This response is as a critical friend, bringing forward points that unless addressed could mean that the Rivers Trusts in Wales are unable to function successfully.

1. In common with all the small Rivers Trusts in Wales the South East Wales Rivers Trust has always relied on grant funding to carry out its work to benefit the environment, bringing with it social, educational and economic benefits to local communities and beyond. The Trust was formed in 2007 and has delivered a large programme of improvements across the former Industrial Valleys of South East Wales from the Ebbw Fach in the East to the Ely in the West. Our organisation is volunteer based and sets out to run value for money projects with funding to work on the riverine environment to make improvements to comply with the Water Framework Directive.

2. Our concerns centre on the Competitive and Partnership funding arrangements that were announced by Natural Resources Wales last year. During the time between the official launch and the opening of the system for applications, there was a lot of uncertainty about the timing of the bid process, but we were assured that it was likely that the deadline for submitting applications would be December 1st 2014.

3. However, when we were invited to apply in September, we were told that the deadline was only six weeks away. This left us at an extreme disadvantage to try and look for the 50% match funding that was required.

4. Whilst we appreciate that Natural Resources Wales has a responsibility to ensure best value from expenditure, the match funding requirements have a disproportionate impact on small organisations such as ours. Larger organisations have better fund raising resources, and financial reserves that can act as a guarantee for match funding so that credible bids can be submitted and processed while match funding is sought if it isn’t already in
place. Our Trust has none of these resources, and as a result had to submit a JWP bid knowing that we were unlikely to find the required match.

5. Rivers Trusts were set up to carry out some of the duties that Environment Agency Wales was finding difficult to achieve. We managed to obtain EU funding from Afonydd Cymru as well as small grants from Countryside Council for Wales, and with the help of unpaid volunteers have carried out excellent projects to help bring our rivers towards the European WFD standard. This success encouraged Environment Agency Wales and then Natural Resources Wales to joint fund a number of projects under the old funding arrangements, and we were able to deliver outstanding value for money. However, the new funding system stands to put this all in jeopardy.

6. This is no better demonstrated than the case of our Clean the Clun project. NRW gave us a grant of £25,000 in June of 2014 to launch a small-scale catchment restoration on a tributary of the River Ely. We recruited an excellent project officer who has made a tremendous impact in the nine months that the project has been running. We were told to apply for funding under both the JWP and Competitive funds to continue the project for the next three years. In December we learnt that while we were going to be given some funding. Imagine our disappointment and surprise when we learnt that it was only 15% of the annual project budget, meaning that the Trust would have to find 85% match funding for a project that is working to restore the worst performing river catchment in South Wales. At this funding level, the project is untenable, and it is likely that when the current funding runs out at the end of June 2015, the project officer will be dismissed and the volunteers that have been recruited will be disbanded.

7. One of the fundamental issues we face is the difficulty in obtaining match funding for river restoration work. Given that much of this work is driven by the requirements of the Water Framework Directive, the response of many potential funders that we have approached is ‘Why would I give you money to pay for work that is the responsibility of Welsh Government and Natural Resources Wales?’ We recognise that one of the best sources for match funding is the EU, but the length and complexity of the bidding process is beyond a small organisation such as a Rivers Trust, again swinging the balance in favour of the large organisations that have the resources to bid for and win European money.

8. We are also concerned at the amount of overall funding that has been directed to river restoration and fisheries. Based on discussions with other River Trusts, we have concluded that the proportion of funding that has been allocated to our sector does not reflect the importance of the fisheries to the Welsh economy, or the importance of the rivers in delivering ecosystem
services. We look across the border to the Trusts in England that have benefitted over the years from the River Improvement Fund and more recently the Catchment Restoration Fund from DEFRA and can only conclude that rivers simply aren’t a priority in Wales.

9. The future is more uncertain as the Sustainable Fisheries Fund as it was, originally ring fenced by Welsh Government for this purpose, has now we have been told due to new ways of working, been put into a central pot for all departments to bid for. This means less for fisheries and more uncertainty. A look at what was achieved by fisheries through the use of this fund would produce some staggering outcomes of cost benefit.

10. The following question was posed in the West Wales River basin Management Plan: **Removal of barriers to fish migration through the sustainable fisheries programme in Wales.** This statement flies in the face of the above where for reasons, still not explained properly, the ring fencing of this fund was taken away. The question should be asked was this decision taken with the approval of the Welsh Assembly Government.

Yours sincerely,

Anthony Rees MBE
Chairman