

Cynulliad Cenedlaethol Cymru
Y Pwyllgor Amgylchedd a Chynaliadwyedd
NRW 2015 – 12
Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015
Ymateb gan Paul King (Saesneg yn Unig)

Dear Sirs,

In response to your request for contributions to the annual review of the NRW in 2015 here are my observations as an angler, shooter and lover of the countryside. I am secretary of one angling club and on the committee of two others in Wales, and I am also a member of the Dee and Clwyd LFAG:

Rivers/Fishing

The NRW has not so far proved to be a good thing for the river environment in Wales with the EA(W) being subsumed into a much larger organisation. The first impression was of an internal power struggle between the three bodies that were bought together to form the NRW, principally between the former CCW staff and the former EA(W) staff. The exit of significant numbers of the former EA(W) staff over the past year is perhaps indicative of the outcome and that they are uncomfortable with the current direction of the NRW, maybe not, but for whatever reason the exit of so many key fisheries staff is of great concern.

I should make clear that at a local level I have nothing but praise for the NRW staff, the story at a higher level is however very different. We were recently advised by the NRW that there was to be no more stocking of migratory fish in Welsh rivers. The “evidence” presented was highly suspect and had the strong appearance of being “cherry picked” to suit a financial imperative to save money by closing hatcheries. There was a public consultation process and, from the report of the NRW officer who processed the responses and reported to the LFAG, the response was overwhelmingly against closure, this was even considering that 193 responses against were not reported as representing tens of thousands of angling club members, for example the single response from the Prince Albert AS represented their 8,000 members. Instead the NRW Board were disingenuously encouraged to draw the conclusion that only receiving 193 responses was indicative of general apathy to the issue.

Following this there was another meeting for angling interests at Coed y Brenin at which NRW local staff were not allowed to speak, the senior (mostly former CCW staff) took over and were frankly curt to the point of rudeness to the anglers representatives. Another vote was taken, again overwhelmingly against closure but the result was that hatcheries were to close. One therefore has to ask at what point the results of a consultation would have any bearing on the outcome, if a vote of over 95% against can be ignored it is hard to imagine any consultation being more than a “tick box” exercise - unless the result suits the NRW. The press announcement was made so soon after the NRW Board decision and in so much detail that it seems unlikely that the result wasn't pre-determined.

For the record there is no hard scientific evidence to support the premise that hatchery bred fish are damaging to native fish, of the over 200 references published by the NRW there were virtually none relating to Atlantic salmon, most of them related to the mass stocking of rivers in the Pacific North West of America with pacific salmon and steelhead (migratory) rainbow trout in an operation that bears little similarity to either the species or methods used in Wales. Even those views were “beliefs” rather than “evidence”. So weak are the arguments and hard scientific evidence for closure that it's hard to see past it being merely a financial exercise.

To summarise, I am content with the local NRW staff support and input, concerned over the rate of key staff attrition within their ranks and have absolutely no confidence in the NRW as guardians of our freshwater fisheries and environment.

EU Habitats Directive

I am concerned that in responses to my questions under the Freedom of Information Act, the NRW admitted to having an effective "shoot on sight" policy in respect of all deer species and wild boar in Wales. The words used were to the effect that "further expansion of range would be discouraged". For alien species such as muntjac, Chinese water deer and sika deer this is acceptable and should be supported. For wild boar (formerly present) and fallow deer (present for at least 900 years) it might be open to debate in terms of whether they can be considered indigenous species but for roe and red deer, they have always been present in the UK, and they are properly considered to be indigenous species. The Habitats Directive requires indigenous species to be encouraged to expand their distribution and the current NRW policy is in breach of this responsibility and in fact the reverse is the case, culls of red and roe deer should be minimal and on humane grounds only.

I hope this helps

Best regards

Paul King