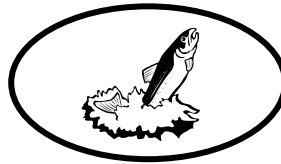


# YMGYRCH AMDDIFFYN PYSGODFEYDD CYMRU

## CAMPAIGN FOR THE PROTECTION OF WELSH FISHERIES

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11<sup>th</sup> June 2009.

Ceri Jones,  
River Basin Programme Manager,  
Environment Agency Wales,  
Cambria House,  
29 Newport Road,  
CARDIFF  
CF24 0TP

Dear Ceri,

**Re: Consultation: Water Framework Directive – Western Wales River Basin Directive.**

Firstly may I take the opportunity of thanking you for providing us with the opportunity to comment on the draft directive, in the hope that our comments may be considered well intended and constructive.

I should firstly like to express our views on the generalities of the proposals, before moving onto more specific comments.

As far as the consultation documentation is concerned, whilst it is clearly comprehensive and wide ranging it suffers from being far from user friendly because:

- a) The sheer volume of information presented is almost overwhelming.
- b) There is a need for the reader to have at least a broad overview understanding of a considerable amount of technical knowledge.
- c) The level of jargon adds to the complexity. The apparent simplicity of the questions posed e.g. Q1: Do you agree with the assessment of problems in water bodies? What would you change? Requires a detailed technical knowledge and potentially would require a similar volume of similar wording to answer in a really meaningful manner.

*“yr ymgyrch mater unigol ar ran genweirwyr Cymru: lleol ac ymwelwyr.”*  
*“The single issue campaign on behalf of the anglers of Wales: local and visiting”*

With regard to the contents of the document, in so far as they are “translatable” by the layman

- a) The targets set for the first “phase” of the proposals to 2015 do not appear to represent a proportionate outcome when compared to the apparent requirement to meet the demands of the second “phase”.
- b) The targeted increases of 2% -4% suggest that the input required will hardly be justified to meet such limited targets.
- c) Is this then tokenism at a potentially high cost?
- d) The private sector is targeted with providing the higher proportion of resource. Is this to be gained by compulsion or persuasion? Will it be forthcoming? This is not explained.
- e) Although voluminous and comprehensive the documentation is far too general and lacks reference to individual river system. With the exception of the Dee area.
- f) Lack of specific river basin reference precludes the ability to set river specific targets. For example the Clwyd system used to have heavy growth of *Ranunculus*, this has now all but disappeared. Targets could have been set for the gradual re appearance of this river plant as a measure of the success of reducing that pollutant which is currently inhibiting its growth.
- g) There is far too greater emphasis on the potentiality of targets being achieved being dependent upon available finance. This is a wholly incorrect and unacceptable basis for the whole process. All targets should be costed and the total cost presented to the politicians. They should then decide what is or what is not affordable so that we the stakeholders can hold them to account. This document should be need led not finance driven. Make the politicians accountable.

More specifically there seems to be inconsistency or lack of understandable logic in the following:

- a) The greatest percentage of failure on the rivers relate to their failure to meet fish targets. This failure screams out as a far higher percentage than the rest. Why then is there a complete lack of reference to:
  - i. The protection of the existing fish stocks.
  - ii. Protection of their spawning habitats?
  - iii. Protection of the fish stocks from illegal predation by illegal fishing methods
  - iv. Enforcement of the current regulations designed to protect fish stocks.
- b) There are many protected bird species as well as endangered bird species, this is acknowledged. However salmon as an endangered species are not considered in relation to bird predation. Why is there no mention to controlled culling of certain bird species. Not to illuminate the birds but rather to manage their numbers. For example the growing numbers of Goosanders, the young of which consume vast numbers of fry remain uncontrolled. Heron seem to be redirecting their interest in food source from sea to river, and in large numbers. There is no control. There is an imbalance in priorities between species.
- c) The generality of the document means potentially productive spawning tributaries have little mention, and only then by reference to the removal of obstructions to facilitate migration or immigration, rather than the improvement and protection of this valuable but vulnerable area.

- d) Our waterways are used and often abused by the general public. What point is there in protecting and enhancing this resource whilst failing to educate the general public? There should be educational programmes included as part of the plan to point out the potential damage that can be caused by simple things like;
- i. The disposal of apparently harmless waste such as milk.
  - ii. What constitutes illegal fisheries activity
  - iii. The scarcity of certain fish species and how easily they can be further damaged.

In an effort to comply with the questions as sequenced in the document our reply is as follows:

Q1: as above.

Q2: No we do not agree with the proposed objectives. As explained above, they are not high enough. The targets set are minimal and hardly worth bothering with as proposed.

Q3. We do not agree. The targets pre 2015 are too low and far too much is left pre 2015.

Q4: We disagree with the basic principle that a national approach should be taken. The plan is too broad, lacks specific measures and makes very broad non specific action plans which are so broad they almost lack meaning. The whole thing would be more effective and meaningful if reduced to each river basin or system. This would give a sense of ownership to participants or stakeholders as we are now euphemistically called. The inclusion of the pie charts stating the situation now compared with proposed indicates that the plan may almost be defined as futile.

Q5: A number of potential chances appear to have been missed. Those with interests in our waters are willing and keen partners and little allowance has been made for volunteer participation. Scenario C seems to be far too dependent upon certainty and completely ignores common sense and low cost/no cost actions that could be taken particularly if using local knowledge.

The Campaign is currently working with the Environment Agency on the river Clwyd system trialling a joint initiative to establish the extent of illegal activity on going on the river system. In this case volunteers will work in unison with the Agency for the good of the system. This system, if successful is potentially to be extended to the whole of Wales. This is a classic case of turning a very confrontational situation to the Agency's advantage by working with and not against a pressure group. This support system is now in place and potentially worth replicating.

The sea angling community has asked for consideration of what it calls "The Golden Mile" this would essentially ban commercial fishing within a mile of the Welsh coastline. On the face of it, this is a selfish and no go initiative. However, the consultation document makes clear that whilst potting for lobster and crab as well as shell fish production is a revenue earner for the Welsh economy, the netting of inshore water for fish species is a relatively low earner. Sea angling however generates millions of pounds to the Welsh economy. Yet the few trawlers are now trawling up to the shore line and to sea walls, denuding the waters of fish for the recreational angler. We feel it is possible to make a good business case for banning inshore (within one mile of the low water mark) trawling, whilst permitting putting and shell fish production and harvesting. This would add a large volunteer force to assist the Agency, make them a lot of badly needed friends as well as boosting the Welsh economy. Another case for making the plan more local and less general! The resources on offer from the sea angling community are potentially exceeding beneficial.

Q8: Climate change may well prove to be a global disaster in the long term, however whilst planning to address the causes I fail to see how the Agency can be so positive about the

longer term effect to which the document makes reference. This however is a specialism outside the scope of the laymen of the Campaign.

We are pleased to be offered the opportunity to comment on the proposals but must record our objections to the lack of effort made by the Agency in publicising the work, setting up consultations and workshops with the “man in the street”.

I trust you will give serious consideration to our views and we look forward to seeing to what extent they are taken on board.

Yours faithfully

A solid black rectangular box used to redact a signature.

For the Campaign for the Protection of Welsh Fisheries.