

Jack Sargeant MS
Petitions Committee Chair
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

By email: petitions@senedd.wales

14 June 2024

Dear Mr Sargeant

Petition P-061398 To act to increase the effectiveness of Natural Resources Wales in halting pollution on the Teifi

Further to the Petitions Committee's consideration of this petition and your subsequent letter of 15 May, Natural Resources Wales (NRW) welcomes the opportunity to provide further information in relation to the question:

"... what impact the budget settlement will have on your planned work to improve water quality and fulfil your obligations in relation to the monitoring of the health of the river and the enforcement of legal requirements."

Public funding is exceptionally tight across the whole of the UK. As such, we are having to look across all of our remit and critically review what we can and must continue to do, what we stop, and what we slow or do differently to fulfil our [Corporate Plan](#) ambitions. This is no different to any other public sector body at the moment.

We have already taken significant steps to reduce our financial pressures, such as tighter recruitment controls and reducing use of agency and temporary contracts, and this is helping to safeguard permanent roles.

We are currently looking at options for managing our remaining pressures and this includes our staffing structure. We are aiming to mitigate job losses as much as possible. Despite this we have been able to set an overall budget of between £260m and £270m for this year, with which we can make substantial progress on the priorities we have set out in our Corporate Plan, including those related to improving water quality.

Over the last four years NRW has invested approximately £65m, received from Welsh Government, in targeting its fight against the Nature and Climate Emergencies (NaCE). The NaCE programme has delivered a range of projects across Wales aimed at improving our National Nature Reserves, protecting and enhancing SSSIs, restoring peatlands (by significantly reducing carbon emissions and actively storing more carbon from the environment) as well as looking to improve water quality from pollutants such as metal mines and land use, which will result in improving the habitat within our rivers for Salmon and Sea Trout. This is just the tip of the iceberg as there is more to do across Wales, not only to reduce the impact of the climate and nature emergencies but to start reversing the decline.

NRW is forecasting a further spend of £28m in 2024-25 and has prepared a planned programme up to 2030, subject to Welsh Government agreement and funding.

The Petitions Committee have been informed of NRW's key water quality projects and other work in the Teifi Catchment from the information provided in the [Research Brief](#) and [correspondence from the Minister for Climate Change](#). The following sections set out the funding source(s) of this planned work and any potential impact on delivery due to our current financial / resource pressures.

Teifi Demonstrator Catchment

As stated in the [correspondence from the Petitioner to Committee](#), unfortunately our entry to Ofwat's Water Breakthrough Challenge 4 (catalyst stream) competition – supported by sixteen partner organisations – was unsuccessful. However, we remain committed to this innovative project and we are utilising funding from Dŵr Cymru Welsh Water (DCWW) to continue development and start delivery of the project this year. We have ringfenced a small number of key posts to lead the work.

DCWW have committed to lead an entry to Ofwat's Water Breakthrough Challenge 5 (transform stream) competition on behalf of the Teifi Partnership and NRW will be submitting other collaborative funding bids to supplement this and deliver other initiatives that emerged from the hackathon event in February.

The project has already started to deliver benefits to the catchment, including an evidence report, a data visualisation / story map proof of concept and alignment of other projects. Whilst progress has been made, delivery of the overall concept over the medium to long term is dependent on successful funding applications to Ofwat and others.

Monitoring

NRW's water quality monitoring programmes are strictly prioritised following changes to staffing in 2019. The 2024 monitoring programme has been planned to be a similar size to the 2023 programme, but some elements of the invertebrate ecology and fish monitoring programmes will be reduced because of delays and limitations on our ability to recruit staff ie the recruitment controls referenced earlier. The document in Annexe 1 provides an overview.

NRW supports the development of citizen science through our work with the UK Environmental Observation Framework [Citizen Science resources](#) (UKEOF) and the Joint Nature Conservation Committee (JNCC). The JNCC website provides a useful summary of existing well established citizen science schemes: [Citizen science survey methods and tools | JNCC - Adviser to Government on Nature Conservation](#).

NRW asks groups seeking further advice in relation to undertaking citizen science projects to complete a simple online form which is designed to enable support to be allocated fairly across projects and groups: [Evaluation of external citizen science partnership proposals - Natural Resources Wales Citizen Space - Citizen Space \(cyfoethnaturiol.cymru\)](#)

Control of Agricultural Pollution Regulations (CoAPR)

NRW has secured a funded Service Level Agreement (SLA) with Welsh Government specifically to undertake a programme of compliance and enforcement inspections on sites across Wales, where higher risk agricultural activities are carried out. This SLA has been funded initially for two years.

Higher risk activities are considered to be:

- Cattle farms with over 200 cattle – dairy and beef
- Poultry units with over 1000 birds
- Pig units over 50
- Any farms importing organic manures as defined under CoAPR, which includes livestock manures, digestate, biosolids and wastes recovered to land
- Notification of intent to participate in the Enhanced Nutrient Management Approach
- Farms which have been identified as a result of a recent pollution incident investigation and pose a risk to environment

Sites within the Teifi catchment where higher risk agricultural activities are carried out are included within this programme and will be inspected for compliance with the regulations during the lifetime of the SLA.

Other relevant planned work includes the following:

4 Rivers for LIFE

This is a £9m project with 60% funding from the EU and the remainder from Welsh Government and a number of partners. The project started in 2021 and ends in December 2026 and covers the Teifi, Tywi, Cleddau and Usk catchments. Because of the ringfenced nature of the funding, we do not anticipate that NRW's 2024-25 budget settlement will have any significant impact on the project.

SAC Rivers Project

The SAC Rivers Project has moved to a transitional phase where we will be ultimately (by April 2026) responding to the issue through our day-to-day activities rather than a dedicated project. We remain committed to our actions in the First Minister's [Relieving](#)

[pressures on Special Areas of Conservation \(SAC\) river catchments to support delivery of affordable housing: action plan \[HTML\] | GOV.WALES](#)

We have already delivered on several actions including publishing the NRW position on Constructed Wetlands, a Mitigation Measures Menu and clarifying acceptability of citizen science data. The Review of Permits is due to be completed by the end of July this year. This includes varying 27 DCWW permits within the Teifi catchment to include a phosphorus limit, of which 22 have already been amended.

NRW is also a member of the Nutrient Management Boards for each of the SAC Rivers including the Teifi with local staff representing NRW on the Board, the Technical Advice Group and the Stakeholder Group.

Wales Better River Quality Taskforce

We continue to work with the Better River Quality Taskforce to develop action plans to gather greater evidence on the impact of [storm overflows](#) on our rivers, to reduce the impacts they cause, to improve regulation and to educate the public on sewer misuse.

Water Company Business Plans

Our work to improve water quality in the Teifi and across Wales involves using evidence of the impact of a range of sectors to influence action. Informed by our evidence, water companies submitted their Price Review 2024 (PR24) business plans to Ofwat on 2 October 2023. These plans include investment to address the impact and risks that their operations place on the environment. Ofwat is now reviewing the submissions and will issue draft determinations on 11 July 2024 following the General Election, before final determination in December 2024.

We also undertake assessments of the water companies' environmental performance and publish this information to drive improvements.

Metal Mine Remediation Projects

The Metal Mines Programme continues this year with ringfenced budget from Welsh Government, under NaCE referenced earlier, in line with the settlement of the previous year. The two significant mines on the Teifi – Abbey Consols and Esgair Mwyn – remain priorities within the programme and will be progressed appropriately within the available budget.

Fisheries Habitat Restoration

The Inland Fisheries Habitat Restoration Programme is continuing this year. West Wales Rivers Trust has been awarded a NRW Strategic Allocated Fund (SAF) grant to deliver this work in west Wales, including for the River Teifi. The objective of this fund is to address the habitat degradation and barrier to migration pressures that are implicated in the decline of salmon and sea trout populations in Welsh rivers.

The source of this SAF grant is the NaCE funding from Welsh Government, which is ringfenced via a grant offer letter.

I trust that this provides assurance that our planned work in the Teifi catchment is progressing this financial year. We continue to carry out our roles in regulation, enforcement and incident response in the Teifi catchment. We always look to improve our performance on compliance assessment and prioritise our responses to enable us to take action on the most potentially harmful incidents reported to us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Clare Pillman', with a horizontal line underneath.

Clare Pillman

Prif Weithredwr, Cyfoeth Naturiol Cymru
Chief Executive, Natural Resources Wales

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.
Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.