

National Assembly for Wales  
Environment and Sustainability Committee  
NRW 2015 –17  
Natural Resources Wales – Annual Scrutiny 2015  
Response Carmarthen Amateur Angling Association

**Cymdeithas Bysgota Amatur Caerfyrddin**  
Sefydlwyd 1894



**Carmarthen Amateur Angling Association**  
Established 1894

**President:** Mr G. Philipps

**Chairman:** Cllr. Daff Davies

**Vice Chairman:** Mr. John Williams

**Hon. Secretary / Treasurer:**

Mr David Neil Evans, 4 Lon Clychau'r Gog, Heol Castell Pigyn, Abergwili, Caerfyrddin, SA31 1DQ

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Dear Sir / Madam,

1. We are grateful for the opportunity to comment on the performance of Natural Resources Wales (NRW). Your engagement with us as “customers” in this way is to be commended.
2. Declining fish stocks are a concern to all right thinking anglers and most of the circ. 2000 anglers who fish the Tywi each year. These days, most of the anglers along the river are conservation minded with many practicing voluntary catch and release. Carmarthen Amateur Angling Association comprises members from all parts of society - doctors, teachers, engineers, nurses, labourers, schoolchildren and lawyers. All are united in a love for our river and a desire to see it survive.
3. There is awareness amongst members of the need to return most fish. In recent years we have gone far beyond what we may reasonably be expected to do to help sustain our fish stocks. We are now looking to NRW to show the same level of commitment. We have:
  - Introduced a by-law on size limits - all sewin over 6 lbs. must be returned;
  - Introduced a by-law limiting the number of salmon that can be taken to 5 per season. This is enforced by our own tagging system. We encourage members to use hooks that facilitate the quick release of fish and have sign posted them to NRW's good practice guides;
  - Planted trees to reduce bank erosion and silting of spawning gravels;
  - “Adopted” a spawning tributary, the Crychiau, where we have created several miles of fenced in buffer strips. These strips have created wildlife habitats, improved shade and prevented siltation of spawning gravels.
  - Modified in-stream obstacles to assist with the upstream migration of salmon and sewin;

- Successfully made representations against the further afforestation of upland headwaters of the Tywi. Conifers play a major role in the acidification of upland waters. We would hope that NRW would use more joined up thinking in this regard in future;
- With partners, made representations against over fishing by coracles, estuarine nets and illegal netting in Carmarthen bay;
- Undertaken regular invertebrate sampling to monitor the underlying health of our rivers; a number of our members have received kick sample training and have been feeding information to the Carmarthenshire Rivers Trust.
- Contributed funding to the Llyn y Fan Hatchery year on year to stock our waters with thousands of juvenile fish from brood-stock **voluntarily** donated by anglers – we are determined to sustain our fishery. The decision of NRW not to support this activity on the Tywi despite the support of many anglers leaves many of us extremely disheartened. NRW will have received many representations in this regard and we would like you to press them on the rationale/scientific reasoning for their decision to withdraw support.

4. We continue to work with the Carmarthenshire Fishermen's Federation (C.F.F.) re. :

- Llyn Brienne mitigation fund issues;
- supporting a licensed cormorant and goosander cull;
- addressing reports of illegal netting in Carmarthen Bay;
- addressing the licensed netting operation by the coracle and seine netsmen - according to declared net catches, licensed netsmen "take" about 950 sea trout and salmon from the river each year. These fish are the larger "brood stock" vital to the future of the river – fish that would survive if caught by our members (thanks to our own by-laws) are killed if taken by the nets. Why is there not a proper equilibrium here; what logical system would allow no restrictions on the number of fish (brood-stock) that can be theoretically taken by the nets? The economic and social benefits of angling are well documented. Angling in the Tywi valley attracts far too much revenue into the area for it to be jeopardised by the interests of a handful of commercial netsmen.

5. Below is a table indicating the numbers of fish caught on our waters in recent years (lower Tywi) – it does not make for good reading. There is a pattern of a continuing decline in rod catches. As a consequence declines in angler numbers are already being experienced. These catch statistics should be read within the context of our member numbers – about 350. Last season 70 % of our members caught neither a salmon nor a sewin!

SEASON	Salmon	returned %	Sewin	returned %
2010	234	~	317	~
2011	300	37%	395	61%
2012	136	33%	425	57%
2013	228	45%	316	69%
2014	108	56%	189	76%

6. If you examine the number of fish returned for both salmon and sea trout (sewin) for a minute and divide these numbers by the number of rods for 2014 each rod kept 0.1357 of a salmon and about 0.1296 of a sewin each – honestly! We therefore see the call to increase our catch and release rates to 90% as unrealistic.

7. There is a significant risk that smaller angling clubs will fold and that the larger clubs will not be able to compete with external private interests. If, at some point in the future, the health of the river is restored, local people may find it impossible to fish on their own rivers!
8. There is very little NRW bailiff presence on the river at present and reduced angling effort will reduce the activity of self-policing even further.

**9. We would like to see N.R.W. (and above it you, our Government) :**

- Work tirelessly to realise the ethos of 'The Wales We Want' - now being forged within the Future Generations Bill. We want to see a "can do" attitude from NRW!
  - Create a Marine Conservation area within Carmarthen Bay and end all netting within that area. Please stop tinkering around the edges – the river is on its knees!
  - Suspend commercial netting (coracle and Seine nets) until such time as there is a marked improvement in fish numbers.
  - Support a significant licensed cull of cormorants and goosanders over the next three years and beyond if necessary. Each bird eats about 6000 to 8000 juvenile fish a year and there are hundreds sighted on the Tywi.
  - Provide adequate resources to facilitate enforcement – we have had enough of hearing of boats netting with impunity in Carmarthen Bay.
  - Co-operate with the police and others to energetically prosecute illegal netting within Carmarthen Bay.
  - Allow the hatchery to continue with fish reared and released being adipose clipped, so that the effects can be assessed more properly. Only then do we believe an informed decision can be made on the efficacy of the stocking.
  - Review their management processes to ensure that there is a co-ordinated joined up strategy to deal with the severe problems we face.
  - Prosecute all instances where agricultural practices are detrimental to the health of our waterways. Raise awareness of best practice in relation to habitat protection. There is much work to do here.
  - Some matters are obviously outside NRW control but where this is the case we want NRW to act as the "environment's champion" and energetically make representations to the relevant authorities and/or politicians.
  - Establish a pool of volunteers to act as bailiffs, samplers and river improvement workers. They could be used to halt the spread of invasive species and as locals, build on existing good relationships with landowners. Training, equipment and complimentary fishing licenses could be provided as a thank you. Many Local Authorities have used this approach with the Ramblers Association i.e. rather than constantly tell ramblers that they did not have the resources to open up footpaths, they used those same people as a free yet highly motivated workforce.
10. There are sound economic and social reasons for ensuring that our precious natural resources are protected. Indeed people are beginning to accept that continued economic growth is impossible and that, rather we should concentrate on using the resources we are blessed with in a sustainable manner. NRW has a pivotal role in this and we as anglers are looking to them to manage our natural resources wisely and effectively.

11. The Tywi once enjoyed an international reputation for the quality of its fishing and it is still incredibly important economically and socially to a great number of people. Angling has been the catalyst that has launched many environmental careers – including many who work for NRW now. Where has the enthusiasm gone? Many of us on the outside are very frustrated; we want the decline to stop. There is still time to put things right! These problems are not insurmountable if we all work together. Many of us anglers are eager to help, as can be seen by the work we are doing, but we need NRW to take the necessary bold decisions and play a bigger part than is currently being shown. The time for “pussy footing” around the edges is over.

These comments are conveyed with good heart and an exceptionally strong desire to see things improve.

Cofion gorau/kind regards.

David **Neil** Evans

Hon. Secretary / Treasurer  
Carmarthen Amateur Angling Association