



**Cyfoeth  
Naturiol  
Cymru**  
**Natural  
Resources  
Wales**

Mr Stuart Smith  
Penyhil  
Felindre  
Brecon  
Powys  
LD3 0SU

Our Ref:

Your Ref:

Date: 26<sup>th</sup> October 2016

Dear Stuart,

**Re: NRW decision on closure of hatcheries and cessation of stocking**

Thank you for your letter (undated) on the above subject, which you handed to me at our meeting on the 2<sup>nd</sup> September.

I note the numbers of anglers represented by the four organisations you name, and that you present this as evidence of opposition to the decisions taken by NRW. Three of these organisations sent responses to the original hatchery consultation exercise to express their objections to the proposals, however the Welsh Salmon and Trout Association did not. We did receive a joint response from the Salmon and Trout Association Cymru and Afonydd Cymru which was amongst representative body responses supportive of our position.

You refer to the most recent assessment of salmon and sea trout stocks in Wales, which concludes that all 23 principal salmon rivers (including the three cross-border rivers) are either 'at risk' or 'probably at risk' of failing to achieve their management targets. We note that this applies to all rivers, stocked or not, and we concur with the widely-held view that a common factor driving this performance is the low level of marine survival. Our objective must therefore be to optimise conditions within our rivers, and the number of wild fish that survive each year to spawn. The same principal applies to our sea trout stocks.

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In seeking this way forward, I note that we are very closely aligned to the thinking and proposals in England, Ireland, and Scotland.

You refer to the evidence base represented by the papers within the bibliography, and also to the further papers I sent to you on the 24<sup>th</sup> August, describing these as “without merit”. We disagree, not least because publications are subjected to stringent peer review, and reiterate previous observations:-

- We note that there is no single study that absolutely replicates the management issues we seek to address, but that there has been an emerging consensus that hatcheries do not achieve the outcome that represents our objectives in Wales.
- We note that contemporary publications support the thesis that stocking is unsuccessful as a strategy to improve stocks.
- We contend that removing wild broodstock to supply an artificial rearing programme is damaging for a number of reasons, including the loss of wild spawning and the risk of damage to or loss of local adaptations
- That the best technical advice is not to adopt a hatchery strategy when there is a viable wild stock present.

I refer you, at the end of this letter, to the publication referred to by Phil McGinnity in the workshop. I am sure this will be of interest to you. I also refer you to a publication by the Atlantic Salmon federation that has recently come to my attention.

You specifically ask “... why the use of hatcheries to assist ‘recovery’ from at risk status has been rescinded”. This is the essence of the review into hatcheries and the consultation exercise. Firstly I note that the use of hatcheries to assist recovery was never adopted. Further, only two of the stocking programmes in Wales, the Taff (where the stock was extinct) and the Mawddach (where a very serious pollution incident had occurred) were initially intended to assist recovery from ‘at risk’ status. We believe that the other stocking programmes are ineffective in delivering their implicit objectives and/or represent risk to wild salmon populations.

Clearly all of the programmes were originally put in place with the best of intentions according to management advice that prevailed at the time. However emerging evidence, advice and the standards and requirements set out under the Habitats Directive clearly justified the review into effectiveness and risk.

We note your final contention that our actions lack scientific evidence and popular support amongst anglers. I hope you agree that the expert evidence presented at the workshop helped to refute the first contention. We understand that the decision is unpopular with some anglers and fishery owners however in the context of the broader duties we are charged by Government to deliver, we are confident that the outcome is correct.

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I hope that we can look forward to better partnership working to undertake the work required to bring all of our rivers back to 'Good' or 'High' Ecological Status for fish.

Finally, and as you request, I have passed your letter to our Directors for their consideration, and they will also receive a copy of this response.

Yours Sincerely,



**PETER GOUGH**  
**Senior Technical Specialist**

cc	Mike Evans	Head of Evidence, Knowledge and Advice
	Ceri Davies	Executive Director for Knowledge Strategy and Planning
	Emyr Roberts	Chief Executive
	Peter Matthews	Chairman

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## REFERENCES

Bacon, P.J. et al (2015). Can conservation stocking enhance juvenile emigrant production in wild Atlantic salmon?  
Transactions of the American Fisheries Society Volume 144: 642-654:  
doi 10.1080/00028487.2015.1017655

(NB – abstract attached, but for copyright reasons I cannot send you a full copy of this paper.)

Carr, J. et al (2015). What works? A workshop on the wild Atlantic salmon recovery programs. Atlantic Salmon Federation, St Andrews, New Brunswick, Canada, 24pp.

(This can be found as a free download on the web.)

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