

Senedd Cymru
Pwyllgor yr Economi, Masnach a
Materion Gwledig
Rheoliadau Llygredd Amaethyddol

Economy(6) APR13

Ymateb gan:

Welsh Parliament
Economy, Trade, and Rural
Affairs Committee
Agricultural Pollution
Regulations

Evidence from: Gwent Angling
Society

Gwent Angling Society is a progressive, conservation-minded Welsh angling club offering fishing on six beats on the River Usk, two on the River Wye, the Sirhowy river and two on the Afon Llynfi (Powys), and also the Talybont Reservoir. We have nearly 200 members.

Pollution of Welsh rivers from agricultural sources continues to show no sign of decline. Each year in Wales, we see acute pollution incidents that cause dozens of fish kills and destroy or cause longterm damage to fisheries and the surrounding environment. At present 60% of waterbodies in Wales are failing to reach their statutory targets because of high levels of phosphate which come primarily from agriculture. And only one in six freshwater habitats are considered "favourable" for wildlife in Wales.

In 2016 and 2020, the Gwent Angling Society's waters on the Powys river Llynfi suffered such devastation, with [a total loss of fish and invertebrate life](#) that set back many hard years of work invested by the club in restoring this once productive fishery. It will now take at least 10 years for the river to recover.

During the summer of 2021 the Llynfi has been blighted by algae blooms, as have our two beats of the river Wye which, for weeks on end, have been heavily coloured with algae and polluted with nutrient run-off from diffuse pollution sources. This has ruined the fishing for salmon and trout for our members for most of the season.

The whole ecology of the river Wye is threatened by excessive fertiliser (phosphate) most originating from agricultural sources. Since July 2020 we have been monitoring phosphate concentration for the Wye Salmon Association on the Rivers Wye and Llynfi. This has confirmed that the Llynfi catchment fails to meet its SAC EQS target for phosphorus.

Worryingly, the river Usk is also now seeing increasingly high phosphate levels in recent years and an algal bloom, a real threat to what is one of the best game fishing rivers in Wales and a further threat to our portfolio of waters.

If sufficient legislation had been in place, these past and ongoing incidents could have been avoided and in the case of the Llynfi fish kills, a successful prosecution brought against the offender.

We supported the Control of Agricultural Pollution Regulations 2021 that came into force in April 2021 that designated the whole of Wales a Nitrate Vulnerable Zone (NVZ). Without this legislation unfettered pollution will only continue and will get worse in Wales, until we no longer have any aquatic life and waters worth fishing.

We will also point out that angling is worth **at least £150 Million** annually to the Welsh economy. A review of the economic value of angling on Welsh rivers alone, commissioned by NRW in 2018, concluded that the scale of economic activity supported by angling on Welsh rivers alone was comparable to that derived from the Wales Coastal Path. Clean rivers and lakes serve as a major draw for tourists, but they will not in the near future, should these regulations not be implemented.

In the light of the Welsh Senedd vote on annulling the regulations in March 2021 and the recent National Farmers' Union Cymru legal challenge, we would emphasise that we do not believe that these regulations are disproportionate or that there is any unlawfulness in the process by which they came into force. Indeed, a decision by The Senedd on this has been limbo for nearly 10 years prior, so every Welsh farmer would have been aware of proposed regulations via NFU Cymru for many years. We see no alternatives to regulation; voluntary measures have failed. There have been so many failings that the only way to enforce compliance is by regulation. Therefore, an all-Wales approach is the only option.

What is needed in addition to these regulations is proper funding of NRW to visit farms, investigate agricultural pollution and take enforcement action under the regulations. A failure to enforce or properly regulate renders these regulations meaningless.

The regulations must be revised to include **other forms of agricultural pollution** as a standard for the whole of Wales, not just spreading of nitrogen fertiliser. They do not cover cattle poaching, soil erosion, run-off prevention and other forms of agricultural pollution, including from phosphates; they also seem to create a loophole for non-NVZ land which begins to show an impact from excessive nitrogen pollution before the 2023 and 2024.

Above all, sufficient resources need to be ring-fenced for their enforcement - a failure to enforce or properly regulate renders the Regulations meaningless.

Yours faithfully,

Gareth Lewis
Secretary
Gwent Angling Society