

A concern has recently been brought to Afonydd Cymru's attention regarding the frequency of CSO discharges to Bathing and Shellfish Waters. Whilst marine and tidal waters are not strictly part of Afonydd Cymru's (AC) remit, a number of these assets discharge into rivers which form part of the designation. More importantly, AC is now concerned that the approach to these assets is similar to the one now agreed and being applied by the WG Taskforce for Better River Water Quality. It is imperative therefore that we are clear on how permit conditions will be applied and assets will be maintained to future proof investment decisions in the next AMP.

Unlike other CSO permits, CSOs discharging into Bathing Water (BW) and Shellfish Waters (SFW) have set frequencies defined on their permits. These frequencies are typically 5 spills per BW or 14/26 spills per SFW. We recognise, however, that in some cases spill frequencies have been set that are based on modelled catchment data which may allow some CSOs to operate above this frequency. The published data does not provide sufficient data to clarify this.

In the 2021 published EDM dataset, there seem to be 38 out of 126 instances where CSOs have discharged into BW and SFW in Wales exceeding their spill frequency targets. We also note that the Annual Performance Report on Water Companies published by NRW does not cover any metrics on these assets.

AC is not aware of any actions that have been taken against Dŵr Cymru for these exceedances by either NRW or Ofwat. We seek clarification please as to why this is the case? As we move towards a new permitting regime for all CSOs and defined spill targets on permits, AC seeks reassurance from both NRW and Ofwat that permit conditions will be met and necessary measures will be taken when they are not.

Further to this, we are concerned that perhaps previously funded schemes to deliver BW and SFW improvements have not been funded adequately for required maintenance as climatic changes occur which are testing the resilience of the wastewater network. For example, a number of the failures noted in 2021 were in the Loughor Estuary an area which received significant funding in the previous AMP and delivered a Rainscape approach which we would have hoped should have resolved these failures.

Whilst Bathing Water status in Wales is one of the highest in the UK and Europe, we must not lose sight of the fact that permit conditions for all purposes must be met and that the conditions should be appropriately enforced by both NRW and Ofwat.

We look forward to a meeting to discuss.

With kind regards,



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