisheries
Gwynedd Local Fisheries Advisory Group Representative – Prince Albert Angling Society
Secretary – Clwyd, Conwy & Gwynedd Rivers Trust
Copies of
Inquiry Document Pages referred to in

CLOSING SUBMISSION
of
JOHN EARDLEY
River flows have a significant impact on fish migration patterns; however, there can be considerable variations between catchments.
Extracts from a document sent to NRW staff - November 2014

On 11th May both the Mawddach and Wnion were flowing at the top of their banks. This was to be the last major rise of water until 6th October!

On 23rd June Lampreys were observed spawning immediately above Llanelly Bridge. This has been a regular event during recent seasons and, given the life cycle of the lamprey, would seem to indicate that there is little wrong with the water quality. Around the same time (and for much of the summer there were large numbers of both parr and fry (50 – 100?)

The lack of fresh water meant that the tidal mud continually moved upstream on the flood tide. Throughout the whole season the whole width of the river channel on the tidal water was 20-30cm deep in mud. Fish seemed reluctant to take up residence in much of this area. When salmon did appear they would only stay for one tide.

The first proper spate occurred on 6th October and this is the first day that fish were caught on the upper Wnion (although there were few anglers to be seen). On 9th October I watched numbers of fish (both salmon and sea trout) jumping the falls on the Wnion at Bryncoedifor. On the 14th October, during a brief window of lower water levels, I counted 25+ salmon in the Bryncoedifor/Rhydymain areas of the Wnion. There were also good numbers of sea trout in this area. During this last week of the season I hooked 4 salmon in the upper Wnion, losing 2 and returning 2 others. During these last 2 weeks of the season I only saw 1 other angler on the upper river and it is therefore unlikely that catch returns are going to reflect fish stocks.
The River Tyne has been restored from heavy pollution to become the most prolific Salmon River in England and Wales, routinely responsible for around 25% of the total number of rod caught salmon.

During the 2017 season 3357 salmon were caught on rod and line.

A MAFF document reveals that between 1951 and 1961 the total rod catch was 59 salmon.

There is ongoing debate as to what extent it was habitat improvement or stocking from the Kielder Hatchery that was responsible for this improvement.

One thing is certain however. Catch & Release would have played no part whatsoever.

To suggest that without a legislative approach, Salmon will disappear from Welsh Rivers is not supported by the figures from the Tyne.
Proof of Evidence

Of

Laurence Hutchinson

Director - Freshwater Solutions Consultancy

Personal Background

My name is Laurence Hutchinson and I am the Director of Freshwater Solutions (http://www.ecological-aquaculture.co.uk). I am qualified to degree level in the field of freshwater ecology and am the author of a book entitled “Ecological Aquaculture: A Sustainable Solution” (ISBN 1-85623-032-5). I am also a long term member of the Freshwater Biological Association (FBA) and have studied and researched salmon for some 40 years.

A flawed approach to the restoration of salmon and sea trout stocks in Wales.

The overarching problem is of course that over the last 50 years changes in agriculture practice, and the long march to intensification, has run in parallel with a decline in fish stocks across the whole of the United Kingdom.

Each river has what can be described as a carrying capacity with regard to fish populations. In brief, the amount of biomass or ecological production will determine the resilience and robust characteristics of the river and its ecological production, and hence its ability to support fish stocks.

Carrying capacity was originally used to determine the number of animals that could graze on a segment of land without destroying it: applying this to lakes, rivers and streams allows us to understand population densities and predictions.

The salmon and sea-trout stocks are now at an all-time low due to the lack of ecological biodiversity in the rivers. What these stocks are in exact numbers is hard to estimate precisely. Obviously, accurate and reliable catch returns would give some indication, with margins for error.

Some of the Welsh rivers have been heavily biologically degraded over time and no longer have the carrying capacity to support the large numbers of fish that used to inhabit these wonderful rivers, especially migrating salmon and sea-trout, whose numbers have declined with the advent of factory farming and its continued intensification since the early 1960s. Agricultural impacts and pollution events have been well documented in South Wales over this time.

The proof of evidence documents and the decisions likely to be taken by NRW may well be the worst possible outcome for salmon and sea-trout stocks to date in Welsh rivers, and could well end their existence altogether. Owing to the loss of biodiversity, salmon and sea-trout are now dependent on very much reduced food chains in Welsh river systems for the survival of their offspring. The macro-invertebrates and crustacean populations produce their own offspring in early April and May as the water temperature increases, coinciding with the hatching of salmon and sea-trout eggs. This interaction allows the small alevins their necessary microscopic food supply at this stage in their lives.

This depleted food chain is only just large enough to support a maximum number of fish in the recruitment phase and hopefully through to when these fish return to the sea about two years later. This depleted food chain is only capable of supporting so many fish. Taking some fish out of the river each year is allowing the remaining stocks to survive. The less pressure applied to these fish stocks the better, as this will more than likely secure their future.
These populations of salmon and sea-trout may well be there because the very people that take salmon and sea-trout out of these rivers each year are the reason why the populations have survived at all. Removing fish from the river takes the pressure off the remaining fish population also competing for diminished ecological resources. The reduction of inter-specific competition in this case has its benefits and should not be ignored. It would appear that the rod fishermen, coracles and the remaining nets are allowing these small populations of fish to survive and are not in fact the cause of their decline as the NRW claims.

The rod fishermen would seem to be doing the Welsh migratory fish populations a big favour and need to continue to do so until NRW and the other environmental agencies can improve the aquatic food chains that support any migratory fish population recruitment. Until these ecological services can be improved, fish populations will remain under threat.

It is changes to agriculture which must be the priority for action in order to deliver long term and sustainable improvements to our rivers. Targeting anglers and introducing unnecessary method restrictions is not the correct ecological path to follow and is merely a diversion from the real issues that need to be addressed by Natural Resources Wales.

Statement of Truth
I hereby declare that:

i. This proof of evidence includes all the facts which I regard as being relevant to the opinions that I have expressed and that the inquiry’s attention has been drawn to any matter which would affect the validity of that opinion;

ii. I believe the facts that I have stated in this proof of evidence are true and that the opinions I have expressed are correct.

Laurence Hutchinson
Director - Freshwater Solutions
5,000 Salmon Spawning (50% hens)

98.5% Juvenile mortality from egg to smolt due to diffuse pollution and predation

Due to In-River Losses there is only a 1.5% survival rate from egg to smolts reaching the sea.

95% Marine losses to predators (avian/fish/mammals) disease/sea lice from salmon farms, climatic factors and by-catch

50% Post smolt mortality at sea

50% Smolting Mortality

50% Losses to predators during smolt migration

In-River Mortality (340)

10% In-River Mortality (340)

3,750 returning adults

2% Rod mortality (6 Salmon) based on 375 salmon (10%) caught by anglers with 80% Voluntary Catch and Release

95% Post smolt mortality at sea

Rod mortality due to disease and stress this is a natural occurrence in all rivers

In-River mortality due to disease and stress this is a natural occurrence in all rivers

From egg to sea and back

Circa 99.5% In River losses

Circa 95% Marine losses

95% Marine losses to predators (avian/fish/mammals) disease/sea lice from salmon farms, climatic factors and by-catch

Angling has the lowest impact From egg to sea and back

Due to In-River Losses there is only a 1.5% survival rate from egg to smolts reaching the sea.
While there will always be some uncertainties about the information on stock status, I would reiterate 5.2.7b from the agreed international guidelines (NASCO, 2009, see NRW Doc_POL/14):

Managers should demonstrate that they are being more cautious when information is uncertain, unreliable or inadequate, and the absence of adequate scientific information should not be used as a reason for postponing or failing to take conservation and management measures.

2018 Update on catch & release rates and methods used by anglers on the Usk: the annual Fisheries Statistics published by NRW report that in 2017, 591 anglers who fish the Usk released 90 percent of their catch. As described in Appendix 4, reports from the index fisheries suggest that the percentage for the whole river will be even higher in 2018.

Fly-fishing is now the dominant method which should increase the survival rate of rod-caught salmon, complementing the high release rate. Data provided to me by the Environment Agency show that in 2017, almost two-thirds (63 percent) of the 753 rod-caught salmon were taken on fly, with a third on spinner and a few percent on bait. In the late 1970s and 1980s, catch returns to the then Welsh Water Authority show that only about a fifth was caught on fly.

Bag limits and carcass tagging: neither would be appropriate for the Usk. Catch returns to NRW show that over 500 anglers fish the river each year for salmon. Even a limit of one fish per season could result in more salmon being killed as anglers would feel entitled to take their bag limit.

Hatcheries and stocking: I do not have time in preparing this evidence to go into the details of the merits or otherwise of hatcheries and stocking to try and boost salmon stocks. However, in my professional view, the scientific evidence indicates that artificial propagation is potentially damaging if attempted on a scale large enough to make a substantial difference. Such a scheme would be particularly unwise on a river, such as the Usk, designated as a SAC for its salmon. Hatcheries also divert resources from other more beneficial activities to protect and enhance the wild stock though they are undoubtedly popular with some anglers.

The impact of the byelaws on spawning escapement: In 2015, I estimated that if all mortality associated with angling ceased, then spawning escapement might increase by as much as about 8 percent of the stock, as described in Appendix 6. This was likely to have been an upper estimate. Since 2015, the rate of release has increased to 90 percent or more and, as indicated in 3.22, a large proportion is now caught by fly fishing, generally the least damaging method. Consequently, using similar calculations, I estimate that angling now kills between 2 and, at most, 6 percent of the potential spawning stock. The upper estimate of 6 percent is improbable at it assumes that all undeclared salmon are killed. If the byelaws were approved in full, with mandatory catch and release and restrictions on the most damaging fishing methods, the impact of angling on the spawning stock might be halved to between 1 and 3 percent. The byelaws are therefore unlikely to achieve very much on their own to protect and improve the stock.

Closure of the rod fishery, the obvious alternative, would provide a slightly greater direct benefit to stocks from legal fishing. Maintaining a legal rod fishery is desirable not only for socioeconomic reasons but to prevent illegal fishing. It also provides the only currently practical way of monitoring adult salmon stocks in the Usk.
5.8 NRW note that the current levels of exploitation are not the primary cause of the current low abundance and that the proposed measures will thus result in relatively modest increases in spawner numbers, although accumulated benefits would be expected over time. Nonetheless, it is entirely justifiable to aim to maximise spawner numbers in the short term and, while it is clearly important to continue to address the many other factors affecting stocks (e.g. water quality, habitat), it needs to be recognised that such improvements are only likely to be achieved over the longer term. As such, it clearly makes sense to implement appropriate fishery control measures in the short term to increase the numbers of fish surviving to spawn and to facilitate recovery.

5.9 Following my review of the NRW Technical Case, I concluded that it provides a comprehensive evidence base in support of these proposed measures, and that these appear proportionate and reasonable. I remain of this view. The measures set out in the Technical Case have been designed to ensure proportionality in balancing the interests of both net and rod fishery sectors while addressing the underlying need to better protect Welsh salmon and sea trout stocks. I am therefore happy to endorse them. I further consider that a solution to the urgent and severe problem of salmon and trout stock depletion can only be provided by means of a raft of measures to be deployed simultaneously and in combination and that these measures must include the proposed Byelaws.
There is little real evidence of how many salmon entered the Mawddach during the 2017 season (or any other). I have made this point to NRW on a number of occasions. The heavy peat stain and nature of the pools makes fish spotting all but impossible whilst the scarcity of anglers means that rod catches in no way reflect the stock of the river. The NRW 2018 juvenile surveys revealed that the results for both salmon and sea trout poor and fry were the ‘best on record’. In short the NRW stock assessments do not reflect the true state of the river.

The annual sites on the Ogwen, Seiont, Gwyrfia, Llynfi, Gilwern and Dwyryd were all good compared to the historic data for both salmon and trout. The Dwyryd and Dwyryd were poor for salmon compared to the historic data, however the trout numbers were good.

The Mawddach catchment had some very positive results with the Waun and Mawddach having their best results on record for both salmon and trout. Fishing efficiency has been improved at both these sites as the high temperature increases conductivity which increases fishing efficiency. Conductivity is usually very low at these sites. Spawning would also have had to be successful to get such high densities.
NRW Enforcement Staff told the Gwynedd LFAG members on 5th December 2018 that they are receiving fewer and fewer intelligence reports from anglers which is making their work more and more difficult. They attribute this lack of intelligence to the fact that anglers have been alienated by the current proposals.

We were also told that the current number of enforcement officers (16.25 FTE equivalent) will be reduced when they are reorganised into 10 teams.

If Mandatory Catch and Release is introduced, NRW Enforcement Officers cannot police it. On the other hand, angling organisations can, and do, police their own rules both through club bailiffs and peer pressure from other members.
A survey of the impact of the proposed new bylaws in the spring of 2018 revealed that a number of clubs had seen membership decline.

“20% downfall on membership”

“We have been approached by an unusually high number of riparian owners from across Wales asking us to consider taking on their wasterz.”

“A number of Club members stated that they would not join our Club until they knew if bylaws would be implemented this year or not.”

“At the time of writing we have 3 vacancies instead of a waiting list.”

“At the time of writing we are down roughly 20%.”

“A number have at this time still not joined and we expect to lose more next year.”
The introduction of 100% Catch and Release in 2018 by the EA on the Border Esk has had a major impact on membership numbers of both the major angling club and private syndicates.

The Border Esk and Liddle Angling Club (the only principal Esk member club) has seen its membership fall by 46% this year, and the syndicate at the prolific Longtown Willow Pool managed by the Carnegie family have had their rods fall this year from 20 to 12, and advised the family they will not renew their lease next year.

The Longtown syndicate over the last 5 years has had a full complement of 30 members. As a result of the new catch and release bylaws 18 anglers have stopped fishing this year. ......local Longtown business will suffer, notably The Graham Arms and the March Bank for accomodation, The Spar and the Gretna Cafe for food and the Esso Service station for fuel.
Hi Joel,

My thoughts on a possible way forward in terms of stock exploitation were as follows:
To establish for each drainage basin a ‘management’ group made up of representatives of Angling Clubs, Riparian owners and NRW. This would use the information from catch returns, NRW’s ‘Know your River’ document and (crucially) observations from people who are actually on the river on a daily basis in order to set appropriate exploitation levels for the next season. I realise that this would require a time commitment from NRW but smaller rivers could be grouped together to take place (separately) on the same day. There would be a number of advantages in working in this way:

- It avoids a ‘one size fits all’ model which would not be appropriate for many rivers
- It is much more flexible and allows us to respond to changing stock levels
- It would allow us to introduce zero exploitation in the short term without the need for statutory legislation
- It would further partnership working between NRW and stakeholders and give those stakeholders some degree of ownership
- It would enable angling organisations to police stock levels (NRW has insufficient enforcement officers to do this)
- It would reduce the risk of driving visiting anglers away

Clearly this requires considerable development but I do feel that it is an idea which should not be dismissed out of hand.

John
Wales deserves better than what is being proposed here.

Are we really prepared to extinguish all hope by abandoning the good practice that has seen release rates rise from 0% to 86.5% in the relentless pursuit of a mandatory solution that will deliver little or no gain?