



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

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Mike Hedges MS
Chair of Climate Change, Environment and Rural Affairs Committee

By e-mail: SeneddCCERA@senedd.wales

07 January 2021

Dear Mike,

Salmon and migratory trout net fishing licence duties, 2021, 2022 and 2023

Thank you for your letter dated 11th December on the subject above in which you set out the concerns of the Climate Change, Environment and Rural Affairs Committee regarding the Natural Resources Wales (NRW) advertisement of proposed new net licence duties. I understand the Committee's concern, however, I would like to assure you that there is clear reasoning behind the proposed increases.

In approving un-changed net fishing licence duties for 2020, the Minister for Environment, Energy and Rural Affairs set a condition that NRW should review duties prior to the 2021 season to ensure they are based on a robust and transparent methodology. The key principles for the review were the challenge set by the Minister, and the principle of regime cost recovery as set out in the document 'Managing Welsh Public Money' (Welsh Government, 2016). The costs we seek to recover are those of administering the licencing system, and for the assessment of compliance with regulations. As part of our own regulatory principles, we endeavour to ensure our regime administration costs are kept to a minimum and that the logic and method of calculating revised duties are both rational and transparent.

Since the 1990's the licencing system has included a banding structure so that those fisheries that catch most fish pay more, whilst those with low catches and low environmental impact pay less. We have proposed to bring this system up to date so that the cost of duties within each band reflect contemporary levels of catch. The majority of duty increases are modest and average 21% across fisheries, comparing favourably to the 29% inflation rate since the duties were last reviewed in 2010. I acknowledge that the proposed increase for some fisheries, notably the Teifi coracle fishery with a proposed increase of £302, is comparatively large, however this reflects the average catch per licence in the fishery.

In contrast to your concerns, the proposal for the Teifi, Dyfi and Mawddach seine nets are for decreases of £32, £132 and £161 respectively. This again reflects the revised banding proposal which is itself a result of the low catches and impact of these fisheries on stocks.

The committee may also wish to note the proposed lowest licence band (Band D) includes the Blackrock lave net fishery. The proposed duty for a licence within Band D is £100, representing an increase from £79 (21%) which is lower than the increase in the rate of inflation over the past decade.

I recognise that higher prices may have an impact on some fishermen, including those who use traditional fishing methods. NRW and its predecessor bodies have been mindful of the cultural value of unique fishing methods, and it was for this reason that in 2011, Environment Agency Wales consulted with fishermen on a potential 'Heritage' licence. This would have combined a lower annual duty with a cap on the number of fish that could be taken. The Tywi and Teifi coracle net fishery interests were amongst those who rejected proposals to consider this further.

Nevertheless, we do recognise the importance of heritage value and that coracle fishing should be preserved for future generations. The best way to ensure that this is possible is to take action to restore fish stocks to sustainable levels, and NRW is considering a range of initiatives needed to ensure this happens.

You mention statutory duties for tradition and culture under section 3(1) of the Well-being of Future Generations (Wales) Act 2015 (the WBFG Act). As a public body NRW is under a duty to carry out the:

“process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle aimed at achieving the well-being goals”.

However, this does not mean that NRW must meet the duty independently of its other more detailed duties and powers. The statutory guidance of the WBFG Act 2015 is clear that the duty to carry out the *“process of improving the economic, social, environmental and cultural well-being of Wales”* therefore sits alongside and compliments NRW's more detailed powers and duties which are now exercised in the context of the duty to carry out the process of improving well-being.

Finally, Welsh Government has received a number of responses to the advertised duties. I want to reassure you that NRW will fully consider and reply to those that have responded and hopefully address their concerns before sending our recommendations to the Minister for final consideration and decision. We are aiming to send our recommendations to the Minister by the end of January 2021.

Yours sincerely,



Clare Pillman

**Prif Weithredwr, Cyfoeth Naturiol Cymru
Chief Executive, Natural Resources Wales**