

To -

Economy, Trade, and Rural Affairs Committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
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From –

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30<sup>th</sup> August 2021

**SENEDD CYMRU**  
**Consultation on the priorities for the**  
**Economy, Trade and Rural Affairs Committee**

**Response by Salmon and Trout Conservation Cymru**

Introduction

Salmon and Trout Conservation Cymru is grateful for the opportunity to respond to this consultation and trusts the committee will find our comments helpful in identifying priority issues to be discussed and pursued to the benefit of the natural environment, the socio-economic health of rural communities and the international reputation of “Brand Cymru”.

Since its foundation in 1903, Salmon and Trout Conservation (S&TC) has been the leading advocate for the welfare of the wild fish of Britain. Upon receiving charitable status in 2008, S&TC revised its activities to focus solely on science-led campaigns and has enjoyed many successes in its efforts to defend the ecological integrity the freshwater environment. Wild fish are natural indicators of the well-being of our streams and rivers and we remain resolute in our mission to protect their interests wherever and whenever they may be challenged.

As an independently funded charity, S&TC is able to speak and act without fear or favour and is beholden to none but its charitable objectives. Our activities in Wales are conducted under the title Salmon and Trout Conservation Cymru (S&TC Cymru).

Our response to this consultation is set out over the following two pages.

## Our Response

The particularly delicate nature of the freshwater environment calls for consistent and robust protection. Even seemingly minor incidents of pollution or failures in land management can have catastrophic consequences for the naturally evolved ecology of a stream or river, sometimes to the extent of precipitating crashes in plant and animal populations to the point of potential extinction. Similar in effect but far less visible is the pernicious blight of diffuse pollution which slowly but surely suppresses natural processes, again to the point of collapse and potential extinctions. We would ask the committee to remain aware at all times of the profound consequences of pollution on wild fish populations and the fragile freshwater environment.

Natural Resources Wales (NRW) recently reported that the stocks of all but three of our principal salmon rivers and over two thirds of our sewin (sea trout) rivers are currently “at risk” or “probably at risk” of failing to meet their conservation limits and are in a state of continued decline. Other migratory fish such as shad and the European eel are similarly threatened. Should this persist, there is every likelihood that not only the fish themselves but also the rich legacy of intimately associated cultural and economic benefits will be lost for ever. S&TC Cymru therefore calls upon the committee to keep the needs of wild fish foremost in its thoughts when discussing the many issues that threaten the freshwater environment. These include -

### 1. REGULATION

Enforcement of the greater part of environmental law relating to the freshwater environment is exercised by NRW, the Welsh Government sponsored regulator on matters of environmental concern. Having suffered cuts in its funding to the order of some 35% we urge the committee to review Government expectations of the organisation with a view to prioritising its regulatory activities. We contend that its advisory remit should be transferred elsewhere thereby allowing it to dedicate a far greater part of its resources towards its role as regulator. We also urge the committee to press the Government for the need to ensure NRW is provided with sufficient funding in order that it might more effectively fulfil the regulatory functions that are expected of it.

### 2. POLLUTION

The pollution of our rivers from both historical and contemporary sources continues to pose a clear threat to the freshwater environment. Legacy sources of pollutants, typically old mine workings, alert us to the long-term consequences of failing to address such problems as they arise and should serve as a warning to remain vigilant. While pollution from traditional industries has diminished significantly, the industrialisation of agricultural production and failures within water treatment installations to cope with increased flows are leading to increased nutrient levels and silt burdens which, in turn, can lead to catastrophic declines in the biodiversity of river systems. S&TC urges the committee to establish within its timetable a regular update session to keep abreast of pollution incidents in order that it might challenge those responsible to answer for their actions.

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### 3. TIDAL POWER

S&TC Cymru fully endorses Welsh Government's ambition to move away from carbon-based energy sources and develop sustainable forms of electricity generation to take their place. We must ensure, however, that in addressing the historic causes of environmental degradation and biodiversity decline we do not create others in their place. Given the fragility of wild fish populations and the absence of knowledge on so many aspects of the ecology of both diadromous and coastal marine species, the most prudent course of action is to adopt the Precautionary Principle and defer the deployment of all forms of estuarine and coastal tidal power schemes until we can be more certain of their impact on aquatic biodiversity. Accordingly, we call on the committee to encourage government to close this knowledge gap through the provision of adequate funding for independent research into the ecological impacts of tidal power before allowing any further expansion of the sector.

### 4. PLANNING CONSENTS

The devastating consequences on the freshwater environment of the proliferation of intensive poultry and dairy units is now clear to all. In light of the 'Dutch Case' with regard to housing developments, we believe it is timely that nutrient discharge from agricultural developments should similarly be considered within the planning process. Furthermore, while it is hoped the new Water Resources Regulations will have the desired effect, we urge the committee to explore means of enforcing better planning regulations where the cumulative impact of multiple units is brought to the fore. We look to the committee to explore these issues with a view to effecting change.

### 5. ACCESS

S&TC calls on the committee to consider in the greatest detail proposals that would in any way compromise the current laws on access to freshwater for recreational purposes. The fragility of the freshwater environment cannot be overemphasised, and unrestricted open access would undoubtedly result in greater numbers participating in river-based activities. Such activities would inevitably become concentrated around particular features or along certain sections of rivers thereby creating barriers to the movement of many riverine species. We further call on the committee to consider a more equitable method of regulating whatever access is permitted such that all parties contribute equally to the costs of policing such use. It is iniquitous that some are required by law to possess licences while others enjoy access without charge or registration.

We remain available at all times should you have any queries or wish to discuss the points we raise in greater detail

**Richard Garner Williams**

**Swyddog Cenedlaethol dros Gymru / National Officer for Wales**

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