

The Rt. Hon. Thérèse Coffey MP
Secretary of State for Environment, Food & Rural Affairs

The Rt. Hon. Mark Drakeford MS
First Minister of Wales

28 September 2023

Dear Secretary of State and First Minister of Wales,

The declining state of the River Wye

On 17th July, The Wildlife Trusts convened and hosted a Roundtable in Hay-on-Wye, bringing together local and national stakeholders concerned about the declining state of the River Wye. A list of participants is attached. Discussions built on those had by many parties at the Phosphate Summits held by Welsh Government, and the roundtable held in May by Defra Secretary of State, The Rt Hon Thérèse Coffey MP.

As chair of the event, I am writing to share my reflections with you on the sense of agreement I felt from all attendees in the room on several key issues. I have shared this letter with all attendees, and hope that they feel this is a fair reflection of our discussions.

Our starting point at the event was to discuss 'what the problem looked like' from different stakeholder perspectives. There was complete consensus that the current pollution pressures upon the Wye are unacceptable, and strong enthusiasm for collaborative action to resolve the problem. We agreed an aspiration that we must ensure we have reached 'peak worst', meaning that, at the least, we cannot allow nutrient pollution to further increase from here.

In this vein, The Wildlife Trusts welcome that the Welsh Government has paused a number of planning applications for Intensive Poultry Units and is considering calling them in, and that Defra has committed to improving the effectiveness of environmental permitting of poultry farms.

Beyond halting the decline of the Wye, we then considered the range of solutions that must be drawn upon to support the river's recovery. Here we recognised that action will be needed to tackle legacy phosphate as well as current inputs, and that this will require land management changes at a landscape scale. All participants of course recognised the range of action already underway, and further plans in the pipeline, but agreed that the effectiveness of some current initiatives is constrained, and that further action will also be needed. We discussed how, if the Wye were a school or a hospital, we would be calling for it to be placed into 'special measures'. We agreed that the same level of urgency and focus must be applied to solving the challenges facing the Wye, and the following five points summarise our discussions around what that might look like:

1) Refresh Catchment Governance

Multiple groups and initiatives are already active in the catchment but there is a lack of clarity over whether and how these interact, how duplication can be avoided, how trust and transparency can be developed, and how to gauge the collective impact of action. The Wildlife Trusts note that the Wye Catchment Partnership could, if sufficiently resourced and supported, play a more central role here, in line with proposals in Defra's Plan for Water.

Crucial to oversight and strategic steer is the Nutrient Management Board. Attendees were generally in agreement that current governance arrangements are not adequate and wish to see senior political and community leadership, transparency of decision-making and a structure and process that can identify and drive forward immediate action. The Wildlife Trusts believe that proposals from Herefordshire Council for a Cross Border Task Force could fulfil this function; in our view, a new structure including MPs / Ministers that could facilitate changes to policy, working practices or resources – those things that cannot be changed locally – would complement a refresh and strengthening of local partnerships and structures.

2) Ensure plans add up

Similarly, the discussions reflected on the multiple plans that exist across the catchment. It is unclear whether these collectively add up to a level of delivery that would enable key targets to be met; for example, the COP15 Global Biodiversity Framework targets signed up to by the UK, and by Welsh Government through the Edinburgh Declaration, such as to 'reduce excess nutrients lost to the environment by at least half' by 2030. In particular, the plans lack the level of certainty required to be confident that their ambitions will be achieved; the who, where, when, how and so on of delivery commitments. There was recognition that monitoring and reporting against these plans is currently insufficient to enable stakeholders to understand the scale and impact of action, and to inform further delivery – we recommend that any reshaping of plans takes this into account. Attendees felt that alongside a plethora of plans, there are also regulations that do not necessarily function well, suggesting that gaps, and differences in approach between England and Wales, need to be tackled.

3) Frame solutions around the RePhoKUs recommendations

Whilst accepting that phosphate is not the sole issue here, all stakeholders present at the roundtable agreed that the recommendations made by the Lancaster and Leeds Universities' RePhoKUs Project should be used as a foundation for further action. Noting that some conclusions are already being acted upon, we felt placing them central to future plans would create the necessary focus and ambition. Critical was recognition of the need to reduce the phosphate input, particularly from agriculture, and that this will best be achieved through a combination of processing manure to produce renewable fertilisers, exporting phosphate products out of catchment, and reducing animal numbers. The full set of recommendations are appended below.

4) Prioritise (and fund) solutions

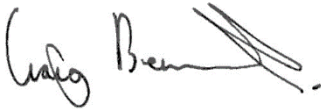
We discussed multiple solutions that could deliver mitigation or restoration. Of particular note were nature-based solutions as mitigation for nutrient pollution where housebuilding is held up, noting the impact of this situation upon rural communities; substantial multi-functional buffers along river corridors to not only slow nutrient losses to the river but to provide protection against climate change impacts as well; and the consideration of incineration or Anaerobic Digestion to generate lower-phosphate fertiliser products (though noting the uncertainty and potential long times frames associated, and that particularly for the latter, pollution risks would need to be closely managed and currently present a barrier to use). Linked to our first conclusion around catchment governance is the need to prioritise these various solutions and ensure that funding sources (both statutory and corporate) are most effectively targeted towards delivering the highest priority actions.

5) Develop and support Farm Clusters

The value of supporting farmers on the ground to facilitate change was recognised by all. Farm cluster groups which bring farmers together, showcase best practice and innovation, and share solutions to common issues through peer-to-peer learning have been shown to be effective in scaling up action on the ground, and enabling faster change. To complement work undertaken through Farm Herefordshire, support for similar initiatives in Powys & Monmouthshire should be secured.

I hope that you find these reflections useful, and I would welcome the opportunity to discuss these conclusions with you further, to support your consideration of the additional focus that we all believe needs to be directed at the River Wye in order to halt and reverse its concerning decline.

Yours sincerely,



Craig Bennett
Chief Executive, The Wildlife Trusts

c.c. Tony Juniper (Chair, Natural England)
c.c. Alan Lovell (Chair, Environment Agency)
c.c. Sir David Henshaw (Chair, Natural Resources Wales)

c.c. all participants of The Wildlife Trusts' roundtable, held on 17th July 2023 (see appendix)

RePhoKUs Report Key Recommendations for Action:

- Policies to mitigate river P pollution from agriculture should change emphasis and seek to **reduce the P input pressure on catchments in addition to the current emphasis on mitigating transport and delivery of P** from land to water. Catchments cannot continue to absorb annual agricultural P surpluses without risk of long-term endemic P loss to water.
- **Better enforce and support existing regulation** (e.g. impending Water targets and existing Farming Rules for Water) with policies, tools and governance towards achieving at least net zero P surplus at catchment and regional scale.
- **Reduce livestock manure P loading through a reduction in animal numbers and by processing manure to produce renewable fertilisers** to replace imported fertiliser, and by exporting manure to other regions. Research is needed to support technological development of safe and effective recovered P fertilisers and feed supplements.
- Provide **incentives to draw-down areas of high-risk P-rich soils** to at least the agronomic optimum. Research is also needed to explore farming at soil P Index 1.
- **River monitoring data generally needs to be made more accessible, consistent and at a higher resolution** to be able to make robust comparisons to catchment nutrient loading pressures and soil P build-up and monitor progress of the P Action Plan.
- **Substantially scale-up and provide for stable resourcing and long-term funding of local catchment officers, complementary land stewardship schemes and permanent knowledge sharing and coordination platforms to build stakeholder trust and understanding of P issues**, and support uptake of both incremental and more transformative structural changes in practice.
- **High resolution crop census data, and fertiliser and manure input data needs to be made more widely available** to allow accurate quantification of P cycling within the catchment.

Reference: [Re-focusing Phosphorus use in the Wye Catchment \(2022\) Withers, P. et al](#)

River Wye Roundtable Attendees

Organisation

Avara Foods
Border Oak
CPRE Citizen Scientist
CPRE Herefordshire
CPRW
Dŵr Cymru (Welsh Water)
Environment Agency
Environment Agency
Farm Herefordshire
Foyle Food Group
Friends of the Lower Wye
Friends of the Upper Wye
Herefordshire Council
Herefordshire Council
Herefordshire Rural Hub
Herefordshire Wildlife Trust
Herefordshire Wildlife Trust
Herefordshire Wildlife Trust
Kepak
Leeds & Lancaster Uni / RePhoKUs
Natural England
Natural England
Natural Resources Wales
Natural Resources Wales
Natural Resources Wales
Nature Friendly Farming Network
NFU Midlands
NFU Cymru
Powys County Council

Attendee

Jim Roberts
Merry Albright
Ian Hague
Andrew McRobb
Christine Hugh-Jones
Jennifer Grubb
Alan Lovell
Clare Dinnis
Martin Williams
Harriet Price
Nick Day
Nicola Cutcher
Cllr Elissa Swinglehurst
Ross Cook
Kate Speke-Adams
Jamie Audsley
Alison Mclean
Malcolm John
Julie Finch
Professor Paul Withers
Tony Juniper
Emma Johnson
Gavin Bown
Tristan Hatton-Ellis
Sir David Henshaw
Hywel Morgan
Sarah Faulkner
Stella Owen
Cllr James Gibson-Watt

Powys County Council
Radnorshire Wildlife Trust
River Action
Soil Association
Soil Association
Tesco
The Wildlife Trusts
The Wildlife Trusts
The Wildlife Trusts
Waitrose
Waitrose
Wildlife Trusts Wales
Woodland Trust Cymru
WRAP
WWF
Wye & Usk Foundation

Ethan Hamer
James Hitchcock
James Wallace
Helen Browning
Andrew Tuddenham
Alice Ritchie
Craig Bennett
Ali Morse
Barnaby Coupe
Marija Rompani
John Gregson
Rachel Sharp
Natalie Buttriss
William McManus
Conor Linstead
Simon Evans