Response form

Potential extension to the Yorkshire and North East coastal sea trout netting season

We welcome your views on our consultation of the options to extend the sea trout netting season. Please use this form if you are responding by email or post rather than online.

Please complete the questions and where there is a free text field, give as much information as possible to support your answer.

**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

Returning your response

The consultation will run for 5 weeks from 20 January 2020 to 21 February 2020.

The closing date for responses is 21 February 2020. Any responses we receive after this date 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 to jonathan.shelley@environment-agency.gov.uk using the heading, Potential extension to the Yorkshire and North East coastal sea trout netting season. Please use this email address if you have any questions regarding this consultation.

Or by post to:

Jon Shelley, Environment Agency, Tyneside House, Skinnerburn Road, Newcastle Upon Tyne NE4 7AR

Section 1: About you

To help us analyse the responses we receive we’d like to understand more about you or the organisation or group you represent.

Q1. Please tell us if you are responding as an individual or on behalf of an organisation or group.

Please select one answer only from the following options:

□ Responding as an individual

X Responding on behalf of an organisation or group

□ Other

If you're responding on behalf of an organisation or group, please tell us who you are responding on behalf of.

Wild Trout Trust

If you selected other, please specify.
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Other, please specify

Q2. What is your e-mail address?

The Environment Agency would like to keep you informed about the potential extension to the Yorkshire and North East coastal sea trout netting season. If you would like to receive email updates about this, please give us your email address below.

By providing us with your email address you consent for us to email you with updates about the potential extension to the Yorkshire and North East coastal sea trout netting season. We will keep your details until the project is closed or until you withdraw your consent.

You can withdraw your consent to receive these emails at any time by contacting us at jonathan.shelley@environment-agency.gov.uk

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

director@wildtrout.org

Q3. Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

 X Yes

 □ No

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

Section 2: Give us your views

Q4. Please provide your comments on the length of the netting season for sea trout in Yorkshire

and the North East. If you have documents or images please enclose them with your form.

The Wild Trout Trust believes that there is no justification for any extension to the season for sea trout in the north east beach net fishery. Indeed, we believe that there is sufficient evidence, as highlighted in the consultation report and elsewhere, that the north east sea trout beach fishery is a mixed stock fishery, exploiting at-risk populations with no demonstrable, sustainable surplus. The precautionary principle would dictate that the fishery should cease with appropriate compensation paid to the net licencees, at least until such time that the management of the fishery is underpinned by reliable information on stock composition and the presence (or absence) of a harvestable surplus.

As noted in the consultation report, the Environment Agency (EA) is obliged by law and its own guiding principles to conserve flora and fauna dependent on the aquatic environment, to move to close predominantly mixed stock fisheries, to reduce to zero the exploitation of at-risk fish stocks but to support exploitation of stocks where such exploitation is sustainable.

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The north east beach net fishery is exploiting sea trout from populations of all the rivers of north east England and south east Scotland, acknowledged and evidenced in the consultation report as a mixed stock fishery (eg page 12, 37). Since the mixed stock nature of the salmon fishery was a primary reason for the closure of the drift net fishery, applying the guidance of NASCO and ICES, the same fundamental conservation and fishery management principle should be applied to sea trout, recognised in EA's Sea Trout and Salmon Fisheries Strategy 2008-2021.

The EA’s stock assessments (for sea trout, based on rod catch) indicate that sea trout in the principal rivers of north east England have been consistently classified as At Risk or Probably At Risk over recent years. Rigorous and much-needed conservation measures have been introduced for salmon, yet comparison of EA's stock assessment for salmon and sea trout reveals that the latter may be in an even worse state across the north east. Further, the method of stock assessment used for sea trout is extremely crude, and, unlike salmon, not based on scientifically derived conservation limits; the current assessment may thus underestimate, perhaps substantially, the threat to sea trout stocks. We understand too that data from the Tyne's Riding Mill counter since 2016 have yet to be formally classified into sea trout and salmon, further illustrating the paucity of detailed and reliable knowledge on the status of the respective stocks in recent years.

Declared net catches (Table 1, below), expressed either as total catch or where fishing effort is standardised as catch per licensed day, also appear to point to a dramatic decline in sea trout numbers. The licencees in the north east fishery are long-standing, applying the same methods over many years; thus, it is likely that the reduced catch indicates a genuine reduction in the number of sea trout available to the fishery.

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| Table 1: Declared sea trout catch in the north east T & J fishery, 2015-2018 |
| Year | Total Number | Catch/licensed day |
|  |  | Northumbrian T net | Yorks T or J net |
| 2015 | 60696 | 38.18 | 19.23 |
| 2016 | 38863 | 23.49 | 13.79 |
| 2017 | 35148 | 25.73 | 17.72 |
| 2018 | 22508 | 16.65 | 10.69 |

Furthermore, EA fish counter records for both the Tyne and Wear show very significant declines in the number of fish entering the river. The Tyne counter recorded over 43000 fish (salmon and sea trout) in 2015, with less than 20000 a likely 2019 total. For the Wear, the reduction has been even more dramatic, from over 22000 in 2015 to less than 6000 fish recorded in 2019; it is noticeable that the consultation report very rarely refers to the 2019 figures. Additionally, the report repeatedly refers to the reduced net catch between 2018 and the trials of 2019 and suggests that this reflects a less efficient/more selective fishery. However, this reduction in net catch from the new designs could equally be explained by the low 2019 fish numbers, as recorded by both the Tyne and Wear counters.

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The counters may also suggest a shift in run timing, with more sea trout migrating into the river in the summer (rather than, as previously, in the autumn), when the nets have been fishing, prior to the 2018 byelaws. A similar pattern is reported from the Tweed (R. Campbell, pers comm, Dec 2019).

We believe that the available evidence described above points to the north east beach nets as a mixed stock fishery exploiting at risk or probably at risk populations of sea trout, with no demonstrable surplus to support exploitation. In this context and applying sound fishery management, none of the options in this consultation are supportable; there is a strong case that EA should close the beach net fishery, at least temporarily, until evidence is available that the north east sea trout stocks are sufficiently robust to sustain the fishery.

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