



Summary Response by Salmon & Trout Conservation (S&TC) to Southern IFCA net fishing byelaw formal consultation

(Please [click here](#) for the full response)

- **S&TC does not support the net fishing byelaw and believes that ring-netting should be banned year-round to provide adequate protection for migratory salmonids.**
- **S&TC supports a total ban on netting within 1 mile of the coast, including in estuaries and harbours, as the only realistic way of ensuring a minimum impact on migratory salmonids.**
- Atlantic salmon throughout the Southern IFCA area are currently at critical status, 'at risk' or 'potentially at risk' of failing their conservation limits, including the Avon, Frome, Piddle, Test and Itchen and their genetically unique populations of Atlantic salmon.
- Atlantic salmon and sea trout are designated UK Biodiversity Action Plan species; identified as being threatened and requiring urgent conservation measures. Management action is required to provide protection under the precautionary approach – this is particularly true in river systems designated Special Area of Conservation (SAC) and Sites of Special Scientific Interest (SSSI) where the species are listed and have the highest conservation status.
- Migratory salmonids are vulnerable to all types of netting, and ring nets are merely encircling gill nets with the high potential of damaging any salmonid caught as by-catch, making survival after release and particularly to successful spawning very unlikely.
- Migratory salmonid protection requires coastal as well as estuarine and harbour protection from netting to safeguard vital migration corridors as well linking together the essential fish habitat required by migratory salmonids throughout their lifecycle. We believe this can only be achieved by a 1-mile coastal net-free zone – the 'Golden Mile' initiative.

The above statements aside, S&TC would also like to voice the following serious reservations about the proposed byelaw (more details can be found in the full response):

- Salmon are likely to be held up in coastal zone/estuaries during periods of low freshwater flows and high temperatures increases the pressures upon them. The same is true for sea trout, however, their presence in estuaries and near coastal areas all year round makes them particularly vulnerable to netting. There is a lack of data on interactions between salmonids and a ring net fishery and therefore the precautionary principle should be applied.
- Functional linkage and site evidence on known salmonid migration routes with higher potential risk of migratory interaction, has been mis-applied and does not provide sufficient protection for salmonids. Further evidence on environmental variables, together with the enclosed nature of areas, means the following locations must become Net Prohibition Areas:
 - the whole of the Christchurch Harbour system to fully protect the Avon (SAC) & (SSSI)
 - the whole of Southampton Water, including the Hamble.

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- S&TC do not believe that the economic case for continuing commercial netting in estuaries and harbours should override the conservation needs of salmon and sea trout. A position Cornwall IFCA and Devon and Severn IFCA would seem to agree with as they have now prohibited gill netting in all their estuaries. The economic impacts presented by Southern IFCA are based on best estimates which is not acceptable.
- Monitoring and Control plans must be strengthened to aid enforcement. When netting it should be a requirement to report all salmonid by catch and interactions, in all net areas.
- For Net Permit Areas, the Net Permit conditions, and the actual net fishing gear types should be clearly set out in the Byelaw, rather than within supporting documents, which could be subject to change.

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