




**Radnorshire
Wildlife Trust**
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Sir Faesyfed

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Radnorshire Wildlife Trust
Charity No.519021
Company No.2132736

Clare Pillman
Natural Resources Wales
Ty Cambria
29 Newport Road,
Cardiff
CF24 0TP

12th April 2022

Re: Response to your letter regarding the 'Save the Wye campaign' from Radnorshire Wildlife Trust

Dear Clare,

We have received a response from NRW, unsigned, on 25th March 2022, in relation to our current campaign which makes several asks of both NRW and Welsh Government. We thank you for this response and note that not all the requested actions fall directly to NRW to implement. However, we hope that you can advocate and support these measures as much as your powers and influence allow.

We wish to further respond on 2 points in more detail.

Q2. From the evidence we have seen, from multiple sources, and that has, and will be, published by Lancaster University as part of the RePhokus project, the high density of IPU's within the Wye catchment, and the resultant manure they generate, are a significant contributor to the pollution on the river Wye. The phosphate surplus within the Wye catchment is 60% higher than national average phosphate levels, and source apportionment for agricultural sources is being cited as around 70% by RePhoKus, updated from the 60% in the nutrient management plan. Manure from poultry accounts for around 35% of the total. And Poultry has been the most significant change to land management practices within the Welsh catchment in the last 10 years. This marks the river Wye out amongst other Welsh and UK rivers as it means Combined Sewage Outflows and sewage contribute to far less of the overall problem than is the norm. We request that you state this more clearly. We feel a clear and precise public statement from you on this matter would allow the right conversations to happen amongst partners and stakeholders in the catchment – currently many people deflect the issue from agriculture to water companies and sewage, which is not helpful. The lack of evidence found by NRW for a direct connection between poultry farms and waterbodies failing SAC targets in fact highlights the failings of the NRW monitoring approach and the slow response to this critical issue.

We would also like to be clear that IPU's of and in themselves are not the only source of potential nutrient pollution but add to the burden within the soils that is already produced by sheep and cattle within the catchment. It is the manure that is produced by livestock, including those housed in intensive livestock units, and how it is spread, when, and at what level that has the impact. Again, a clear supporting statement from NRW





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highlighting that there are issues that need resolved and that agricultural manure and the nutrient loading resulting from the amount spread in the catchment is an issue that needs funding, support, and action to resolve.

Q4. The current nutrient management plan cannot be said to be working, and this is not a good situation to be in given the state of the Wye. A Nutrient Management Board has been in place for many years now, and while we know that the plan has recently been updated, it is widely viewed as no longer fit for purpose. Its measures do not go far enough, fast enough and there is a lack of real financial support for a catchment-based approach in Wales. What we are calling for is a new governance structure, that pulls together a wider group of stakeholders than is currently around the table, that is chaired by an independent body, or person, that can draw in money from both public and private sources to focus on lasting nature-based solutions that benefit a wide section of society and the economy. That means a mandatory catchment wide River Ecosystem Management Plan that addresses cumulative impacts, incorporated more than just nutrients – soil, tree cover, wetlands, water security and natural flood management all need covered and supported.

The catchment-based approach is not fully supported, politically, in Wales, and although NRW attend the Wye Catchment Partnership the level of engagement, funding and direct action from the Welsh side is far less than we see within England. We know from contacts at DEFRA that approaches have been made to Welsh Government, including NRW, but they have not been taken up. This is disappointing. The river needs support, funding and a far greater level of monitoring and enforcement by NRW in Wales and the Environment Agency in England. We need a catchment-based approach from source to sea and one that looks to fund and deliver far more in the way of nature-based solutions than we have seen to date. We are at a critical time for the environment and climate. In years to come water security, along with climate adaption and mitigation will become ever more important. A new and revived catchment management body, following the [Eden Model](#) and looking to implement a [Nature Investment Co-operative Model](#) would potentially be transformative to the river and the rural economy, setting landowners and local businesses up to deal with the shift in support and payment for land management that is already underway as we move to a focus on 'public payment for public benefit'. Business as usual is not an option. That must apply to how Natural Resources Wales engages with stakeholders and delivery partners and the scale of ambition it shows for the natural environment as we move through the next decade.

If you wish to meet to discuss our proposal that would be welcome. We would like to offer you a hosted visit here in Radnorshire, where we can show you some of our recent work on nature's recovery.

We look forward to hearing from you.

Yours sincerely,

James Hitchcock
CEO
Radnorshire Wildlife Trust

