

I regret that I have not been able to respond more fully or timely in respect of your recent report. I therefore write in respect of a specific problem related to two protected sites, the rivers Wye and Usk SAC

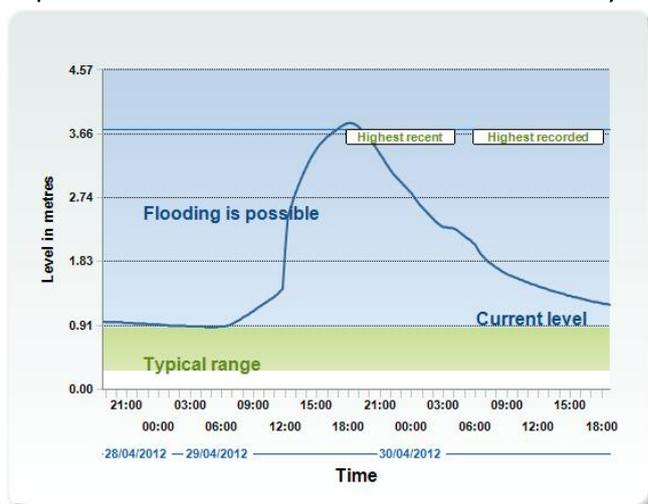
The Wye and Usk Foundation is a registered charity seeking to restore the ecology and fisheries of the Wye and Usk, two heavily abstracted SAC rivers. Our work covers a range of activities which may be found [here](#). There have been extensive discussions with the Environment Agency, CCW and others over the issue of whether the flows in these rivers are adequate to allow the proper migration of Atlantic salmon and other annex II species which include shad and lamprey.

Unquestionably, the recent decade has shown that salmon are now primarily caught in the lower sections of both rivers where once they would migrate throughout the catchments. Investigation has found that this is not because of a shift to later running fish either. In wet years, it seems migration occurs as had been habitual for records spanning 100 years. We attribute this to the management of flows and abstraction levels in the Wye. A sticking point in the Review of Consents discussions has been the deployment of the UKTAG naturalised flows. Both rivers fail their conservation targets for salmon yet this is applied to one (the Wye) and not to the Usk.

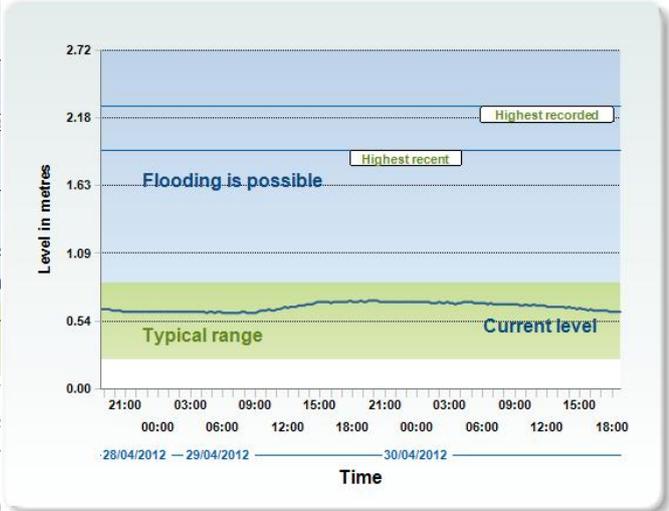
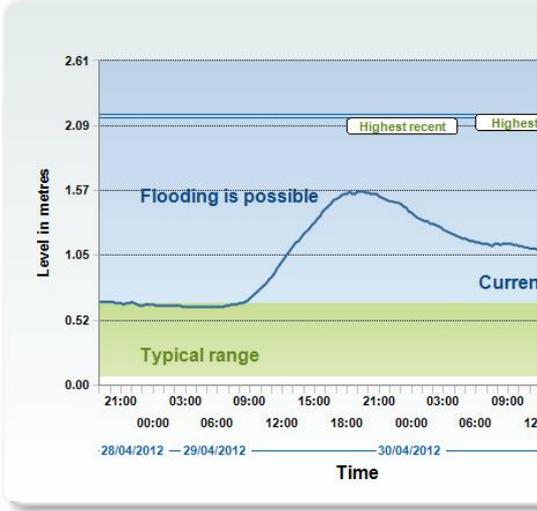
Both rivers have reservoir systems and about the same proportion of both is occluded behind dams. The EA maintain that the Elan dams (Wye) have been there so long, any changes they cause are effectively to be considered as 'natural'. This we hotly contest not least because there have been changes over the years to the management of the system, including increased total abstraction. Originally there was a compensation flow that was something close to the Elan's natural base flow. Now it is just 68Mld but given a boost when flows at the bottom of the river (some 125 miles away) drop to a certain threshold. Compounding the difficulties for migration, on the detection of a natural spate, the regulation discharge (which is approximately 3 times the compensation flow) is switched off, resulting in severe "clipping" of any summer spate. In short, this is anything other than natural and we have spent considerable time with an experienced Hydrologist who has produced a lengthy report [here](#) (please see the pdf reducing the impact of abstraction on salmon in the Wye) showing a cost effective means of correcting this. The Agency cling to their UKTAG flows, presenting an impasse.

On our very long SAC rivers we believe consideration should be given to the importance of ensuring salmon are well up the system in the autumn while catch records show this is no longer the case, with consequential problems in ensuring that the headwaters are fully populated. The issue of emigration of smolts especially on the Usk which are subject to severe losses during low spring flows which could be mitigated by smarter abstraction management. We have not dealt with other migrants.

We see that calling the flows on the Wye or Usk natural when these massive abstractions and impoundments have such a marked effect is clearly wrong. As an example of the effects of



impoundment, I include three graphs of the same spates: on the left the Monnow but typical of all gauged tributaries on that day (30th April 2012) middle Arrow, right Elan



Please would you advise if the above can be included in your consideration of target flows