

Llyr Gruffydd MS
Cabinet Minister for Rural Resilience and Sustainability
Welsh Government

30th September 2026

Dear Minister,

The drought through the summer of 2026 has raised a number of concerns with regards Wales's rivers. Some of these were identified by Afonydd Cymru after the 2022 and 2025 droughts and we would strongly urge Government to consider the following recommendations in preparation for future events. The Lessons Learnt report from 2025 remains unpublished.

Afonydd Cymru's recommendations are:

1. Whilst water company drought plans are published, NRW has not published its own drought plan which we think should be subject to consultation. We would ask that NRW operational protocols are reviewed against their Drought Plan to ensure that the appropriate protocols are in place to protect the environment and wildlife.
2. NRW processes for management of water resources have not been maintained since the formation of the body. This includes abstraction management ledgers and licensing strategies. This compromises the sustainable management of natural resources and we are not confident that current permitting is protecting river flows in Wales.
3. Welsh Government's commitment to water reform in Wales supports rivers to be managed on a catchment basis, using local knowledge to deliver against national and statutory priorities. The lack of understanding of water resources in Wales is compromising any understanding of the resilience of rivers, which underpins policies for growth, development, resilience, food and farming. This requires a National Plan for Water. All Government commitments must be made against an assessment of sustainable water resources.
4. All abstractions must be registered so that support can be coordinated to private water supplies and future forecasts for water can be realised.
5. Farming in Wales must be supported to have sustainable management of water. A National Plan for Food in Wales must consider the needs for water. The aim should be to ensure long-term on-farm water storage to protect low river flows.
6. Afonydd Cymru has previously raised concerns on Welsh Water's zonal leakage performance against target. We raised this with the water company, NRW and Ofwat in 2022. This year's drought has demonstrated that the issues we raised at that time remain. Significantly, whilst

email: admin@afonyddcymru.org www.afonyddcymru.org

Welsh Water has reported errors in leakage reporting at company level (for which they were subsequently penalised by Ofwat) there is clear regulatory failure by both regulators to manage performance against zonal leakage targets. We would urge Welsh Government to address this failure and set zonal performance targets for water companies in Wales.

7. Water company water resource management plans and drainage and wastewater management plans are based on delivery of Welsh Government policy to implement metering, water efficiency targets and control of water usage in Wales. To date, few of these policies have been implemented at UK or Welsh level. A realistic review of these policies is required urgently so that a true reflection of water need is reflected in PR29 Business Plans. If this is not undertaken, investment in water infrastructure will not be delivered with a consequential need for future ongoing water restrictions in Wales.
8. An independent review of drought planning guidelines should be undertaken which considers the phased approach to Temporary Use Bans against environmental protection in Wales and the long-term resilience of rivers to support abstraction during a drought.

If Wales is to be prepared for the future drought events that are predicted, we urge Government and its agencies to adopt these recommendations as a matter of urgency.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gail Davies-Walsh'.

Gail Davies-Walsh,
CEO, Afonydd Cymru