**Question 1: Do you agree with the proposed harbour and estuarine net management areas measures for the Southern IFCA district? *Please**provide a rationale.***

*We do not agree. The spatial protection for migratory fish should be wider than that proposed in the consultation. Migratory salmonid protection requires coastal (“without the headland”) as well as estuarine and harbour protection from netting.  Salmon & Trout Conservation (S&TC) would ideally like the imposition of a 1-mile coastal net-free zone – the ‘Golden Mile’ initiative. The accompanying Environment Agency (EA) documentation and initial findings from current research being carried out by the SAMARCH project, of which we are a partner, supports this need for increased spatial protection.  S&TC believes this is especially relevant for sea trout, which tend to stay close to the coastal zone while foraging for food in their marine phase and are therefore vulnerable all year (individual fish may spend more than one winter in the sea, and so regulation must consider the probability that sea trout will be present in the coastal zone for 12 months of the year).*

**Question 2: In areas where a minimum headline depth restriction of 3 metres has been proposed (Southampton Water and Lyme Bay), do you feel that the risk to salmonid interception will be suitably mitigated? *If no, can you suggest an alternative approach?***

*A headline depth restriction of 3m, as proposed for the Solent and Lyme Bay, is likely to prove inadequate. Although migratory salmonids probably spend the majority of their time in the top three metres of water, there is increasing evidence that both salmon and sea trout occasionally dive to much greater depths.  S&TC therefore believes that there is no feasibly safe headline depth for estuarine or coastal nets that precludes migratory salmonid by-catch. We therefore believe that a precautionary approach should be taken to netting regulation, as in answer 1 above – no netting within one mile of the coast.*

**Question 3: Do you agree with the proposed pier net management areas measures for the Southern IFCA district? *Please provide a rationale.***

*Reference our answers in 1 and 2 above.*

**Question 4: Do you agree with the principles for the definition of ring net use? *Please provide a rationale.***

*We do not agree that ring netting should be allowed and therefore do not accept the definitions for its use. As explained in our answers to 1 and 2 above, we favour the closure of all netting out to one mile from the coastline at all times. There are three reasons for this:*

1. *Any netting, including ring nets, will pose a risk to migratory salmonids year-round (salmon may not be present at certain times of the year, but sea-trout are present in coastal waters year-round).  Therefore, protecting migratory salmonids from exploitation is impossible if any netting is allowed.*
2. *Ring nets are basically gill nets shot to encircle fish, and any fish that are gilled are unlikely to survive being released.  Therefore, it will not be possible to release unharmed any migratory salmonid intercepted by ring nets as a by-catch. S&TC believes that ring-netting should be banned year-round to provide adequate protection for migratory salmonids, especially sea trout.*
3. *If ring nets have to be used, they should not be shot against the shore - the idea of 75% channel closure is far too generous in tidal waters as a small fall in water levels will result in near total, or even complete channel closure.  With the lack of resources likely to be available for enforcement, any restrictions such as percentage closure of channels will be extremely difficult to police, and therefore S&TC supports a total ban on netting as the only realistic way of ensuring a minimum impact on migratory salmonids.  Regulation will be easier to enforce if all netting within the 1-mile coastal zone is illegal.*

**Question 5: From your experience can you describe the likelihood of catching a salmon or a sea trout in a ring net?**

*We have little experience of ring-netting, but S&TC believes that, in order to protect migratory salmonids, the Southern IFCA should take a precautionary approach to exploitation by banning all estuarine and coastal netting out to one mile from the coastline.*

**Question 6: From your own experience are there any steps that can be taken to avoid catching salmon or sea trout in a ring net?**

*Yes – abide by the precautionary approach to protecting migratory salmonids by banning all estuarine and coastal netting out to one mile from the coastline.*

**Question 7: What would be your preferred option for the minimum size of grey mullet species in the Southern IFCA district? *Please provide a rationale.***

*As above, S&TC does not believe that netting should be permitted within one mile of the coastline.  However, if netting does take place, we believe that mesh size is more important to migratory salmonid protection than minimum landing sizes for target fish.  Mesh sizes should be calculated so that only the smallest migratory salmonids would be vulnerable to being gilled and, therefore, the maximum number of fish could be released unharmed.*

*However, as salmon and sea trout smolts are known to shoal, there is still the danger of significant damage being done to migratory salmonid stocks by a net shot in the wrong place at the wrong time intercepting a shoal of migratory salmonid smolts/post smolts.  S&TC therefore sees this as yet another reason to ban all estuarine and coastal netting out to one mile from the coastline.*

**Question 8: Do you agree that the proposed measures will (a) support fish nursery areas; (b) provide areas of refuge for fish; (c) provide protection for migratory species, such as salmon and sea trout?**

*S&TC does not agree that the proposed measures will provide adequate protection for migratory salmonids for the reasons already discussed above*

**Question 9: How do you believe net fishing by recreational users should be managed?**

*Recreational netting should not be permitted.  S&TC believes that migratory salmonids should be fully protected in estuaries and the one-mile coastal zone.  We fully support mandatory catch and release of all rod-caught salmon and sea trout, wherever they are caught, until such time as stocks recover sufficiently for a sustainable harvest to be taken.  However, we believe that we are a long way from that situation and so all exploitation of migratory salmonids should be limited to fishing methods that allow salmon and sea trout to be returned unharmed to the water.*

**Question 10: How would you like to see fishing nets marked in the district?**

*As above, we believe the only realistic method of regulating estuarine and coastal netting is to ban its use out to one mile from the coastline*

**Question 11: What are the anticipated costs or benefits to you as a result of these measures? Where possible, please provide financial estimates.**

*We now know, from work undertaken recently at Exeter University and Game & Wildlife Conservation Trust, that southern chalkstream salmon are genetically distinct from all other European strains of Atlantic salmon\*.  Also, S&TC does not believe that sufficient is known about sea trout stocks to be sure of their status, and we therefore see the banning of all coastal netting out to one mile from the coastline as being good management practice in seeking to conserve and restore important and, indeed, unique strains of wild migratory salmonid stocks.*

*\* The paper, published in the Journal of Fish Biology (2018), is entitled: Atlantic salmon Salmo salar in the chalk streams of England are genetically unique C. Ikediashi\*§, J. R. Paris\*§, R. A. King\*, W. R. C. Beaumont†, A. Ibbotson† and J. R. Stevens\*‡ \*Department of Biosciences, University of Exeter, Geoffrey Pope Building, Stocker Road, Exeter EX4 4QD, U.K. and †Salmon & Trout Research Centre, Game & Wildlife Conservation Trust (GWCT), East Stoke, Wareham, Dorset BH20 6BB, U.K*

**Question 12: Are there any further comments you would like to make on the impact of the proposal?**

*There are many freshwater and marine issues connected with declining migratory salmonid stocks, but one of the few we can do anything about, at least in the short term, is to limit exploitation.  We know that marine survival is much lower than it was in recent decades and therefore S&T believes that salmon and sea trout should be protected as closely as possible when they enter the estuarine and marine environments.  While this consultation is primarily about netting methods for other marine species, we believe there is a very strong possibility that both salmon and sea trout could be significantly impacted as a by-catch of these fisheries, and that migratory salmonids are so important to the south of England, both biologically (conservation status) and socio-economically, that the threat of by-catch exploitation should be minimised.*

*S&TC would like to reiterate the unique genetic status of southern chalkstream Atlantic salmon, and the lack of information as to the true status of southern sea trout stocks.  At the same time, England is signed up to the precautionary approach to salmon management as members of the EU delegation at the North Atlantic Salmon Conservation Organisation (NASCO), and therefore has an international responsibility to manage salmon – particularly where stocks are at risk or even possibly at risk – so as to minimise their exploitation.  As already stated, this is one of the few management options outside of freshwater with a high likelihood of having a beneficial impact to stocks.*

*S&TC fully supports the mandatory catch and release of all rod-caught salmon and sea trout in the consultation area* ***until*** *such time as stocks recover sufficiently for there to be a sustainable harvest.  We therefore believe that commercial and recreational netting should be banned out to one mile from the coastline to provide similar protection for migratory salmonids in the estuarine and coastal phases of their life cycles.*