



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

Dear Sir,

Re: Environment and Sustainability Committee - Natural Resources Wales Annual Scrutiny

May I first thank your Committee for their invitation to submit views on the newly created Natural Resources Wales.

My name is Allan Cuthbert, and I regularly have formal and informal contact with Natural Resources Wales staff working “out in the field”, as well as with middle management, and occasional interaction with Senior Management. I am Secretary of The Clwyd Conwy and Gwynedd Rivers Trust, members of the Dee and Clwyd Local Fisheries Advisory Group, The Federation of Clwyd Angling Clubs and Secretary of the Denbigh and Clwyd Angling Club. I am also founder of the Campaign for the Protection of Welsh Fisheries and it in that capacity that I make this submission.

I should, in the first instance like to express my grateful thanks to the members of the old Environment Agency Wales Fisheries Team, now renamed as Fisheries Technical Team, the members of the soon to be Denbighshire Natural Resources Management Team and the Enforcement Team, who do a great job under very difficult circumstances. These staff members and their direct managers do a fantastic job albeit that the Enforcement staff are far too few and woefully underfunded. One individual, who is not untypical of the fisheries front line staff generally, puts in many hours of his own time working on the Trusts School Programme, which locates salmon eggs tanks in classrooms until they hatch as part of an educational package. The same staff member has also been directing Campaign volunteers in assisting with habitat improvement works to small tributaries of the River Clwyd; again in his own time. I have



nothing but praise and a sense of gratitude for the hard work and dedication shown by the ex Environment Agency staff, now NRW.

The NRW staff that regularly attend the Dee and Clwyd Local Fisheries Advisory Group are a credit to themselves and the NRW, although, understandably there appears to be a great deal of uncertainty among them as to their future following the amalgamating of the three separate organisations, not that they communicate concerns at the meetings. However the number of middle management staff having resigned since the amalgamation is of great concern

The other side of the coin is that the senior management with whom I have had direct contact were a little disingenuous, condescending and in my view verging on duplicitous in their attitude towards the representatives of the angling community in West and East North Wales. There was a "consultation" with representatives of the various angling groups in North Wales, held at Coed-y-Brenin, Dolgellau, at which the proposal to close the hatcheries in Wales was discussed. We were assured that it was a consultation process and that no decision had been made. At the meeting, of which no minutes were ever issued, the vote was around 48 of those present against the proposal to close the hatcheries with 2 in favour. There then followed an open "consultation" process as part of which NRW issued a list of many learned papers, which they claimed proved that stocking hatchery reared salmonids into rivers was detrimental to the genetic integrity of the native fish population. None of the papers to which they made reference provided "evidence" of their claim, and much of the documentation related to works carried out in America on fish species that do not occur in this country. I took the trouble to read a number, but by no means all, of the papers listed as supportive of the idea that hatchery bred fish were a risk to native stocks, but found no evidence in any of those I read. I did note however that the following was included in the NRW assertion.

"Restoration stocking after extinction is a valid method of reintroducing a population to available habitat, and is consistent with an Ecosystem Approach"

This we believe is a potentially misleading statement and possibly a mistranslation of the introduction to "The balancing act of captive breeding programmes: salmon stocking and angler catch statistics." By K. A. YOUNG of Natural Resources Wales, Cardiff, UK, one of the papers NRW officers have presented and referenced as one of the leading drivers to their recommendation, the introduction to which states

"Captive breeding programmes can help conserve species at risk of local extirpation or extinction, but impose a range of ecological and evolutionary risks (Snyder et al.1996; Blanchet et al. 2008; Fraser 2008; Neff et al.2011)."

Note: bolding of the words above is by this writer.

Given that salmon stocks in the majority of Welsh rivers are "at risk", then we believe the above actually recommends that hatcheries at the present time are essential to provide mitigation stocking of salmon in Wales

The assertions made by NRW are still being challenged. My point is this, and I apologise for being so long winded in making it, is that it appears that there was never any intention of doing



other than closing hatcheries; the decision was a purely economic one. What the NRW management should have done was to have been honest and explained that due to economic pressure hatcheries other than the one located at Cynrig, were not economically viable or affordable, then perhaps the angling fraternity would have accepted the fact.

However the Committee may not be aware that the need for a hatchery in Wales is critical to protect the future of the Arctic Char a rare and endangered species that lives in Llyn Padern and other deep water lakes in North Wales together with the Gwyniad, also a relic from the ice age, which is also endangered and inhabiting North Wales deep water bodies. The future of these species has to be ensured. There is no disagreement about this and NRW staff are working hard to save both species. However the need for hatchery bred fish to sustain these rare fish is in North Wales, yet the centre of excellence proposed is to be by way of the development of the hatchery in Cynrig in the Brecon area.

The Clwyd, Conwy and Gwynedd Rivers Trust runs a very well received and well respected schools educational programme, which included taking salmon eggs into schools and allowing the children to watch the eggs develop and hatch before ceremoniously transferring the developed fry to the river. The whole programme was produced at great cost and developed to heighten awareness of the importance of and need to protect salmon in Welsh rivers. Are these eggs to be transported from Cynrig to North Wales? This was the promise given by Tim Jones, one of NRW's senior managers at a recent meeting attended by many angling representatives.

It seems that preference is being given, once again, to South Wales, which like the South in England, continues to expand whilst the North suffers increasing unemployment and deprivation. It seems to me that this is an issue which should be in the forefront of the assembly members' minds, or is North Wales to become the increasingly poor relation, as in the South of England?

Wales enjoys a revenue income, which the Assembly acknowledges, of in excess of £150 million each year from angling. The amount should and would grow if, when advertising Wales as a holiday and recreational destination, the excellence of Welsh recreational angling was more widely promoted. When I raised this issue with NRW staff I was told that to include recreational angling in UK and worldwide advertising, would cost. Of course it will cost, but the benefits would far outweigh the costs. Perhaps Assembly Members are not aware of the current television advertising campaign on behalf of Welsh tourism, I recommend that they take a look and come to their own conclusions. The North Wales Bass Festival used to encourage thousands of anglers to the coast of North Wales and was famous throughout the UK. It should be re activated.

To conclude, I am of the opinion that fisheries and fishery related matters are of little importance to the Senior Management of NRW and that cost cutting and meeting the rigors of performance targets that have little relation to the real world are seen by them to be of greater importance.

Wales's GDP currently compares less than favorably with the rest of the United Kingdom, it is our belief that by providing greater protection of our rivers and coastal waters and by better



funding fisheries, the employment benefits and improvements to the rural economy, especially in North Wales, would greatly improve the lot of the people living in rural Wales.

Fisheries generally and fisheries protection represented only 3% of the employment and budget of the Environment Agency, the percentage of costs and employment of fisheries staff employed by NRW is therefore considerably lower, as a percentage. We have so little faith in the NRW and its senior management that our hope is that fisheries, due to their importance to Wales and the Welsh economy, be separated from the great monolith that is NRW, and given its own remit, to include the protection of our coastal fisheries as well as inland waterways and to include a remit to encourage anglers of all types to visit Wales, where all types of angling are excellent but generally unpublicised. With an economy that fares so poorly compared with the rest of the U.K. Wales need to grow its economy and build on what is one of its great assets.

Yours sincerely

Allan Cuthbert

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) 19th Century Cree Indian saying

<http://www.cpwf.co.uk/campaign/>