Dear Sir/Madam

1. We appreciate the opportunity to express our views regarding the performance of Natural Resources Wales (NRW).

2. The situation regarding the decline in fish stock in the river Towy is of grave concern to all our 300+ permit holders and they comprise a real cross section of society today from labourers to barristers, they are the people for whom we as an Association provide the facilities for them to enjoy their pastime by angling.

3. Our permit holders are conservation minded and last season 70% of the fish caught were returned, this is a remarkable figure and the percentage of fish returned has increased year on year. Whilst anglers on the Towy are showing an awareness of the decline in fish stocks the same cannot be said for the netsmen on the Towy and it is the responsibility of NRW to address this situation.

   We have introduced voluntary rules to protect the fish stocks:
   - All Sea Trout caught after the 1st September in any season must be returned
   - There is a limit of 3 salmon to be taken in any one season.
   - Only 2 migratory fish are to be killed in a 24 hour period.
   - All Sea Trout over 8lb (3.6kg) must be returned carefully and immediately.

These rules are over and above the current NRW byelaws.

The table below shows the decline in numbers of fish caught since 1966 on our water. The figures speak for themselves.

<table>
<thead>
<tr>
<th>YEAR</th>
<th>SALMON</th>
<th>SEATROUT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1966</td>
<td>485</td>
<td>1426</td>
</tr>
<tr>
<td>1967</td>
<td>502</td>
<td>1475</td>
</tr>
<tr>
<td>1968</td>
<td>302</td>
<td>1227</td>
</tr>
<tr>
<td>1969</td>
<td>307</td>
<td>622</td>
</tr>
<tr>
<td>------</td>
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<tr>
<td></td>
<td>101</td>
<td>203</td>
</tr>
</tbody>
</table>

The figures for the last 3 years have been inflated due to the fact that we purchased additional water on the Cothi.
Of the 340 permit holders last season (2014) 244 did not catch any fish. Our waiting list for permit holders had in the 1980’s well over 200 people on it and at that time it took 12 years to become one, this list has now disappeared and any applicants for a permit can be given one instantly. This is a very worrying trend as there are very few junior permit holders coming through the system, we only charge a £1.00 for junior membership.

The pool at Llandeilo road bridge is exclusively for the use of children of Llandeilo and Ffairfach where they can fish for free. This applies also to O A P’s from the same areas.

4 We have had trees planted and bank protection work carried out on the Towy as well as the Dulais to encourage a better habitat for fish. We also recently provided a platform and easy access to the river for disabled anglers funded by a grant from the then Environment Agency.

5 In conjunction with the Carmarthen Fishermen’s Federation we have and continue to work on the following issues:-

- Carried out surveys in support of a licence to cull Goosanders and Cormorants.
- By placing a levy on the number of permit holders we have contributed to the Llynyfan Hatchery to stock the river with juvenile fish taken from brood stock caught on the Towy. It is extremely disappointing to see the N R W withdraw its support for this scheme not only for the voluntary restocking but also for the mitigation stocking due to Llyn Brianne. Since there was an Act of Parliament to create Llyn Brianne which included the mitigation stocking it would appear that in the absence of any attempt to revoke the Act of Parliament the legality of this move is questionable.
- The buy out of some of the operating Seine nets and the lack of control in the number of fish taken by all netsmen, as well as the overfishing of Carmarthen Bay by trawlers.

6 The revenue to the area by anglers is critical and several guest houses, hotels and caravan parks depend on anglers staying in the area, a large portion of our permit holders live away from the area and spend their holidays and spare time in the area. We also supply Day and weekly tickets for visiting anglers and this is well used. There is no financial equivalent contribution to the area by netsmen.

7 These are some of the issues that N R W should address

- End all netting in Carmarthen Bay and create a Marine Conservation Area.
- Suspend all Seine and Coracle netting until such time as the fish population has recovered.
- Finance an adequate enforcement regime, the fact that there is only one bailiff on the Towy is a joke as he is expected to police the netsmen as well as anglers.
- Allow a substantial licensed cull of avian fish predators namely Goosanders and Cormorants.
- Ensure that all effluent from farms is properly contained with a strict enforcement regime.
• Provide support for the restocking of the river with all restocked fish being identified by adipose fin clipping and educate all anglers as to how to identify these fish so that accurate records are made which will provide facts as to whether restocking is working or not.
• Work in conjunction and provide a closer relationship with anglers for the benefit of the river.

8 The Towy has suffered dramatically in the last two decades and we would not wish to be the generation that has allowed the river to decline to its current state and be held responsible this in the future. The N R W needs to address the many serious issues that affect the river now and show a commitment to protect and improve a very valuable resource.

G A Stephens
Secretary Llandeilo A A Cyf