

ENVIRONMENT AGENCY

YORKSHIRE AND NORTH EAST COASTAL SEA TROUT FISHERY CONSULTATION, FEBRUARY 2020

Response from the Tay District Salmon Fisheries Board

4 Please provide your comments on the length of the netting season for sea trout in Yorkshire and the North East.

Please enter your comments here: The Tay District Salmon Fisheries Board considers that out of the options provided in the consultation document, the netting season for sea trout in Yorkshire and the North East should remain as it currently stands, i.e. Option 1 in the consultation document.

Further, we consider that this should be combined with the new type of modified nets. These should be made mandatory under the existing seasons.

Although not listed, our preferred option would be for no catch and release netting of salmon to be undertaken at all. As we have stated in previous emails, commercial sea trout fishing, if it is to be practiced in NE England, should be conducted within rivers and estuaries using beach seine nets targeting individual river stocks, not in open coastal mixed stock fisheries.

Our reasons are as follows.

It is well understood that fisheries in NE England take fish from a range of rivers in eastern Scotland, including the Tay, Earn and Eden in our district. The Earn and Eden are classed as category 3 by Marine Scotland and are subject to compulsory catch and release. While the Tay itself is currently classed as category 1, that is based on catches over the period 2014 - 2018. As shown in the consultation document, the catch in 2018 was particularly low. 2019 was much the same, only slightly higher. Therefore, at the present time, the situation on the River Tay appears worse based on the last two years than the category 1 status indicates. Because of this situation, we are recommending that all salmon and grilse should be released on the River Tay in 2020. Against this background and the fact it applies to other rivers too, it is not appropriate that salmon should be caught as an unintended bycatch to then be released damaged. In a previous consultation we showed how it is common for salmon and sea trout caught in gill nets to be damaged. We note that the consultation document implies damage to released salmon was limited in the trial. However, our interpretation of the fish shown on video etc is rather different. As shown on photos accompanying this submission, most of the fish images provided showed damage, especially net abrasion of the skin on the head. We have experience of this sort of damage catching broodstock salmon in trammel nets. This type of mark persists for a long time and is very vulnerable to fungal infection, in a hatchery at least, unless immediately disinfected. Thus, rather than being undamaged, we consider most

of the fish shown to have been damaged and potentially vulnerable to disease once they return to freshwater. Given the position we find with salmon experiencing unprecedented levels of marine mortality, permitting a salmon bycatch in this type of gear is simply unacceptable, but if we have to pick one of the options, it must be for that which has least impact.

5 If you have any documents or images to attach to your response please upload them below

Examples of net damage from images / videos from netting trials



Net damage above the eye, diagonal lines across the head

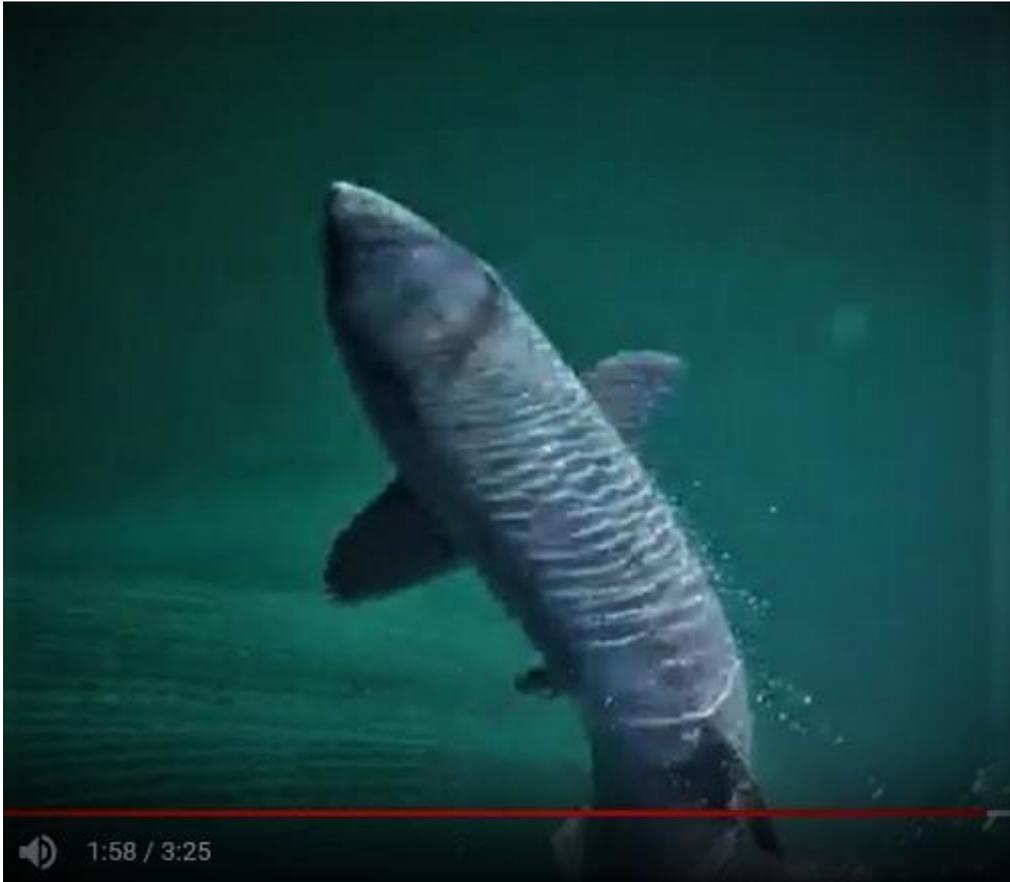


Lines again across the head



5. Salmon immediately after release from a T net, in good condition

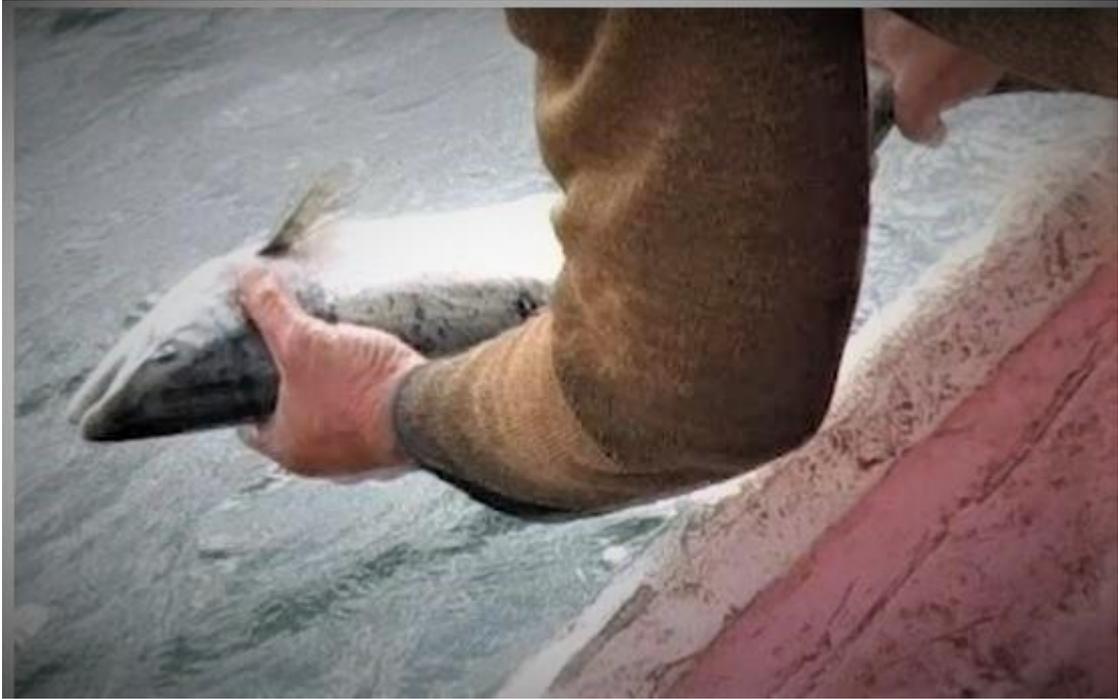
May again be a line across the head, unless shadow.



Dark lines crossing head again



May be lines on head again, but dorsal fin is torn and vertical net mark leading down from dorsal.



Dark mark again on head in front of thumb.