

**Request to Welsh Government for approval of the fixed salmon and sea trout net licence duties for the 2024 fishing season and supporting information.**

Prepared by [REDACTED] Freshwater Fisheries Management -  
Evidence, Policy & Permitting Directorate.

Date: March 2024

**Issue**

In line with statutory requirements set out in the Salmon & Freshwater Fisheries Act 1975 (SAFFA), Section 25 and Schedule 2, and following a statutory advertisement exercise, Natural Resources Wales (NRW) is now seeking formal approval from Welsh Government for fixed net licence duties for the 2023 fishing season.

NRW is the responsible body for the administration of fishing duties in Wales (SAFFA, Part IV, Section 25). Before fixing or altering any licence duty, NRW is under a statutory obligation to advertise the duties, with any written objections to proposals to be submitted to the Welsh Minister. The Minister then has the power to refuse to approve any duty submitted by NRW for approval or may approve the duties with or without modifications (SAFFA, Part IV Section 25, Schedule 2).

NRW needs to advertise new net licence duties each year in time for them to be advertised and approved prior to the start of the net season.

Until 2023 licence duties had remained unchanged for 12 years. In 2023 we raised all licence duties by 5% in-line with the agreed increases to the salmon and migratory trout rod licence. A total of five objections were received during the 2023 consultation period, all from fisheries located in the South West of Wales [REDACTED].

Previously, a proposal to revise duties had been submitted to Welsh Government (WG) in 2020, however the decision was deferred pending further work on a review of the sustainability of sea trout fisheries and recommendations for how they could be better managed.

NRW has progressed with developing options, which include the possibility of setting Total Allowable Catches, and has consulted informally with netters on these. The final options however have been deferred further, pending the implementation of planned revisions to the salmon and subsequent planned sea trout stock status assessment methodology and decision structure, due to be concluded in 2024.

We have assured WG that NRW continues to develop our proposed approach and engagement with netmen, however acknowledging the new proposed approach and further development of our stock assessment methodologies in 2024/25, will mean that we are not able to finalise them in time before the commencement of the 2024 season.

In the meantime, we are seeking to increase net licence duties again in line with the planned increase in rod licences, but with the inclusion of a new heritage licence, with a restricted take and lower cost.

### Background

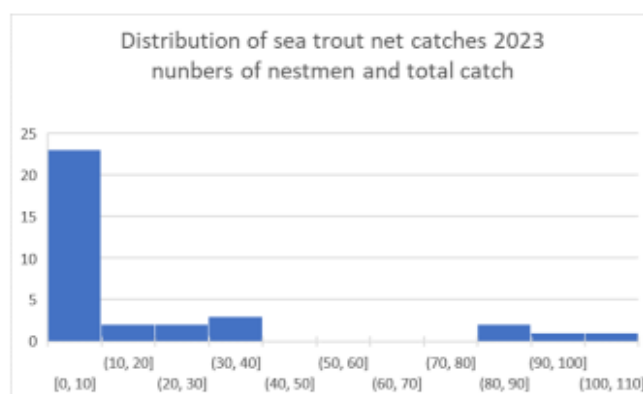
NRW licences net fishing on 10 estuaries in Wales (Cleddau, Conwy, Dyfi, Dysynni, Mawddach, Nevern, Taf, Teifi, Tywi, and Wye).

All net fisheries (except for the Wye Black rock lave nets and Lledr trap) are managed via Net Limitation Orders (NLOs reviewed and renewed every 10 years) which set the number of licences. Byelaws, some of which are time bound, prescribe the fishing seasons, weekly periods, methods, and logbooks (reporting) & requirements for carcass tagging. The Wales NLO was reviewed and renewed in 2017 and is due for renewal in 2027.

The maximum number of net licences that can be issued is 53, with a total charge income of £17,420 per year. Participation in the fisheries and take up of licences has reduced in recent years, in 2023 – 48 licences were allocated, although only 35 net licences were taken out by netmen, raising a charge income of £10,505.

The income from net licences does not cover the administrative and compliance costs estimated to be circa £21K per annum.

Catches of sea trout in the net fisheries are highly variable both between fisheries and by individual licencees within fisheries. The total net catch in 2023 was 610 sea trout. The two main fisheries are the Tywi (165 sea trout) and Teifi (419 sea trout) account for some 96% of the total Welsh net catch.



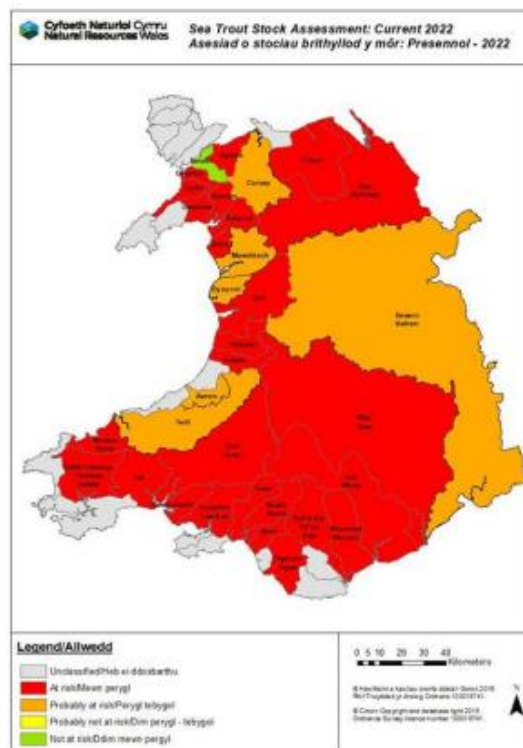
Under the current 'All-Wales' byelaws introduced in 2020, no net fisheries are permitted to take salmon, however they can take sea trout. The same byelaws however prevented nets from fishing early in the season (April), providing some additional protection for the earlier running, typically larger, sea trout. Commensurate restrictions on the rod fisheries require all

larger (>6lb) fish to be returned. In addition, net seasons were curtailed at the end of July primarily as a salmon measure as few sea trout were caught by nets during August.

The principle of fish stock sustainability. NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. In evaluating management options, the sustainable management of the natural resource should take precedence.

Sea trout stocks however remain vulnerable and in decline and we consider that additional measures are required to provide increased protection.

Most sea trout rivers in Wales (79%, 26 rivers) are now classed as being "At Risk" and 15% (5 rivers) as "Probably at Risk". Of the remaining rivers, 1 is Probably Not at Risk and only 1 river is categorised as "Not at Risk". There continues to be a downward trend in sea trout stock abundance across Wales. Note - all the rivers with a net fishery are either A Risk or Probably At Risk



### Engagement with netmen in 2023

Following the endorsement of our planned approach by NRW's Fisheries Strategy Group, in February 2023 we held 3 engagement sessions and invited netmen to attend, 1) In North

Wales near Ddolgellau, 2) In South Wales at Haverfordwest and 3) an online Teams meeting with those unable to attend.

Both in-person meetings were well attended, some 45 netmen including endorsees and past netmen attending the meetings.

The discussions including the status of stocks and measures to reduce exploitation pressure. These measures included the introduction of a possible "heritage" licence category, which would allow netmen to take out a licence and fish, but with licence conditions restricting the number of sea trout that could be taken using the carcass tags. A copy of the presentation *Options for sustaining net fisheries in Wales Netsmen Liaison meetings February 2023* is in Appendix 5.

The number of tags available for a heritage licence was not tabled by NRW, though feedback from the meetings suggested that 10 sea trout per annum could be considered appropriate. Based on recent catches, this would only restrict 11 netmen who caught more than 10 sea trout in 2023.

It should be noted that uptake of the 'Heritage licence' would be voluntary basis. No netmen would be required to give up their right to fish commercially.

Feedback from the 1st meeting with North Wales nets (Conwy and Dyfi) was broadly supportive and would have little if no impact on current net catches in North Wales.

Feedback from the 2nd meeting with the South Wales nets (Teifi, Tywi, Cleddau and Taf) however were vehemently against any changes. Their objections stemmed from.

- Rejection of a heritage licence category, previously consulted on some 15 years ago.

- A desire for netting to a commercial activity.

- Criticism of NRW's stock assessments of both salmon and sea trout.

- That nets had already been subject to reductions in seasons both recent and historic.

- The loss of salmon catches due to byelaws restrictions had not been reflected in licence duties in any reduction.

As NRW develops our ongoing approach to managing these fisheries, we are considering this feedback.

In the meantime, for the 2024 season, we see the introduction of a voluntary Heritage Licences as a valuable option, as set out below.

### **Heritage Licence**

NRW has the legal vires to introduce a "Heritage Licence" without formal consultation, through the introduction of licence conditions.

In recognition of the heritage and cultural value of these net fisheries, we have offered all netters the opportunity to apply for "Heritage Licence." This will have a nominal cost equivalent and will allow them to take a small number of fish proposed to be 10 sea trout per year.

On most fisheries, these proposals will have minimal impact on the currently low level of fishing and take.

Uptake of a Heritage Licence would be voluntary, netsmen would still be able to take out a full licence with unlimited catch. Once the netsmen had reached their catch limit they would be expected to stop fishing.

The Heritage licence has the advantage of acknowledging the cultural value of our long-standing net fisheries. It allows most netsmen that catch less than 10 sea trout per year to continue netting activities, restricting any potential excessive harvest.

Out of the 41 licences that are to be allocated in 2024, 6 applications have been received wanting to take out a 'Heritage Licence'.

Inevitably widespread uptake of a Heritage License would reduce net licence income. For 2024 the proposed allocation of 6 'Heritage Licences' would reduce the potential total income (assuming all other licences are allocated) from £13,734 to £12,279. Although this would not meet the combined administrative and compliance cost recovery, it would cover the estimated 2024 administrative costs of £11,840.

Proposed net licence duties for 2024.

| Ardal Bysgota<br>Fishing Area              | Dull Pysgota<br>Fishing Method   | Toll<br>Duty |
|--|--|--------------|
| Dyfi                                       | Sân/Seine  | £635         |
| Tywi/Towy                                  | Sân/Seine  | £635         |
| Tywi/Towy                                  | Cwrwgl/Coracle   | £606         |
| Teifi                                      | Sân/Seine  | £635         |
| Teifi                                      | Cwrwgl/Coracle   | £270         |
| Dysynni                                    | Sân/Seine  | £407         |
| Taf  | Cwrwgl/Coracle   | £270         |
| Taf  | Bracso/Wade  | £90          |
| Conwy                                      | Sân/Seine  | £407         |
| Conwy                                      | Byddagl/Trap   | £144         |
| Nanhyfer/Nevern                            | Sân/Seine  | £285         |
| Mawddach                                   | Sân/Seine  | £285         |
| Cleddau                                    | Cwmpawd/Compass  | £105         |
| Gwy/Wye                                    | Gaff/Lave  | £90          |
| Trwydded Treftadaeth<br>/ Heritage Licence | Cyfyngir dalffeydd i 10<br>sewin y tymor / Catch<br>restricted to 10 sea trout<br>per season | £90          |



### **NRW Governance approval**

In November 2023, the further development of our approach to net fisheries was reviewed by two internal business board subgroups, as set out in Appendix 1 NET FISHERIES: 2024 NET DUTIES AND INTRODUCTION OF HERITAGE LICENCE (Reference: FSG2311\_03).

Both the Fisheries Strategy Group (FSG) and Regulatory Business Group (RBG) Strategic and Performance Group endorsed a 4% increase in net licence duties for 2023 and an increase in the minimum net licence fee to match the migratory rod licence, to match the increase in rod licence duties for migratory salmon and sea trout.

Under NRW's Statutory and Legal Scheme of Delegation (SaLs) approval to proceed was signed off by [REDACTED] Legal Services and [REDACTED] Evidence Policy and Permitting.

### **Advertisement process**

There is a requirement under SAFFA to formally advertise the duties including placing a formal notice in the press and allowing the statutory 30-day period for objections to be sent to Welsh Government and copied to NRW.

In line with previous WG advice, the statutory notice was placed in the London Gazette on December 15<sup>th</sup> 2023 with a closing date January 26<sup>th</sup> 2024 for objections <https://www.thegazette.co.uk/notice/4513735> (Appendix 2, voucher copy of the statutory notice).

Mindful that the statutory 30day period included the Christmas holidays, the period for objections was extended to 26<sup>th</sup> January 2024. At the same time as the advertisement, netsmen received notification of our intention to increase the duties in writing - via email or letter where we do not hold an email address, and via the usual licence application process. (Appendix 3, bilingual notification to netsmen by letter or email)

### Responses Objections and Support

A total of 13 responses, 12 objections and 1 letter of support, were received during the consultation period; [REDACTED]

| Objector   | Fishery                         | NRW reference     |
|------------|---------------------------------|-------------------|
| [REDACTED] | Tywi [REDACTED]                 | ND2024 [REDACTED] |
| [REDACTED] | Tywi [REDACTED]                 | ND2024 [REDACTED] |
| [REDACTED] | Black Rock Lave Net Association | ND2024 [REDACTED] |
| [REDACTED] | Black Rock lave nets            | ND2024 [REDACTED] |
| [REDACTED] | Teifi [REDACTED]                | ND2024 [REDACTED] |
| [REDACTED] | Dyfi [REDACTED]                 | ND2024 [REDACTED] |
| [REDACTED] | Dyfi [REDACTED]                 | ND2024 [REDACTED] |
| [REDACTED] | Dyfi [REDACTED]                 | ND2024 [REDACTED] |
| [REDACTED] | Teifi [REDACTED]                | ND2024 [REDACTED] |
| [REDACTED] | Black Rock lave nets            | ND2024 [REDACTED] |
| [REDACTED] | Teifi [REDACTED]                | ND2024 [REDACTED] |
| [REDACTED] | Black Rock lave nets            | ND2024 [REDACTED] |
| [REDACTED] | Black Rock lave nets            | ND2024 [REDACTED] |

Copies of objections to the proposed duties and NRW responses are listed in Appendix 4.

### Summary of points raised by objectors for the 2024 net licence duties.

- Cost of living crisis
- With the cost of living at the highest it has been for years this increase will only put unneeded pressure on fishers and their families.
- Reduction in Season and 2020 byelaws not taken into consideration.
  - Over the last couple of years 40% of our season has been taken which would be considered an increase. One of our main species Salmon was taken from us which would also be considered an increase.
  - Reducing our fishing season, taking the prime month for catching sea trout away from us, and ensuring the return of all salmon. Numbers of salmon have increased so by increasing the License fee, not reducing it, is an insult.
  - Our licence fee was for two species our most valuable was salmon and has been removed from our licence, and again there has been no reduction in our licence fee.
  - I do not understand why the administration costs should vary significantly between different rivers, estuaries, areas of fishing.
  - We should have a 60% reduction as we are no longer able to keep salmon yet pay for a full licence.
- Terrible state of our Waterways and Pollution
- Use of expensive hotels for meetings
- Heritage licence rejection
- Loss of income because of introduction of a Heritage Licence
- Want to be able to take sea fish.

- Anglers have not had such limited fishing conditions placed upon them.
- Status of stocks and scrutiny of rod fisheries and their regulation.

Our responses to these objections have been:

#### **1. Cost of living crisis**

NRW's charging schemes are based on the principle of full cost recovery in line with Managing Welsh Public Money, HM Treasury rules and obligations under the Natural Resources Body for Wales (Establishment) Order 2012. Our aim is to develop a charging scheme that applies the right charges to our activities and that the cost of our permitting and compliance work is recovered from those we regulate, avoiding subsidy through the public purse (Grant in Aid). By fully cost recovering, this helps ensure NRW is better able to regulate and protect the environment of Wales, contributing to the Sustainable Management of Natural Resources.

NRW is committed to continually improving our processes making them as streamlined and efficient as possible, providing a valuable service and a reduced burden on business.

The existing net duties structure was set in 1996 with individual net fishery duties calculated on average catch of salmon and sea trout per licensee (the higher the average catch the greater the duty). This was deemed the fairest way to set duties at the time and gained Ministerial approval following consultation. The duties increased again in 2006, 2010 and 2023 but by inflation only by overall 19%.

By comparison, rod licence duties have increased by 20% since 2006, a full migratory salmonid rod licence costs £86.10. Whilst inflation (2010-2024) has increased by some 47%. It has been confirmed following advertisement and consultation that Rod licence duties for salmon and sea trout will rise from 1st April 2024 by 4% to £90.40.

We do of course recognise the difficult economic position many people find themselves in at present, however, we do need to adjust some charges to ensure we effectively manage inflationary pressure.

Net licence duties were increased in 2010 and 2023 and since then, sales and income have been declining whilst high inflation in recent years has reduced the spending power of the income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

It would not be appropriate to seek additional Grant in Aid for regulatory activities that should be covered by charges, and we cannot cross-subsidise from other income streams. When proposing new fees and charges, we follow the requirements set out in Managing Welsh Public Money ensuring that only eligible costs are included within calculations.

We recognise the financial impact our charging proposals might have on some business sectors, especially as our proposals coincide with wider financial pressures from inflation and the increased cost of living. However, a failure to manage our charging schemes to ensure they reflect full cost recovery would impose significant resource implications, a reduction in our technical skill base and, therefore, an inability to ensure that our natural



resources are sustainably maintained, enhanced, and used, now and in the future.

The advertised increase in Net Licence duties for 2024 are modest, and in line with other increases in fees proposed by NRW.

**2. Recent exploitation constraints have not been taken into account.**

There was a strong feeling amongst the objectors that the duties should now be reduced given the reduction in season length arising from the introduction of the new byelaws introduced in 2020. We pointed out that the new byelaws are a necessary minimum requirement aimed at protecting stocks and that the duties were not originally based on season length, but rather on average catch per licensee on individual fisheries.

Following the outcome of the Byelaw Inquiry – where the Inspector concluded “the proposed byelaws to be a measured response to declining fish stocks in Wales; accordingly, they are necessary, proportionate, and reasonable in view of salmon and sea trout stocks throughout Wales.” The salmon and sea trout byelaws received Ministerial approval and came into effect on 1st January 2020 in Wales.

NRW is clear that the first principle in managing fish stocks must be that the exploitation and harvest of fish stocks should only take place when the stock is sustainable. Stocks of both salmon and sea trout (particularly early running sea trout) have been in decline for several years and it is now important that spawning escapement is protected.

The Byelaws have a ‘sunset’ clause and will expire in 10 years. We are committed to a review of the byelaws after 5 years.

There has been no reduction in the NRW resources required to administer and regulate the fishery (indeed costs have increased markedly), hence we did not therefore consider it appropriate to change the duties following the introduction of measures to protect vulnerable stocks.

**4. With the cost of living at the highest it has been for years this increase will only put unneeded pressure on fishers and their families.**

We do of course recognise the difficult economic position many people find themselves in at present, however, net licence duties were last increased in 2010 and 2023 since then, sales and charge income have been declining whilst high inflation in recent years has reduced the spending power of the charge income we receive from sales. It has, therefore, become necessary to again seek to increase duties with the aim of at least being able to maintain current levels of service.

The advertised increase (4%) in Net Licence duties for 2024 are modest, and in line with other increases in fees proposed by NRW.

## 5. Administration costs are too High.

The Table below sets out the estimated administration costs for 2024.

|  |  |  |  | Man days | at £60K/FTE |
|--|--|--|--|----------|-------------|
| Annual allocation of licences, appeal,       |  |  |  | 20       | £5,455      |
| Issuing of Licence/tags/logbook CCC          |  |  |  | 3        | £818        |
| Appeals (managers and legal)                 |  |  |  | 3        | £818        |
| Collating catches/reporting                  |  |  |  | 2        | £545        |
| Annual advertising of duties and application |  |  |  | 10       | £2,727      |
| Total annual Allocation workforce costs      |  |  |  | 38       | £10,364     |
|  |  |  |  |          |             |
| Tags and Logbooks                            |  |  |  |          | £700        |
| Posting of Licence logbook and tags          |  |  |  |          | £500        |
| Posting of Application                       |  |  |  |          | £60         |
| Posting Reminder                             |  |  |  |          | £35         |
| Advertisement cost                           |  |  |  |          | £1,000      |
| Sub Total                                    |  |  |  |          | £2,295      |
|  |  |  |  |          |             |
| Estimated administration costs               |  |  |  |          | £12,659     |

(There will be no appeals for net allocations, as there are no competing applicants, therefore the administrative costs are reduced by £818 to give an estimated total of £11,840).

Note the costs do not include compliance costs, checks by enforcement staff.

## 6. Costs of Netsmen's meetings held at expensive hotels, lack of commitment by NRW to nets, embrace the digital age.

We held 3 meetings with netsmen in 2023, to explain our approach. The meeting for the North Wales nets meeting was held at Oakley Arms, a venue that was central to the bets form the Conwy, Mawddach and Dyfi the room hire was less than £100 for the evening. Similarly, the meeting at the Mariners Hotel in Haverfordwest for the Tywi, Taf, Cleddau and, Nevern and Teifi nets was again less than £100. The Third meeting was held online for those unable to attend and had no associated room costs.

Our salmon and sea trout fisheries remain a priority for NRW. We welcome input from both netmen and rod anglers alike. We run several Local Fishery Groups at which netmen attend both the West Wales and Ceredigion Local Fishery Groups. It is unfortunate that there is not an overall netmen's group that could attend the Wales Fisheries Forum.

The Wales Fisheries Forum is made up of a wide range of stakeholders who are coming together to share ideas and function as ambassadors for Welsh fisheries. The goal is to ensure our freshwater and migratory fish stocks are protected for generations to come.

We want this group to represent everyone who cares about fish, not just rod and net licence holders; angling clubs; fishery and riparian owners, but also conservation organisations; rivers trusts; volunteers and other fish and fisheries-related businesses and professionals.

There is no one silver bullet to solve the many issues and challenges facing fisheries, the solutions can be found in a combination of different changes, all of which need to be supported by new ways of thinking.

By working together, the forum will be a channel for the exchange of ideas and best practice and will help inform NRW's fisheries work on, among other areas, strategy, promotion, and partnership working.

We note the request to embrace the digital age when issuing and recording a change in licence details. Whilst the application process is on paper, licencees can of course call or email for a change in licence details, the costs associated with this were abolished some 15 years ago. We will look to issue application forms via email in future however please note less than 80% of netmen have an email address.

## **7. Water Quality (Terrible state of our Waterways and Pollution)**

Addressing Water Quality remains a priority for NRW.

Water quality issues continue to be the subject of intense public and political scrutiny, and we have had to significantly re-prioritise and adjust our workplan priorities to respond.

For example, we have set up a programme to address the problem of phosphates in SAC rivers, with detailed plans to bring failing catchments back to favourable condition.

We are reviewing our regulatory position on storm overflows and how and if NRW needs to develop its regulatory response. NRW is chair of the Task force set up between Water Companies, Ofwat, Welsh Government and NRW, who have developed a storm overflow roadmap and action plan to drive forward improvement in the performance of storm overflows in Wales.

The Investment Water Companies make through Ofwat's Price review will be critical to addressing the Nature Emergency, alongside action by others.

We continue to work with others to take forward action in the storm overflow Roadmap to review our approach to the regulation of storm overflows and to drive forward the Actions NRW committed to take in the SAC Rivers action plan.

We welcome the continued capital funding from WG which means that we will be able to continue investing in our Nature and Climate Emergencies capital programme which includes water quality, metal mine remediation, peatland restoration and nature projects.

As an example, NRW has started a new project on the Teifi – landowners, industries and regulators join forces for pilot 'demonstrator catchment' project.

The Afon Teifi is one of our nine Special Area of Conservation (SAC) Rivers in Wales, designated due to the rare species it supports, including lamprey, Atlantic salmon, otter, and floating water-plantain.

It meanders 122km through three local authorities - Ceredigion, Carmarthenshire, and Pembrokeshire - as well as through National Nature Reserves and Sites of Special Scientific Interest.

Like many of our other SAC rivers, sadly the Teifi is in an unfavourable condition, and in 2021 it was reported that it was exceeding acceptable water quality targets for phosphorus.

This project will involve partners, land and water management sectors and others, to highlight collaborative approaches to water quality and water resource improvements and building riverine habitat resilience through sustainable land and water management.

Within this project we will adopt agile and innovative approaches and the learning developed will be scaled up and out across Wales bringing multiple benefits to other river systems.

This is a great opportunity to act now to work with land management and water sector partners and communities to reverse the trends we are seeing and to improve water quality, ecology and habitat, and support the resilience of local communities and the benefits that come from their natural environment.

#### **8. Status of stocks and scrutiny of rod fisheries and their regulation.**

In 2019 a Local Inquiry examined NRW's approach to salmon and sea trout stocks and our proposals.

The Inspectors report and the Ministers response can be found here: [Written Statement: Outcome of the Local Inquiry on Natural Resources Wales' proposed 'All Wales Salmon and Sea Trout Byelaws' \(16 July 2019\) | GOV.WALES](#)

The Inspector found them to be necessary, proportionate, and reasonable in view of the decline of salmon and sea trout stocks throughout Wales. The measures introduced by the byelaws had a similar effect on both nets and rods. The degree of scrutiny for the rod fishery has been same.

We acknowledge that there will be a mortality of salmon because of continued fishing even under catch and release restrictions both with nets and rods. Survival following angling is greater than 90%, over 96% for fly fishing. We have introduced restrictions to improve survival including banning bait fishing for salmon, the use of barbed hooks and treble hooks.

We have never sought to blame either netmen or anglers for the decline in stocks, however continuing to kill fish when there is such a large deficit in the number of spawners required to maintain populations is not sustainable. It is important to note that any additions to the spawning stocks are particularly valuable when stocks are at low levels. Even relatively small numbers of fish are crucial to recover stocks in as short a time as possible. Every spawner Matters.

#### **9. Heritage Licence**



NRW recognises that some fishing methods, including some which have been in existence for several hundred years, represent traditional activities and may therefore have heritage value. These fisheries include the well-known coracle net operations on the Tywi and Teifi, but also the Cleddau compass nets and the Black Rock lave net fishery. This view has been supported in a report commissioned by the Environment Agency (2004): -

[Microsoft Word - Science Report SC030212 FINAL.doc \(publishing.service.gov.uk\)](#)

NRW's purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced, and sustainably used. In this context sustainability means with a view to benefiting, and in a manner designed to benefit, the people, environment, and economy of Wales now and in the future.

Importantly we are proposing a new category of licence for 2024.

Recognising that stocks and catches have markedly decreased in recent years this will allow netsmen to continue to participate in the fisheries, whilst helping protect stocks maintaining many of their heritage and cultural values whilst restricting the catch to less than 10 sea trout. Only 11 netsmen in 2023, caught more than 10 sea trout, the average median catch of sea trout was 8 in 2023.

The Heritage licence category is voluntary. Netsmen can either pay the full amount for their licence without any catch limits on the numbers of [tags or](#) apply for a Heritage licence that will be capped at a maximum of 10 tags. The cost of the Heritage Licence has been proposed as £90, the same as a full migratory salmonid rod licence.

There are no limits on the number of Heritage licences available in each fishery, up to the maximum set within the Net Limitation Order.

In every other way, other than the total permissible catch and that once the Licencee has caught their maximum number of 10 fish they must cease fishing the licence is identical to the full licence. They must adhere to the same byelaws and NLO restrictions as the full Licence.

Once a netsmen has taken out a Licence with the catch restrictions, they would not be able to revert to a full licence in the same season. It would however not stop them for applying for a full licence in future.

#### **10. Captures of sea fish should be allowed.**

The net licence issued by NRW is a "Licence to fish for Salmon and Migratory Trout with an instrument other than rod and line." It does not entitle licence holders to take sea fish.

We note that several of the salmon and sea trout net fisheries are within areas designated by Welsh Government Sea Fisheries as a Bass Nursery Area, in which their Byelaw 29 states that:

"No person shall fish for sea fish either from or by using a boat..."

Please access these links via electronic devices to see Welsh Government Sea Fisheries

<https://gov.wales/sites/default/files/publications/2018-05/south-wales-inshore-fishery-legislation.pdf>

bylaw 29 (c) shows a map and describes the restriction.



Marine Management Organisation Bass Fishing Guidance

<https://www.gov.uk/government/publications/bass-industry-guidance-2020/bass-fishing-guidance-2020>

**Withdrawal of objections**

NRW wrote to all objectors addressing these points (Appendix 4, Copies of Objections to advertised duties and NRW responses) inviting objectors to consider NRW's response and withdraw their objections based on the information in our reply. If we did not hear from them after 7 days (8th March 2023) we informed them that their objection would remain.

None of the original 12 objections were subsequently withdrawn. We are now, therefore, required under SAFFA to seek formal (Ministerial) approval from WG for the proposed duties in 2024.

**Conclusion**

NRW has proposed new licence duties to reflect increased costs of administration, which are in line with costs imposed elsewhere by NRW.

NRW has also introduced a new Heritage Licence category, which is more affordable and offers the opportunity for netters to maintain their activity whilst also offering greater protection to sea trout stocks.

NRW has followed the statutory requirements for advertising net duties for the 2024 fishing season. We received 12 objections and one letter of support. Despite addressing these objections in writing none of the objections were subsequently withdrawn. Hence, we are now required to seek formal approval from Welsh Government (Minister for Rural Affairs) for the implementation of the proposed duties in Wales from 1st of April 2024 for the proposed duties.