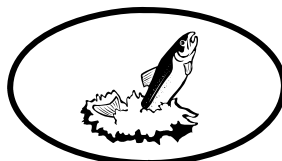


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CAMPAIGN FOR THE PROTECTION OF WELSH FISHERIES

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1st September 2009.

Virginia Hawkins, Clerk to the Committee, at: Sustainability.comm@Wales.gsi.gov.uk

Dear Virginia,

Re: Sustainability Committee's inquiry into access to inland water in Wales

The Campaign for the Protection of Welsh Fisheries has the support of 20,000 individual anglers and angling organisation. It is a single issue Campaign seeking to highlight the current rape of Welsh fisheries as a consequence of lack of funding for enforcement and general fisheries protection. However the Campaign is of the opinion that the granting of unrestricted access to Welsh river systems will add further stress to the salmon stocks in Wales. Salmon are an endangered species and as such, require appropriate protection unless this Welsh treasure is to be lost from our waters.

As anglers, we enjoy the pleasure of Welsh Rivers as much for the beauty of the surroundings in which we practice our sport as for the fish we hope to catch. With this in mind therefore, it seems unreasonable that we deny others the opportunity to experience the pleasure of our rivers and the beautiful Welsh countryside. However as anglers are subject to governing rules and regulation as well as limited in the extent to which they can participate in their chosen sport, so to should others. Not because they may or may not detract from the right of the angler to enjoy his sport, but because we are obliged to protect the salmon whose rivers we share. We are conscious that the views of those both for and against the proposals to allow greater access are being submitted with the bias that one must expect from vested interest, we however wish to make the case on behalf of the salmon.

*"yr ymgyrch mater unigol ar ran genweirwyr Cymru: lleol ac ymwelwyr."
"The single issue campaign on behalf of the anglers of Wales: local and visiting"*

We believe the following risks are associated with increased access by water sports enthusiasts.

1. It will facilitate greater illegal fisheries activity.
2. Increase mortality of fish during and prior to spawning
3. Disturb and damage spawning areas.
4. Potentially have an adverse effect on the Welsh economy.

Facilitate greater illegal fisheries activity:

We believe that current salmonoid fish stocks are being seriously reduced by illegal fisheries activities such as poisoning, netting, gaffing and so on. These illegal practices are pursued with little risk of apprehension by determined criminals who make a great deal of money from the rape of our fisheries.

If canoe or kayak is unrestricted and ungoverned then it is highly likely that criminal elements will use this access as an aid to their illegal activity. It will assist

- a) Illegal netting, gaffing, snaring and the like
- b) Facilitate access to vulnerable poisoning positions on the rivers.
- c) Make the collection of poisoned or stunned fish so much easier
- d) Provide a ready means of transporting poached fish from the scene of the crime.

Illegal netting:

Modern mono filament or nylon nets are cheap to purchase, easy to conceal and deploy as well as deadly to fish making their annual spawning runs up to the headwaters of the rivers in which they spawn. A kayak or canoe is a perfect means of transporting not only the light and easily concealed nets but also for placing them across the full width of the river, thus potentially taking and killing a whole run of fish running the river. Access by water will provide opportunity for villains to otherwise inaccessible waters which because of their isolation make them ideal poaching points.

Access to vulnerable poisoning locations:

There are positions on our rivers where the addition of "Cymag" a cyanide derivative or other poisons, liquids such as bleach, liquid soaps and the like. Swiftly flowing water running into a deep still pool would be an ideal position to pour these toxic liquids into the fast water, so that as they enter the pool, with all the oxygen removed by the chemical reaction of the poison, they essentially suffocate the fish, which then float to the surface for the waiting boat to collect them and hide them in the body of the canoe or kayak. The less toxic of these poisons will be sufficient to kill the majority of the fish in a pool whilst being dispersed into the water below, thus leaving no tell tale trail of dead and dying fish. Fish taken by these illegal methods, especially using the more toxic Cyanide derivatives are usually sold on with the head of the fish removed as the gills retain traces of the poison.

Facilitating the collection of dead and dying fish:

The benefit of a canoe or kayak to the above must be clear and obvious to any reasonable and right thinking person. Unrestricted access will provide a licence to assist those bent on the theft of fish and illegal fisheries activity.

Increase mortality of fish during and prior to spawning:

The salmon leave the river of their birth and head for the open ocean travelling, we believe, to the food rich waters around Iceland, where they feed avidly and rapidly put on weight and fat reserves prior to making the long journey back to the river of their birth. They return not only to the same river, but to the same part of the river from which they hatched. Whilst in the river they cease feeding and fast until they have spawned. They may enter the river early in the year and certainly many will be in our rivers by March they spawn around Christmas. This means many have gone without food for a period of up to ten months, although, of course, many will enter the rivers later and have only been in the river for a couple of months. They then fight their way up river to the spawning grounds where they mate, the hen fish immediately attempting to return to the sea whilst the male or cock fish stays to protect the eggs or redd. By the time they have reached the spawning grounds the salmon have paired up with their proposed mate and both are near to death. At this vulnerable stage the fish need to be left to mate undisturbed. Fright will cause them to flee, to run down river and away from the spawning grounds. If the fear is constant, the fish may be literally frightened to death from exhaustion from the exertion required to flee. Paddles from canoeists at this stage will produce this flight and would the canoe themselves where the water low. The effects of George runners, who actually run through the redds, it also disturb not only the fish but the newly laid eggs which they release from their gravel bed homes by stamping on or kicking the gravel.

At this time the spawning grounds must be protected from invasion by humans, they have enough to cope with from their "natural" predators. Currently anglers are banned from fishing for these fish during this period. The redds must be protected from access by humans. Poachers are known to carry fish from these spawning areas, leaving a trail of eggs from the fish they steal as evidence of their evil deeds. Allowing access to canoeists will make access for poachers easier and their presence less easy to spot. This must not be allowed to happen.

Disturb and Damage Spawning Areas:

For salmon to spawn, they need very specific river bed conditions: gravel of the right size and consistency, combined with good quality and fast flowing water. Without these conditions the fish cannot deposit their eggs for fertilisation. These conditions often go to make the fast water to which the canoes and kayaks are so attracted. It may be, but it is by no means certain, that during flood conditions, when the water is running very high, that the passage of a "boat" over these redds does no damage at all, however in lower water, when boats can navigate the redds, there is a real possibility of disturbance as described above. However, even after the fish have laid their eggs, the redds are still vulnerable to disturbance and indeed suffocation. People running over the gravel crush or dislodge the eggs setting them free to be eaten by the various predators. Now the canoeists and kayak riders will claim that they travel harmlessly over these areas and that may, for the most part be true. However when these boats capsize, collide or simply run aground the gravel bed is most certainly disturbed. The vulnerability of these areas has been recognised and acknowledged by legislation protecting them from disturbance. To disturb these areas is a criminal offence.

These areas may also be suffocated by fine particulates carried on the current by persons disturbing mud or silt areas of river bed above the spawning areas, these fine particles then enter the gravel beds and essentially suffocate the eggs by blocking the flow of water that provides the oxygen that sustains them.

Potentially have a damaging effect on the Welsh economy:

Angling generates over 100 million pound in revenue to the Welsh economy each year, much of this from anglers who come to Wales in search of its famous sewin and salmon fishing. Many of the hotels that were, in years gone, fully booked throughout the season by anglers, are currently suffering as a consequence of the lack of salmon in Welsh rivers to attract the paying guests. Much work is being done by the Welsh Assembly Government and the Environment Agency Wales to assist the revitalisation and regeneration of our salmon rivers as well as to encourage anglers to visit Wales. Some fishing methods require an angler to stand perhaps over waste deep in flowing water in order to cast a line to a known fish lie on a certain part of the river. This means that in effect to enjoy his sport the angler requires unfettered access to the whole river width. Clearly this is not possible if parties of canoeists are passing down the water he wishes to fish. Having said that to ban such "boaters" would seem both unfair and unreasonable. It would therefore seem sensible to restrict access to such water for the limited periods when fishing of this type takes place.

The value of a fishery is usually based upon the number of salmon caught in a year multiplied by the agreed value of each fish. Many years ago this figure was £1,500 per fish per year. This meant that if anglers on a given a stretch of river, or beat, caught 100 fish in an average year the value of the fishery would be 100 times £1,500 or £150,000 and that may be the value of one bank of the river for a length of perhaps half a mile. We are advised the value of fisheries on the Wye have reduced by one half due to the current canoe access arrangements.

There are real fears that non native aquatic species and serious diseases are being transferred to our rivers: the mitten crab and American Crayfish to name but two of the aquatic species. Canoes and Kayaks may move from one river to another in a single day or from a continental river to a Welsh river within a day or so. This represents a real threat in that water transported within the body of the boat or the protective covers over the seat and occupant or the ropes and ties attached to the boat.

These issues cannot be adequately addressed by voluntary codes of conduct. They would certainly be exacerbated by unrestricted access.

If access to our rivers is to be provided to those that wish to canoe or kayak, then it must be done by legislation:

- a) To ensure the protection of our salmon stock, an endangered species demanding protection.
- b) Ensuring the protection and the interests of other river users.
- c) The legislation must be enforceable.
- d) There must be sufficient enforcement staff to police it. The current numbers of enforcement officers are not adequate to protect our fisheries so a large increase in numbers would be essential if effective policing and monitoring is to be put in place.

- e) Canoes and kayaks should be identifiable, with registration numbers clearly displayed as is the case with boats licensed to travel over the waters of the Lake District National Park.
- f) There must be rules of the river as there are rules of the road, to incorporate good manners and means whereby the boats are made aware of the action to be taken when encountering other river users. Which side of the river to travel and when.
- g) Means for agreeing how large numbers of organised boats will travel down a river. For example, one at a time with ten minute intervals or all together keeping in a reasonably tight group

The Waters of Wales are one of the jewels of the national, to allow their unrestricted and un policed destruction by neglect would be a national disgrace.

The Campaign for the Protection of Welsh Fisheries opposes free and unrestricted access to the rivers of Wales and urges that this folly not be supported.

With thanks for offering us the opportunity to participate in this consultation.

Yours sincerely

Allan Cuthbert

For: The Campaign for the Protection of Welsh Fisheries