

SUBMITTED TEXT

The Scottish Anglers National Association (SANA) is the recognised sport governing body for game angling in Scotland. SANA opposes any extension of the coastal net season in Yorkshire and the North East of England. Curtailment or closure would be preferred.

Sea trout are considered to be an important component of trout populations generally - because of greater egg deposition. Therefore, this submission is sent on behalf of both Migratory and Non Migratory Fish Committees.

Mixed Stock Fisheries

1. Internationally, it is considered extremely bad practice to maintain large and indiscriminate commercial fisheries away from the point of river origin of salmon and sea trout stocks. The proposed extension of the netting season would give potential ammunition for other interests that might wish to restore other severely damaging fisheries, elsewhere in the North East Atlantic area, which are no longer operating.
2. You should note that all coastal fixed engine nets in Scotland have been closed down. These are the equivalent of T and J nets. The decline or cessation of these commercial fisheries has allowed much greater escapement levels to rivers in recent years and has given some well-needed buffering to rod catches, in the face of an overall stock decline. Substantial efforts are being made within Scottish rivers to restore freshwater habitat, ease man-made barriers and conserve and manage individual spawning stocks through angling catch and release and other measures. These efforts are being undermined by your continuing mixed-stock fisheries exploitation of those stocks.

Environment Agency Position

3. **A well regulated fishery?** The consultation admits, at Section 6, that the fishery is essentially self-regulated. Observers are not always present. As we noted in an earlier submission on this subject, there has been a history of under-recording of catches. However, our more substantive criticism of the fishery is that it cannot be known whether it is well regulated from a sustainability perspective.
4. Earlier tagging experiments indicated a substantial impact of the fishery on multiple river systems. Genetic identification of fish stocks is in its infancy. While there may be great confidence in identifying between Scottish and English rivers of origin, we are not yet in a position to say what stocks within Scotland, never mind which stocks within rivers, are being impacted. The report of the analysis* says: “the resolving power to assign fish to rivers within Scotland is insufficient to allow robust assignments to be made”. Therefore, it is plain bad practice to operate this mixed stock fishery.

19 February 2020

* **Genetic Investigation of the North East English Net Fisheries** John Gilbey, Lee Stradmeyer, E
Cauwelier, Stuart Middlemas (2012) Marine Scotland Science, Freshwater Laboratory, Faskally,
Pitlochry, PH16 5LB