

**Working Together Consultation 22 June 2018 to 22 December 2018  
Written Consultation Response**

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<b><u>Response summary</u></b>	<p><b><u>Delete as appropriate;</u></b></p> <p><b><u>Yes I would like a copy of this response to be included in a summary for the next consultation</u></b></p> <p>Any response you send us will be seen in full by NRW staff dealing with the issues which this consultation is about. It may also be seen by other NRW staff to help them plan future consultations.</p> <p>NRW intends to publish a summary of the responses. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.</p> <p>Names or addresses we blank out might still get published later, though we do not think this would happen very often.</p> <p>For further information about how NRW processes personal data and your rights please see our privacy notice on our website <a href="https://naturalresources.wales/?lang=en">https://naturalresources.wales/?lang=en</a></p> <p>The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including NRW. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would</p>

	get in touch with the person and ask their views before we finally decided to reveal the information.
<b>Would you like your details to be added to our WFD stakeholder list to keep you updated on this work.</b>	<b><u>Delete as appropriate;</u></b> <b>YES</b>
<b>At what scale are you responding?</b>	<b><u>Delete as appropriate;</u></b> <b>All Wales</b>

### **Consultation Questions**

- 1) Does the programme set out include all of the significant steps necessary to review and update the River Basin Management Plans?

Afonydd Cymru is the representative organisation for the six rivers Trusts of Wales. These are fundamentally ‘bottom up’ organisations that work to bring tangible improvements to our rivers, their ecosystems, fisheries and the economies attached to them. Typical annual expenditure by the six within the three RBDs will be over £5m next year and this goes directly on such projects as Farm Advisory visits to improve diffuse pollution, habitat restoration, fish passes and the like.

The problem for organisations like us is that there is seldom any part of a ‘visionary’ consultation like this that applies to the actual delivery of WFD river improvements – our particular forte - so in answer to the question:

**Maybe, but probably not**

- 2) How do you want to work with us in updating the River Basin Management Plans? Please include what level of involvement (inform, consult or working together to solve problems) you want and specify what methods you would prefer?

Does NRW want to separate their processes relating to WFD planning entirely from the actual delivery of the required actions? The chasm is already too wide. We will continue with our river improvement projects whatever obstacles are put in our way. Many of our trusts complain of massive time delays and extremely slow delivery of agreed funds. We do appreciate the need to advise NRW of relevant actions undertaken and it is apparent from our omission from the list of conservation groups (Appendix 5) that what we do is not at all well understood. A list of current Wales wide river improvement projects in progress or planned by Trusts is available on request.

An example of how delivery and planning could work together is more than amply demonstrated by the [Wye Catchment Partnership](#) of which NRW is a member. Here, all sectors involved and concerned with the river water quality: water companies, farming groups, local authorities, Biodiversity concerns and industry work closely together to deliver WFD improvements. Seed funding has enabled one of our members, the Wye and Usk Foundation to form and coordinate the group which has levered in £millions to be focussed on WFD issues.

3) Do you have suggestions on how we can improve our communication with you for updating the River Basin Management Plans? Have we identified the right organisations that need to be involved in reviewing and updating the River Basin Management Plans? (see Appendix 5)

We think the Water Forum is a good start as it allows communication across and about the three RBDs. However, you also need to ask the right questions and give full answers. Please tell, for example, how you expect to deal with EC belief that the previous RBMPs were “insufficiently ambitious” and lacking in delivery.

If the substantial number of forums, sub groups, committees, consultations, task and finish groups, plans and media outputs equated to better water quality, then Wales would have some of the best water quality in the world. However this is far from the case and it is only by some ‘skilled tactical’ monitoring techniques that any improvement have been measured. More detailed monitoring in England has resulted in fewer WBs reaching ‘good’ status. Should not the same happen in Wales if we are true to our environmental principles?

4) (a) Have we identified all the plans and strategies that affect, or are affected by the River Basin Management Plans? See Appendix 3. If not, please tell us what other plans and strategies we need to be aware of?

**No** There is no mention of inland fisheries in Appendix 3. It deserves a section of its own or possibly could be included in the Biodiversity section as a subheading. There is concern generally amongst Afonydd Cymru’s membership and the angling sector as a whole that freshwater fisheries have been quietly forgotten despite fish being the most easily used biological WFD parameter. It is worth reminding NRW that the 1995 Environment Act is still in force in Wales requiring NRW to “Maintain Improve and Develop” our freshwater fisheries. This is not exempted by the more recent welsh legislation as evidence suggests and some NRW staff suggest. Since taking over in 2013, nearly every Salmon River has declined its conservation targets.

Since fish are one of the indicators in the WFD, the level of failure of our migratory fish species is not properly reflected in WFD and Habitats Directive Targets. This is a national disgrace.

- (b) Can you identify any opportunities to integrate the River Basin Management Plans with other plans and strategies?

**YES**

- (c) How do you think the consultation on the updated River Basin Management Plans and Flood Risk Management Plans can best be co-ordinated?

By producing outputs and actions that deliver the required results

- 5) What opportunities can you identify in developing Area Statements that would join up with the River Basin Management Plans?

An identified problem with Area Statements is that their MO runs slightly contrary to the accepted whole catchment management approach, with some rivers split across different areas and key technical/ fisheries staff dispersed awkwardly around NRW. We worry that this new tier of bureaucracy brings little to help the aquatic environment while sapping energies to work out how to apply the new arrangements.

- 6) Do you have any comments on how we can get the best out of our new Wales Water Management Forum, as it continues to deliver the role of the Liaison Panels, but takes on a greater role mirroring the work of the Wales Land Management Forum?

Getting the NRW Forum staff out a bit more: they need to see issues and problems 'on the ground' so that they can report in a less abstract way



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- 7) We propose to explain how we have considered your response to this consultation when we consult on the significant water management issues in 2019. Previously, we have published a response document for each consultation. Are you satisfied that this is a reasonable approach?

**Yes**

Afonydd Cymru Cyfyngedig

December 2018

