

Environmental NGO Recommendations for the Minister



Our 3 Key Concerns with the Draft River Basin Management Plans

- We cannot see which measures will apply to individual water bodies and therefore cannot comment on their effectiveness.
- There is insufficient information provided on how measures have been appraised, and how decisions have been made on whether they should be adopted or discarded.
- The Environment Agency have told us that they are deviating from UKTAG guidance in their approach to monitoring and classification, yet this is not documented. We are also concerned that no action will be taken on some water bodies as a result of poor monitoring.

The 3 Changes Needed for the Plans to Address Our Key Concerns

- 1) **A clear and transparent “Measures Appraisal Process” that includes worked examples of how measures are assessed and clearly explains why some measures have been discarded.**

Key to the River Basin Management Planning (RBMP) process is ensuring that the most effective measures are put in place to deliver Good Ecological Status (GES). This must be a transparent and logical process. In its current form in the draft plans, the measures appraisal Annex refers to the names of the different measure assessment tools used, but does not describe them in any way. The actual methods remain unclear and no worked examples or detailed information is provided. Without this it is incredibly hard to understand how the measures appraisal has been worked through and how decisions about the best measures have been made. The updated measures appraisal Annex (currently Annex 9) must include worked examples of the measures appraisal processes mentioned, and list (along with justifications) measures that were considered but not adopted.

- 2) **Annex 10 (Proposed Objectives) must include a list of the measures that are going to apply to each individual water body.**

Without this information, there is no link whatsoever between the measures chosen and the actual water bodies within the plans. Such a link is vital as it allows an

assessment of the effectiveness of measures and demonstrates how targeting has been approached. Although we acknowledge that in some instances it may be difficult to assess, for example, the exact magnitude of improvements expected at a water body level for all national measures, we do know that the Environment Agency (EA) will have made this assessment themselves through modelling work. This means that they could at least list measures that would be expected to help each water body. Considering that the plans are legally required to deliver for individual water bodies, it seems completely irrational not to list the measures needed at the water body level.

- 3) The EA must produce a clear and well referenced monitoring protocol that sets out how they have established their monitoring network and how this has been used to inform classification. This should include a description of the risk-based approach to monitoring, an outline of the reference sites being used, the approach being adopted for sites that have no monitoring, and a description of how and why confidence in monitoring is determined. This document should also be consulted on.**

The Draft ministerial guidance makes reference to UKTAG guidance on monitoring and classification. However, we have been informed by the EA that they will be taking a significantly different approach on a number of key issues such as alien species, and the percentage of a water body needed to trigger failure. These changes in the approach to classification are not documented. We believe a clear auditable trail is vital in order to allow meaningful stakeholder involvement.

One of our key concerns is that where there is low confidence in a classification, this could either be due to genuine complexity in the water body, or inadequate monitoring. It is vital that the plans differentiate this when they report low confidence in classification.

The Ministerial Guidance must require the publication of and consultation on an EA monitoring protocol before the draft plans are consulted on in December.

This briefing is supported by the following Link member organisations:

- Anglers' Conservation Association
- Association of Rivers Trusts
- Buglife: The Invertebrate Conservation Trust
- Campaign to Protect Rural England (CPRE)
- Froglife
- Pond Conservation
- Royal Society for the Protection of Birds (RSPB)
- Salmon & Trout Association
- Wildfowl & Wetlands Trust (WWT)
- The Wildlife Trusts
- Woodland Trust
- WWF-UK