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Carrie Moss
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Department for Environment and Sustainable Development
Welsh Government
Cathays Park
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Dear Carrie,

Re: Natural resources Wales - Proposed arrangements for establishing and directing a new body for the management of Wales' natural resources

May we thank you for offering us the opportunity to respond to the consultation document, on behalf of the Campaign for the Protection of Welsh Fisheries and the many thousands of anglers who have pledged their support to our stated aims and objectives as defined in our mission statement which can be read on the Campaign web site located at www.cpwf.co.uk.

We apologise that this submission is not submitted in a bi lingual format.

By way of an introduction we should like to make it clear that we are aware that this consultation document is a fairly high level document and as such it may be that our concerns are addressed, at least in part, at some lower level in the documentary hierarchy but as we were not offered the opportunity to read or to comment at that lower level we keen to do so here.

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"The single issue campaign on behalf of the anglers of Wales: local and visiting"*

Taking the questions as set out in your document:

Question 1: What are your views on our proposal to deliver more integrated management by bringing the three bodies together and creating a single environmental body for Wales?

We are aware of the economic necessity and consequential financial benefits of the proposal and can see that the current fiscal climate leaves little option but to embark on the restructuring, however we do have a major concern.

The existing fisheries section of the Environment Agency equates to approximately 3% of the total Agency budget as does the staffing compliment: at this level we believe that fisheries, especially the enforcement capability of that department, are almost drowned by the sheer size of the existing organisation. We are therefore concerned that following the restructure, this fisheries function, in particular, will be reduced to such insignificance that it will carry little weight and have equally little influence when fighting for budget allocation. In view of the great economic importance of angling to Wales, in excess of £100 million a year by your own accounting, this aspect of the Agency's current responsibility is worthy of special consideration and we believe that consideration should be given to making fisheries a "special case", with a ring fenced budget and an annually agreed increase in that budget based upon the increased level of potential revenue that function should and could generate for the Welsh nation.

Question 2: In developing our proposals for the body, are there additional measures we could take to address the concerns we have identified in section 2.4 or any other concerns which you have?

We note, with regret, that those stakeholders, with whom you held discussions, appeared not to include representatives of the angling community, the views of whom we feel were at least worthy on some consideration.

Question 3: What are your views on this phased approach? How could we improve on it?

We are disappointed not to see some further consultation included during the later phases as there may be stakeholder input that would benefit the assumed "lessons learned log". Often minor amendments in the early period can prevent possible trauma later.

Question 4: Do these proposals provide a good basis for the principal aim and strategic outcomes of the body? How could they be improved?

We assume that the first stated aim to "*Contribute to protecting public health and safety and to promoting economic, social and environmental well-being and outdoor recreation.*" Would include the promotion and encouragement of angling, whilst the third to "*Further the conservation, restoration and enhancement of ecosystems,*" will encompass the proposed improvements to water quality and river habitat. There is no reference to enforcement: it would be helpful, for the sake of clarity, to know where this responsibility is to be included. We note the current comments being made in the press with regard to the loss of the WDA and the loss of the benefits it brought by the promotion of Wales internationally. We are of the view that the current estimate of the revenue estimated benefit of angling to Wales as being in excess of £100 million is an under estimation and that the quality of angling in Wales is such that with appropriate marketing the national income from the sport could and should be greatly increased. We believe that there is a good business case for devolving the fisheries function to a separate and distinct body which could then be charged with selling

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the Welsh angling experience to the wider UK and international market. This approach would provide the opportunity to set business delivery targets with the potential to improve the international image of Wales whilst generating much needed income and jobs in the rural areas, which are so desperate for secure and meaningful job opportunities.

Question 5: What are your views on the approach to the delivery framework?

We would like to see some reference to the views of stakeholders be taken into account when drawing up aims and objectives to include within the proposed delivery targets. It would also be useful to see some reference to stakeholder input into the establishment of performance indicators or at least the areas of performance that it is proposed be measured.

Question 6: Are the functions described in tables 1 to 3 a reasonable summary of those required? How could they be improved?

We appreciate that the functions listed are broad: there is no reference to enforcement relating to the section: *“Maintaining, improving and developing fisheries for salmon, trout, eels, lampreys, smelt and freshwater fish.”* We are of the view that this is one area where engagement with stakeholders could and should be added as the level of stakeholder participation and involvement is currently growing, albeit slowly. It is also an area where volunteers are currently being put to good use and it would be folly to disregard to potential of their growing enthusiasm and local knowledge. We believe that at least some of the operational duties that must inevitably be lost can, at least in part, be taken up effectively by volunteer groups, such as the Campaign for the Protection of Welsh Fisheries, who are currently working with the Environment Agency, albeit in a small way, to compliment works on environmental improvements. We believe that the salmonids, salmon and sewin, are part of the great Welsh heritage that must be preserved, enhanced and be there for our grandchildren to enjoy.

Question 7: What are your views on our proposals for changes to Welsh Government functions, including Marine and Wildlife Licensing and Tree and Plant Health? How could they be improved?

The current estimates on the value of angling to Wales are based on much anecdotal evidence, especially the value of salmon and sea trout fisheries. Consideration should perhaps be given to “licensing” visiting anglers by perhaps making it a requirement that anglers fishing our rivers be required to offer a weekly permit, albeit that the permit be at negligible or even no cost. Angling generates a high revenue income to Wales and by this type of licensing it would be possible to objectively measure the increase in visiting anglers to Wales.

The Welsh GDP gains little from the national fishing industry due to the nature of the landscape and consequentially poor infrastructure to potentially service coastal ports, however the installation of the many coastal wind farms may well have the effect of producing artificial “reefs” to allow the grown of juvenile fish of all species to develop free from the trawlers that are banned from fishing too close to these installations. We believe that this offers a potentially profitable source of increased national income by the implementation of an enhances “Golden Mile” initiative, which would exclude commercial fishing boats, with the exception of small local inland fishing initiatives like lobster, crab and other historically established sea harvesting. This would inevitably result in a much increased local head of fish, offering sea angling opportunities that would attract many to the rural areas where alternative sources on income are much needed.

Question 8: Do you agree with the proposals for co-ordination of Welsh Government investment in environmental research? How could we improve them?

You state “A key priority for the Welsh Government would be for the new body to take the opportunity to gather evidence of environmental issues on the ground in Wales to inform interventions.” We hope that this priority would include engagement with stakeholders at grass roots.

Question 9: Do you agree with the proposals about the status, governance and accountability of the new body? Is there any way we could improve the proposed arrangements?

Our response is as for question 8 above.

Question 10: Have you any views on the approach we propose for the new body in relation to its stakeholder arrangements? How might we improve the approach?

We are concerned that this consultation has not been widely publicised. It should not be necessary for stakeholders to have to trawl the Assembly Government web sites: interested parties and their representatives are well known, this consultation could well have been cascaded down. Stakeholder engagement must be won and encouraged. We are disappointed to see that the FERAC is being abandoned, and would hope that perhaps the involvement of the Local Fisheries Advisory Groups will be encouraged and their appeal widened as has been happening over the last two years, much to the delight of many anglers and other interested parties.

Question 11: What are your views on these aspects of the regulatory arrangements?

We are of the view that self permitting, like self regulation is basically flawed and assume this to be an economic expedient.

In conclusion, I think it fair to say, that we have worked hard to establish a working relationship with the fisheries section of the Environment Agency Wales. We are about to launch a Bailiffs handbook for the River Clwyd system, which has been produced in collaboration with the Agency and the North Wales Police. We are working to enhance the environment on a major tributary of the Clwyd system and hope that these initiatives will be taken up throughout Wales, tailored to each of the river systems. Anglers generally are being encouraged to take a sustainable approach to their sport and the numbers returning caught salmonids to continue their journey up river to spawn is increasing greatly year by year. We believe we have been in the past and will continue to be in the future guardians of our rivers systems and the fish that depend upon them.

Change and the management of change are special skills that if not handled correctly risk disruption and the destruction of good working relationships which having taken years to develop can be destroyed “at a stroke”. We are concerned that the developing partnerships with the unofficial third sector, who are also stakeholders in every respect when it comes to the environment, water quality and fish protection, may be damaged. We therefore request that the consultation process be continued throughout the early stages of this amalgamation and would ask that the Assembly Government keep an open mind with regard to the possibility of taking fisheries out of the giant conglomerate and relocating it as a separate entity where it can be directly answerable to the Assembly Government and its stakeholders. We also request clarity with regard to the future role of the new body, if the fisheries section is absorbed therein, with regard to enforcement, policing our rivers and the provision of a dedicated enforcement team staffed such that they are able to gain intimate knowledge of the rivers they protect, their ecology, the areas susceptible to the ravages of poaching, which we believe is currently on the increase as a consequence of the difficult economic

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climate that prevails.

We appeal on behalf of the angling community, the businesses that profit from the presence of local as well as the thousands of visiting anglers, but more importantly, on behalf of the fish which our Mission Statement charge us to protect.

Yours sincerely

For and on behalf of the Campaign for the Protection of Welsh Fisheries.

Only when the last tree has died and the last river been poisoned and the last fish been caught will we realise that we cannot eat money. (Cree Indian saying)

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