

# **Wales Net Fishing Licence Duties: options review and proposed new duties for 2021 - 2023**

**October 2020**

## **Summary**

This paper supports the proposals for new net licence duties to apply from the 2021 fishing season until 2023. It is intended for net fishermen and anglers who target salmon and sea trout stocks in the rivers in question, and other stakeholders with interests in the wellbeing of fish stocks. The proposed new duties will be advertised in early November.

There has been no revision of net licence duties since 2010, and the fishery banding arrangements used to calculate those duties have been unchanged since the 1990s, although there are differences in fishery catches since that time. A review is therefore required to ensure net licence duties are equitable and reflect inflationary costs incurred by NRW in administering the net licencing system, and in ensuring compliance of the sector with current byelaws. Recovery of regime costs is a requirement under the Welsh Government principles of managing public money.

This paper sets out the principles for this review of duties, considers 6 options for duties to apply from 2021, and identifies the preferred option. This makes use of a revised banding approach in which net fisheries are ranked according to catch and, therefore, their impact on supporting stocks, together with the application of an increase to account for inflation in administrative and compliance costs of the net fishery regime since 2010.

The favoured Option 6 will be the subject of a statutory advertising process in the autumn of 2020.

A further review of the existing net licencing process will address issues of stock sustainability and exploitation. This is now being prepared, and a non-statutory consultation on this will take place in 2021.

## **Introduction**

NRW is the responsible body for the administration of fishing duties in Wales (Salmon and Freshwater Fisheries Act 1975, Part IV, Section 25). Before fixing or altering any licence duty, NRW is under a statutory obligation to advertise the duties, with any written objections to the proposals to be made to the Welsh Ministers. The Minister then has the power to refuse to approve any duty submitted by NRW for approval or may approve the duties with or without modifications. (Salmon & Freshwater Fisheries Act 1975, Part IV Section 25, Schedule 2).

The Welsh Government Minister for Environment, Energy and Rural Affairs, in approving un-changed net fishing licence duties for 2020, set a condition that NRW would review the net licence duties prior to the 2021 season. This paper therefore sets out options for revised duties and identifies the preferred option, in compliance with the principles set out in the Welsh Government publication "Managing Welsh Public Money":

<https://gov.wales/sites/default/files/publications/2018-10/managing-welsh-public-money.pdf>

Relevant extracts from this document are presented in Annex 1.

The last revisions to net licence duties were made in 2010 and followed advice from UK Government and the Welsh Assembly (a summary of this advice is given in Annex 2). Debate leading to these revisions, the review of the Net Limitation Order in 2009, and a subsequent request by the Minister for Rural Affairs, resulted in a later non-statutory consultation in Wales into the potential for a heritage net licence. The essence of this was to seek to protect culturally significant fisheries in return for a reduced duty and a reduced catch allowance. This was rejected by relevant Welsh net fishing interests in 2011, the majority of respondents wishing to remain regarded as commercial fishermen.

The infrequent amendments to net fishing licence duties are in recognition that the costs of introducing revisions are significant relative to the level of additional income raised. Nevertheless, it is also recognised that since the last inflationary duty increase, the costs of migratory salmonid rod licences have increased by approximately 14%. The cost of a full migratory salmonid rod licence in 2010 was £72, whilst the cost for 2020 was unchanged from 2019 at £82 (a full review of rod licence duties is currently scheduled for 2021). Since the last increase in net licence duties, inflation (RPI) has been running at an average of 2.9% a year (29.2% over the 10-year period, source: [Bank of England inflation calculator](#)).

The new All-Wales net fishing byelaws, which came into force in January 2020 amend most net fishing seasons and require mandatory catch-and-release (C&R) of salmon in all net fisheries covered by the current Net Limitation Order. The current review of duties and the proposed future revision of net licencing arrangements therefore apply predominantly to sea trout.

### **Principles**

The key principle for this review of net licence duties is the recovery of costs for administration of the net licencing system, and for the assessment of compliance with the net fishing regime. It should be noted that these estimates do not include costs incurred as a result of enforcement activities, which are funded by Grant-in-Aid, nor a range of current activities intended to improve stock status. The sum of administration and compliance work alone is currently estimated at £21.5k per annum which comprises: -

- administrative costs associated with advertising of duties; determining and issuing licences, tags and log books; postage; receiving, managing, interpreting and publication of catch returns (current annual costs estimated at £11K);
- assessment and assurance of compliance of net fisheries with all required byelaws. The number of visits is risk-based and so varies between fisheries (current annual costs estimated at £10.5K).

NRW seeks at all times to manage these costs to an acceptable minimum. One example of this is the proposed advertisement which will cover the next three years, 2021 – 2023, thus reducing administrative costs associated with advertising.

It is also a principle that the logic and method of calculation of revised duties is rational and transparent.

Finally, it is a principle that those who catch most fish, and therefore have greater environmental impact, should pay most.

A revision of the system for determining the net licence regime is proposed during 2021 and a discussion paper on this will be available later in the business year 2020/21.

### Options for revised duties

This paper considers 6 options for a revision of net licence duties from 2021. These are presented below (Table 1) with an outline appraisal of their strengths and weaknesses. In considering these options, NRW is conscious of the perceived values associated with tradition and heritage of some fishing methods.

**Table 1. Options for revisions of net licence duties: strengths and weaknesses**

OPTION	SUMMARY	STRENGTHS	WEAKNESSES
1	<b>Unchanged duties</b> Duties remain unchanged for 2021 – 2023.	<ul style="list-style-type: none"> <li>• Straightforward option;</li> <li>• Likely to be no additional pressure to existence of traditional fishery methods.</li> </ul>	<ul style="list-style-type: none"> <li>• Not compliant with “Managing Welsh Public Money” principles, and therefore deemed an irrational approach;</li> <li>• Would not deliver on the direction from the Minister, at the suggestion of NRW, to review duties;</li> <li>• Based on a banding system that was derived from catches more than 20 years ago and does not reflect current relative catches;</li> <li>• Fails to recover regime costs (if all licences were taken out duties would total £16.58k, approximately 77% of costs) and so would still require public subsidy from other sources.;</li> <li>• Would not reflect season reductions or salmon C&amp;R requirement under the recently-introduced net fishing byelaws;</li> <li>• Sector would still fail to contribute to other fisheries service costs; <i>to maintain, improve and develop fisheries</i> (restoration, conservation and monitoring).</li> </ul>
2	<b>Reduction in duties.</b> Two elements have been considered:	<ul style="list-style-type: none"> <li>• Would address constraints of current byelaws;</li> <li>• Reduces risk of closure of traditional net fisheries.</li> </ul>	<ul style="list-style-type: none"> <li>• Not compliant with “Managing Welsh Public Money” principles, and therefore deemed an irrational approach;</li> </ul>

	<p>A) Duties reduced commensurate with constraints arising from the All Wales net fishing byelaws;</p> <p>B) Duties reduced as in 2A above, but with inflationary increase applied at 29.2%.</p>		<ul style="list-style-type: none"> <li>• Would not deliver on the direction from the Minister, at the suggestion of NRW, to review duties;</li> <li>• Based on a banding system that was derived from catches more than 20 years ago and does not reflect current relative catches;</li> <li>• Would fail to recover regime costs: if all licences were taken out duties would total A) £10.5k, approximately 49% of costs, or B) £13.7 approximately 64% of costs and so would still require public subsidy from other sources.</li> <li>• Might encourage full uptake of net fishing opportunity, potentially adding to pressure on stocks;</li> <li>• Would lead to pressure to reduce compliance checks due to cost;</li> <li>• Sector would still fail to contribute to other fisheries service costs; <i>to maintain, improve and develop fisheries</i> (restoration, conservation and monitoring).</li> </ul>
3	<p><b>Increased duties</b> Regime cost recovery through equal costs for all licence duties.</p>	<ul style="list-style-type: none"> <li>• Transparent;</li> <li>• Would recover regime costs;</li> <li>• Simple net licence system analogous to existing rod licence system;</li> <li>• Popular with larger net fisheries that currently pay substantially more: Tywi coracles (8 licences) Tywi seines (3 licences) Teifi seine (3 licences) Dyfi seines (3 licences);</li> <li>• Compliant with “Managing Welsh Public Money” principles;</li> </ul>	<ul style="list-style-type: none"> <li>• Might result in fewer licences sold, reducing income (but unlikely to reduce costs) and thereby failure to recover regime costs;</li> <li>• Potential imbalance with small fisheries (16 licences would see substantial increases in licence duty);</li> <li>• Might add to pressure on future of traditional fisheries;</li> <li>• Would not take account of highly variable catches between fisheries;</li> </ul>

			<ul style="list-style-type: none"> <li>• Would not address restrictions introduced by new byelaw (season reductions or salmon C&amp;R);</li> <li>• Sector would still fail to contribute to other fisheries service costs; <i>to maintain, improve and develop fisheries</i> (restoration, conservation and monitoring);</li> </ul>
4	<p><b>Increased duties</b> Regime cost recovery through applying inflationary increases.</p>	<ul style="list-style-type: none"> <li>• Transparent;</li> <li>• Would recover regime costs (if all net licences were taken out);</li> <li>• Compliant with “Managing Welsh Public Money” principles.</li> </ul>	<ul style="list-style-type: none"> <li>• Based on a banding system that was derived from catches more than 20 years ago and does not reflect current relative catches;</li> <li>• Might result in fewer licences sold, reducing income (but unlikely to reduce costs) and thereby failure to recover regime costs;</li> <li>• Would not address restrictions introduced by new byelaw (season reductions or salmon C&amp;R);</li> <li>• Might lead to reductions in some traditional fisheries;</li> <li>• Sector would still fail to contribute to other fisheries service costs; <i>to maintain, improve and develop fisheries</i> (restoration, conservation and monitoring);</li> <li>• Sector would still require public subsidy from other sources.</li> </ul>
5	<p><b>Increased Duties</b> Regime cost recovery through increases in all duties by applying equal administrative costs per licence plus differential fishery compliance costs (not</p>	<ul style="list-style-type: none"> <li>• Transparent;</li> <li>• Not based on the historic banding system;</li> <li>• Administration costs applied equally to all net fishing licences, so large fisheries do not subsidise smaller fisheries;</li> <li>• Compliance costs applied to match costs incurred per fishery;</li> </ul>	<ul style="list-style-type: none"> <li>• Some small fisheries would face large increases;</li> <li>• Might result in fewer licences sold, reducing income and thereby failure to recover regime costs;</li> <li>• Would not address restrictions introduced by new byelaw (season reductions or salmon C&amp;R);</li> </ul>

	enforcement) (Annex 3).	<ul style="list-style-type: none"> <li>• Would recover regime costs (if all net licences were taken out);</li> <li>• Compliant with “Managing Welsh Public Money” principles.</li> </ul>	<ul style="list-style-type: none"> <li>• Does not take account of low or zero catches in small fisheries, and therefore their low environmental impact;</li> <li>• Might lead to reductions in some traditional fisheries;</li> <li>• Sector would still fail to contribute to other fisheries service costs; <i>to maintain, improve and develop fisheries</i> (restoration, conservation and monitoring);</li> <li>• Sector would still require public subsidy from other sources.</li> </ul>
6	<p><b>Increased Duties</b> Regime cost recovery through increases in all duties by applying administrative and compliance costs (not enforcement) across all net fisheries, using a 4-tier banding system based on relative catch:</p> <p>A – Tywi fisheries B – Teifi fisheries C – other fisheries D – minor impact fisheries.</p>	<ul style="list-style-type: none"> <li>• Transparent (Annexes 3 &amp; 5);</li> <li>• Rational as based on revised system of banding based on recent average catch (or historic catch in Taf coracle), therefore also accounting for fisheries with minor environmental impact;</li> <li>• Would recover regime costs (if all net licences were taken out);</li> <li>• Compliant with “Managing Welsh Public Money” principles;</li> <li>• A more rational approach: allocates fisheries into 4 bands taking into account average catches per licence over the past 5 years;</li> <li>• Addresses objections by some netmen in 2019 concerning banding of different fisheries;</li> <li>• Relatively small change to 3 (Tywi coracle and seine, and Teifi seine fisheries) of the 4 main fisheries.</li> </ul>	<ul style="list-style-type: none"> <li>• Potentially unpopular with net fishing sector;</li> <li>• Might result in fewer licences sold, reducing income and thereby failure to cover regime costs;</li> <li>• Increase in duties would not address netmen’s objections based on reduced opportunity to take fish;</li> <li>• Might lead to reductions in some traditional fisheries (e.g. Teifi coracle fishery would see an increase in duty to bring it into line with similar fishery on Tywi);</li> <li>• Sector would still fail to contribute to other fisheries service costs; <i>to maintain, improve and develop fisheries</i> (restoration, conservation and monitoring);</li> <li>• Sector would still require public subsidy from other sources.</li> </ul>

### **Comparison with rod licence duties**

Salmon and sea trout rod licence income raised in Wales amounted to approximately £230,000 in 2019/20 (compared to £10.2k from the net fishing sector). Rod licence income partly funds the costs of NRW's fisheries service to migratory salmonid rod licence holders including: -

- contributions to development control to ensure migratory salmonid populations are protected;
- some habitat improvement projects which benefit migratory salmonid populations;
- rod licence administration and compliance-checking;
- providing advice to fishery owners and angling clubs; and
- managing Local Fishery Groups and other stakeholder meetings.

Income from net licence duties does not contribute to these costs (other than the costs of administration and compliance for that sector - Annex 3).

The shortfall in the costs of the fisheries service, as for the net licence sector (including high impact enforcement activities, fish population monitoring etc) is paid for by Welsh Government Grant-in-Aid and other occasional sources such as the European Union's Data Collection Framework.

**TABLE 2. Comparison of licence duties for each option.**

Net Fishery (number of licences)	Option 1	Option 2			Option 3	Option 4	Option 5	Option 6
	Unchanged duties: remain at current costs	Reduction in duties: following introduction of new byelaws			Increased duties: identical licence duties in all fisheries	Increased duties: inflation applied to current duties (29.2%)	Increased duties: equal admin cost per licence plus differential compliance costs (Annex 3)	Increased duties: simple 4 banding system based on sea trout catch (Annex 4): recovering overall administration and compliance costs (Annex 5)
Reduction in fishing effort #		A) Proportional reduction in duties	B) Proportional reduction in duties (inflation added @29.2%)					
<b>Tywi coracle (8)</b>	<b>555</b>	40%	332	432	<b>399</b>	<b>722</b>	<b>399</b>	<b>A – 650</b>
<b>Tywi seine (3)</b>	<b>582</b>	40%	348	453	<b>399</b>	<b>757</b>	<b>725</b>	<b>A – 650</b>
<b>Teifi coracle (12)</b>	<b>248</b>	40%	148	193	<b>399</b>	<b>322</b>	<b>464</b>	<b>B – 550</b>
<b>Teifi seine (3)</b>	<b>582</b>	40%	348	453	<b>399</b>	<b>757</b>	<b>725</b>	<b>B - 550</b>
Conwy seine (3)	372	34%	245	319	399	484	262	C – 450
Dyfi seine (3)	582	40%	348	453	399	757	320	C – 450
Dysinni seine (1)	372	34%	245	319	399	484	378	C – 450
Nevern seine (1)	261	50%	130	169	399	339	378	C- -450
Taf coracle (1)*	248	40%	148	193	399	322	725	C – 450
Taf wade (1)	79	0%	79	103	399	103	551	D – 100
Mawddach seine (3)	261	34%	172	224	399	339	262	D – 100
Cleddau compass (6)	96	34%	63	82	399	125	262	D – 100
Severn Estuary - Blackrock laves (8)	79	0%	79	103	399	103	237	D – 100
Conwy - Lledr trap (1)	131	34%	86	112	399	170	378	D – 100
<b>TOTAL REVENUE</b>	<b>16,852</b>	-	<b>10,529</b>	<b>13,687</b>	<b>21,546</b>	<b>21,908</b>	<b>21,516</b>	<b>21,350</b>

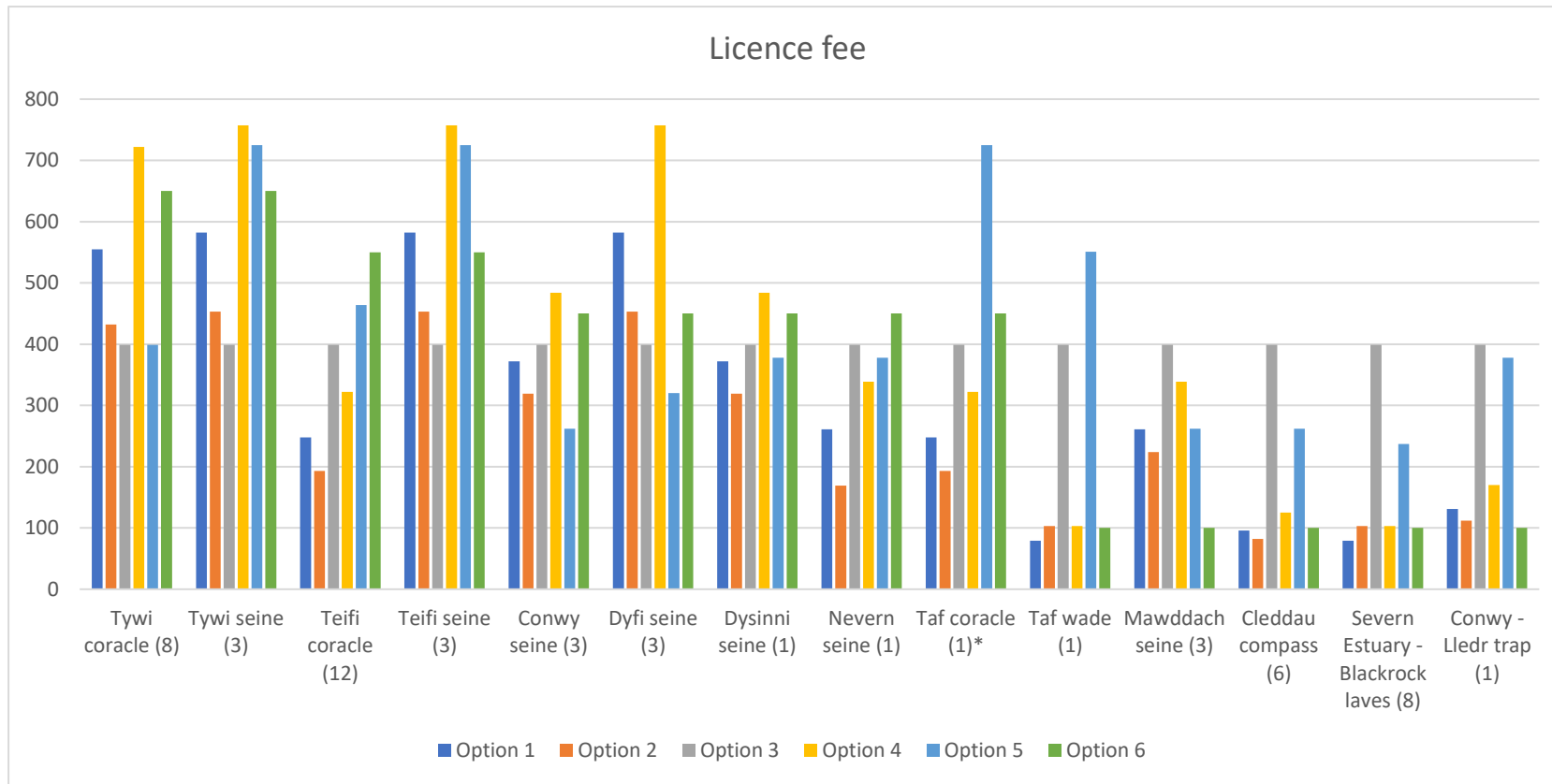
Bold font: largest fisheries

# Reduction in season duration arising from All Wales byelaws

\* Fishery irregularly fished – banding based on most recent experience of potential catch.



Figure 1 – Summary of costs of each option



### Conclusion - preferred Option

The preferred option is Option 6, as this: -

- results in income from duties that covers the administrative and compliance costs of the net fishery licencing regime (if all licences are taken up);
- is based on a more rational assessment of contemporary levels of catch of sea trout through a revised banding system;
- represents a hierarchical structure that:
  - recognises and reflects low catch and impact on natural resources of smaller fisheries;
  - recognises fisheries with larger catches and impact on natural resources and requires them to contribute more.
- shields small fisheries which have minimal impacts on stocks from disproportionately large increases in duties.

### Duties

We propose to increase the duties and set these for 3 years, 2021 - 2023 (Table 3).

**Table 3 Duties 2021 – 2023**

Fishing Area	Fishing Method	Duty (£ p.a.) 2021 - 2023
Tywi	Coracle	£650
Tywi	Seine	£650
Teifi	Coracle	£550
Teifi	Seine	£550
Conwy	Seine	£450
Dyfi	Seine	£450
Dysynni	Seine	£450
Nevern	Seine	£450
Taf	Coracle	£450
Taf	Wade	£100
Mawddach	Seine	£100
Cleddau	Compass	£100
Wye	Lave	£100
Conwy – Lledr	Trap	£100

### Future considerations

The net licencing process is now under a more comprehensive review. A discussion paper addressing the broader issue of modernising the process and a methodology for managing the net fishing sector in Wales will be sent to stakeholders in 2021. This will indicate the intended direction of travel that NRW is considering in order to reform the current net licensing system on the basis of contemporary values associated with the sustainable management of natural resources.

We will further consider balancing the level of duties against environmental impact – potentially through a further review of the banding system to differentiate between low and high-catch fisheries.

## ANNEXES

### Annex 1 Principles of Managing Welsh Public Money

<https://gov.wales/sites/default/files/publications/2018-10/managing-welsh-public-money.pdf>

Relevant extracts from this document: -

#### “Chapter 6

Charges for services provided by public sector organisations normally pass on the full cost of providing those services. There is scope for charging more or less than this provided that the relevant Ministerial approval is given and there is full disclosure.”

“The Welsh Government expects proper controls over how, when and at what level charges may be levied.”

“6.2.1 The standard approach is to set charges to recover full costs.”

“6.2.2 This approach is simply intended to make sure that public organisations neither profits at the expense of consumers nor makes a loss for taxpayers to subsidise”

## **Annex 2      Review of past advice provided by statutory advisory committees and Government.**

### **Reference Sources:**

#### **Net Licence for Migratory Salmonids. Options for Future Licence Structure and Duties (National Rivers Authority, 1994)**

The report cites:

the Secretary of State for Wales (SoS), commenting in 1992, that "...it is appropriate for the NRA to ensure that income derived from any customer group is sufficient to meet all expenditure incurred...on the groups behalf." Nevertheless, the SoS declined to increase net duties for coracle fisheries.

The report notes that:

Government policy is that the costs of a service should be recovered as fully as possible from those who benefit from the service or who cause it to be needed.

Since netsmen and anglers exploit the same resource, the NRA should seek to be consistent and fair in setting duties for the two groups of fishermen.

#### **Salmon and Freshwater Fisheries Review (Ministry of Agriculture Fisheries and Food, 2000) (together with responses by MAFF (2001) and the (National Assembly for Wales (2002)).**

Matters raised in these papers have been considered.

#### **Environment Agency Regional Fisheries, Ecology & Recreation Advisory Committee (2003). Salmon Net Licence Duties**

This paper adopted principles for 2003 review:

- Duties will not be set to recover the full costs incurred because of and on behalf of managing net fisheries. Nets will be placed in catch bands based on recent catches (1998-2002).
- Catch bands will be set where there is a natural gap in groups of mean catch.
- A single duty will be set for each catch band, and each instrument will be subject to this duty in the long-term, if not immediately.
- No duty shall be less than that for the full salmon rod licence.
- No special provision has been proposed, as yet, for coracle fisheries (which have previously been identified by Ministers as having significant cultural value) or any other possible heritage fishery. However, if it became apparent that fisheries of significant heritage value would close because of increases in licence duty, consideration could be given to a reduced duty linked to some change in their operation that would maintain or increase their heritage value, whilst reducing their impact on stocks. For example, the cultural value of such fisheries might be enhanced by limiting fishing to predictable times when people could come and watch them.

It is noted that this advice is approximately 17 years old, however some principles are considered relevant still, for example the application of catch bands to differentiate between high and low-catch fisheries.

**Environment Agency Wales: Fisheries, Ecology & Recreation Advisory Committee (April 2007).  
Setting Rod and Net Licence Duties 2008-2010.**

It was noted that: -

- The costs of revising net licence duties are significant relative to the additional income raised.
- There had been no increases to salmon net licence duties between 1994 and 2004 so duties were then increased by inflation and backdated to the last increase (1995) and phased in over three years (10% in 2005, 10% in 2006 and 8% in 2007).
- A commitment was made to review the salmon net licensing structure before setting duties from 2008 onwards including the intention of having a single duty for each catch band.
- Due to the small number of licences sold and consequent low income, a major revision of the salmon net licensing system was not considered cost effective.
- To take an approach consistent with that for salmon rod licence duties, all salmon net licence duties could be raised by inflation (currently 3%) in each of the three years.
- Advertising costs meant that it would be more cost-effective to retain current duties as the cost is higher than the extra income raised over the three years.

**Environment Agency Wales: Fisheries, Ecology & Recreation Advisory Committee (May 2011).  
Setting Rod and Net Licence Duties and Authorisation Charges.**

This paper noted that no increases were recommend for rod duties and that the same funding and economic scenarios should apply equally to net licence duties. Duties were therefore “frozen” at 2011/12 levels for 3 years (subject to annual inflation not exceeding 3%).

### Annex 3. Costs of administration and compliance for each net fishery.

This table sets out the apportionment of administrative costs for each net licence, together with calculated costs of scheduled compliance visits to each fishery.

Fishery (number of licences)	Current Arrangements		Potential future cost arrangements					
			Compliance commitment		Admin cost (£)	Costs admin + compliance	Cost of each licence (£): (used in Option 5)	Income (£) (Option 5)
	Current duty (£)	Potential income (£)	Hrs	Cost (£)				
<b>Tywi coracle (8)</b>	555	4440	36	1562	1632	3194	399	3194
<b>Tywi seine (3)</b>	582	1746	36	1562	612	2174	725	2174
<b>Teifi coracle (12)</b>	248	2976	72	3124	2448	5572	464	5572
<b>Teifi seine (3)</b>	582	1746	36	1562	612	2174	725	2174
Conwy seine (3)	372	1116	4	174	612	786	262	756
Dyfi seine (3)	582	1746	8	347	612	959	320	959
Dysinni seine (1)	372	372	4	174	204	378	378	378
Nevern seine (1)	261	261	4	174	204	378	378	378
Taf coracle (1)*	248	248	12	521	204	725	725	725
Taf wade (1)	79	79	8	347	204	551	551	551
Mawddach seine (3)	261	783	4	174	612	786	262	786
Cleddau compass (6)	96	576	8	347	1224	1571	262	1571
Severn Estuary - Blackrock laves (8)	79	632	6	260	1632	1892	237	1892
Conwy - Lledr trap (1)	131	131	4	174	204	378	378	378
<b>TOTAL REVENUE</b>		<b>16852</b>	242	10500	11016	21516		<b>21516</b>

**Annex 4      Sea trout net catches 2015 to 2019 (5 year mean)**

<b>Fishery included in Wales NLO</b>	<b>Method</b>	<b>NLO</b>	<b>mean catch per licence available</b>	<b>mean catch per licence taken out</b>
Tywi	Seine	3	68	68
Tywi	Coracle	8	43	55
Teifi	Coracle	12	36	37
Teifi	Seine	3	23	29
Conwy	Seine	3	3	3
Dyfi	Seine	3	5	6
Dysynni	Seine	1	11	14
Nevern	Seine	1	5	6
Taf	Coracle	1	0	0
Taf	Wade	1	0	0
Mawddach	Seine	3	0	0
Cleddau	Compass	6	0	0
<b>Other Fisheries (non NLO)</b>				
Severn Estuary	Blackrock laves	n/a	0	0
Conwy	Lledr trap (Historic Installation)	n/a	0	0

## Annex 5. Revised catch banding system adopted for Option 6.

The cost of the net licence regime comprises administration and compliance costs totalling £21.5k. The principle NRW must follow is that these costs should be recovered from the net fishery sector in amended licence duties.

It is proposed that duties should be based on: -

- a ranking of relative catches in each fishery;
- the previously supported principle that duties within each band should be equal;
- the desirability of shielding minimal and zero-catch fisheries.

The duty for each fishery has been based on its most recent 5-year average annual catch of sea trout. The duty proposed for each band reflects both the degree to which a fishery exploits the sea trout resource and NRW's expenditure in maintaining and improving that resource.

The number of bands selected is 4 and has been chosen to balance the administrative complexity of a larger number of bands, and the recent clear pattern of catch which is predominantly in the Teifi and Tywi fisheries only.

The duties proposed for each band reflect the average catch per licence for the past 5 years 2014-2019. The average catches are calculated from licence returns and do not include licences that were either taken out but not fished, or unallocated licences.

It is noted that the Taf coracle net was not fished between 2015-2019, and the 'C' banding has therefore been based on the last declared catch in 2014 which represents the potential catch by this fishery.

**Table 1. Bands and range of mean catch per licence**

<b>Band</b>	<b>5-year average catch per licence 2014-2019 per licence fished</b>
<b>Band A</b>	>50
<b>Band B</b>	20-49
<b>Band C</b>	1-19
<b>Band D</b>	<1



**Table 2. Banding of each net fishery**

<b>Fishery</b>	<b>Method</b>	<b>Number of licences (current NLO)</b>	<b>Mean catch per licence taken out 2014-2019</b>	<b>Band</b>
<b>Tywi</b>	<b>Seine</b>	<b>3</b>	<b>68</b>	<b>A</b>
<b>Tywi</b>	<b>Coracle</b>	<b>8</b>	<b>55</b>	<b>A</b>
<b>Teifi</b>	<b>Coracle</b>	<b>12</b>	<b>37</b>	<b>B</b>
<b>Teifi</b>	<b>Seine</b>	<b>3</b>	<b>29</b>	<b>B</b>
Conwy	Seine	3	3	C
Dyfi	Seine	3	6	C
Dysynni	Seine	1	14	C
Nevern	Seine	1	6	C
Taf *	Coracle	1	0	C (Note: 17 sea trout caught last time fished in 2014)
Taf	Wade	1	0	D
Mawddach	Seine	3	0	D
Cleddau	Compass	6	0	D
<b>Other Fisheries (non NLO)</b>				
Severn Estuary	Blackrock laves	n/a	0	D
Conwy	Lledr trap (Historic Installation)	n/a	0	D