From: Chairman Usk Fishing Association

To: ALL MEMBERS

Date: 28th November 2021

Dear Members

**Reference: Meeting with CEO of Dwr Cymru / Welsh Water**

Firstly, I am sorry that I haven’t been in touch with you all in the recently months. The UFA Committee have, however, been working in the background throughout the summer on your behalf as the river levels plummeted, the phosphates increased, the algae got worse and fish became more and more scarce. We were talking behind the scenes with NRW and Dwr Cymru, and we weren’t getting very far until the Panorama programme hit our screens on the pollution of our river and the general social media backlash against the regulatory bodies and NRW.

I have done 3 pieces to camera for BBC Wales and ITV Wales News in the past 2 months on the pollution and phosphate issue of the River Usk. I then wrote on behalf of the UFA to the CEO of Dwr Cymru requesting an urgent meeting with him and the Board to discuss the issues relating to their pollution into our river.

The meeting took place a few weeks ago, and I was supported by our Deputy Chairman (Helen Harrison) and Guy Mawle (UFA member with relevant expertise). We met with the Chief Executive, The Head of Waste Management and the Head of Marketing and Communications.

We had a very frank and thorough conversation covering many aspects of the current and future issues that will affect the River and how Dwr Cymru will take action to cease much of the pollution in the river. Guy had prepared a number of more specific questions for Dwr Cymru to answer and I have included those questions and answers at the end of this email for you to read. Within the Dwr Cymru CEO covering letter, Peter Perry wrote:

“**recent investment in the Usk Catchment** – I can confirm that we have completed commissioning last year, a £10.2m upgrade at our Llanfoist wwtw [waste water treatment works], to increase capacity and resilience in the treatment process. At the time we started this work, NRW did not indicate that a phosphorous (P) stripping requirement was needed. We also invested £3.0m in our Aberbaiden wwtw in 2019 to increase capacity and improve storm discharges.

**proposed investment** – we are currently spending £2m at the Mill St storm overflow. We have already reduced its operation by installing a bigger pump to forward flows to the treatment works and we are installing an automatic screen in early 2022. Options to reduce its operation are being examined but are likely to cost between £10-20m, given where all the surface water is coming from in Usk Town. We have a scheme planned for delivery by 2024, to expand the treatment capacity at Brecon waste water treatment works. The original plan for this upgrade, like Llanfoist, did not require phosphorous removal but we are requesting the NRW allow us to move a planned phosphorus removal scheme from a works on a non Special Area of Conservation tributary on the Wye to Brecon. Reducing P levels at Brecon would have a positive beneficial impact downstream on the Usk. We are also exploring the technical challenges and timescales to install P removal at Llanfoist and Monmouth treatment works. This is likely to cost over £9m, investment we currently don’t have available in the current regulatory period, so we are working with the Local Authorities and NRW on including this in our AMP8 (2025 – 2030) investment plan. We are also exploring if there is a temporary, lower cost solution we could deploy over the shorter term at these works and a couple of others on the Wye.”

I do not presume to provide you all a complete transcript of our meeting as there was a lot of history of the problems initially and a lot of talk of current regulations in some detail. What I will tell you is that I believe the CEO, Peter Perry, does care and does worry about what has gone on and what is going on. Regulations to a degree need to change in order that further funding with new regulations can be appropriated by Dwr Cymru. This is a Wales issue as well as OFWAT issue. There is a degree of one arm being tied behind their back: for instance, if they were to carry out works in their pumping stations that would be above and beyond the regulations, they say that this would initiate a cross compliance issue and therefore they would not get paid for the works they are currently doing.

I made it very clear to Peter Perry, that this was no excuse not to do better and not to go above and beyond to make sure that:

* raw sewage is not pumped, leaked or spilled into the river, and
* tampons, sanitary towels, plastic waste and other solids are not seen coming from outflow pipes belonging to Dwr Cymru.

The social media evidence was overwhelming, and he agreed they have to do better. He stated that in 2022 he is recruiting four river wardens whose specific jobs will be to patrol and monitor the Usk from source to estuary and all their infrastructure along the river. We along with WUF will work with these wardens and report anything untoward. We will receive further details early next year. This can only be a good thing for the UFA.

We made it clear that the current situation was totally unacceptable and that the Board of Dwr Cymru must as a matter of urgency address the issues we have seen this year in particular. He said that he was ‘absolutely determined’ to work with UFA and its members moving forward.

I therefore ask you all to keep me informed of ‘ANY’ pollution or incident (be it farming, Dwr Cymru or other) that happens on the river or its tributaries going forward. I have the CEO’s personal mobile and am to call him directly should anything occur. Helen and I will continue to engage with Dwr Cymru Welsh Water on an ongoing basis with your best interests in mind.

I very much hope that we will be able to have a full AGM in the new year and I will arrange that an email is posted in the next few weeks with some proposed dates. The committee will meet before the AGM and create an agenda as always, so if there are any specific issues you wish to be raised please please email Helen and me.

In the meantime, please do email me with any comments or questions you may have in regard to our meeting or anything else. I wish you all a Happy Christmas and safe and healthy New Year until we meet.

With my Best wishes

Harry

**Meeting: Usk Fishing Association (UFA) and Dwr Cymru Welsh Water (DCWW)**

**DCWW Shaws Building, Fountain Lane, St Mellons Cardiff CF3 0FB - POD A**

**0930-1030 hrs, 20 October 2021**

**Attendees:** DCWW: Steve Wilson (MD Wastewater Services), Gwyn Thomas, Peter Perry

UFA: Harry Legge-Bourke, Helen Harrison, Guy Mawle

**Darft agenda & suggested questions:**

1. **Housekeeping and Introductions**
2. **Mill St CSO, Usk:**
   1. The problem: discharge of unscreened sewage especially on low flows: Aesthetic/ Impact on fishery/ health/ environment.

This is something we do recognise and we are currently working on an improvement programme.

With regards to screening – not all CSOs are required to be screened using NRW / EA permitting guidance. However, guidance for the River Usk would be that we would need to install screening to 6mm in 2-dimensions (this is the tightest screening on a CSO and meets the best available technology not entailing excessive cost approach.

Impact on river health is undertaken by reviewing our modelling and undertaking assessments of localised impact using the Storm Overflow Assessment Framework (SOAF) programme. We have undertaken this for the Mill St CSO and the results are due to be issued by our consultants at the end of the year. Current assessment is that there is no Water Quality impact (as assessed using NRW guidance). WFD is currently moderate but in the 2015 assessment NRW did not put Welsh Water assets as a Reason for not achieving good. However, we are expecting a new NRW review by the end of the year). Phosphorus assessment awaited from consultants, so we need to stress that this review is ongoing and the above is initial analysis.

We have assessed against Bacteriological standards and immediately downstream of the bridge is not currently suitable for Bathing Water standard.

* 1. What data are available on the discharge: date/ flow of discharge/ time flowing?

We have data from December 2021 and can easily provide this. The asset was not performing well early in the year, and we installed a larger pump in the pumping station (SPS) and spill frequency reduced. In May 2021, where the long-term average rainfall was 241%, we discharged 7 times (spill block counted method). However, it must be noted, we do NOT measure flow from our intermittent discharges, just the 15 minutes blocks when they discharge.

* 1. How long has it been operating like this? Since 1974
  2. Why is it operating like this? Design faults?/ Poor planning?/ lack of funds?

It was designed to operate like this to ensure the upstream catchment does not flood – our pumping stations are designed according to the modern day standards that are applicable at the time of construction and designed to forward a pass forward flow set in the environmental permit. Above that, the guidance is that we can discharge to the environment as this will be at times of rainfall so both the discharge will be highly diluted (around 95-97% rainwater to 3-5% sewage and there should be more flow in the river also.

* 1. Why no consent?

This was an old District Council SPS and when the Water Industry was privatised all existing assets were permitted under a single permit with a view to the regulator issuing single permits (or consents as they were then) at a later date. DCWW agreed with NRW to tidy up this process and make sure that we had the right permits for the right assets as we went about installing these new Event and Duration Monitors (EDM) in the period 2016-2021. We surrendered around 400 permits no longer required but had around 200 which required new permits. We had notified NRW about this number and were working with them on what guidance applied so that the permits met the new, current standards. This guidance has now been agreed and applications are underway.

* 1. Why doesn’t DCWW report discharges to NRW?

We send the regulator a report at the end of each year which highlights the number of discharges and total duration for each asset. Usk was only installed in 2020 so the first time we report data will be in 2022 (February).

* 1. What action has NRW asked DCWW to take?

NRW have asked us to undertake the pre-permit assessments according to their Technical Guidance Document and to submit new permit applications within 2 years. The reason this takes so long is we need to undertake 2 separate invertebrate samples and a water quality assessment as well as explore options to make any improvements identified against their guidance. We are on with this in Usk Town.

* 1. When will the problem be fixed?

It is very hard to commit to a final solution until we know what the actual permit requirements are likely to be (e.g. discharge numbers, etc). We will be installing a screen in 2022 and making permanent the current temporary pumping arrangement we will have to make some improvements at the Wastewater Treatment Works (wwtw) to ensure no deterioration of discharges but the longer-term catchment plan depends on a number of investigations. We continue to look for opportunities to reduce surface water in the network which will assist in spill reduction. We will be working in this catchment area now into the next investment period (AMP8 2025-2030) but we are working on what can be done in the short term to reduce discharges.

Current options below

Timeline

Description automatically generated

1. **Other raw sewage discharges to the Usk:**
   1. How many and where? Can DCWW provide information?  
      We have 3 No. similar to Mill Street as direct discharges into the SAC river but we will provide separately a list of all those assets discharging in the Usk and its tributaries.
   2. Is this a major problem for the ecology of the Usk or just people?

We need to undertake our calibration of the SAGIS river model to confirm numbers but no, this is not a large issue for the water framework assessment and ecology, although we do recognise improvements must be made over these discharges. However, from a phosphorus perspective, which is the big issue on the river, the model will tell us how much a proportion DCWW contribute to the problem and how much of that problem is split between CSOs and WwTW. On the river Wye, of the DCWW contribution of 25 to 33% of the total load, CSOs make up 3%. On the Usk we think it will be circa 7% but this work is still ongoing. On the Wye, our planned improvements to phosphorous removal at around 10 wwtw, will drop that contribution to between 10-20%.

1. **Treated sewage effluents to the Usk:**
   1. Do DCWW discharges comply with standards on permits?

Yes; occasionally we might have issues which cause a single permit breach and our the permits are assessed over a 95%ile analysis before the works would become non-compliant. This is because sewage treatment is a biological process and the living biology does not perform perfectly in all weathers. The 95%ile basis allows for occasional reductions in performance in very cold / very hot / flooding scenarios.

* 1. What does DCWW report to NRW?

We report against the quality determinands specified within the permit. These are in the main, Solids and BOD. On Urban Waste sites we also report on COD. A number of our works, where it has been deemed to be required by the regulator, have ammonia, phosphorus and nitrogen permit limits. There will also be a number of metals and other quality elements that we monitor against if the permit specifies. So, iron will be added to permit limits if we dose iron based chemicals on a site to protect the receiving water.  
 We also report against flow and this is done annually. Currently this is only DWF (where permitted to do so – so those that discharge over 50 m3/d) but is being extended to include PFF by 2025 for the larger of the WwTW (circa 380 of the 830 treatment works).

* 1. What parameters do permits cover? See above
  2. What checks does DCWW do on treated effluents? Just parameters on permits or other pollutants? Just parameters on permits via our OSM team (independent team which sit within our legal and compliance directorate). WE sometimes are part of National programmes to understand emerging chemicals in our effluents which then feed back into the regulator for their assessment. In the past, this has been things like endocrine disruptors. The national Chemicals Investigation Programme (CIP’s) is agreed on a 5 year basis and we agree with our regulators and with other water companies a range of the more exotic chemicals present in household good, pharma products, herbicides and pesticides and even illicit drugs that we will analyse for so that we can collectively understand what other compounds may be in the aquatic environment from discharge through the wastewater network.

1. **Asset Management Programme (AMP):** 
   1. What will be done, where and by when to reduce impact of sewage effluents to the Usk and its tributaries?

On the Usk, it is important to stress there is nothing in AMP7 specifically for the Usk as the focus was on the River Wye. The regulator and the recent P report for the river was based on the last three years of specific assessment under the tightened targets. There were a couple of sites in our programme for AMP8 NEP (Libanus and Talybont on Usk). However, the model will confirm what is needed for inclusion in our PR24 programme and will be agreed with NRW for inclusion in NEP

* 1. What specific plans to reduce phosphate, especially at major works: e.g. Brecon, Llanfoist STW?

At present there are no plans, but we can clearly see from the results that both sites will need P removal in AMP8. We are exploring with the Local Authorities and NRW if we can accelerate these sites but we have not been funded for these so we are working on where funding could come from and with NRW on whether a temporary permit could be issued so that we could install chemical dosing to reduce phosphorous.

* 1. What has been/is stopping DCWW from doing more, faster?

Affordability and time to ensure the model is calibrated, verified and scenarios run to ensure we invest in the right assets to achieve DCWWs fair share reduction. We need the data and the model so we can assess how much P we need to take out at each site to ensure we take out our fair share (DCWW customers should not pay for load reduction from other sources). It will also allow us to understand if we could technically take out more P and then that would be the opportunity to work with a range of stakeholders so that we could create a “payment for ecosystems services approach”, so we can collectively get the Usk back into a state that we all want to see, but that there is a more equitable “polluter pays” approach.

WWTWs are a major contributor to the amount of P in the Usk – this was not known to us until NRW published their recent compliance assessment against the recently tightened P standards for the Usk in Jan which allowed us to reassess our contribution to problem.

We also need the nutrient neutrality and fair share modelling policies from NRW which they are currently working through and will be released in due course.