



18th June, 2009

Dear Minister,

SALMON AND TROUT ASSOCIATION WALES

RESPONSE TO THE CONSULTATION ON THE DRAFT RIVER BASIN MANAGEMENT PLANS FOR THE DEE, SEVERN AND WESTERN WALES RIVER BASIN DISTRICTS

Background

Salmon and Trout Association Wales (S&TAW) is a branch of the S&TA set up to represent and further the aims and objectives of its parent organisation in Wales, by addressing all issues relevant to fisheries legislation and regulation, together with environmental and species management and conservation. It represents about 500 S&TA members residing in Wales comprising game anglers, fishery owners/managers, affiliated trades and members of the public with an interest in conserving the aquatic environment and its dependant species. S&TA's UK wide membership numbers 11,600 individually, many of whom fish in Wales on an annual basis and have a close interest in the health of the aquatic environment and its dependant species.

Current Plans – Our Views

The Water Framework Directive (WFD) has been heralded as one of the most important pieces of environmental, conservation and fishery legislation of recent times because it seeks to progressively achieve good ecological status (GES) or good ecological potential (GEP) in all water bodies by 2027. Unfortunately the current River Basin District Management Plans (RBDMPs) represent a missed opportunity to make significant progress towards this objective. The summary plans are too general and generic, covering districts that are too large and are not homogenous because of the different characteristics of their constituent catchments. They lack ambition and have no SMART objectives to achieve GES in an acceptable, structured or progressive way. The Annexes to the summary plans are impenetrable to the general public, are based on inadequate data and local knowledge and consequently contain numerous errors and omissions.

Partnership Working

Despite these serious concerns, S&TAW and its membership are committed to working with Government, its Agencies and other organisations such as the Rivers Trusts movement to improve the situation and achieve good environmental and ecological status in the rivers, streams and lakes of Wales. We believe that the Welsh Assembly Government shares our vision, not only because of its environmental responsibilities, but also because of the

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potential social and economic benefits to communities, tourism and industry of improving our environment.

S&TAW has already demonstrated its commitment to the WFD principle of working in partnership by supporting three successful WFD Workshops recently held in Wales in partnership with Afonydd Cymru (AC) and its member Rivers Trusts, the Our Rivers campaign, Environment Agency Wales (EAW) and the Countryside Council for Wales. These workshops were held in North, West and South Wales and attended by more than a hundred individuals representing a wide range of local interests and organisations. They promoted awareness of and responses to the RDBMPs and identified local environmental problems and potential solutions that will be developed by AC and EAW into partnership projects that will contribute towards the achievement of GES as resources are made available by Government.

The Way Ahead

We believe that, in contrast to the current “top-down” approach of the current RDBMPs, the most cost-effective achievement of GES/GEP will be achieved through the implementation of local Catchment Action Plans developed and delivered by local interests working in partnership. Welsh Assembly Government could facilitate this initiative by asking EAW to set-up local WFD Catchment Groups with appropriate representation and setting up a Catchment Restoration Fund (possibly £2m p.a), similar to that currently under consideration in England to fund partnership projects designed to contribute towards the achievement of GES/GEP.

Specific Comments on Current Plans

S&TAW works closely with and wishes to strongly endorse the responses submitted by the S&TA, CCW, Afonydd Cymru and the Association of Rivers Trusts and their member Rivers Trusts.

We would like to emphasise the following points in relation to the specific questions posed in the Dee, Severn and Western Wales RBDMPs:

Q1. *Do you agree with the assessment of problems in water bodies? What would you change?*

Disagree. The summary nature of the plans and the diverse nature of the constituent catchments, result in the omission of crucial importance to individual rivers. For example, the major contributor to failure to comply with GES is poor fish populations and these are adversely affected in some catchments (eg Welsh Dee, Clwyd, Rheidol, Tywi, Afan and Taff) by water flow problems and barriers to migratory fish. Water flow problems will be exacerbated by climate change, yet they are not recognised as a significant issue in either the Dee or Western Wales RBDMPs.

Problems and remedial measures need to be identified and implemented at the river catchment level by appropriate local stakeholders operating within nationally agreed guidelines for widespread issues (eg Codes of Best Practice, National Strategies).

Q2. *Do you agree with the proposed objectives? What would you change?*

Disagree. Whilst agreeing with the objective to achieve GES/GEP by 2027 at the latest, the timescales outlined in the RBDMPs to achieve this propose little or no significant

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improvement in the status of Welsh rivers between now and 2015. This lack of ambition during the first planning cycle will defer the benefits that would accrue from accelerating the required programme of environmental improvements and leave too much to be done to achieve GES/GEP in the remaining twelve years before the statutory deadline of 2027. Catchment Action Plans should be developed as a matter of urgency to improve compliance with GES/GEP progressively and cost-effectively over the next seventeen years. The Welsh Assembly Government should set up a Catchment Restoration Fund similar to that being considered in England to implement projects designed to achieve good GES/GEP on a prioritised basis.

Q3. For some water bodies we have proposed objectives with deadlines after 2015 or a lower overall target. Do you agree with these changes? What would you change?

Disagree. The basis for relaxing deadlines and targets because of remedial measures being deemed “technically infeasible” or “disproportionately costly” is not fully described or justified in the plans and cannot be supported.

For example, Agriculture and Industry cause deterioration of many Welsh rivers, yet many relatively low-cost, common-sense initiatives such as the promotion of best practice for the disposal of pesticides and chemicals and the adoption of Catchment Sensitive Farming appear in Scenario C Actions and will only be implemented “if we had more certainty that they would be proportionate and feasible”.

Q4. We have followed a process to assess (appraise) the actions. Do you agree with how we have done this?

Disagree. We are concerned that a large number of local measures have not been included and for those included the assessment process is unclear. Also, given its importance, that Hydromorphology is only used to differentiate between high and good ecological status. A lot more work needs to be done at the local catchment level before we can develop a data set that will enable us to plan action programmes with any real confidence.

Q5. What comments do you have on these actions? Are there any actions that have been missed, or any changes you would propose?

Scenario C actions outlined in the RBDMPs are not comprehensive and should be urgently and thoroughly reviewed at national and local catchment level (see for example the WFD RBDMP response from the South-East Wales Rivers Trust) to provide an extended, prioritised list of actions appropriate for each catchment for progressive implementation. Resources should be made available to implement many of the actions on the revised list during the lifetime of the first planning cycle on a prioritised basis. It is simply not defensible to defer the implementation of actions such as those mentioned in Q3 above and activities such as pollution prevention, enforcement action and promotion of environmentally protective best practice that could and should be carried out by EAW and local authority staff.

Q6. What comments on Scenario C do you have, including any information you can supply about specific actions?

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AC's member Rivers Trusts have developed Development and Action Plans to address priority problems in their catchments and the recent WFD Workshops have identified specific problems and potential solutions that will be developed by AC and EAW over the next few months into partnership projects designed to increase GES/GEP compliance throughout Wales.

Q7. What support can you offer, such as undertaking any actions or providing resources, to help deliver more for your environment?

S&TAW is committed to actively working with AC and other organisations with similar objectives to improve the environment and fisheries of Wales and will develop the role that it can play in forthcoming months. We strongly support the creation of a Catchment Restoration Fund in Wales, similar to that being considered in England and AC's application for funding from the European Fisheries Fund to undertake habitat improvement work designed to improve fisheries in Wales.

Q8. Do you agree with our assessment of how climate change will affect pressures on the water environment? What would you change?

Agree. Climate change is an important cross-cutting theme for all of the significant environmental issues identified, not least because of its impact on water flow, which should be given greater prominence in the plans. Projects designed to facilitate adaptation to and mitigation of climate change should be developed and implemented during the first planning cycle.

Q9. Do you have any other comments on this draft plan that you haven't already given?

If RBD Liaison Panels have a role in future, their role should change to one of facilitating and over-seeing the implementation of Catchment Action Plans developed and implemented at local catchment level.

The Monitoring requirements of the WFD are considerable if the current inadequate data base is to be improved and the efficacy of interventions assessed appropriately. S&TAW and AC are already actively involved in the national Fly-Life Monitoring Programme which could be a valuable source of supporting monitoring data to EAW, provided that they have the resources to process the data. The Clwyd & Conwy and Dee Rivers Trusts have already commenced the monitoring of fish populations in collaboration with EAW and CCW and this initiative could be extended elsewhere in Wales if resources are made available.

Summary

Whilst S&TAW has serious reservations about the current RBDMPs covering Wales as outlined above, much work has been done that could form the basis of making sustainable progress towards achieving GES/GEP in the aquatic environment in Wales. The key to whether this is successful will be the adoption a local approach, the provision of an appropriate delivery framework and resources and the development of partnerships at all levels to deliver cost-effective solutions.

S&TAW is committed to playing its part in delivering this vision.

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Kind regards

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