NRA

National Rivers Authority

CLEAR WATERS

Priorities for the National Rivers Authority after one year's work

THE LAPHROAIG LECTURE
TUESDAY, 30TH OCTOBER, 1990.

SPEECH BY
THE RT. HON. THE LORD CRICKHOWELL,
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at
The Fishmongers' Hall
London

It is a particular pleasure to have been asked to give this *first Laphroaig Lecture* for two reasons. The first is that my wife and I have a particular personal link with the island of Islay. A good many of her forebears came from it; her grandmother was born in Islay house and her great-grandmother in the Manse at Kilchoman. I suspect that many of her male ancestors when home from trading in the Far East consumed a great deal of the local whisky! The second reason is that this company's interest in pure water and its generous sponsorship of this lecture enables me to report on the first year of the life of the NRA and upon our plans for cleaner rivers.

We came into existence in July 1989 and took over our responsibilities in September of the same year. We have had to create a management structures and systems for a new national organisation, prepare our first Corporate Plan and develop a strategy for information technology. We have also had to develop a large number of new policies by a process that involved working parties and experts from our Regions, our senior management and finally the Board which had to consider over 80 policy papers between July 1989 and the end of the financial year in March. We had to set up our Regional Committees and begin to involve them in all aspects of our work. We had to respond to a series of demands from Select Committees, from the Royal Commission and others for evidence of one kind and another. We have had to establish relationships with many different organisations and while all this was going on we have had to cope with emergencies and carry on with our operations covering a very wide range of responsibilities in ten different Regions. We have had to do all this with an inherited regional structure which was far from perfect and with only a skeletal head office.

A further complication has been that our work has been undertaken against the background of one of the driest periods of two consecutive years on record. That drought exacerbated conditions in many of our rivers that stimulated vigorous complaints from fishermen and others. Their indignation and impatience was understandable; but I have to say that many of them seem to have little understanding of the nature of the problems we face or the timescales that will be needed to carry out the massive programmes that are required to put them right. Industrial Britain has developed over the course of more than 250 years and current levels of pollution and over abstraction are the outcome of our way of life in an industrial society as it has developed over that period. A number of the more intemperate comments and some of the demands from the environmental pressure groups seem unconnected with the real world and the finding of practical solutions. Yet, I share their objectives and impatience and my irritation is very seldom aroused by people demanding action, though it is sometimes by their assertions that we don't care, don't understand or are neglecting to do anything about the problems that they identify.

The simple point I have to make is that even if tomorrow we were to scrap our factories and chemical plants, and if our farmers were to return to age old agricultural practices and we were to carry the water from our rivers to our rustic homes in buckets, it would still take decades to clean up the mess; though without the output from modern industry we would not have the resources to undertake the clean up in any event. Clearly that is not an option; and so we have to take an alternative way forward in which we identify modern technology not as an inevitable cause of destruction but as an instrument of improvement.

We should not underestimate the progress that has been made in the last twenty five years. If I take the mid sixties as my starting point it is because by then the period of post-war reconstruction was behind us and people were looking with increasing concern at the devastation that they had wrought. During a recent visit to the North East the NRA Board was shown photographs of the industrial and chemical complex on Teesside as it was at that time. It is hard now to credit that such a scene of belching chimneys and outfalls could have been allowed, but in eastern Europe they have permitted such things to continue to this day. One distinguished member of the Royal Commission, then with ICI, reminded me recently that the concentration of effort then was on health and safety and on the removal of hazards within the plants themselves. The damage being done outside to the rivers, the oceans and the atmosphere was not fully understood. Since the mid sixties the old heavy

industries have declined, ICI and companies like it have spent millions on reducing the pollution load, and a start has been made in adequately treating the sewage discharged into the river.

The Tees is no longer biologically dead and fish are returning to it in significant numbers. Much remains to be done. During that visit by our Board I formally initiated the £80M sulphuric acid recovery plant which with the associated reed bed treatment subsequently opened by Chris Patten will together more than halve the BOD and ammonia loads discharged from ICI's Billingham site. We expect that the measures taken by ICI, together with the provision of secondary treatment at Northumbrian Water Plc's two sewage works, will lead to a very substantial improvement in water quality by the end of 1993.

Elsewhere similar stories can be told. The Tyne was a dead river ten years ago; today it is one of the best salmon rivers in England. The Taff had no salmon in it at all in 1983: now significant numbers are being caught and further improvements in river quality are planned. Unfortunately in contrast to these indications of real and substantial progress there is the unhappy fact that as a consequence of diffuse pollution caused, in part but by no means exclusively, by modern agricultural practice many of our rivers which were formerly Class 1 (including in many cases the head waters and spawning grounds of our best fishing rivers) have been deteriorating in an alarming way. In addition excessive abstraction of rivers and ground waters, particularly in the chalk regions, has severely damaged and in some cases destroyed some of our most attractive streams. These two problems, diffuse pollution and over-abstraction, may be much more difficult to solve than point source pollution which, given adequate capital programmes and the time to complete them, can be largely overcome.

If this was the situation in the rivers themselves the NRA's industrial and technical inheritance was equally unsatisfactory. It included existing consents for discharges and for abstraction which, though highly detrimental for the environment, convey important rights to those who hold them. Not only is the physical task of reviewing and replacing each of these consents extremely daunting; but before it can be undertaken new policies have to be worked out, taken through the process of public consultation and approved; and capital programmes have to be designed, finalised and implemented. Fortunately the Water Act, one of the most important environmental measures ever passed by a British government, not only created the NRA as the instrument for raising standards but through privatisation gave the water plcs access to the money needed to finance very large capital programmes.

The Act has also given us the mechanism to take the process forward. "Controlled Waters" have been defined in the Act, which allows for the Secretary of State to approve a classification scheme for them and to set "Water Quality Objectives". The NRA has already set out its views on classification schemes and what Water Quality Objectives should contain and submitted these to the DoE and we are now awaiting a response. The Department has indicated that it intends to introduce "Water Quality Objectives" from 1992 onwards, and in preparation for this the NRA is currently undertaking a two-part river quality survey. One part will provide a basis of comparison with the situation covered by the previous surveys in 1980 and 1985 and the other will form a firm basis for the future in a system which we hope will include biological criteria as well as the chemical and physical determinands which have been used in the past.

The NRA will have a major say in advising the Secretary of State; but the WQOs will have very substantial practical and resource implications and in reaching his conclusions the Secretary of State will have to take full account of the wider issues. Once the WQOs have been approved, the NRA is responsible for enforcement. The NRA is also a 'competent body' for carrying out EC directive work in England and Wales and it has responsibility for some 13 directives which in themselves form WQOs.

In deciding on "Water Quality Objectives" and on "Water Quality Standards" against which compliance will be assessed, difficult decisions will have to be taken about the relevant criteria, which will not only be environmental but will include consideration of our other statutory obligations - for example for conservation and recreation.

Conflicts will have to be resolved. It might be argued, for example, that discharges into a particular stretch of water should receive disinfectant treatment in order to make that water suitable for water sports but treatment of that kind might be entirely incompatible with the biological and fishery objectives. There will be plenty of room for debate on such issues.

One of the instruments that we propose for assessing such conflicts and for establishing satisfactory criteria are catchment surveys in which we will examine the specific character of particular catchments, the activities taking place there, and the capacity of the catchment to absorb any given quantity of pollutants.

We have to study the river and its related groundwater as it flows from its source down to coastal waters and out beyond. We have to look at what goes into the river from particular discharge points, what happens to those discharges, (some of which may contain very nasty chemicals), and how they settle or accumulate; we have to look at the diffuse pollution from the land, from agriculture, from industrial and other development, from chemicals and fertilisers; and then we have to consider what happens to all of that. Finally we have to make judgements about the capacity of the land and the water to absorb what is going into it and set objectives which will form the basis for individual discharge Consents. These two concepts which in the NRA we are beginning to refer to as *"catchment accountability"* and *"environmental capacity"* will be very much in our minds as we approach this major task of setting standards.

The NRA has inherited a large number and a wide range of Consents with varied and ambiguous content which it needs to overhaul. During my time as Chairman of the National Rivers Authority Advisory Committee I drew attention to the unsatisfactory nature of the consenting system; to the problems created for a regulator by the way in which look-up tables were being used and to the necessity for upper tier limits. The shortcomings of these arrangements are well illustrated by a recent incident on the River Wey in the Thames Region when a substantial fish kill occurred due to an alleged fault at a sewage treatment works but prosecution was not possible under the terms of the Consent though action is being pursued for the recovery of costs - including restocking costs - by way of civil action.

As the first steps towards improvement, interim guidance has been issued which among other recommendations emphasises the desirability of upper tier limits; and, more significant for the future, a major review of Consent and Compliance has been completed under the chairmanship of David Kinnersley. The conclusions are currently the subject of consultation. We hope to complete the consultation later this year and we will bring the new system into operation for new Consents and for the revision of existing Consents once we have the approval of the Secretary of State.

From April 1991 onwards we shall also have to start operating, in co-operation with HMIP, the new system of consenting of processes for certain dangerous substances under the complicated arrangements for Integrated Pollution Control which stems from the Environmental Protection Bill now before Parliament. While these preparations and consultations involving the consenting system are in progress, a parallel consultation has been going on in connection with our Cost Recovery Charging Scheme for NRA work related to Consenting Discharges. All this has reinforced the need for the complete review and overhaul of our effluent and associated environmental monitoring programmes, the introduction of Automated Systems of Monitoring (where we are making very substantial and encouraging progress), the creation of a national database and the completion of our network of laboratories.

Two points I think need to be made at this stage. The fact that I am emphasising the scale and complexity of what we are about does not mean that I am seeking to provide an excuse for lack of action: we are as anxious as anyone to see early results and we have been acutely aware of the need to create public confidence and meet public expectations. Notwithstanding the constraints of our timetable, the public expects results in the very short term; and I believe that we have been able to achieve that by our determination to improve monitoring and to prosecute whenever that seems necessary. The courts have shown a welcome determination to

support us in this approach. The maximum penalty in the Magistrates Courts will shortly be increased from £2,000 to £20,000. It is already unlimited if we take the case to the Crown Courts. We have also made a vigorous drive to improve the visual appearance of our rivers by seeking public co-operation in the removal of litter.

The second point I want to address at this stage is the question of costs. When we issued the Kinnersley Report there were those who said that it should have estimated the cost consequences for dischargers of implementing the proposals. I have to say that I disagree. The criticism arises in part from a misunderstanding of the nature of the Report which is not concerned with setting standards but with the instruments by which we can efficiently and equitably ensure that any given standard is achieved. By themselves the Report's recommendations do not affect costs and they could be implemented in a way that does no more than maintain existing achievements. Any additional costs arise, not because a particular instrument is used, but because of the need to achieve a specified environmental quality objective or as a result of setting Consent Conditions for a discharge. For individual Consents that are issued or varied before Statutory Water Quality Objectives are approved by the Secretary of State, that is in order to achieve existing river quality classification standards, we will certainly have to discuss costs and the cost-effectiveness of particular proposals.

What should our approach to costs be when after completion of the current Water Quality Survey we make recommendations to the Secretary of State about the Water Quality Objectives he will set after 1992? It seems clear that cost benefit analysis will have to form part of the process catchment by catchment.

There are difficulties - it will be by no means easy at that stage to obtain reliable and realistic costs. One problem is that the moment an environmental regulator proposes a new standard those that it wishes to regulate put forward the highest possible cost estimates to avoid trouble later and perhaps to frighten off the regulator or Government. It is only later when the new conditions have been approved that the regulated organisation sets about the task of finding the lowest possible cost solution. The two figures are likely to be substantially different. Improved management techniques may be as important as capital expenditure.

We also must never lose sight of the responsibility we have to recommend Water Quality Objectives on the basis of what is both environmentally desirable and practical and can be achieved in a three to five year timescale. At the very least we will want to ensure that existing EC standards are met and that the 1985 state of classification of rivers is maintained, and in a large number of cases that will be a totally inadequate objective. It is our job to give everyone a clear view of what the environmental target should be taking account of our various statutory responsibilities and despite the fact that considerable expenditure may be necessary to achieve them. Yet we have as great an interest as anyone else or any other organisation in maximising the cost benefits because we want to see that resources are directed to where they will do most good and so we will have to discuss with dischargers the practicality and cost of the various options that may be available in a given catchment.

During the process of consultation no doubt those likely to be affected will produce cost estimates. There will be no shortage of economic impact assessments from such organisations as the CBI, the NFU and The Chemical Industries Association. In the case of the Water Industry their own representations will no doubt be supplemented by a commentary by OFWAT who will have to form a view as to what should be permitted under the "pass through" arrangements. At the end of this process the Government will reach a view of the cost implications and that will influence its decision on the Water Quality Objectives that are approved and the timing of their achievement. The great virtue of the Water Act is that it will ensure these arguments are conducted out in the open and that we do not have objectives set and consents issued as a result of private in-house negotiations in which other objectives may be compromised by the desire to avoid expenditure or embarrassment. Once the Secretary of State has reached his conclusions, which of course he has to defend in Parliament, then it is our job to issue Consent Conditions that will achieve those objectives and see that they are

rigorously enforced and I would remind you that there is a statutory obligation on both the Secretary of State and the NRA to ensure that the objectives are met by the dates set. At that point in the process we are no longer in the business of cost benefit studies but we are concerned instead with the cost-effectiveness of the techniques for achieving the Water Quality Objectives.

We are then into the final lap of this complicated obstacle race because the NRA can then request a review of one or more of the Water Quality Objectives. The onus will then be on the NRA to argue the case for the benefits to be gained or the cost of the perceived detriment if it is not corrected. That leads me to make my final point about the cost issues. If we are to take full account of the improvement costs, that is to say the burden of putting things right, we must also attempt to find ways of assessing detrimental costs, that is to say the value lost to society as a result of damage to the environment. We are initiating research on those relationships because the search for an optimal objective that minimises the totality of those costs is a desirable part of the process for setting or re-setting Water Quality Objectives. The evaluation of these costs and the definition of an *"optimal objective"* should be our contribution as Guardians of the Water Environment to the cost benefit analysis debate on each Water Quality Objective and must be set alongside the important concepts of *"catchment accountability"* and *"environmental capacity"* which I have already described to you.

Now I fear that we may have reached the point at which many of you are desperate for whatever restorative our sponsors may provide over luncheon and that those of you who are only concerned to know that the water is clear and full of fish will be bored silly by all this talk about costs and financial analysis. I'm sorry about that, but what I have just been saying may nonetheless be the most important part of this Lecture because the costs involved in clearing up the water environment are already large, will grow larger and the price ultimately has to be paid by the consumer. The environmental standards that can be achieved, the speed at which progress can be made, the acceptability of what we propose to Government and Parliament and the consequences for shareholders and consumers, are all to a large extent dependent upon finding generally acceptable techniques for tackling these complex issues. Let me turn now from costs.

I said that I would comment about having to take account of what is practical when we come to set environmental objectives. Let me give you two examples: I suppose that one could say that we should seek to put all rivers into the Class 1 Category, but I think that it would be a bizarre misuse of resources if we were to set that objective for the Mersey or some of our most polluted industrial rivers simultaneously with the setting of a similar objective for our best trout streams. It ought to be a very high priority to protect those rivers that are Class 1 and to restore to that condition those that have deteriorated in recent years. In the case of industrial pollution what we perhaps should be seeking to do is to lift them from Class 3 or 4 as a first step into a higher class. Once we have done that we can think about further improvements. Being practical is to take account of where we are and what it would involve in getting to somewhere else. But we also have to be aware of conflicting user objectives in setting standards, and as I said earlier it would make no sense to try and make a stretch of river suitable for submersible sports if that meant disinfecting discharges so that the biological life of the river and its fisheries was damaged or destroyed.

I have been talking about raising standards through the control of discharges. I now turn to what I have already described as one of the greatest problems that confronts the NRA and that is the control of diffuse pollution. Diffuse pollution comes from many sources; it comes from modern agricultural practice; it comes in the form of run-off from industrial estates, large and small; from housing estates and roads; from air pollution; from forestry and from modern chemicals, pesticides and fertilisers.

There are important planning issues to be considered in our approach to the problem of diffuse pollution and we have been making suggestions to the Department of the Environment about desirable improvements to the planning laws. The Environmental Protection Bill currently before Parliament also addresses some of these problems, notably that of Contaminated

Land and the pollution that can arise from it. In turning now to the question of farm pollution I do not want to suggest that this is the only source of our difficulties or that farmers are not making very considerable efforts to safeguard the environment, but there is clear evidence that in many parts of the country farm pollution is the principal reason for the deterioration of river quality. Significant changes have taken place in grass and arable land management, field drainage, housing of animals, storage of waste and disposal to land. Surveys carried out by our regional staff show that a number of these poor quality catchments have no point source inputs other than agricultural waste discharges and that there are no sewage or other industrial waste inputs. One such example is the Bulkington Drove stream in West Wiltshire. In the early 1980's the catchment demonstrated poor water quality and the 1985 river quality survey classification was Class 3. Since 1986 water quality staff have systematically visited and surveyed the effluent containment and handling arrangement of all agricultural sites within the catchment; there has been intensive monitoring and two successful prosecutions have been taken for particularly serious cases of pollution. All this effort has resulted in significant improvements in water quality and it is hoped that the stream will achieve Class 2A in the 1990 classification. Another example is the River Frome which rises in the Eastern Mendips and the headwaters of the catchment flow through dairy farming country. There are no industrial or significant sewage discharges to this part of the catchment and in the mid-1980's the only cause of the river's poor quality was agricultural discharges of one form or another. Persistent efforts by NRA staff and our Water Authority predecessors in recent years have produced encouraging results.

Unfortunately reported pollution from farms underestimates the true scale of the problem, which is hardly surprising when one considers that over 200 million tons of animal waste are disposed of to land and hundreds of different chemicals are used on farms. That means that the amount of untreated animal effluent going on to the land at least equals the quantity of human effluent that is substantially treated in sewage treatment works. Farm inspections in many different catchments show that a very significant proportion of farms are polluting at the time of visit and very frequently farmers are entirely ignorant of the fact. Throughout England and Wales there are over 10,000 farm discharges given deemed Consents and many of these are unsatisfactory.

I have already commented on the need to consider "environmental capacity", the capacity of the land to absorb pollution. We think that means that any farm like any industrial concern should undertake an environmental impact assessment which should seek to ascertain how much stock it can sustain and how much farm effluent can be spread on its land before pollution occurs. It is our present view that in many areas of intensive livestock production present levels of stocking and slurry disposal are damaging the environment. The solution does not necessarily require a reduction in stocking levels: the necessary improvements may be achieved by alternative methods of disposal. Up to now too little attention has been given to this aspect of the problem - stocking and disposal - because priority has been given to overcoming the very serious damage that can be caused by leakage of slurry and sileage. Undiluted slurry is over 80 times more polluting than human raw sewage; sileage liquor is 200 times more polluting than untreated sewage. A single farm pollution incident can be as lethal in its effects as the total sewage output of a large town. I welcome the significant progress that has been made in improving storage arrangements and the tightening up of regulations that is taking place. Clearly much more needs to be done before we can overcome this very serious problem. It is simply not good enough for us to clean up the old industrial discharges and transform the rivers in our urban areas only to see our rural rivers deteriorate.

I have a great deal of sympathy with the situation that the farmers find themselves in. I have had Ministerial responsibility for agriculture in Wales, one of the primary livestock producing areas of Britain, and I have represented a major milk producing constituency. Farmers have been pushed first in one direction and then in another: it is not surprising if - like a blancmange that is given the same treatment - they are a bit wobbly and seem likely to collapse. They need guidance and help; they need to know exactly what is required of them to meet today's objectives. That fact combined with the central environmental

significance of the problem is the reason why the NRA believes that what is needed is nothing less than a national strategy for agricultural waste management; and we therefore attach great significance to the discussions now under way with MAFF, the Welsh Office, the Farmers' Unions and the CLA. I am particularly grateful for the constructive response that we are receiving from the NFU and the CLA. A national strategy for agricultural waste management implemented by individual farmers with consultant advice where necessary on a farm by farm basis, would secure a sound means of controlling pollution and its impact, ensure steady improvement in water quality, provide a clear, practical and complete plan for farmers to follow, allow positive direction of grant aid and proper audit of its cost-effectiveness.

We are also concerned about the effect of coniferous afforestation in the uplands which in some parts of Britain is severely damaging the headwaters of some of our very best fishing rivers and removing all fish life from lakes and streams. Much depends on the underlying geology but in regions where there is hard granite rock, as in North and West Wales, there is clear evidence that coniferous afforestation is a particularly effective agent for removing acid from the atmosphere and depositing it in the rivers, very often with releases of aluminium and other minerals to provide a pretty lethal cocktail. Once again in the NRA we are not advocating the abolition of coniferous afforestation, but we do believe that we have to consider very carefully where it can be safely carried on and what can be done to minimise the adverse consequences. I have invited the Chairman of the Forestry Commission and his Senior Officials to discuss these issues with us.

The condition of our rivers and their ability to sustain any given pollution load is critically dependent on volume and flow. I referred earlier to the pressures that arise because we live in a crowded island and these pressures are particularly severe in the South and East where the rainfall levels are also much lower than in the West and there is a greater dependence on aquifers. Like so much else in our inheritance, there is a great deal that causes us concern. Abstractions and existing rights to abstract are unsatisfactorily related to the availability of supply. Demands for water mount all the time and pressure on many of our rivers and the aquifers that supply them is very severe. Sadly some streams, particularly in the chalk regions, have ceased to exist altogether or have been reduced to mere trickles. We are at work on the preparation of a national policy designed to address these problems which may well have to include the withdrawal of existing abstraction rights, compensation schemes recovered through charges on the Water Resources Account, and transfer schemes covering greater distances than has been thought economically feasible in the past. At present we often find a situation where water costs more in parts of the country such as Wales where it is abundant but where the engineering costs of supplying it are high, but if we are to ease the mounting pressures in the crowded South East increasingly charging schemes must reflect not only the cost of providing a scarce resource but the damage that is being done to the environment.

In the meantime we have identified the 40 most severely affected rivers and have started a priority programme for the 20 that we regard as being in the most critical condition. For example, in the Southern Region we have designated 6 rivers for investigation, with the Darent and Wallop Brook taking priority. We are letting contracts for 3-4 month investigations of the Wallop Brook and the Bourne Riverlet; we have linked these two tributaries of the Test because of their similarities. A similar approach would then be taken with the Meon and Hamble in Hampshire next year. Solutions for the problems of the Stour/Nailbourne are linked with plans for a major new reservoir. In the Wessex Region another example is provided by the River Allen where we are working closely with the River Allen Association. I was pleased that Mr. Humphreys, the Honorary Secretary, wrote in The Field in September that "since its inception a year ago, the NRA has acted quickly and decisively" and he went on to welcome "the thoroughness and professionalism of the NRA's proposals". This summer we were able to obtain an increase in compensation water pumping by guaranteeing to meet the extra pumping costs involved.

Let me now take four rivers as examples of differing aspects of the pollution and resource problems which I have been describing. The Test by all standards of comparison that we have is a very clean river in good condition with the results

of biological surveys showing a diverse and abundant fauna typical of very clean rivers. Yet when I wrote a letter saying just that in June this year, I brought down a stream of criticism on my head. In retrospect I can see that I would have saved myself a great deal of trouble if I had added just one or two sentences indicating that I understood the widespread concern among fishermen that things were not as good as they had been and promised further examination of the reasons for their anxiety. However, my failure to do so may have proved a blessing in disguise because in addition to the general allegations of blindness, boneheaded stupidity and worse and some very controversial assertions, there were contributions that revealed a depth of knowledge and experience that we clearly need to harness if we are to obtain a complete picture of the river and its condition. It is to obtain such collective wisdom that we have Statutory Regional Advisory Committees, but on this occasion in addition to seeking their advice we have invited all our correspondents and others to an open meeting tomorrow in Winchester for a presentation and to hear their comments. In advance of that meeting I do not intend to draw conclusions except that the extent of concern about a particular river and the power of a lobby prepared to do battle on its behalf does not necessarily bear a precise relationship to the scale of the problems in comparison with those existing on other rivers. The great and the good and others who fish that river are influenced by a range of factors: some perhaps by purely commercial considerations or the price they pay; many more by a vision, real or imaginary - it does not matter - of one of the greatest of rivers as they think it was or ought to be. They are not concerned with the fact that it may be very good or better than other rivers - they are concerned with absolutes. They believe that there are some things in life and art and nature that are worth preserving and fighting for simply because they are beyond comparison; and who can say that they are wrong? It is an attitude that I have to say poses particularly severe problems for an organisation with difficult choices to make about its priorities and with the statutory obligation to reconcile differing interests. Is this vision; are those commercial interests; are the views of the club subscribers expecting to catch their allowance whatever the conditions more important than the security of supplies of those who live in the towns or water their gardens along the bank or operate the fish farms? These are not easy questions to answer and our response should not, I think, be dictated just by the power of a lobby; but it may be of some comfort to those who have campaigned so vigorously that I do strongly believe that among our other priorities we have a duty to try and preserve or restore the very best just because they are the very best, and just as we would wish to do if we were dealing with great art or with great music.

If I say rather less about my other examples it will be now clear that it is not because I think them less important. The Torridge in Devon has a rather different history. For most of the 19th century it had ceased to be a salmon river at all because of the existence of large numbers of weirs. With the weirs removed and largely free from major pollution from sewage treatment works or industry, it had become by the 50's probably the best salmon river in the South West. Today it is a sad shadow of its former self and it has been particularly severely affected by diffuse pollution in its spawning grounds. We have recently taken senior officials of MAFF there because we think that this river well justifies our concern about diffuse pollution; not that the Torridge lacks its lobby either; how fortunate a river to be defended by the Poet Laureate with eloquent pen and unmatched expertise!

The case of the Darent illustrates a chalk stream devastated by over-abstraction. I walked along part of the river this summer on a bed as dry as the floor of this room. This is a particular tragedy - oh lucky Test in comparison! Surely we are right as an organisation to be at least as concerned about the virtual destruction of a fishery that should provide good sport for large numbers in Kent and from East London. Our Southern Region regard the Darent as their greatest challenge, not least because what we propose may pose real difficulties for Thames Water. This Summer we persevered in the face of an initial prickly response from the Water Plc. We asked for and got a hosepipe ban together with a voluntary restriction of abstraction, and recently for the first time they have pumped water back into the Darent to sustain flows. We have been organising an environmental impact survey; we are preparing a Consultant's brief which will

particularly investigate the root cause of the problem, the location of boreholes and sewage disposal policy for example, and consider radical solutions including relocating boreholes and revoking licences. Once again the River has its ardent advocates and the Darent River Preservation Society is doing excellent work.

I could of course have chosen many other examples: a chalk stream in Norfolk which I visited this Summer where we were sinking boreholes in order to supplement the flow, or the headwaters of the Teifi severely affected by acidification as a result of coniferous forestry.

I have spoken about some of the key issues but we are currently considering a whole range of other matters of particular concern to anglers. A Policy Paper on angling rod licences should come before the Board later this year. A number of options will be considered including that of a National Licence. We will give all interested groups ample opportunity to give their views and we would not propose introducing a new scheme before April 1992. On many rivers we are building fish passes and opening up new spawning grounds for salmon, but as river quality improves on some of our previously polluted rivers we may have to consider whether this is the appropriate policy for all such streams when we take account of the costs involved and the possibly damaging consequences for existing coarse fisheries.

Our effectiveness as an organisation will arise from a combination of effort and expertise in the carrying on of our operations in the Regions, a developing programme of Research & Development, and the pursuit of national policies and strategies designed to achieve long-term improvements to the water environment. In our evidence to the Government during the preparation of its White Paper, we have advanced proposals for organisational changes with the object of achieving the most effective integration of the various environmental agencies, while retaining our own vital role in the management of the water environment with responsibilities for a range of functions which depend on the water resource. We are glad that both the Government in its White Paper and the Opposition in its Policy Paper have responded positively to these ideas.

We have pressed for important reforms in planning, land use and agricultural policy, and we have strongly supported the moves towards economic charging policies that go much further than mere cost recovery and which in our view will strongly reinforce the existing systems of regulation. Again we are greatly encouraged that the Government is pressing forward with detailed studies of such charging policies.

One day in the mountains this summer as time after time the summit ahead was replaced by yet another rise and a higher hill beyond, my increasingly breathless companion who had served long years in Government commented that it was like the business of politics: as each challenge is overcome an even more tremendous obstacle always seems to lie ahead. That, I suspect, will be the experience of the NRA - forever struggling upwards through storm blown and rocky mountains. Meanwhile I am equally certain that there will be many others in the still backwaters or perhaps boastful at the bar or whisky glass in hand by the fire who will be expressing their impatient grumbles and testing their epithets in letters and articles in the fishing and environmental press. There will be much talk about bromides, ignorant bureaucrats and heads buried in the sand! We in the NRA will not complain: instead we will be just a little envious of all those lucky men and women able without responsibility to dream dreams - dreams I fear that may never be completely satisfied except on that day when they find themselves in another place where all the rivers are pure and teem with fish - those, that is, that avoid the dark and forever polluted river far below!