Coarse fishing close season on English rivers

Appendix 6 - Response form

We welcome your views on the coarse fishing close season on English rivers. Please use this form if you are responding by email or post rather than online.

If you would like to respond online, please use this link - <https://consult.environment-agency.gov.uk/fisheries/consultation-on-the-review-of-the-close-season>

The consultation document and supporting evidence documents are also available using this link. We would encourage you to read them. If you would like a hardcopy, please email us at [fisheries@environment-agency.gov.uk](mailto:fisheries@environment-agency.gov.uk) or write to us at the address at bottom of this page.

Please complete the questions and where there is a free text box, give as much information as possible to support your answer. If you have any documents that support your response, please include them with this form.

**How we will use your information**

The Environment Agency will look to make all responses publicly available during and after the consultation, unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals who respond.

We will also publish a summary of responses on our website in which we will publish the name of the organisation for those responses made on behalf of organisations.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

The Environment Agency is the data controller for the personal data you provide. For further information on how we deal with your personal data please see our Personal Information Charter on gov.uk (<https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter>) or contact our Data Protection team.

Address: Data Protection team, Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

Email: [dataprotection@environment-agency.gov.uk](mailto:dataprotection@environment-agency.gov.uk)

Returning your response

The consultation will run for 8 weeks from 14 January to 11 March 2019. Any responses we receive after 11 March will not be included in the analysis.

We would like you to use this form if you are not submitting your response online. You can return it by [email](mailto:fisheries@environment-agency.gov.uk?subject=Coarse%20Fishing%20Close%20Season%20Consultation) to [fisheries@environment-agency.gov.uk](mailto:fisheries@environment-agency.gov.uk), using the heading "Coarse Fishing Close Season Consultation". Please also use this email address if you have any questions regarding this consultation.

Or by post to your completed form to:

Coarse Fishing Close Season Consultation  
Environment & Business  
Environment Agency Fisheries Team  
Horizon House  
Deanery Road  
Bristol  
BS1 5AH

Section 1: About you

To help us analyse the responses we receive, we’d like to understand more about you and, if applicable, the type of organisation or business you represent.

a) Please tell us if you are responding as an individual or on behalf of an organisation or group (please select only one item).

Responding as an individual

Responding on behalf or an organisation or group

b) If you are responding as an individual, please select an option (please select only one item).

I am a coarse, game or mixed angler

I own or manage a commercial fishery

My business is dependent on anglers, eg tackle trade or accommodation/catering business

I am a member of the public

I am responding in some other capacity

c) If other, please specify.

d) If you are responding on behalf of a group or organisation, please select from one of the options below (please select only one item).

I am responding on behalf of an angling club, association or syndicate

I am responding on behalf of a fisheries/angling organisation

I am responding on behalf of an environmental organisation

I am responding on behalf of a government agency/department

I am responding on behalf of a local authority

I am responding on behalf of another group or organisation

e) If other, please specify.

f) If you are responding on behalf of a group or organisation, please give its name here.

Wild Trout Trust

g) What is your email address?

If you provide your email address below you will automatically receive an acknowledgement email when you submit your response.

Also, by providing us with your email address you consent for us to let you know when the consultation summary responses document has been published. We will only keep your details until we’ve notified you of this.

We will not share your details with any other third party without your explicit consent unless required to by law.

You can withdraw your consent to receive these emails at any time by contacting our Fisheries team at [fisheries@environment-agency.gov.uk](mailto:fisheries@environment-agency.gov.uk).

director@wildtrout.org

h) Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity (please select only one item).

Yes

No

i) If you do not want us to publish your response, you need to tell us why.

j) Please tell us how you found out about this consultation.

Please select only one item.

From the Environment Agency

From another organisation

Through an organisation, group or trade association you’re a member of

Press article

Social media e.g. Facebook, Twitter

Through a meeting you attended

Other

k) If other, please specify below.



Section 2: Your views

1. Coarse fish close season options

Everyone is welcome to complete this section.

We are consulting on three options for the coarse fishing close season. In this section, we want to know which you support:

1. Retain the current close season. This option would retain the current statutory close season on rivers in England between 15 March and 15 June (both dates inclusive).
2. Remove the close season. This option would remove the statutory close season altogether.
3. Retain a close season, but change the start and end dates. This option would retain a statutory close season, but change the start to 15 April and the end to 30 June.

Question 1.1 Do you support retaining, removing or changing the current river coarse fishing close season?

Please select only one item.

Retain the current close season

Remove the close season altogether

Change the close season to 15 April to 30 June

Don't know/undecided

1. Risks to coarse fish

Everyone is welcome to complete this section, but we are particularly keen to hear from anglers, angling clubs and representative organisations and fishery managers.

In this section, we want to understand your views on whether a close season is necessary to protect coarse fish stocks, and the fisheries they support, and whether changing or removing the close season poses any risks. In particular we would welcome any evidence you have to support your views.

Question 2.1 Do you believe that changing the statutory coarse fishing close season on rivers to 15 April to 30 June would pose a risk to coarse fish?

Please select only one item.

Yes

No

Don't know/undecided

The current coarse fish close season is far from perfect in protecting all coarse fish species, but in an average year, it will provide significant protection for most coarse fish species, for most of the time, with a degree of future-proofing as climate change shifts fish life cycle patterns. Moving the coarse fish close season as proposed (with a month later start date) potentially leaves pike, dace and grayling at risk from increased handling and disturbance at a time when they are particularly vulnerable.

Dace and grayling are two species which are struggling on many river systems at the present time and the in-combination effects of increased angling pressure, at such a sensitive time of the year, could potentially lead to further decline. Climate change scenarios suggest that aseasonal floods may become a feature for temperate countries like England & Wales and this may create still greater challenge for Spring-spawning coarse fish species; adding to those stresses with angling pressure is unwise.

The statements made in the supporting evidence relating to dace being at a reduced risk of rod capture in late March/early April are questionable. It is true that coarse anglers do not tend to fish in shallow, gravel glide habitats at the back end of each season but we believe that some anglers may well move to those areas were large pre- and post-spawning aggregations of fish will gather. Handling and catching bags of dace immediately pre- or post-spawning will put this species under increased pressure.

Many trout anglers avoid targeting grayling during Spring time trout fishing sessions. Even when caught by accident, the number of grayling intercepted is likely to be a fraction of those that would be captured in the Spring with the increased use of bait fishing that the proposed changes would precipitate.

We believe that other coarse fish species may also be adversely impacted by this proposal, especially given the unpredictable nature of our climate. In addition to the flooding issue outlined above, climate warming is likely to induce early spawning more frequently in the years to come and thus the proposed close season change risks exposing coarse fish populations to unwelcome (and unnecessary) angling pressure.

Question 2.2 Do you believe removing the statutory coarse fishing close season on rivers would pose a risk to coarse fish?

Please select only one item.

Yes

No

Don't know/undecided

For all the reasons set out above in 2.1.

We believe that the abolition of the coarse fish close season could put some species of coarse fish at increased risk. The level of risk will vary from river to river and will be linked to perturbations in seasonal weather patterns, as outlined above. At a population level, it may be virtually impossible to measure the impacts of angling pressure and to disentangle it from other factors, but there is an avoidable risk from that pressure and harm to individual fish. We conclude that the in-combination impacts are likely to be significant.

Question 2.3 In the event of changing or removing the close season, do you believe there should be different arrangements for pike fishing?

Please select only one item.

Yes

No

Don't know/undecided

Pike will undoubtedly be more vulnerable to proposed changes to the close season. Specific byelaws pertaining to pike fishing at this time would overlap with tactics used by anglers targeting other predatory fish species, including salmonids.

Introducing a tiered close season for different species would be confusing and allow a few unscrupulous anglers to take advantage of potential loop holes. A byelaw solely aimed at pike conservation would to be extremely difficult to enforce, especially with the ongoing reductions in EA/NRW resources.

1. Risks to salmon and trout

Everyone is welcome to complete this section, but we are particularly keen to hear from salmon and trout anglers, angling bodies and fishery managers.

In this section, we want to understand your views on whether a statutory coarse fishing close season is important to protect salmon and trout stocks, and the fisheries they support, and whether changing or removing it would pose any risks.

In particular we would welcome any evidence you have to support your views.

Question 3.1 Do you believe changing the statutory coarse fishing close season on rivers to 15 April to 30 June would pose a risk to salmon and trout?

Please select only one item.

Yes

No

Don't know/undecided

We believe there are additional risks posed to both juvenile and adult salmonids from the proposed change to the close season. For juvenile trout and salmon, there is currently often spatial separation from the areas most heavily fished by coarse anglers but this could change if spring time fishing were permitted. At this sensitive time of the year, juvenile trout redistribute, including sea trout pre-smolts leaving the relative safety of shallow side-streams at the beginning of a downstream migration. Both salmon and trout smolts will be vulnerable to being caught and handled by bait fishers and however careful the angler might be, some will inevitably be deep hooked, or roughly handled and will not survive the transition from fresh to salt water.

In rivers like the Hampshire Avon and Itchen, where salmon are a key feature of the Special Area of Conservation, any changes in the law will have to be tested under the Habitats Regulations. We do not believe it is possible to show "no adverse effect" from changing the existing coarse fish close season. Many rivers with "at risk" populations of salmon have heavily-angled "free" fisheries in their lower reaches e.g. Itchen and the Dorset Frome, where coarse anglers have no additional regulation from controlling clubs or land owners.

Rivers with mixed populations of both coarse fish and salmonids, which we believe equate to the majority of rivers in England and not a minority, as stated in the supporting evidence document, will be at risk from increased angling activity at a time of the year when juvenile salmonids will be most vulnerable.

Adult spring salmon will also be put at additional risk from accidental hooking or capture by coarse rods. The EA has already taken emergency measures to provide more protection for spring salmon, so potentially to put them at increased risk from exposure to anglers targeting pike, perch and zander with lures, or indeed barbel or chub with worm baits is counterproductive.

Question 3.2 Do you believe removing the statutory coarse fishing close season on rivers would increase the risk to salmon and trout?

Please select only one item.

Yes

No

Don't know/undecided

For all the reasons set out above in 3.1.

Trout can be legally targeted with bait in some regions in the Spring, as the Evidence Document points out. However, we do not believe that this is any justification for allowing Spring-time bait fishing in all areas, with its potential to increase pressure on salmonid and coarse fish populations. .

During the open season for salmonid angling (part of which coincides with all/much of the current coarse fish close season, depending upon location), restrictions on angling methods (particularly use of and/or type of bait) are in place in all Environment Agency areas. Proposals to relax the coarse fish close season will inevitably jeopardise these important salmonid protection measures. The Salmon and Sea Trout Protection Byelaws 2018 (introduced in England in January 2019) and with a similar instrument proposed for Wales highlights the need to regulate some methods, especially bait fishing; byelaw 12 in England specifically prohibits the taking of, or attempting the taking of, salmon before 16 June with anything other than fly or lure. Permitted coarse fishing, inevitably involving bait, would undo any gains from this new legislation.

1. Risks to other fish species

Everyone is welcome to complete this section, but we are particularly keen to hear from anglers, angling clubs, angling representatives and fishery managers.

In this section, we want to understand your views on whether a statutory close season is necessary to protect other species of fish, notably eel, smelt, lamprey or shad. In particular we would welcome any evidence you have to support your views.

Question 4.1 Do you believe that changing the statutory coarse fishing close season on rivers to 15 April to 30 June would increase the risk to eel, smelt, lamprey or shad?

Please select only one item.

Yes

No

Don't know/undecided

It is very likely that protected shad populations will be at risk if bait angling in the Spring is to be allowed by law. Populations in rivers like the Wye will be at particular risk, where there is significant coarse fishing interest.

The Severn Rivers Trust is undertaking a multi-million pound project, Unlocking the Severn, improving access across weirs for migrating fish, especially shad populations. Potentially putting these fragile populations at increased risk from accidental exposure to baits aimed at coarse fish would seem counterproductive and is largely avoidable by doing nothing!

Increased bait fishing resulting from these changes would also expose eel, a species which has suffered enormous decreases in abundance in recent decades, to more angling pressure than the current situation.

Question 4.2 Do you believe removing the statutory coarse fishing close season on rivers would increase the risk to eel, smelt, lamprey or shad?

Please select only one item.

Yes

No

Don't know/undecided

As above. Exposure to increased angling pressure will very likely put fish like eel and shad at increased risk. We do not have any experience of our members catching lamprey or smelt by rod and line.

1. Risks to wildlife and habitats

Everyone is welcome to complete this section, but we are particularly keen to hear from wildlife conservation bodies, as well as from anglers, angling clubs, angling representatives and fishery managers.

In this section, we want to understand your views on the role of the statutory coarse fishing close season in protecting river wildlife and river habitats. Again, we would welcome any evidence you have to support your views.

If, as a result of this consultation, we make new byelaws, we are required to carry out an assessment of risks to protected species and sites, which we would do with support from Natural England (and Natural Resources Wales in respect of border rivers). This may limit where any changes to the close season might apply.

Question 5.1 Do you believe that changing the statutory coarse fishing close season on rivers to 15 April to 30 June would pose a risk to river wildlife and habitats?

Please select only one item.

Yes

No

Don't know/undecided

Increased bank activity in the sensitive early Spring time period could have an adverse impact on nesting birds. We recognise that there is already significant activity on river banks in the Spring but the current levels of activity, which is mainly restricted to game rods, is at a much lower density and therefore has less impact.

Question 5.2 Do you believe that removing the statutory coarse fishing close season on rivers would pose a risk to river wildlife and habitats?

Please select only one item.

Yes

No

Don't know/undecided

As above in 5.1. In addition, the manner in which coarse anglers tend to occupy hot "pegs" or "swims" could also potentially reduce the riverside bank's ability to recover in the all-important Spring period, potentially leading to increased erosion pressures. Increased levels of bank wear may also impact on other wildlife, including protected vole populations.

1. Angling participation - for individual anglers

Please answer these questions if you fish for coarse fish in England. If you do not fish, please continue to the next section.

In this section, we want to understand how the current river coarse fishing close season affects your coarse angling and how any change to the river close season would affect where, when and how often you would go fishing.

Question 6.1 Please tell us about your fishing

What type of fishing do you do?

Please select only one item.

Coarse fishing

Game fishing

Mixed coarse/game fishing

I do not fish in freshwater

Where do you fish for coarse fish?

Please select only one item.

Rivers only

Stillwaters only

Canals only

Any waters

I don't go coarse fishing

Do you fish for coarse fish on stillwaters or canals between 15 March and 15 June?

Please select only one item.

Yes

No

Question 6.2 How often do you currently fish rivers for coarse fish between 16 June and 30 June?

Please select only one item.

No more than once

Twice

Three or more times

I don't go fishing at this time

Question 6.3 If the statutory river coarse fishing close season was removed, how many times would you go fishing for coarse fish on rivers between 15 March and 15 June?

Please select only one item.

Once or twice in total

Three to ten times

Eleven times or more

I wouldn't go fishing at this time

Question 6.4 If the statutory river coarse fishing close season was changed to 15 April to 30 June, how many times would you fish for coarse fish on rivers between 15 March and 15 April?

Please select only one item.

No more than once

Twice

Three or more times

I wouldn't go fishing at this time

Question 6.5 If the statutory river coarse fishing close season was changed or removed, what would be your principal reason for not fishing for coarse fish on rivers during this time?

Please select only one item.

I disagree with fishing while fish are spawning

To allow rivers time to recover

To avoid disturbing other wildlife, eg nesting birds

To take a break from fishing/do other activities

I prefer to fish stillwaters for coarse fish

I prefer to fish for game fish

Other

None of the above - I would fish on rivers if the close season was removed or changed

If other, please provide details.

Question 6.6 If the statutory river coarse fishing close season was changed or removed, would you continue to fish on stillwaters during this time?

Please select only one item

Yes, the same amount

Yes, but more often

Yes, but less often

No, I would no longer fish on stillwaters during this time

I do not fish on stillwaters during this time

Question 6.7 Please use the space below if you would like to provide any further information on your angling activity and the close season, including any supporting evidence.

1. Angling participation - for angling clubs, associations and syndicates

In this section, we want to understand how the current close season affects angling clubs, associations and syndicates, and what effect changing or removing the close season would have on angling behaviour and angling participation.

Please complete this section if you are responding on behalf of an angling club, association or syndicate. If you do not represent such a group, please continue to the next section.

Question 7.1 Please provide the name of your angling club, association or syndicate.

Question 7.2 What type of coarse fishing does your club own or lease?

Please select all that apply.

River

Stillwater

Canal

Question 7.3 Is the current statutory river coarse fishing close season a barrier to more people joining your club?

Please select only one item.

Yes, strongly agree

Yes, agree

Neither agree nor disagree

No, disagree

No, strongly disagree

Undecided/don't know

Question 7.4 If the statutory river coarse fishing close season was changed or removed, are there other barriers that might prevent your members from fishing on your club's river(s) during this time?

Please select all that apply.

Yes, we only lease our river fishing rights for 9 months

Yes, the river is reserved for game angling during the close season

Yes, other river events make angling difficult/unviable at this time

Yes, club staff and volunteers are unlikely to be available

Yes, we use this time to maintain the fishery

Yes, other - please specify

No, there are no other barriers

If other, please specify.

Question 7.5 If the statutory river coarse fishing close season was changed or removed, do you think it would affect the value of your river fishery?

Please select only one item.

Yes, our fishery would increase in value

No, our fishery would not change in value

Yes, our fishery would fall in value

Don't know

Prefer not to say

We don't own or lease any river fishing rights

Question 7.6 If the statutory river coarse fishing close season was changed or removed, do you think it would affect the value of your stillwater or canal fishery?

Please select only one item.

Yes, our fishery would increase in value

No, our fishery would not change in value

Yes, our fishery would fall in value

Don't know

Prefer not to say

We don't own or lease any stillwater or canal fishing rights

Question 7.7 If the statutory river coarse fishing close season was changed or removed, do you anticipate paying more in running costs for your river fishery (for example increased fishery lease, employing more staff or higher maintenance costs)?

Please select only one item.

Yes, our running costs would most likely increase

No, our running costs would most likely remain the same

No, our running costs would most likely reduce

Don't know

Prefer not to say

Question 7.8 Please use the space below if you would like to provide any further information on the close season and angling activity, including any supporting evidence.

1. Angling participation - for angling representatives and others

Please complete this section if you are responding on behalf of an angling representative body, other non-governmental organisation or government department/agency.

We want to hear views on how retaining, changing or removing the statutory river coarse fishing close season contributes towards the Environment Agency's and partners' objectives for angling and the environment.

Question 8.1 Please provide the name of your organisation.

Wild Trout Trust

Question 8.2 Do you think the current statutory river coarse fishing close season is a barrier to more people going fishing?

Please select only one item.

Yes, strongly agree

Yes, agree

Neither agree nor disagree

No, disagree

No, strongly disagree

Undecided/don't know

Question 8.3 Do you think the current close season reduces or enhances the social and economic value of angling?

Please select only one item.

Significantly reduces socio-economic value

Reduces socio-economic value

Neither reduces nor enhances socio-economic value

Enhances socio-economic value

Significantly enhances socio-economic value

Undecided/don't know

Question 8.4 If the statutory river coarse fishing close season was changed or removed, do you think it would reduce or enhance the social and economic value of angling?

Please select only one item.

Significantly reduce socio-economic value

Reduce socio-economic value

Neither reduce nor enhance socio-economic value

Enhance socio-economic value

Significantly enhance socio-economic value

Undecided/don't know not checked

Question 8.5 Please use the space below if you would like to provide any further comments on angling participation, including any supporting evidence.

We are concerned that the documents supporting this consultation do not fully explore the implications of any changes to the coarse fish close season for game anglers. Many fisheries are mixed and not simply coarse or game and most run smoothly, with little conflict, even on unmanaged, free sections.

We believe that the proposed changes to the coarse fish close season will adversely impact on the interests of many game/all-round anglers. Changes to the current coarse fish close season would particularly affect those less affluent game anglers that can only afford access to mixed beats, usually with the peak of their sport in the Spring time.

Some large, well-run clubs like Salisbury & District AC, have a two-tier licence where anglers can choose to pay more for a specially preserved chalkstream beat, or they pay a "mixed" ticket which enables the all-rounders and the less well-off the opportunity to enjoy first-class sport for both coarse and game fish. Other large clubs such as Christchurch AC also give their members the chance to experience game angling on what are usually beats predominantly fished by coarse anglers. These proposed changes will reduce opportunities for the many angling all-rounders, who target trout in April, May and early June before switching to coarse species in mid-June.

Angling clubs may indeed have the opportunity to set up their own local rules, but very many with mixed fishery beats have single bank access/ownership and require the protection of the law to ensure that they work as a genuine, mixed fishery.

We believe that the current break in the coarse fish close season gives anglers the chance to try something different; in fact, it encourages choice. Many trout anglers will see their valued April/May angling time disrupted with the proposed shift or abolition of the coarse fish close season and a consequent presence of coarse anglers on rivers, providing fewer opportunities for high quality game angling on rivers with mixed populations.

The current coarse fish close season works very well for conservation but also for access on many mixed fisheries. Changing the byelaws may force the hand of some landlords who currently support coarse angling from the June 16th but who might not be so generous if game angling opportunities become more limited.

1. Angling-related businesses

In this section, we want to understand how the current statutory river coarse fishing close season affects businesses which depend on angling, and what effect changing or removing it would have those businesses.

Please complete this section if you own or run a business that relies (wholly or in part) on angling. We are particularly keen to hear from commercial fishery managers, angling professionals, members of the tackle trade, and catering and other businesses.

Question 9.1 What type of business do you own or manage?

Please choose one option.

Commercial fishery

Accommodation and catering

Fishing equipment, tackle and bait

Angling guide

Fishery contractor

Other

Conservation charity and charitable company limited by guarantee actively involved in river restoration and habitat enhancement.



What is the name of your business?

Wild Trout Trust

Question 9.2 How does the current statutory river coarse fishing close season affect your business?

Please select only one item.

Significant positive impact

Some positive impact

Neither positive nor negative impact

Some negative impact

Significant negative impact

Undecided/don't know

Question 9.3 How would removing the statutory river coarse fishing close season affect your business?

Please select only one item.

Significant positive impact

Some positive impact

Neither positive nor negative impact

Some negative impact

Significant negative impact

Undecided/don't know

Question 9.4 How would changing the statutory river coarse fishing close season to 15 April to 30 June affect your business?

Significant positive impact

Some positive impact

Neither positive nor negative impact

Some negative impact

Significant negative impact

Undecided/don't know

Question 9.5 Please use the space below if you would like to provide any further information on this section, including any supporting evidence.

The last two weeks in March is an important working window for WTT for tree works. We and our many partners would be unable to carry out tree works in the proposed extension period due to nesting birds.

We are a membership charity and our fear is that any erosion of the sport enjoyed by game anglers potentially will lead to reduced support for WTT; the same may be true for other fisheries and conservation NGOs and indeed for mixed-fishery angling clubs.

1. Further comments

Question 10.1. Please use this space to provide any other comments you have about the options for the statutory coarse fishing close season on rivers in England.

We believe that the existing coarse fish close season works well. The abolition of a close season on rivers is indefensible from a conservation perspective and exposes angling to severe reputational risk. A call for a longer close season that provides enhanced protection for spring spawning fish against the backdrop of inevitable changes in our climate would have merit, but not the introduction of change to increase access for one segment of the angling community, with the risk of harm to the environment and to wildlife. It is important for the past-time and industry of angling that it is careful in the messages it sends out to the non-angling public, as well as dealing with equity with its own sectors.

We believe that the proposed changes to the coarse fish close season will reduce, not increase, the choices for anglers and we would support continuation of the current close season i.e. Option 1 of this consultation.

Question 10.2. If you have any documents that support your response, please include them with this form.

Thank you for your time in responding to this consultation.