



# WILD TROUT TRUST

wildtrout.org

Registered Charity No. 1162478 (England & Wales) SCO46354 (Scotland)

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Marine Conservation and Enforcement Team  
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Dear Sir/Madam

01/02/2022

## **Public Consultation - Net Fishing Management Southern IFCA**

This response to the Southern IFCA consultation is made on behalf of the Wild Trout Trust (WTT), a national, membership-based registered charity whose aims and objectives are the protection of wild trout, including sea trout, and their habitat.

WTT has an interest in all coastal netting activities with respect to their adverse impacts on the sustainability of UK sea trout stocks. We have been working in partnership with the Environment Agency to raise the profile of south coast sea trout, through the jointly published South Coast Sea Trout Action Plan.

In the consultation document, the IFCA is recommending option 1, a new byelaw to permit ring netting. In the Impact Assessment document, 3 inch plus monofilament netting is proposed for permitted use within Southampton Water (Test, Itchen and Hamble estuaries) and Christchurch Harbour (Avon and Stour estuaries).

It is inconceivable to suggest that the use of such gear, even when targeting mullet and “shot and pulled” in a circle will not result in “interactions” with salmonid fish species, when at times salmonids will be sharing the same space as targeted mullet. IFCA staff know, as we do, that a salmonid captured in monofilament netting will invariably result in damage to the fish and although mortality may not be instantaneous, the resulting interaction may well lead to debilitation and a potential loss of spawning escapement. For species like the salmon, which is failing to meet conservation targets on all local rivers, the risks of serious impact are unacceptable.

It is difficult to see how the IFCA can claim to be discharging their responsibilities to protect the conservation objectives of designated sites under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the Wildlife and Countryside Act 1981. In setting up a byelaw that permits activities likely to result in “interactions” with Atlantic salmon, the IFCA has to be able to prove “no adverse effect” on a key feature of interest of both the Avon and the Itchen Special Areas of Conservation. During the Dibden Bay Planning Inquiry, Associated British Ports could not prove “no adverse effect” to salmon from a proposed port development and if challenged, it is hard to see how this byelaw proposal is any different.

The Wild Trout Trust Ltd

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Asking the fishermen themselves if they ever catch salmonids whilst ring netting is not evidence of “no interaction”. Warranted Fisheries Officers working for the Environment Agency have witnessed salmonids being taken in Southampton Water using drifting mono nets. Further, evidence recently gathered by the multi-partner SAMARCH research project (<https://www.samarch.org>), using just 600m of gill net set by contracted, commercial fishermen in the near Channel coast, yielded an average daily catch of 1.7 salmonids. The same result is highly likely when using the same material albeit, in the case of the byelaw recommendation, being pulled around in a circle. It is not an acceptable mitigation measure to attempt to zone fishing effort because very little is known about the inward migratory routes of adult salmon and sea trout, but what is known is that numbers of fish wander between rivers before the majority home to their natal river. In both cases, fish *will* be vulnerable to capture in ring nets, wherever set.

Although not particularly pertinent to our concerns for salmonid fish species, we would respectfully suggest that the IFCA should also consider the “social and economic” benefits of protecting mullet from commercial exploitation, when their presence locally provides significant social and economic benefits to both local and visiting anglers.

For the above reasons, we strongly recommend that the Southern IFCA adopt option 2 and produce a byelaw that bans the use of all nets within these highly sensitive locations.

Yours faithfully,



Shaun Leonard  
Director, Wild Trout Trust

cc CEO, Southern IFCA, Unit 3, Holes Bay Park, Sterte Avenue West, Poole, Dorset BH15 2AA