

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Cymdeithas Genweirwyr Eogiaid a Brithyll Cymru	Response from Salmon & Trout Association (Cymru)
EB 10	EB 10



Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



Committee Clerk
Environment and Sustainability Committee
National Assembly for Wales
Cardiff Bay, CF99 1NA.

June 11th 2008

Dear Committee Members,

Response to the Environment & Sustainability Committee's Consultation over the Environment Bill

The Salmon & Trout Association (Cymru) (S&TA(C)) welcomes this opportunity to respond to the Committee's consultation on the Environment (Wales) Bill.

The Salmon & Trout Association (S&TA) was established in 1903 to address the damage done to our rivers by the polluting effects of the Industrial Revolution. Since then, the S&TA has worked throughout the UK to protect fisheries, fish stocks and the wider aquatic environment for the public benefit. S&TA has charitable status in England, Wales and Scotland and its charitable objectives empower it to address all issues affecting fish and the aquatic environment, supported by robust evidence from its scientific network, and to take the widest possible remit in protecting salmonid fish stocks and the aquatic environment upon which they depend.
www.salmon-trout.org

There are three issues over which S&TA(C) would like to make submissions, all three relating to Natural Resources Wales (NRW)'s involvement in fisheries and riverine management issues.

Firstly, we believe that NRW should have regulatory powers and authority over all Welsh rivers, including ordinary watercourses. NRW has statutory obligations under the EU Water Framework Directive to bring all rivers to good ecological status or potential by 2027, and we fail to see how this is feasible without having regulatory control over the whole of individual river catchments. A recent case study in Conwy, where sea trout spawning gravels were destroyed by a flood defence scheme given agreement by the local council against NRW advice, shows the urgency with which this change in legislation is required. NRW should have as its primary objective the protection and conservation of the environment – in this case the aquatic environment – and such environmental destruction should not be permitted under any but the most urgent extenuating circumstances.

S&TA(C) believes that this regulatory role should be NRW's primary function in the aquatic environment. We would strongly support a close association with deliverers

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such as the Rivers Trusts (Afoydd Cymru) so that the third sector becomes responsible for implementing river restoration schemes and projects. Evidence shows that the third sector can deliver relevant projects more cost effectively and efficiently than public bodies, albeit with advisory and regulatory input from NRW.

S&TA(C) is especially concerned over freshwater fisheries management – we believe it must be given a high priority within NRW's role. We are generally worried that dedicated fisheries' personnel are slowly giving way to more general staff in the aquatic field and we feel this is a mistake. Fisheries management requires specialist knowledge for it to be delivered, or advised upon, effectively and S&TA(C) urges the Committee in the strongest terms to recommend that a fully functional fisheries team be retained within the national NRW setup, supporting local specialist fisheries operatives in river catchments, and liaising with stakeholders through an Inland Fisheries Group at national level.

S&TA(C) has already given oral evidence to the Committee and would welcome the opportunity to do so again.

Best wishes,

Paul Knight
Chief Executive

Richard Garner-Williams
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Chairman S&TA (Cymru)

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