



Afonydd Cymru's response to GB Non-native Species Secretariat's public consultation on draft Pathway Action Plans (PAPs) for Invasive Non-native Species (INNS).

August, 2025.

Afonydd Cymru is the umbrella body for rivers trusts in Wales. We provide advocacy to Welsh Government and Natural Resources Wales. In the context of this consultation, our regional rivers trusts deliver invasive non-native species (INNS) eradication in Wales. Afonydd Cymru are a member of the Wales Fisheries Forum and some regional rivers trusts support the Fishing Passport for Wales scheme.

We welcome the opportunity to comment on the consultation of Pathway Action Plans (PAPS) for INNS in Great Britain. Our focus is specifically on PAPS for angling and for boating.

Afonydd Cymru endorses a coordinated approach across Great Britain to tackle INNS given the high risk of transference of INNS between the four nations. However, we find the lack of recognition of Welsh specific organisations in the PAPS a concern, which is likely to lead to lack of coordinated response in Wales and would likely lead to a failure to deliver information bilingually. It is unclear from the PAPs how the plans are specifically being implemented in Wales.

Our comments are:

Angling

- There is a lack of Welsh representation in organisations – only NRW and the Canal & Rivers Trust cover Wales (assuming Glandwr Cymru is being represented by CRT). No other Welsh body has been specifically defined. Neither Angling Cymru nor Fishing in Wales are referenced as partners in the PAP.

- The Action Plan would be clearer if key organisations were identified by devolved nation overall
- The PAP needs river catchment-based coordination across all users of the river (currently these catchment partnerships do not exist in Wales) to ensure that there is a coordinated delivery.
- The Action Plan is lacking any definition of lead and accountable authority (which would be assisted by separating the nations, as this will differ depending on where you are), there are no clear timescales for delivery and no measure of outcomes/success. It is unclear how it is known whether the actions detailed are being undertaken.
- We do not consider that the actions have considered differences between types of angling and specifically the differences between a river angler versus a stillwater angler. Many of the actions detailed are impractical for river angling (for example, signage at every access point, install cleaning at all access points).
- There is currently no Welsh rod licence, and licences are issued by the Environment Agency (EA) for England and Wales. The licences are now issued electronically, we are unaware that any biosecurity information is issued with the electronic licence as indicated in the PAP. We would expect this information to be provided bilingually and we are unclear how this is being achieved under a system issued by the EA.
- Actions have been assigned to rivers trusts which we do not think are within rivers trusts' responsibilities in Wales.
- The PAP suggests that angling clubs will provide equipment which is kept on site. This may be the case for a fishing club based at a lake, but nearly all anglers own their own fishing equipment and move this equipment with them (Action 10A)
- There is considerable crossover with the Boating PAP which should be clearly linked and referenced

Boating

- Again, there is a lack of representation of Welsh boating organisations in the PAP
- Again, the PAP would benefit from considering actions by devolved nation, identifying the correct key organisations in Wales and assigning accountability for delivery of the PAP in Wales
- There is a lack of coordination across bodies in Wales, and between different water users particularly with increase in recreational usage in waters, as an example, actions in the PAP do not make reference or include paddleboarders and wild swimmers who should also be delivering the same messages on equipment. Most waters are being shared by multiple users and responsibility should be considered across all water users to implement the same requirements

- Code of Conduct should be updated to include boat users having a responsibility for reporting INNS and a clear governance structure of to whom

Overall, INNS requires a multi-sector, coordinated response programme. We have seen specific lack of accountability and responsibility in Wales when INNS has been identified, with unclear governance and lack of clarity as to who needs to deliver actions – this is specifically where waters are used by multiple users and it is unclear who has accountability. This would be resolved by interlinking the two PAPs and ensuring water-based INNS have a clear governance structure in Wales for resolution.

Afonydd Cymru

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