

Dr Nerys Llewelyn Jones
Interim Environmental Protection Assessor
PO Box 123
Cardiff

5 August, 2024

Subject: Water Quality Report: Call for Evidence

Dear Dr Llewelyn Jones,

We are writing to express the disappointment we share with Wales Environment Link (WEL), as stated in their letter (dated 23rd July 2024), that agricultural sources of pollution are not included in the frame of focus of the IEPAW Water Quality Report.

We acknowledge that the decision to focus on wastewater in the call for evidence has been in large part driven by the need for efficiency and the avoidance of duplication of the review of CoAPR. However, for any review of such a complex set of issues to be effective, it must take a systemic overview of all sources of water pollution. While we understand that the IEPAW anticipate being in a better position to consider agricultural pollution upon the completion of several pieces of work, this piecemeal approach to review perpetuates the fragmented approach to water quality regulation that is an underlying part of what is now a great public concern.

CIEEM is very sympathetic to the impacts of inadequate resourcing on the ability of regulators and IEPAW to discharge their functions, and we regularly cite this as a key factor behind persistent environmental harm. This gives us cause for concern about the ability of Natural Resource Wales to adequately check for compliance with water discharge permits, monitor and report on the state of the water environment. This lack of resources also limits NRW's ability to investigate pollution incidents and to undertake take enforcement action. There are citizen science projects which could help ease the burden of water quality monitoring, (question 22) though they are limited in the determinants they can monitor.

We believe the Environmental Permitting Regulations, if properly enforced, form a sound basis for controlling discharges of pollutants either directly to water, or indirectly via emissions to air or application to soils, we believe they need strengthening in a number of ways:

- increasing scope, for example, by lowering the threshold for intensive pig and poultry units (IPUs) to require a permit, by including intensive beef and cattle rearing (which can be more polluting than IPUs which require a permit), and including more highway run-off discharges;
- increasing (where appropriate) the range of pollutants controlled by permits (and their monitoring in the environment). For example, emerging micro-pollutants such as microplastics, and pharmaceuticals.

We recognise the final questions of the call for evidence as an opportunity to express views on other sources of water pollution besides wastewater. While we note that there is not currently a plan for what to do with this information, we would like to highlight highway runoff as an unregulated source of water pollution which can contain heavy metals, hydrocarbons and microplastics from vehicle wear, and residues including oil and screen wash. Whilst the issue and its potential seriousness are known, the extent of the impact is not well understood because there is no consistent monitoring of highway runoff pollution¹. Similarly, while there is growing concern about the impact of emerging micro-pollutants²

¹ <https://www.bbc.co.uk/news/science-environment-68130715>

² <https://doi.org/10.1016/j.scitotenv.2022.157014>.



such as microplastics, and pharmaceuticals in wastewater, there is little monitoring of their extent in the water environment.

Yours sincerely,

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