

**National Assembly for Wales**  
**Environment and Sustainability Committee**  
**NRW 2015 – 34**  
**Natural Resources Wales – Annual Scrutiny 2015**  
**Response from Andrew King**

**National Assembly for Wales, Environment and Sustainability Committee**

**Response to Consultation: Natural Resources Wales (NRW) – Annual Scrutiny 2015.**

Thank you for the opportunity to contribute my personal views on aspects of the performance of Natural Resources Wales. I write as a resident of Wales, with the utmost concern for the manner Welsh environmental affairs are managed. I do not write on behalf of any organisation. It has been hard to distinguish whether some of my criticisms should be pointed at NRW or at meddling by Welsh Government. I am happy these comments are displayed; all are relevant to the work of your Committee but may not be relevant to NRW.

While some may argue that NRW is still a fledgling body and that it should be given time to mature, evidence suggests that NRW is performing badly.

The concept of amalgamation of three former organisations Countryside Council for Wales, Environment Agency (Wales) and Forestry Commission (Wales) each with important roles was, I believe, flawed from the start. The motive was obviously one of slashing overall costs to Welsh Government, at the expense of how effective a new body carries out its duties. Long and continued mismanagement of NRW and its work, interference by Welsh Government, and delays in sorting out priorities of work and team structures, have all had unsettling effects on staff and their morale. It confirms to the public in Wales that the system is broken and requires urgent change to create a body that could carry out its roles responsibly and effectively.

Sadly, the very name of the organisation does not help with its duties – Welsh Government obviously treat it as ‘Plundering Natural Resources in Wales’ as air, water, timber, tides, soil, biodiversity are all considered as fair game for abuse and exploitation seemingly at any cost.

It is NRW’s primary role of Nature Conservation Agency in Wales that concerns me most, and on which I wish to concentrate. Protection of the Welsh countryside and its biodiversity is of paramount importance. There is scope for species and environmental protection as well as some allowance for sustainable development of the Welsh economy and serving vibrant communities within Wales. Indeed, some fine work is ongoing in the Black Mountains with NRW taking a lead role. However, there appears to be an overriding influence from the top to ‘develop at all costs’. It is all well and good developing tourism but that will only succeed if Government policy has not harmed the very fabric of the Principality.

1. While NRW staff locally are of high quality and doing their utmost to carry out duties in the face of these difficulties, it is of great concern to me that so many experienced and highly-qualified staff have left. How can a body with a statutory nature conservation duty undertake it effectively without staff with appropriate skill-sets? Such a body should have available staff with these qualities to lead in educating and creating a wider understanding

of all forms of biodiversity. For example, knowledge relating to lower plants (Fungi, Lichens, Bryophytes) is already at a low ebb, with the risk that species will become extinct in Wales without appropriate mitigation advice.

2. The relationship between NRW and their masters. The Welsh Government and its Ministers appear to be interfering with NRW and its effectiveness. Most worryingly, ignoring or meddling with NRW advice in order to push through major projects which have highly questionable benefit to the Welsh economy, and at the same time destroying the environment. The M4 Relief Road, Circuit of Wales and Deeside Enterprise Park are prime examples – I am sure there are more. ‘White Elephant’ developments such as these will make a laughing stock of Wales, destroy large areas of valuable and designated habitats and confirm that values, opinion and finances of the Welsh public can be flagrantly ignored and wasted. Interference by Government MUST cease, and any future NRW should be wholly independent.
3. Species protection and licensing. Wales is still fortunate to hold some species protected under both European and domestic legislation – long may this be the case. NRW issue licences to permit sensitive monitoring, disturbance, handling, photography, etc of these species (A). Secondly (B), in work inherited from the Welsh Assembly, that of issuing licences to deter or control badgers, piscivorous (fish-eating) birds, etc where harmful effects on agricultural or fishery interests are claimed.
  - (A) – in carrying out this role, taken over from CCW, licences issued to field workers now carry requirements and conditions attached such that study (in the main by experienced and committed volunteers) becomes virtually impossible to carry out. These conditions appear to have no legal basis, and have had the effect of turning knowledgeable naturalists away from such interest, compounding the problems highlighted in point 1 above. Cynics would argue that this is part of the grand plan - such a lack of detailed biodiversity and site information leads to uncontested planning applications and therefore no mitigation costs to meet. Convenient, that.
  - (B) – issue of control licences. While I cannot comment on badger control to limit spread of Bovine TB, the issue of licences by NRW to control piscivorous birds on Welsh rivers has been grossly mishandled. Licences have been issued without questioning the inflated claims of damage caused by these birds by inland fishery interests. Prior to 2013 when the NRW took over this work, The Wildlife Team, Welsh Assembly (WA) previously responsible for consideration of applications, carried out this role using sound science. WA organised counts of these species annually along the Wye and other rivers to properly assess whether a licence was justified. Since 2013, NRW have issued licences wholesale, without any evaluation or policing of actual numbers shot, such that Goosanders have declined by over 60% in just two years. NRW needs to assess these licence applications using proper science to gauge population size, rather than wildly exaggerated claims by fishermen (and no doubt NRW Board members!). If in doubt, ask county recording networks. Old licences should be rescinded, with no new licences issued – otherwise, NRW risk total blame for extinction of another breeding species in Wales, and all the adverse media coverage that will accompany it.

4. Forestry practices. Several rare birds and insects (some protected) have been affected by untimely by forestry activities in recent years. This is mostly associated with large-scale felling or preparation of planting coupes during the bird breeding season. While I appreciate pressing needs to control tree diseases and avoid the worst of winter weather, permitting these works to be carried out in summer months is reckless. There is no excuse for destroying active breeding sites, and is contrary to the Wildlife and Countryside Act 1981. Proper assessment of species interest on forest sites before work commences is essential. If NRW staff cannot identify affected species or do not know what sites might hold, then they should consult appropriate biodiversity databases, or engage those that do know.
  
5. Respect for the countryside and its wildlife. Many of the above inadequacies show a complete disregard for the fortunes of species in Wales. Declines in wildlife as highlighted in The State of Nature report (2013), published in the same year as NRW came into being, shows how fragile much of our wildlife has become. While not all laying at the door of NRW, increases in general littering, illegal fly-tipping, felling of mature trees by highways and across farmland, removal of hedgerows, ploughing of old pastures, overgrazing, use of insecticides such as Cypermethrin, illegal persecution and poisoning of birds of prey by gamekeepers on Welsh pheasant shoots, all threaten the Welsh countryside and its species interest. The Committee should ask how many NRW board members are complicit to these on their land – you might be surprised by the answers.
  
6. Much is being played on Wales as a tourist destination – maybe we cannot damage the mountains themselves, but just about all other habitats, views and values held in Wales are being eroded at an alarming pace. Welsh Government and Natural Resources Wales appear happy to let this happen on their watch, threatening so much that is valued by residents and tourists alike.

I trust my efforts in highlighting these deficiencies will not be wasted.

Yours sincerely

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