

National Assembly for Wales
Environment and Sustainability Committee
NRW 2015 – 57
Natural Resources Wales – Annual Scrutiny 2015
Response from The Wye & Usk Foundation



Registered Charity No. 1080319

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Wye and Usk Foundation (WUF) Response to Senedd Annual Scrutiny of Natural Resources Wales

Background

1.1 WUF was formed in 1995 to meet a need in fisheries and riverine management – the actual delivery of improvements such as habitat restoration, fish passes and the like. WUF is restoring two of Wales' best known salmon rivers, both EU Special Areas of Conservation, covering approximately 6000 Km² (including Herefordshire). We have raised and spent approximately £1.5million annually and have engaged and trained our own skilled workforce. Our fisheries letting scheme brings in an addition £1.75million to the rural economy and we have created and sustained an estimated 65 FT job equivalents.

1.2 The Wye is one of the few salmon rivers showing an actual year on year improvement (based on 5 year average catches) and WUF has developed several original restoration techniques including the successful amelioration of acid rain, quick and effective ways increasing habitat cover and so on, now widely used in the restoration of rivers across England and Wales. We have 24 FT staff and offices in Talgarth.

Natural Resources Wales

2.1 WUF has worked with a series of historic Agencies: National Rivers Authority, Environment Agency (EA), Natural England (NE), Environment Agency Wales, Countryside Council for Wales, Forestry Commission (FC England and Wales) either as partners or in their regulatory capacity. The author recalls previous incarnations: the Nature Conservancy Council and Welsh Water (as a fisheries agency). Today we work with NRW and its English counterparts (EA, NE, FC)

2.2 There were commonalities, not least the apparent need to reorganise every 5 or so years, adding or splitting off component functions. However in all cases the quality of the local staff has always played a very significant part in the success or failure of the relationship between stakeholders and the agency of the day.

2.3 For a country the size of Wales, it is probably difficult, even if it was desirable, to maintain separate environmental organisations (ie the three legacy bodies). We therefore applaud the creation of the Single Body despite the significant tensions between the constituents and in particular, the adoption of the "Ecosystem Approach". We hope it signals a much more environment friendly approach by the forestry section, formerly a serial water polluter.

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2.4 Wales' environmental legacy includes significant 'chronic' damage from the industrial revolution. More recently, unmanaged agricultural intensification and plantation forestry is now a significant cause of environmental problems on top of developmental pressures. Add Climate change and a reducing budget plus the 'baggage' of each legacy body and it is appreciated that NRW have very significant challenges ahead of them.

2.5 Important EU Directives set standards for rivers (the Water Framework Directive), protected sites (Habitats Directive) and our own SSSIs standards all presuppose high ecological standards while the principle of ecosystem services for the nation's benefit rely on either our citizens and stakeholders caring sufficiently for the environment or effective legislation (or ideally both). A brief look at the litter thrown from cars on Wales' scenic highways, into our rivers and down our cwms and valleys suggests that environmental concerns are not paramount for our citizens.

2.6 Another challenge for any environmental agency is being both regulator and service deliverer. Historic changes have tended to shed delivery services and focused more on regulation, there being no greater example than in 1989 when the National Rivers Authority was created to oversee inland fisheries and regulate the water industry. Today the challenge of delivery of inland fisheries for example, against historic expectations, with virtually no budget is a cause of much criticism.

2.7 With the offer of early retirement to reduce the size of the organisation, it is a concern that it may not always be the least useful staff member who retires.

The National Assembly's Environment and Sustainability Committee: Responses to date

3.1 Scrutiny of the written responses submitted to date (9th April) include a large number from the freshwater angling community. Almost without exception, they are highly critical of NRW and since this is WUF's area of expertise we feel it appropriate to comment. The concerns include: reduced catches of salmon and sea trout, (obviously), increased percentage catch by the estuary and marine net fisheries, water quality, damage by fish eating birds and even invasive weeds. Many seem oblivious to the fact that NRW has only been in existence for two years when they refer to the long term element of these declines. We referred earlier to inherited 'baggage' and these criticisms were evident before NRW was formed.

3.2 Surprisingly, there was no concern that fishing licence money was being deployed to run NRW and not directly to the 'sharp end' of fisheries, nor that, as there were more visitors to Wales from England than vice versa, licence money was attributed to the home address of the purchaser rather than where they fished and that the sustainable fisheries funding was no longer ring fenced for that purpose.

3.3 Overwhelmingly however, the principal criticism is about the closure of all salmon hatcheries across the country. Allegations of failure to consider all available evidence, undue cost cutting and so on have been levied, unfairly in our view. There is no evidence that any welsh hatchery out preforms natural reproduction. Wales has one "index" river, the Dee where salmon are counted in and smolts (emigrating salmon juveniles) are counted out. It is possible to compare the success of natural spawning with that of reared fish. There are other similar monitored rivers in Ireland, England and Scotland and results are collated centrally: all confirm this.

3.4 The Wye suffered a thirty five year decline from the year (1974) when a hatchery was introduced. We believe that from that date, the essentials of fishery management were abandoned in the mistaken, almost religious belief that hatcheries would cure all fishery issues. Barriers to migration were built without passes

and an entire tributary system witnessed the extinction of salmon. However, the PR machine of the day promoted hatcheries and another river recovering from industrial pollution like our own Taff, the Tyne, had a hatchery.

The cause of the recovery of both these rivers was removal of the pollution barrier; the perception by anglers was that restoration was by hatcheries. A favourable rate of return of salmon and sea trout in the '80s appeared to endorse that view. Hatcheries do not work as well as natural spawning and NRW were brave to tackle this "Elephant in the room".

3.5 There will have been important lessons learnt on the PR aspect of this action: never assume that because you act on the best available science, logic and economics, you will carry the support of anglers.

Further Comments

3.5 The inland fisheries of Wales today deliver an important contribution to our economy and is a truly natural resource, but it is a shadow of what could be the case if we had viable fish populations. Farming delivers £217 million to the rural economy with a grant of £360 million. Fisheries: about £75 million with a grant of about £2.6 million. We are missing an important potential gain here.

4.1 It is likely that NRW is or will be pressed just to find funding to manage its basic functions, let alone any significant environmental challenges. We suggest that what is available is used to ensure the regulatory side of the business is prioritised. Delivery of some functions could be (further) transferred to willing and competent partners. We refer specifically to the functions **of Biodiversity, Fisheries and Recreation** but include other aspects.

4.2 Rivers trusts (such as WUF), Wildlife trusts and other NGOs raise funds from supporters, other trusts and draw project funding from Lottery, EU, Landfill and many other sources. With a partnership with NRW in regulatory mode, much of these difficult issues could be managed successfully and much more cost effectively. While NRW has espoused the virtues of partnerships, why has this not happened more comprehensively to date?

4.3 NRW are nearly but not as critical about NGOs as the criticism they themselves receive. Separating regulation ("Bad Cop") from delivering NGOs ("Good Cops") is not the most attractive prospect yet it offers an ideal solution for Wales. Would anglers criticise NRW so much if they were more responsible for outcomes? It would however be necessary to develop certain NGO capacities in parts of Wales.

4.4 NRW has been by far the bravest fisheries regulator to date: NRA failed to tackle the hatchery issue in totality when given the chance in 1993, despite compelling evidence of poor value and survival. Perhaps critics need to understand that on top of national funding shortages, a massive organisational upheaval is taking place. It could and should lead to a more integrated service but ultimately will it have the necessary independence to guard and protect our hugely important national environmental assets and ecosystem services?

Dr Stephen Marsh-Smith OBE

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