

# Salmon & Trout Association

Fighting for the future of game angling

Patron: HRH The Prince of Wales

President: The Duke of Northumberland

Nicola Clarke  
Defra  
Area 2C  
Nobel House  
17 Smith Square  
London, SW1P 3JR

Dear Nicola Clarke,

Thank you for giving the Salmon & Trout Association the opportunity to respond to the consultation of the Recreational Sea Angling (RSA) Strategy.

The Salmon & Trout Association (S&TA) is an international organisation representing the interests of 100,000 individual and club-based game anglers, fishery owners, managers and affiliated trades throughout the United Kingdom. We are especially concerned with promoting and communicating the environmental, social and economic benefits of game angling.

The S&TA supports the objectives of this strategy, particularly with regard to increasing fish stocks and producing larger fish, and to increase participation, awareness and understanding of RSA. We feel the adoption of an 'ecosystem based approach' would be a positive step in striving to achieve sustainable fisheries. This should include plans for habitat management and restoration in vulnerable coastal and estuarine areas.

The S&TA are however, very disappointed with Defra's recent failure to implement the promised increase in minimum landing size for bass. This does not give us confidence that proposed conservation measures would be delivered by Defra, with or without a sea angling rod licence in place.

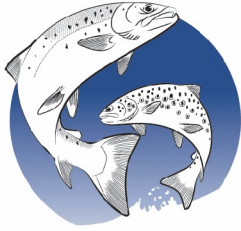
Our responses to the relevant specific questions within the consultation are as follows:

**Q1. What are your overall views on the Strategy? Does it miss anything? Which part would you change and how?**

Overall, the S&TA welcome the developments made in this strategy. We feel the most important objective is to provide more and bigger fish within a healthy and sustainable ecosystem and environment. We feel restraints on commercial cropping of immature fish, the protection of spawning and nursery areas, and a ban on all use of nets within one mile of shore, are all key steps to ensuring sustainable inshore fisheries. We support management designed to produce a healthy and sustainable marine ecosystem, and believe this will holistically also benefit freshwater ecosystems and diadromous species.

We strongly support the proposal for the designation of inshore Marine Protected Areas (MPAs). We feel protecting transitional/ intertidal habitats in this way, has the potential, to increase juvenile fish recruitment and production, and consequentially improve local commercial and recreational fisheries. We would like to see a network of intertidal habitat recreated along the transitional water corridor to aid migratory species.

The S&TA support trialling a pilot study area, where an angling only fishery can be developed. We see this type of inshore fishery management as a positive step in delivering the strategies objective to encourage and increase participation in RSA.



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We support the continuance of fixed engine byelaws (especially under the Salmon Act 1986 section 37), which we feel should be overseen by the Environment Agency (EA). We feel the EA should also keep their duty to manage migratory fish in estuaries.

The S&TA are pleased the Government have decided not to proceed with the sea angling rod license at the present time, as we had a number of reservations from this consultation document. We were concerned the license would reduce RSA participation, by alienating existing anglers and discouraging new participants. Many anglers are introduced to regular sea angling as part of casual holiday activity. The additional cost of a rod licence would discourage participation across all groups in society, especially amongst those on lower incomes. Additionally, those anglers that never venture beyond casual holiday sea angling may be discouraged by a rod licence. This plausible reduction in angling participation could therefore have jeopardised the chances of achieving three out of the four principal objectives of the strategy:

- optimising the economic and social benefits to coastal communities
- increasing participation in RSA on a sustainable basis
- increasing awareness and understanding of RSA through increased participation.

We were also concerned that angling and fisheries conservation would not receive the full benefit of income from a rod licence fee due to the disproportionate costs of administration and enforcement.

Undoubtedly measures are needed to improve stocks of fish species that anglers target. We would, in principal, in the future, support a comprehensive and detailed rod licensing package which delivered both conservation objectives and angling benefits.

#### **Q4. Do you agree with the aim and objectives of the Strategy? Which objective do you think is the most important?**

The S&TA feel the most important objective is to provide more and bigger fish within a healthy and sustainable ecosystem. By achieving this objective, the other objectives are likely to follow, for example; bigger fish are likely to result in increased participation and, therefore, greater economic potential.

#### **Q5. How do you think angling needs can be reflected in fisheries management decisions and policy? What do you think is the best way to achieve this?**

The S&TA feel it is very important that angling and conservation representatives are present on all Sea Fisheries Committees (SFCs). We also believe, if adopted in the Marine Bill, the composition of the proposed Inshore Fisheries and Conservation Authorities (IFCAs) should be biased towards conservation, with equal membership from RSAs and commercial fishermen. It is vital to fisheries management that SFCs and/or IFCAs have balanced representation between recreational sea anglers and commercial fishing interests, scientists and environmental NGOs. This would ensure the remit focuses on achieving sustainable management of fish stocks and the best socio-economic use of marine resources without damaging the environment.

The S&TA feel there is a need for holistic integrated management between the RSAs and commercial fishing interests, as many anglers feel imposing controls such as bag limits are meaningless, unless controls are also imposed upon commercial fishing operations to improve fish stocks. The voice of RSA can no longer be ignored, they are a major stakeholder in inshore fisheries and successful management requires them to be treated as one.