

Cynulliad Cenedlaethol Cymru
Y Pwyllgor Amgylchedd a Chynaliadwyedd
NRW 2015 – 05
Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015
Ymateb gan Ffederasiwn Clybiau Pysgota Clwyd (Saesneg yn Unig)

Thank you for giving us the opportunity to respond on the workings of the new body – NRW.

I write as secretary of the Federation of Clwyd Angling Clubs (Fed). The Fed was formed over 35 years ago to represent the Game Fishing Interests of Clubs within the Vale of Clwyd. From the original conception we now represent more than 600 anglers from the following Clubs – Rhyl and St Asaph Angling Association, Bodelwyddan Game Angling Club, Wirral Game Fishing Club, Denbigh and Clwyd Angling Club and Capenhurst Angling Club.

For background and for you to understand our environmental credentials – The Fed has been notable in winning many environmental battles. In 1998 it purchased the netting licenses from Rhyl nets men (one of the first Net Buy out schemes). Saving an average of 150 salmon and over 500 sea trout annually. It has been successful in running several environmental programs the latest being SOS (Save our Salmon) campaign. We can boast that its member clubs as a direct result from this campaign have the highest catch and release figures for Salmon and Seat Trout in the Province. In fact the EA/ NRW keep lifting the bar on their so called voluntary targets in order to keep ahead of us.

We have worked tirelessly with Clubs and other bodies like River Trusts (many members of the Fed also sit on the River Trust and LFaG) to improve the aquatic environment for all. We fully recognise that we have a unique environment which we wish to conserve, preserve and enhance for future generations. Whilst fully accepting that it is a rich National Asset to be shared and managed sympathetically by all.

Over many years the Fed has had a close working relationship with Water Boards, River Authorities the EA and now the NRW. We have witnessed many changes, some good and some not so good. We as a group are not naïve

and are fully cognizant of the financial pressure placed upon such bodies as NRW. Like you we look forward to the quoted savings of £69m over 10 years from the recent merger. Perhaps as a point of interest you could inform us 3 years on how much of this saving has so far materialised?

As secretary of the Fed, Committee member of Clwyd Conwy and Gwynedd River Trust, member of Local Fisheries Advisory Group (LFaG) and Committee member of the above Clubs. I am aware of the efforts made by Clubs and individuals. If we add collectively the hours spent in writing responses to questionnaires, attending meetings, request for views on proposed changes and requests for information, it comes to dozens if not hundreds of hours of work. The first question I ask myself in response to this latest request – has it made any difference. I/we believe it has not. Will it make a difference, we remain to be convinced.

To give an example Hatchery Closure .many Members travelled to Trawsfynedd where we were asked to listen to a seminar on why Mitigation (which we believe and still believe to be a statutory requirement for the Tryweryn loss) is no longer considered necessary. Notwithstanding, the NRW claim its minds were not closed and requested responses to the proposals to close hatcheries in Wales from interested parties. Many considered and deeply held views were returned. Not just from people objecting to change for changes sake, but from scientifically based rational arguments as to why mitigation is both a legal and a scientific imperative. What was the result; as we stated at the meeting; the minds of the NRW would be closed to any arguments.

The decision to close hatcheries had already been taken. To add further insult the Director NRW stated that in all the responses received he did not see any scientific or rational basis for their retention. An insult to the many hours of careful and considered replies returned. Such was the backlash that the NRW staff member asked to adjudicate, who was well known for "playing with a straight bat", left the organisation. His adjudication reviews along with our views being totally discounted. I cannot say to what extent the closure decision had in him tendering his resignation but I am sure it was a factor.

Similarly the NRW's now disdain for the work previously carried out by their Fishing team and its leaders has led to the loss of so many highly skilled and motivated staff (probably irreplaceable). We now genuinely feel for the future of our aquatic environment. It will become a self-fulfilling prophesy that having orchestrated the reduction of staff, arguments will now be made that the NRW does not have the skill set to retain and develop fisheries.

You will be aware from your own publicity Angling is worth upwards of £150m p.a. to the Welsh Economy. Often boosting the economy of those very rural areas with little other business to offer in terms of employment or the retention of young people.

It is this economy that is now at risk unless genuine and we mean genuine efforts are made to help recover fishing stocks, improve the water courses and promote angling as a sustainable and valuable contribution to the Welsh Economy. We see no evidence at all of this in practice. In fact quite the opposite. Witness the recent adverse publicity when Conwy Council constructed a concrete water course over the bed of a tributary of the River Conwy. Destroying the gravel beds that migratory fish used for Redds. A similar project we believe is being planned for Llansanan. As to whose responsibility it is, we believe if the NRW is unable to protect such water courses, what hope do we have for protection of endangered fish. Further, what use is the NRW, if other bodies can ignore and carry out such environmental vandalism.?

On our local waters we as Club and Trust carry out bank and water course repairs and remove many blockages. Much of this work used to be carried out as a matter of routine jointly with the EA. Club members do not have the physical or material resources that are sometimes necessary to remove blockages or repair damaged banks. Leaving aside the impediment to movement of fish. The NRW claim unless it is a threat to life or homes they will not now carry out such works. We are unsure how anyone, taking into account the history of flooding in North Wales, can be so certain that blockages will not be a future threat.

Back in April 2012 I responded to the EA request for views on the bringing together of the three bodies to form NRW. Whilst we broadly supported one

body, we raised concerns that the savings suggested will not materialize – hence my question on page 1. We also raised concerns that streamlining management processes would weaken the safeguards and regulatory work undertaken. The reduction of these safeguards we now witness daily.

We also raised concerns that we in North Wales would be subsumed into a South Wales centric approach and we would become further impoverished. I leave it to you to examine the figures of staff reductions in North Wales as a percentage of the total. We believe in practice not only is a South centric bias in place, but NRW have lost out to the more politically astute and powerful voices of CCW both inside and outside of the Senedd.

Moving on to what we in the angling fraternity find most worrying the seeming lack of any overall local management control in granting small hydro–electric generation schemes. Leaving aside the economics, which we believe comes straight from the “Mad House”. Recent examples where our rightful riparian concerns have been over ridden by what seems to be a political “dash for hydro”. Decisions being taken centrally in Cardiff with little concern or knowledge/understanding the damage such schemes create to our local environment. This is not a case of “sour grapes” after losing cases.. We have witnessed already the concern that local NRW staff have had over one such structure on the River Elwy at Cefn. Water pollution caused by disturbance has affected the river on numerous occasions. The work has over run, caused blockages and we understand is now being redesigned following floods. A point made in our objections to a proposed and now granted scheme for Maes Elwy just down–stream on the same river. In spite of our concerns we do not believe that the NRW take into account the cumulative effect of such structures on a spate river.

We still state that such schemes are a risk to endangered fish, will cause pollution and possibly flooding in the future. With little if any “Green Benefit”. Who will be left to clear up the damage caused not I suggest the Contractors or Hydro Owners?

In any case we have no faith in the resources the NRW have to manage the implementation of such in River schemes. I give an example of how little oversight takes place in ensuring the approved design is what is actually

constructed. On the River Dee at Chirk, there is a well-known weir adjacent and owned by owners of a Fish Farm. Note the River Dee is one of the most highly regulated Rivers in the UK. Approval was given to allow the weir owner to carry out necessary repairs to the face of the weir. We understand and that it is alleged that whilst carrying out this work additional repairs had to be carried out on the top and toe of the weir.

The result being, we believe that the weir may now be an impediment to the passage of migratory fish. We further understand that the NRW are unclear as to what works have taken place. How what now exists differs from what was original and then proposed. If the NRW cannot manage a project on such a strategically important river as the Dee, what hope have we that proposed Hydro Schemes now approved on the River Elwy will be carried out in accordance with any approved design.

You might feel that this discourse is just a litany of complaints and we object to any change for the sake of it. Further that we have little or no regard for the financial circumstances we as an economy now face. Nothing could, or, is further from the truth. I stated in my submission in April 2012 that we have long held concerns over inappropriate land management. Such practices such as over abstraction, pollution, bank erosion inappropriate use of pesticides will be major reasons why we will fail to meet our WFD objectives. We note 5 years on, improvements in many areas on WFD targets have been made, but we have a long way to go. In 5 years' time the second round of targets will have to be reached. We along with NRW and all interested bodies do not want to see us fail. We are afraid that unless genuine resources are put in place, backed by well-motivated skilled and empowered staff we will fail.

With budget constraints coupled to feelings of genuine ill will towards the NRW (please note this is definitely not a criticism of local staff whose hands are often tied). The lack of cooperation from the "Third Sector" we believe we will struggle to hand over to our children a better environment than that which we inherited. Only when the true value of the unique environment which we have is valued and sympathetically managed will we collectively say - we've done a good job.

Regards

David Jones
C/O Panorama