

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 Sefydliad Gwy ac Wysg	Response from Wye and Usk Foundation
EB 47	EB 47





Response from The Wye and Usk Foundation to the **Environment and Sustainability Committee's** inquiry into the **Environment (Wales) Bill**

12th June 2015

The **Wye and Usk Foundation** and its umbrella body, **Afonydd Cymru** are registered charities concerned with the fisheries and ecology of rivers in Wales. Together with NRW and others they form the delivery arm of the partnership that is working to restore these crucial, natural resources and ecosystems. Clearly the new bill is a very significant and important piece of legislation affecting all of Wales's natural environment.

We acknowledge that the legal and technical aspects of the consultation have been well rehearsed and documented in the consultation response by [Wales Environment Link](#) and we have signed up to this. In addition further points have been made by:

RSPB Cymru

Wildlife Trusts of Wales

Keep Wales Tidy

....and we endorse their position in these other well researched documents.

However there are a few points we feel we would like to add to the consultation of a more general nature.

1. Inland fisheries are an important part of Wales' natural resource 'portfolio' and economy too. Aspects of their management touch on the biodiversity considerations outlined in the Bill. Successful fisheries can become self-funding with anglers and fishery owners contributing in way that assists in the improvement of riverine biodiversity.
2. Uniquely, the green tourism, biodiversity protection and enhancement that a healthy riverine ecosystem brings fits well with the Bills aspiration but requires further integration into how fisheries should be managed with the plethora of existing legislation. Currently enshrined is the Marine and Coastal Access Bill 2011 (incorporating and updating the Salmon and freshwater fisheries Acts). Water quality via the Water Framework Directive; Species – the Habitats Directive and many others and it would be good time to review WGs strategy for inland fisheries too.

3. Common Binding Rules. Although it is disappointing that CBRs are not included in Bill, we can see the argument that existing rules, regulations and laws provide a sufficient framework for the correct conduct of land use operations (farming and forestry) However, the poor results in a number of outcomes (eg water quality, Biodiversity achievement) point strongly to significant short comings in the application of the current regulatory process. We maintain that it is impractical to have a regulatory body (NRW) who is also expected to deliver projects and work outcomesand regulation. The whole notion of Paid Ecosystem Services will not be practical unless there is efficient and effective regulation of what might be termed "ecosystem disservices". Who for example who see a benefit from investment to achieve better water quality if all and sundry continue to pollute upstream?
4. Carrier Bag levy: We are very pleased to confirm that there has been vastly fewer carrier bags retrieved in our 100 mile annual litter picks. However the damage to the environment from plastic waste from other sources is well documented and remains a huge concern.. We felt the Bill might have been an opportunity to provide some possibility in the future to deal with other plastic containers that might be reused in preference to thrown away by promoting a levy on non-reusable containers of any sort.