

National Assembly for Wales
Environment and Sustainability Committee
NRW 2015 – 29
Natural Resources Wales – Annual Scrutiny 2015
Response from Conwy Valley Fisheries & Conservation Association (CVF&CA)

The comments below are on behalf of Conwy Valley Fisheries & Conservation Association (CVF&CA) representing riparian owners, fishing clubs and associations within the Conwy catchment (approx 600 members).

In addition I write as an individual with interests in the Dee catchment and as a member of the Clwyd, Conwy and Gwynedd Rivers Trust (CC&GRT). My comments should not be taken as representing the opinion of the Rivers Trust they are my personal observations from dealing with NRW on fisheries issues relating to the CVF&CA and the CC&GRT.

1. The formation of NRW saw a further reduction in fisheries personnel. The impression is that NRW has little or no concern for the aquatic environment or for that matter their responsibility for the protection of fish as defined in the Salmon & Freshwater Fisheries Act. The re-organisation of management has seen experienced fisheries officers replaced from other disciplines that have little or no knowledge of the aquatic environment. We were advised at the last Gwynedd Local Fisheries Group (LFG) meeting that the management change would take some time to settle down and that it was a steep learning curve. It is becoming apparent that the new management team has a different agenda from the previous fisheries management team who focused on the welfare of our rivers. The focus is now on reducing costs and passing work previously undertaken by EA(W) fisheries personnel to third party providers whilst ignoring the concerns of their stakeholders or for that matter the health of the rivers of Wales, these are seen as an adventure playground or to be used for hydro generation/commercial exploitation irrespective of the environmental damage which may result from inappropriate activity.
2. The recent decision to cease stocking of migratory fish in all Welsh rivers and the closure of the NRW hatcheries has been based upon 'evidence of harm' from the use of hatcheries. Having reviewed more than 200 papers listed by NRW, in a bibliography of evidence of harm, none of these research papers claims that mitigation stocking is harmful and several of the papers have no relevance to hatcheries or stocking. The mantra from NRW is that there is 'emerging evidence of harm' but in reviewing the evidence sent to me following an FOI request to demonstrate this 'emerging evidence' I can find no such evidence of harm, emerging or otherwise. In my research for information I obtained a copy of a 2010 paper of a business review of hatcheries carried out by EA(W). In this document it lists all of the statutory mitigation stocking schemes, following impoundments, which cut off spawning areas for migratory fish, including the cost of running these schemes and subsidies received via Water Company abstraction licences. The 2010 hatchery review was drafted by the same person who prepared the bibliography of 211 research papers purporting to demonstrate harm from the use of hatcheries. It is not known if the 2010 EA(W) hatcheries report was made available to the NRW Board prior to the Board meeting in Menai Bridge in October 2014 my suspicion is that this information has been withheld from the NRW Board who were subsumed with what appeared to be evidence of harm from the use of hatcheries in order to justify the hatchery closures. The statutory requirements for mitigation are clearly stated in the 2010 hatchery review and yet

NRW has claimed that there is no legal obligation to mitigate for the loss of spawning grounds. The imposition of cessation of stocking from third party hatcheries when there is no evidence of harm beggar's belief.

3. NRW has stated that it will use an ecosystem approach which will mitigate for the poor levels of migratory fish in Welsh rivers and yet there is no evidence, as yet, that an ecosystem approach will work. What is clear is that an ecosystem approach cannot make up for the lost spawning grounds for migratory fish above impoundments. Under the Water Framework Directive NRW must ensure free passage of fish beyond manmade obstructions or where this is impossible other methods must be used e.g. use of fish traps, hatcheries or fish ponds.
4. We are lead to believe that NRW see River Trusts as a third party provider and yet the Rivers Trusts in Wales are starved of funds. In a recent round of community grant applications two proposals for improvements to the ecology of the rivers and streams within my own Trusts area were rejected. Whilst NRW declare that they are looking for third parties to undertake this work our grant applications were rejected as they 'did not have sufficient community involvement'. A meeting with an NRW manager to discuss why our grant applications had been rejected showed just how little the present NRW management know about the aquatic environment. Perhaps as the manager we spoke to was an ecologist (Ex CCW) this was to be expected but it is extremely frustrating when Rivers Trusts cannot obtain funding for vital ecology work. As Treasurer for my own Trust I am well aware that we only have sufficient funds to continue through 2015. Our funds are spent on administration costs i.e. trustee and general insurance our volunteer workforce receives no payment or expenses for the work they do. We have no source of income and yet NRW considers that Rivers Trusts can undertake work that they used to do at considerable cost. Our volunteer workforce is quite rightly disgusted with the overall performance of NRW and we are struggling to keep them on side: NRW has lost its stakeholder confidence.
5. The change to 'intelligence lead' enforcement instigated by the previous administration (EA(W)) has seen a further reduction by NRW of enforcement staff coupled with an increased workload for enforcement officers away from rivers. This has enabled poaching to increase on our rivers at a time when our fish stocks are at an all time low. The 0800 number used to report incidents is a joke. Anyone reporting a poaching incident is asked for a map reference as the call centre has no idea of the location of the caller, we don't necessarily have map references in our heads but we know where we are on our rivers. Following a call it can be up to two days before anyone from the NRW enforcement team contacts the caller only to be thanked for the 'intelligence' and they will mark the incident on the map, only if they see a pattern will they take action – poachers are mobile and operate in the sure and certain knowledge that they will not get caught.

Management of change of this magnitude following the merging of three distinct organisations was always going to be fraught with difficulty. However the perception is the new organisation has little or no regard for the statutory requirements relating to fishery protection and from a fisheries perspective is considered not fit for purpose. The perception is of an NRW management staffed by ex CCW ecologists who through ideology are applying techniques to fisheries which are inappropriate. The general perception of fisheries officers within NRW is one of low moral with many taking the opportunity to leave due to the lack of appreciation for the work they do, reduced budgets and a distinct lack of career progression opportunities.

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