



Salmon & Trout Conservation Response to River Basin Management Plans

1. What are your views of these principles? When thinking about your answer, you may wish to consider how easy (or hard) you would find adopting the principles.

S&TC believes there is nothing wrong with the principles set out in the River Basin Management Plans (RBMPs), but they are largely high-level aspirations which leave us with a number of concerns:

- The principles and measures are aspirational - we have read most of them many times before.
- They lack any real clarity on how the principles will be delivered and very few definite timelines for objectives to be achieved. The principles do not filter down to the draft RBMP plans.
- S&TC supports catchment-level actions and delivery, but these RBMPs place too much emphasis on partnership responsibility. The whole RBMP project lacks central ownership and leadership. While actions must be delivered at local level, they must also be relevant to a central strategy with national objectives. There is no strategy to deliver the principles.
- The RBMP project provides little confidence of political commitment to deliver its objectives. Catchment-based actions are worthless without a properly resourced regulator to regulate, monitor and enforce national legislation to combat persistent polluters.

We have heard and read principles like these before in multiple plans and strategies but precious few result in definite actions. This latest collection of RBMPs lack ambition other than through high-level aspirations, which lack an over-arching strategy spelling out how the step change required to deliver the improvements will be achieved.

As a starting point, S&TC would point out that the EU Water Framework Directive (WFD) was originally designed to produce good ecological status (GES) in water bodies (rivers, still waters, estuaries, and the coastal zone out to one nautical mile) by 2015. Had WFD been adhered to within that timeline, very few of the principles in the present RBMPs would still be issues requiring action. For instance:

- *Restoration and recovery of freshwater, estuarine and coastal habitats and species* would already have been achieved under WFD and, therefore;
- *resilience to climate impact* would have been in place, and *carbon sequestration* would be one of the benefits for *people and wildlife*.

As it is, there has been a woeful lack of commitment by the UK government to deliver the objectives of WFD. In particular, the original 2015 timeline has been progressively pushed back to the extent that some objectives are supposed to be achieved by 2027 – 12 years too late - while the rest have an even longer timeline - *Implementing the river basin management plans will help achieve many of the targets in the government's 25-year Environment Plan*. This highlights the total lack of commitment from government and its agencies to protect the aquatic environment and its dependent species.

S&TC believes that the lack of ambitious timelines within RBMPs does little to suggest any greater commitment to restoring the freshwater and coastal zone environments or to achieve the goals originally set out under WFD and rehashed here. Post Brexit, we believe these plans represented an opportunity to go further, be ambitious and deliver more for our failing freshwater biodiversity and habitats. An opportunity to include the whole catchment this time, including headwaters which were absent from the original WFD plans. However, these plans represent no more than a continuation of the status quo, which is barely managing to halt the decline, let alone improve our rivers.

2. Do you agree with the environmental objectives and targets in the draft plans?

All

Most

Some X

None

Which, if any, objectives, or targets would you like to see changed and why?

As the background information states, *many rivers, streams, lakes, estuaries and coasts are degraded and damaged by development, industry, agriculture, and modifications to provide flood protection. Climate change and a growing population are adding to these pressures and without concerted action now will lead to irreversible impacts for future generations*. With these words, the EA is admitting abject failure to deliver WFD objectives in anything like the timelines originally envisaged, let alone the supposedly more stringent requirements of the EU Habitats Directive which are relevant to many water bodies.

The above statement clearly shows why an effective national strategy is needed to oversee delivery of actions at catchment level. S&TC's own professionally conducted research within our Riverfly Census and SmartRivers projects confirms that fine sediments, excess nutrients and chemical pollution, much of it sourced from poor agricultural practise, industrial discharge and poorly treated sewage by Water Companies, are all having a damaging impact on the water environment. We have made little progress on many of these areas over the last two cycles of WFD and now a step change is urgently required. Unfortunately, the environmental objectives and targets in the current RMBP appear to be nothing more than a continuation of existing approaches - which have clearly not worked so far to deliver improvements to freshwater habitats.

Without solid foundations - resources for sufficient monitoring and enforcement of baseline regulations - further improvements cannot be delivered.

Then there is, of course, the elephant in the room- chemicals, with, as stated above, 100% of the waterbodies currently failing chemical status. Current targets do not expect all waterbodies to achieve 'good' for chemicals until 2063 - and that's based on a handful of chemicals not the thousands present in aquatic ecosystems. This is not acceptable. The continual delay in the Chemical

Strategy highlights the lack of political will on the issue. We cannot continue to put chemicals in the too difficult to deal with box. We must take action now.

3. Are you aware of any funded measures that are missing from the programmes of measures?

Yes

No

Please let us know what measures are missing

S&TC does not possess the in-depth knowledge of individual plans to answer this question

4. Do you have any comments on the potential new measures set out in the draft plans? Please tell us about any other new measures that could be taken forward with support from partners to achieve the objectives in the plans.

Below is a classic example of why these RBMPs contain measures which have been rehashed over recent decades, but as stated above, have yet to be delivered:

Setting legally binding targets under the 25 Year Environment Bill. The targets will be used to drive progress to address some of the challenges affecting the waters in the river basin districts. Water quality targets for four of the challenges are being considered:

(a) pollution from agriculture and rural areas, in particular agricultural sources of nitrogen, phosphorus and sediment

(b) pollution from water industry wastewater, in particular phosphorus and storm overflows from combined sewerage systems

(c) changes to water levels and flows, in particular reducing water demand, including leakage, household and non-household water consumption

(d) pollution from abandoned metal mines

The above measures should have been actioned and achieved long ago, yet they are put forward here as though they are new ideas. This lack of political commitment must change, otherwise this whole RBMP round will fail, the same as its predecessors, and the aquatic environment will continue to deteriorate.

Again, the statement below is included in the background information:

Biodiversity targets are also being considered which will help protect and improve aspects of the water environment. These include a target which will support the achievement of favourable conservation status for sites of special scientific interest (including water-dependent sites), and a wider habitat creation target which will include aquatic and water-dependent habitats.

Whatever happened to the targets set out in WFD and the Habitats Directive, which should have been delivered by now? What confidence have we that government and its agencies have any more commitment to achieving these objectives under this round of RBMPs than their predecessors?

There is huge energy at the catchment level to deliver action actions and achieve objectives that restore and protect the local aquatic environment, but without assessment of how effective they will be or national leadership and support for how they contribute to good status. All these actions require political commitment and resources to enforcing regulation. For instance, there is little point in clearing a local water body of fine sediments to improve the habitat for water wildlife, if the

regulator fails to enforce national legislation on persistent perpetrators. The water body will merely fill again with sediment and all the good local work will be negated.

In summary, therefore, the measures read very well, but all the good words identifying the many measures contained within the RBMPs will prove worthless without the government's political commitment to support and resource the regulator to lead on delivery, monitoring and enforcement. S&TC agrees completely with catchment scale projects actioned by local organisations, but there has to be leadership and ownership from an overseer and that responsibility must remain with the national regulator and its area teams.

5. Do you have any comments on the challenges and measures suggested as priorities in your local catchment partnership's page?

Please give catchment specific examples and tell us where, by working together, more benefits can be achieved.

S&TC does not have sufficient in-depth knowledge of individual RBMPs to answer this question.

6. Do you have any further comments on the draft river basin management plans, not covered by the previous questions?

All our comments are contained above.

Response prepared by
Salmon and Trout Conservation

Date of response
April 2022

