



# Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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**Janet Forbes**  
(by email)

**Janet@sniffer.org.uk**

**28<sup>th</sup> February, 2013**

Dear Janet,

## **CCW response to UK TAG consultation on Phosphorus and Biological standards.**

CCW welcomes the introduction of revised standards for phosphorus and various biological quality elements. The site-specific approach for phosphorus standards is particularly welcome as it eliminates errors and anomalies for water bodies close to topological boundaries. The following comments and observations should, therefore, be seen as opportunities for clarification and improvement and not as criticisms of the process itself.

- Given that a large proportion of upland waters in Wales are affected by acidification, we welcome the development of robust tools able to monitor the impacts of this pressure in both lakes and rivers.
- We strongly support the introduction of hydromorphological standards for lakes which, in our view, provide an evidence based method for protecting their ecosystems.
- The summary text describing the proportion of water bodies passing for macrophytes (section 3.1) does not correspond with the text in the summary for rivers (section 2.1). The major changes actually seem to be related to phytobenthos.
- In our view, there is a potentially serious gap in the standards due to the absence of an effective tool for assessing the impact of silt on river communities. We note the recent development of the PSI and would recommend that UKTAG consider taking this index forward as a matter of priority, with the intention of incorporating it into the RICT tool.
- We note that failure to meet GES is often due to biological failures. With this in mind, we strongly recommend that all the environment agencies extend their biological monitoring networks to provide greater confidence in the assessments and broaden and deepen the evidence base.
- High Ecological Status (HES) is in our view an important component of WFD and for river conservation. However, existing morphological tools virtually rule out any water body in England and Wales reaching HES. It should be a priority, therefore, to develop a more ecologically relevant morphological definition of HES to be applied in England & Wales.



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- A key technical requirement for future WFD tools will be the ability to report on and demonstrate compliance with the relevant Habitats Directive habitats and species objectives within general concepts of GES and HES. The conservation agencies have responsibility for setting conservation objectives for designated wildlife sites, and hence for the standards which underpin those objectives. The attempted alignment where possible of the standards used under WFD and HD is a complex process and still underway. We are working with UKTAG towards better integration of Habitats Directive, SSSI monitoring and WFD classification tools and consequent objective setting.

We also look forward to further involvement in the development of the Transitional Waters and Marine Standards as part of National Resources Wales.

Yours sincerely

Kerry Rogers  
Acting Water Management Advisor

