

## **Wildlife and Countryside Link headline response to Environment Agency Risk Assessment and Characterisation for Water Framework Directive Article 5 report**

1. Wildlife and Countryside Link brings together 35 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of almost 7 million people in the UK. This response is supported by the following organisations: Buglife: the Invertebrate Conservation Trust, the Herpetological Conservation Trust, the Marine Conservation Society, the Ponds Conservation Trust, the Royal Society for the Protection of Birds (RSPB), The Wildlife Trusts, WWF-UK and the Wildfowl and Wetlands Trust.
2. Wildlife and Countryside Link would like to raise the following headline concerns in response to the Environment Agency Risk Assessment and Characterisation for Water Framework Directive Article 5 report.

### **Characterisation**

3. **Small Water bodies must be characterised in future iterations.** The area of lakes and rivers covered by this assessment is only a fraction of the total resource, and misses out many of our most ecologically important waters. The WFD clearly states that it applies to ALL surface waters. However, programmes of measures will not address those that are not characterised by the Environment Agency. Amphibians like natterjack toads, dozens of rare and endangered invertebrates, endemic macrophytes, and many species of fish rely on small water bodies for their survival, and are threatened by anthropogenic pressures from pollution to habitat alteration.
4. **Nationally important sites must be included in the protected areas register, or another appropriate mechanism found to ensure their coverage by WFD programmes of measures.** Protecting the SSSI network and Ramsar sites is a Government priority, and it would be a tragically missed opportunity not to include these important commitments in WFD implementation.

### **Risk Assessment**

5. A way of **assessing the effects of combined and cumulative pressures** on water bodies must be found. Different sources of pollution may interact to put waters at risk, and upstream pollution can accumulate as a river flows from source to sea even if the pressure is outside the section of catchment assessed.
6. Decisions on **thresholds for good status** are fundamental to the level of risk calculated. The processes, through which the EA has come to these decisions, must be fully **transparent** with relevant information clearly provided.

### Stakeholder Participation in future

7. The NGOs in Wildlife and Countryside link would like to have **greater involvement in technical decisions** about WFD implementation. Digesting all the information in this review process has been frustrating, and background decisions not always clear. We request access to the UK Technical Advisory Group meetings, or a technical stakeholder group run by the Environment Agency to hold regular meetings over the next few years of refinement under River Basin Characterisation<sup>2</sup>.
8. **Monitoring** will be crucial in providing the correct factual basis for river basin planning. We would like to be fully informed and invited to comment on the design, introduction and progress of the monitoring programmes.