

Cynulliad Cenedlaethol Cymru

Y Pwyllgor Amgylchedd a Chynaliadwyedd

NRW 2015 – 58

Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015

Ymateb gan Seiont gwyrfai and llyfni anglers association (Saesneg Yn Unig)

9th April 2015

Sustainability Committee

I write in response to the request by the Sustainability committee to submit evidence about experience of working with NRW/CNC.

I am Chairman of The Seiont, Gwyrfai and Llyfni Anglers' Association. I am also a trustee of the Conwy, Clwyd and Gwynedd Rivers Trust. I am chair of the Gwynedd Local Fisheries Group held by NRW.

I have therefore some experience of working with NRW and EW Wales previously. The letter from the Sustainability committee asked for information about:

Experience of working with NRW

And/or accessing services from NRW

How it is delivering its statutory functions.

1. Working with NRW.

2: We have regular contact with local staff and I feel a good working relationship has continued since the days of EAW. It is obvious that resources are limited and this limits the practical help available for many local projects.]

3: There has been poor communication at times; Specifically in September 2014 - during our peak seatrout night fishing season flood defence engineers accessed the mouth of Afon Llyfni across our land and opened up the sea pool - thus reducing the depth of the pool such that seatrout would not lie there. When we complained at this discourteous and unwarranted intrusion and disruption of our fishing we were informed that the action was undertaken because fish were felt to be at risk from poachers. This could have been handled better, or avoided with simple discussion beforehand.

4: On a national level I am sure I am not alone in reporting the negative impact of the review of stocking policy and subsequent decision to stop stocking of salmon and seatrout in Wales. This was widely felt to be a "consultation" that needed to be undertaken to satisfy procedure before the decision was imposed. While evidence in favour of ending stocking was presented there has been considerable doubt expressed regarding the selective and inappropriate/irrelevant nature of some of the evidence, as has been pointed out since. There was widespread opposition to the closure of the hatcheries and I feel that the way it was achieved had left many anglers and angling bodies with extremely negative feelings towards NRW

5. This has significant implications for our fishery as we have a legal mitigation agreement in place since the 1980's following the construction of the Dinorwic hydroelectric plant. This provides for stocking to achieve a certain number of smolts produced. With no further stocking "alternative mitigation measures" (as outlined in the agreement) must take the place

of stocking. Given the enormous loss of spawning and rearing habitat in the Dinorwic scheme it appears unlikely that any amount of habitat work could achieve this. Such schemes as we have suggested (opening up further obstructed streams, re-establishing piped streams) meet the inevitable answer of cost limitations and flood defence issues etc that render them unattainable. We have been informed that the budget for mitigation for the Dinorwic scheme is £18,000 p.a for an initial 5 years. Realistically little can be achieved with such a budget.

6. Accessing services from NRW.

Much of the above applies to accessing services as well.

7. Delivering its statutory functions.

Much of my experience relates to the time of the EAW rather than NRW. However, during the past year we as an angling club, through the services of Fish Legal, have had to take legal action against NRW for failing to enforce appropriate action on Dŵr Cymru with regard to Llyn Padarn. During the time of EAW we raised the issue of Llyn Padarn's pollution repeatedly but were dismissed, until we took legal action in 2009. Since that time there has been data to confirm the ongoing pollution over decades. While this was on EAW's "watch" we remain disillusioned that at this stage-6 years after the acknowledgment of the pollution - that we are still in legal debate with NRW over their performance of their statutory functions.

7. Furthermore, on a local level we were pleased that EAW objected to the Quarry Battery development in Llanberis, which would have impacted on the SSSI of Llyn Padarn. We were dismayed, however, to see that in April 2014 the newly formed NRW no longer objected to the same plans. We have watched the piecemeal destruction of a once prolific salmon and sea trout fishery by the gradual accumulation of negative factors- road culverts obstructing streams/ornamental pond/lakes being constructed, repeatedly highlighted polluters ongoing/increasing activity over many years-both private individuals and Dŵr Cymru, and the major impact of the Dinorwic Scheme, while the previous EAW appeared to offer endless assessments and reports but no significant action.

8. Sadly, I feel that the Seiont would be an excellent example of how various factors can cumulatively harm a fishery. I am not certain that it would be a good example of how NRW can protect a fishery from such harm.

Dr. Robin Parry

Cadeirydd, Cymdeithas Pysgotwyr Seiont, Gwryfai a Llyfni