I welcome the opportunity to comment on the newly formed NRW from my own experiences of fishing the River Towy for the last 25 years on many of its association & private waters along its entire length.

Over the last 15 years, I have seen a dramatic decline in the number of Sewin running the Towy. 15 years ago, it would not have been uncommon to hear 100 Sewin jumping at night in the pools on the tidal limits of the river in the peak months of June & July and to have a “pull” on every other cast. Over the last few years, I have fished these same beats in similar condition and not heard a single fish jump or had any takes. I believe the following issues are a major contributing factor to the decline in our fish stocks.

1. **Illegal Nets in Carmarthen Bay** – It is well known that there are a huge number of gill netters operating in Carmarthen Bay (approximately 90 licences granted last year). There are also a couple of larger vessels operated by criminal gangs that can be seen operating in Carmarthen Bay most nights in the spring & summer. These netsmen are free to fish every night of the week and are totally unregulated. There has been one recent prosecution but I believe this to be the tip of the iceberg. Why are the NRW not doing more to tackle these illegal netsmen?

2. **Legal Nets (Seine & Coracles)** – In 2014, the coracles declared a catch of 791 Sewin for a total weight of approximately 5000lb. Most larger Sewin are usually hen fish that can produce approximately 800 eggs for every 1lb in weight. If we assume conservatively that 3000lb of fish caught were hens (3000 x 800 = 2,400,000 eggs). These are rough calculations but how can this be justified when fish stocks are at an all-time low? These net fisheries have no catch limits and no thought for future stocks whilst the NRW stand idly by encouraging anglers to release all rod caught fish. Surely it’s time for the netsmen to fall in line with others who are doing their best to safeguard Sewin & Salmon for future generations. I myself like many other anglers, voluntarily release a large percentage of fish caught but it seems all this good work by anglers is been undone by a small number of netsmen who’s only concern is finding the best price for their fish.

3. **Fish Eating Birds** – The number of cormorants and goosanders are increasing on the river every year. Last year, I witnessed 21 cormorants on one pool alone on the upper Towy! I understand culling licences have been applied for but yet again, the NRW have done nothing. Anglers who fish the river on a regular basis are fully aware of the scope of problem. Unfortunately, when listening to senior representatives of the NRW speak at club AGM’s & CFF meetings, it seems they no idea how many FEB’s are currently on our rivers and are oblivious to the damage they are causing.

4. **Farm Effluent** – The Towy valley now contains a large number of “super dairy farms”, all of which produce huge volumes of slurry. This slurry is spread regularly onto the fields and in periods of wet weather, the runoff from the slurry can be seen entering the watercourses which I assume must have a detrimental effect on the water quality. Is there a suitable and effective water quality monitoring programme in place to ensure our watercourse aren’t been polluted by the excessive slurry spreading?

5. **Stocking Policy** – Our hatcheries have been closed based on “scientific evidence”! Other rivers such as the Helmsdale in Scotland and Ranga in Iceland have successful long term stocking programmes. Both of these rivers produce a phenomenal number of fish that attract anglers from all over the world. How can the NRW justify closing our hatcheries at a time when rivers in Wales probably need them more than ever when they have been shown to be so effective on other rivers throughout the world?
I seriously doubt whether the NRW realise how valuable an asset Salmon, and especially the Sewin is to the rural economies of Wales. Anglers travel all over the world in pursuit of Salmon & Sewin spending considerable sums of money in local economies on hotels, food, & fishing generating hundreds of jobs. It is difficult to quantify how much a rod caught fish is worth to the local economy but studies carried out in Scotland estimate that a rod caught salmon could be worth £10,000 to the local economy whilst a net caught one £5. Do the NRW realise or understand the potential value of rod fisheries to the local economy? I doubt it very much.

Alun Davies, minister for natural resources and food stated recently that "The passing of this order is the culmination of a great deal of time, effort and hard work and means that Natural Resources Wales now has all the legal powers it needs to hit the ground running. "The order will enable Natural Resources Wales to take important decisions that affect Wales’ environment and economy, whilst also ensuring it remains accountable to Welsh Ministers”

The evidence if there from this and the many other documents submitted as part of this consultation. Surely it’s about time the NRW woke up and started exercising its legal powers before it’s too late and our fisheries suffer a total collapse.

Regards
Neil Thomas