



Meeting of the Conservation and Access Committee, 22 November 2014

At My Big Adventure Meeting Room, Pinvin, Pershore, Worcestershire, WR10 2ES

MINUTES

Present: Andrew Hinde [AH] Convenor / BCA Conservation & Access Officer
Constituent Body Representatives:
 Melissa Milner [MM] Derbyshire Caving Association Conservation Officer
 Les Williams [LW] Council of Southern Caving Clubs Conservation & Access Officer
 Stuart France [SF] Cambrian Caving Council Conservation Officer
 Stephan Natynczuk [SN] Association of Caving Instructors
Plus the following non-voting observers:
 Jenny Potts [JP] Recorder / BCA CRoW W. G. Convenor
 Fleur Loveridge [FL] Observer PDCMG
 Bob Mehew [BM] Observer CRoW Working Group
 Andy Eavis [AE] BCA Chairman
 Dave Cooke [DC] Observer CSCC

1. Convenor's Welcome:

AH welcomed people to the meeting.

2. Apologies for Absence:

DCUC, ASCT, Pengelly, NAMHO, Training Committee Nigel Ball, CNCC, Tim Allen.

3. Minutes of last C&A Meeting, 16 August 2014: (Previously circulated.)

- 3.1 *That they be taken as read.* Prop. SF, Sec. AH. **Agreed.**
 3.2 *That they be accepted as a correct record.* Prop. MM, Sec. AH. **Agreed.**

4. Matters arising from the Minutes of the last C&A Meeting.

- 4.1 **Action 1. Minutes of 2009 C&A Meeting.**
Noted (rather than approved) because only one person at this meeting was present in 2009.
 4.2 **Action 2. AE to approach NE for a face-to-face meeting on CRoW and report back to the October Council Meeting.**
 Completed. AE's report given to Council.
 4.3 **Action 3. Regional reps. to prepare a list of the caves that are most at risk from possible change in application of the CRoW Act, etc.**
 See item 19.
 4.4 **Action 4. Liaison with BMC.**
 AH reported on a brief exchange with BMC rep. at a meeting - noted the need to go to authorities with one voice and present options for their consideration. There is a need for one voice from BCA before we can approach NE, DEFRA, etc. (AE explained that the ballot would be going out through Electoral Reform Services on Tuesday 25 with deadline of 18 Dec. Results to be announced at next Council Meeting on 10 Jan. 2015.) BM reported that BMC has set up a campaign to improve working of CRoW Act; BMC want a change in relation to "natural features" and prefer to call them "physical features". SF noted that BMC want to change liability issues in relation to access to quarries. BM would post a link to BMC campaign to AH for him to circulate. Agreed that if BCA is to support the BMC campaign it should be a BCA Council decision. Noted that BMC campaign has already started but they would probably welcome our support and BCA may be able to link to this later so that there is only one set of changes to the law. SF reported that the Welsh government initiative appears to have stalled.
 4.5 **Action 5. DW to issue a statement outlining the outcome of today's meeting and of any future meetings with NE.**
 Report issued. Completed.
 4.6 **Action 6. Review of current publications.**
 See item 19.

Regional Representatives and Constituent Bodies Reports:

- 5. DCUC & 15. William Pengelly Cave Studies Trust: (Combined written response.)**
 5.1 *Please accept our apologies from the DCUC and Pengelly. It seems at the moment caves are being discussed and none of ours are on CRoW land. It'll get interesting for us when mines are included, but one step at a time with the caves. We are in North Wales when you are holding your meeting.*
 David Jean



Not sure that DCUC has much to add, unless you feel otherwise.

The only underground sites on CRoW land are mines in Cornwall and as yet we have not tried to deal with them. We do not have a particular code related to digging.

Roger King

- 5.2. Accepted that DCUC and Pengelly would be more concerned with mines in the region. A list of Devon cave sites had been supplied to JP and none were on CRoW access land.

6. CNCC: *(Written report tabled.)*

6.1 **CNCC Access report for BCA C&A.**

Since the start of the caves & CRoW issue and with the BCA ballot due soon, I have been in regular contact with many of the land owners / land agents in the dales.

I have attempted to keep them fully informed of any developments and had expected a negative or confrontational reception. In reality the discussions have been positive and amenable. They are all fully aware of the implications of CRoW and have all been aware of, or are in possession of the QC opinion. The loss of liability for cavers' being covered under the legislation is positively acknowledged by everybody I have spoken to.

Whatever the outcome of the BCA ballot or any developments going forwards I have assured the land owners / agents that they will be kept informed and we welcome any thoughts or concerns from them.

John Latimer

CNCC Access Officer

- 6.2 The meeting noted the positive reaction from Dales landowners.

7. DCA: *(Written report tabled - see attached.)*

- 7.1 MM summarised her detailed report and explained how DCA was moving forward on Cave Conservation Plans and Audits.

(AH asked about CSCC caves - LW reports only one C.C.P. in Charterhouse & GB area.) MM mentioned Peak District Access & Rigging Guide and Liability booklet (posted to landowners). She explained about the DCA Underground Conservation Forum, how it works and who is involved. Noted many of the works undertaken by DCA in Peak District are being funded by NE.

- 7.2 JP asked that in future all written reports be circulated beforehand to enable people to read them in advance and so they can be appended to the minutes.

Action 1. AH needs to have a proper address list to ensure material is circulated to everyone.

8. CSCC: *(Verbal report made.)*

- 8.1 LW reported Loxton Cavern entrance being dealt with because people who do digs are not securing the entrance. He has meeting due with NE probably in Spring - hopes there will be a gathering of interested parties to move things on. Noted that they have found that photography does not appear to be very helpful. (MM noted it has been of use in dealing with White River Series clean-up - before and after - but agreed there are problems.) BM notes that it can be useful in identifying features which have gone missing. AH noted that the Mendip NE employee responsible for caves needs to ensure that there is someone to act as the Lead on cave conservation when he retires. LW noted problems caused by geographical boundaries and different authorities. Noted also that section 26 will require that there is a management plan in existence.

- 8.2 LW reported that CSCC does not wish to identify caves eligible for section 26 because CRoW does not apply yet; and do not wish to disrupt the status quo or even speak to the landowners on the CRoW issue.

9. CCC: *(Written report tabled - see attached.)*

- 9.1 **Cave Management Groups.** SF reported on his consultation following on from his briefing paper - see item 18.

- 9.2 **CCC Mines/Forestry agreement with NRW:** Nearly fell because initially they refused to accept the BCA insurance policy, they have now reluctantly accepted but still have concerns about certain aspects. If there is ever a claim on the BCA policy NRW has led CCC to understand that all access agreements will be suspended. CCC will now only have 1-year agreement instead of the 3-year agreement they had hoped for.

- 9.3 **Dan-yr-Ogof:** Dig had been started on SSSI without written consent and NRW appear to be keen to have fixed procedures. SF has forwarded the DCA leaflet on digging in SSSIs to NRW and pointed out the NRW needed something similar; caving clubs are not informing their members of responsibility for obtaining permission. There is now an Advisory Panel for DyO (it took the place of the earlier Cave Management Group).

- 9.3 **Ogof Ffynnon Ddu:** Everything seems OK.



- 9.4 **Little Neath River Cave:** SF now has a report of diesel spillage - the problem is to get NRW to do any tests to identify the problem, which now appears to have faded off. SF has searched for oil containers and located them so NRW will now collect them.
- 9.5 **Llangattock:** There has been a small discovery in Agen Allwedd.
- 9.6 **Ogof Craig-a-Ffynnon:** The reported rock falls are from the cliff above, not the roof of the cave.
- 9.7 **Dualling of Head of the Valleys Road:** SF now has information and has links with the contractors.
- 9.8 **Ogof Draenen:** No problems reported.
- 9.9 **Ogof Capel:** The gate is administered by CCC but SF is not aware of any access agreement secured by his predecessors.
- 9.10 **Cambrian Cave Registry:** Now being updated by Martyn Laverty and linked to satellite map so he is building in links to SSSIs and SAMs, etc.
- 9.11 **SSSI website inherited from NRW:** The CCW website for SSSIs inherited by NRW borders on useless in terms of cavers locating relevant information. While there are 1000+ SSSIs in Wales, the main NRW website produces only about 10 hits for the search term SSSI and none of them is a link to the CCW SSSI website nor guidance written for landowners and cavers. NRW has kindly agreed to write an article on SSSIs for the January CCC newsletter and they are considering the DCA's digging leaflet as a starting point for one of their own. (JP noted that the English Heritage SAM website is good.)
- 9.12 **North Wales:** SF has had no reply from NW re. CRoW and noted access more constrained than in South Wales. Some of the N.W. sites are mines and some are now used by commercial "caving" operations. SF noted there was also interest from Urbex members as opposed to just BCA. He felt there was a need to have whole thing out in the open so that everyone has a reasonable means of access. Ogof Llyn Parc shaft is on CRoW land.
- 9.13 **Dealing with contracts:** A limited company wrapper is being set up to administer the NRW mines access agreement because the level of risk that it brings cannot be embraced by a group of individuals such as the CCC is. Its name will be Caving Wales Ltd. The new company may be useful to package up other access deals later on, perhaps re-opening Ogof Carno for example.
- 10. Assn. Scout Caving Teams:** *(Written report tabled.)*
- 10.1 *ASCT has no strong views on way or the other on CRoW. We would however be alarmed if there was an intention to return to the old minimum impact code which placed a blanket ban on group size irrespective of the fragility of the site. One size fits all will not work!*
Idris Williams
- 11. Assn. Caving Instructors:** *(Verbal report made.)*
- 11.1 SN stated that ACI definitely support CRoW and look forward to educating cavers via caver training. There has been a suggestion that trainers could run a stand-alone cave conservation award in consultation with RCCs. There needs to be some consistency throughout regions. SN notes there is already a conservation element as part of BCA LCMLA and CIC schemes.
- 11.2 **Cave Conservation Award:** There had been a suggestion of a commercial organisation running a separate "cave conservation award". The meeting felt that any such conservation award should be via the BCA schemes. BM suggested that there should be a scheme to educate ordinary cavers.
- 12. British Cave Rescue Council:**
- 12.1 No response submitted.
- 13. Cave Diving Group:**
- 13.1 No response submitted.
- 14. Council of Higher Education Caving Clubs:**
- 14.1 No response submitted.
- 15. See Item 5 above.**



16. NAMHO: *(Written statement tabled.)*

16.1 *NAMHO understands that there is to be a meeting between BCA and Natural England regarding whether the CRoW act can be interpreted to include access to caves on open access land. At this stage, NAMHO does not look to influence this discussion. However, if there is a judgment that the CRoW Act does give access to caves, then the position with regard to entrances to abandoned mines may need clarification. NAMHO appreciates that this only relates to Open Access land but believe that current legislation puts a responsibility on land owners & others, to prevent casual access to abandoned mines, & the mineral estate / property.*

17. BCRA:

17.1 No response submitted.

18. Consideration of Caves requiring Section 26 direction under CRoW.

18.1 **DCUC.** No caves on SSSIs in the DCUC area.

18.2 **CNCC.** AH reports Albert Cave (near Victoria Cave) is gated cave owned by YDNPA - reason is to protect sediments from disturbance. AH can use Local Area Forum to help with this problem. Noted that we need to find out exactly how to put in place a section 26 agreement - NE will advise but it is believed the Statutory Authority may be responsible. Also noted Upper Entrance to Dale Barn Cave is on Access Land but owner refuses access - an approach to him may cause problems elsewhere. SF suggests cavers need to present a united front to NE and NRW, so we cannot have regional approaches. BCA is somehow going to have to create a consensus. JP pointed out that, having done this, in England BCA will need to work through the regional caving councils.

18.3 **CSCC.** LW expressed CSCC's concern at the purpose of a list of sites to be protected under section 26 - should it be a public list? The regional council or management committee is the body which has to go to authority to obtain a section 26. AH suggested that AE will need such a list when negotiating with NE; AE suggested rather that he will not need a detailed list but simply to say that a list exists. DC said CSCC is happy to submit the list which identifies the 151 potential CRoW caves, SSSIs, SAMs and will also identify those with access restrictions. LW explained why CSCC is not approaching landowners re. CRoW at present - past experience of closure of caves has made cavers nervous. BM suggested that, of the 151 Mendip caves on CRoW land, there are an unknown no. (maybe 10 - 15 sites) which might be affected by access control. LW stated the position is unclear because of doubts about how the legal situation stands. BM noted that Forestry Commission can issue bye-laws covering all of their property but NT can only do this on a property by property basis.

JP explained that her CRoW database is intended to be strictly factual and simply to list whether caves are on CRoW land; whether they are designated as SSSIs, SAMs, etc; and whether they have access which is anything other than a simple ask the farmer for permission. She could demonstrate her version of the DCA database which has already been partly completed. She had already received from CSCC a list of caves on CRoW land, including those which have restricted access.

AH felt we should have a complete list of caves subject to potential section 26 protection. BM suggested that we might put an overall estimate of possible numbers of section 26 caves. BM gave his understanding of who has the power to grant a section 26 direction - the relevant authority is in relation to any land in a National Park, the National Park authority, and in relation to any other land, the appropriate countryside body which is NE or NRW. He went on to note that any third party could request a section 26 direction so that could include access controlling bodies / regional caving councils or even individuals. In either case there is a statutory duty to consult with NE or NRW in the role as guardians of SSSIs and also English Heritage or CADW for scheduled monuments. He also noted that NE consulted with bodies such as Ramblers, BMC, etc; so BCA itself might become one of these bodies. NE will also consult with the relevant local access forum and presumed NRW did similarly.

18.4 **DCA.** DCA will submit a list.

18.5 **CCC.** CCC will produce a list of 7 potential sites and SF gave details of the various sites, including 2 NNR sites. He has communicated with all the various CMGs



Review of BCA Cave Conservation Documents

- 19. Review of NCA Cave Conservation Policy** (see NCA Cave Conservation Handbook page 2-1)
 19.1 AH noted that there are sections within the first part of the NCA CCP which are actually policy statements - should these be mixed in with the Handbook. BM suggested we need to sort out a sensible set of stand-alone policy statements. AH suggested we do not need "codes" if there were sensible policy statements. JP suggested that we should have short "codes" and longer "guidelines", such as Minimal Impact Caving Guidelines and suggested we also need a 3rd. tier of practical procedures. It was felt that the "Cave Conservation Policy" should be short, and consideration was given to whether it could be on BCA membership cards. There was felt to be a need for a definite short code to go on the back of other documents. AH suggested we should aim to have a completely revised/rewritten Cave Conservation Handbook as a document for outside bodies plus separate top level "policies" and 2nd. level guidelines. AH suggested we need a "Code" of max. 8 points, then 2nd. tier of M.I.C. Guidelines, then a 3rd. tier "manual". A certain no. of printed copies are needed for statutory bodies.
- 20. Review of Conservation Codes** (see NCA Cave Conservation Handbook pages 13-1 to 13-7)
 20.1 **Minimum Impact Caving Code:** AH suggested we need a version of the M.I.C.C. acceptable to all which will be promoted as **Guidelines**. Agreed we need a draft to circulate by email for comments. AH will do a 1st. draft to send round as a Word document and await comments a.s.a.p. in time for next C&A meeting. **ACTION. AH**
- 20.2 **Cave Conservation Code:** This will be top level version - it needs to be brief and to the point, rather than statements with explanation to accompany each point. AH would produce a draft and send it round for comments a.s.a.p. for the next C&A meeting. **ACTION. AH**
- 20.3 **Cave Conservation Handbook:** BM agreed to produce an OCR version of the original C.C.H. to work from so that as a 3rd. priority we can produce a revised/rewritten version. Suggested we need to have both an electronic and print-on-demand version. **ACTION. BM**
- 20.4 **Cave Digging leaflets:** Agreed that every region would be best advised to have their own version of the DCA's "Do You Dig Caves ...". **ACTION. REGIONS**

As a number of those present had to leave in order to attend another meeting it was agreed to defer items 21, 22 and 23 on the agenda until the next meeting.

21. **Discussion on Guides to responsible caving:**
22. **Digging Guidelines - including archaeology:**
23. **Which, if any, guides require hard print rather than pdf download:**

24. Any Other Business:

- 24.1 **Useful basic Cave Conservation statement:** AH asked for the source of the quote "All we have now is all we will ever have." - agreed it came from an Australian hand-out but some felt it is not actually true, given that there will be new discoveries. Is there a similar simple statement we could use as a major conservation statement? Suggested we try to think of something more appropriate. **ACTION. ALL**

25. Date of next meeting:

- 25.1 Suggested drafts of CCC and MIC Guidelines need to be agreed by email round the Committee by a deadline of late February; a suitable date for the next meeting could be agreed after this has been completed and the drafts have been circulated for discussion by regions.
- 25.2 Everyone was asked to inform AH of their regional meetings' dates. **ACTION. REGIONS**

Meeting closed at 13.45.

J. Potts, Recorder

APPENDED TO THESE MINUTES AND FORMING PART OF THEM ARE THE FOLLOWING DOCUMENTS:

Item 7 - DCA: Conservation Plans and Audits – November 2014

Item 9 - CCC: DEVELOPING AN ACCESS MANAGEMENT STRATEGY FOR CAVES ON "CROW ACCESS LAND" IN WALES AND ENGLAND

Conservation Plans and Audits – November 2014

<u>Name of Plan or Audit</u>	<u>Commissioned By</u>	<u>Produced By</u>	<u>Author(s)</u>	<u>Year Published</u>	<u>Status</u>	<u>Notes</u>
<u>Audits</u>						
Masson Hill	DCA	DCA	D.Webb	2001		
Cumberland Cavern & Wapping Mine	DCA	DCA	J.Barnatt, D.Webb	2002		
Jugholes Interpretation Pack	DCA/PICA	DCA/PICA	G.Fiander, D.Webb	2002		
Manifold & Hamps (2 nd Edition)	DCA	DCA	M. Milner	2007	Needs updating	New caves & entrance works to be included
Stoney Middleton (2 nd Edition)	DCA	DCA	M. Cope	2014		
Alderly Edge SSSI	NE	DCC	N. Dibben	2014		

Suggested New Audits

Bradwell Dale
Lathkill Dale

Cave Conservation Plans

Darfar Ridge Cave	EN	DCA	P.Hardwick	1995	Needs scanning & photos adding	Recently re-taped & new photos taken by M.Milner
James Hall's Over Engine Mine & Cave	EN	DCA	P.Hardwick	1995	Unfinished, needs updating	
Waterways Swallet	DCA	DCA	M. Milner	2013		
White River Series, Peak Cavern	EN	DCA	P.Hardwick	1994	Needs updating	
Water Icicle Close Cavern	DCA	DCA	K. Slatcher	2012	Unfinished	
Bagshawe Cavern	DCA	DCA	J.E.Taylor	2008	Unfinished	

Sheet1

Ecton/Clayton Mines?

does one exist? Need to contact NT and/or John Barnatt

Possible New Cave Conservation Plans

Rowter Hole

Contact Buttered Badgers, produce monitoring form with survey

Owl Hole

produce monitoring form with survey, use OCC n/l as basis

Peak Cavern (Main part)

does this exist?

Fox Hole Cave

does this exist? Ask Paul Mortimer of NT

Blackwell Dale Cave

does this exist?

St. Bertram's Cave

monitoring form with survey produced, needs photos adding, then sending to NT & NE

Limepits/West Ecton Mine

monitoring form produced with survey partially done

Sidetrack Cave

Oxclose Mine

Sort out survey in monitoring form and send to John Gunn to complete as he's been down there recently

Garden Path

Produce monitoring form with survey

Other Publications

DCA Access & Rigging Guide	DCA	DCA	Various?	2012
DCA Liability Booklet	DCA	DCA	P.Mellors	2014

DEVELOPING AN ACCESS MANAGEMENT STRATEGY FOR CAVES ON "CROW ACCESS LAND" IN WALES AND ENGLAND

A BRIEFING PAPER BY CAMBRIAN CAVING COUNCIL FOR CAVE MANAGEMENT COMMITTEES WITH "CROW ACCESS CAVES" IN WALES

For the purposes of this discussion, it will be assumed that the Opinion given by Dinah Rose QC to members of the BCA is correct, insofar as any Court would uphold the principle that visitors have access rights into caves located on 'Access Land' scheduled under the CRoW Act 2000.

This right only applies to caves, not mines, a requirement of CRoW being that the location accessed is a 'natural feature'. This may change in the future as the British Mountaineering Council is pursuing wider access to 'physical features' such as quarry faces for going rock climbing. Landowners may well support such a re-definition since the CRoW Act limits their civil liabilities in areas into which the public has access rights, and being able to remove or reduce their liability for incidents in old quarries etc is clearly an attractive proposition.

For the purposes of this present discussion, a mine is deemed to involve cutting virgin rock leaving a space which is not a natural one. By contrast, a cave is a space within rock strata created by natural forces, which may have become blocked by later natural forces, and either re-opened by itself or opened by cavers removing natural debris. In Wales, Tunnel Top entrance is clearly a mine (although it connects to a cave beneath) because it is 10+ metre deep shaft blasted by members of a caving club. Agen Allwedd is clearly an open cave portal, although shortened a few metres by the removal of rock during former quarrying operations: the shape of its entrance passage at daylight is clearly water-worn and a natural feature. The OFD2 entrance is also a natural feature since it is obvious from the large passage immediately inside that the cave was headed for what is now an air space on the mountain outside where the cave would have continued except for rock being cut away by glaciations and the portal in-filled with glacial debris. The in-fill material was removed by members of caving clubs to gain entry to the geologically ancient cave through a natural space which had been open prior to the debris from more geologically recent glaciations.

The British Caving Association convened a meeting of its Conservation and Access Committee in August 2014 (the first such since 2009) to discuss an action plan in the wake of the QC Opinion and a rapidly moving situation on the ground in Yorkshire. The main actions arising are for Regional Councils and Cave Management Committees to provide some feedback enabling BCA to develop new access policies, necessarily coherent and consistent ones given the blanket application of the law, and for BCA to invite Natural England to review its interpretation of the CRoW Act to caving. The BCA is also tasked to develop a working relationship with the BMC to tap into the latter's political expertise. The background papers and August 2014 C&A meeting minutes are here:

http://british-caving.org.uk/wiki3/lib/exe/fetch.php?media=conservation_access:140816_canda_minutes_draft.pdf

The next BCA C&A meeting is on 22 November 2014. In order to collate feedback at the regional level and allow BCA the time to coordinate the regional inputs into a national view, the deadline for Cave Management Committees to respond to Cambrian Caving Council is 22 October. At least this is what we hope the BCA will do by way of preparation for their November C&A meeting and achieve there. For the purpose of this consultation exercise, any clubs that control access into "CRoW caves" will be regarded as CMCs.

There are approaching two thousand sites of speleological interest on the Cambrian Cave Registry of which 38% are on Access Land. The proportion in the Brecon Beacons is 56%. Clearly it would be useful for cavers to enjoy a *de jure* right of access into such a long list of caves. However, freedoms also bring responsibilities, especially with vulnerable caves and those with special conservation interests, and such special caves being few in number are usually gated or may have some kind of paper permit or leadership system as well, or some combination. Another motivation for gating caves has been public safety, and this idea may appeal to landowners.

There is a public safety exclusion provision in the CRoW Act (section 25) but this is clearly intended to be ad hoc and time limited in scope. Gating mines and mine shafts is a requirement of the Mines and Quarries Act 1954 and the Environmental Protection Act 1990 in respect of Statutory Nuisances, which includes all mines operated at some point in the 20th century onwards. The Tunnel Top shaft is clearly a mine and definitely a Statutory Nuisance being so close to a public footpath. Statutory Conservation Bodies (CCW in Wales) have no legal right to remove public access to NNR/SSSI sites under wildlife legislation, including the placing of bat grilles. But there is a provision in the CRoW Act (section 26) to limit access on a temporary or even permanent basis on conservation/heritage grounds by CCW (now NRW) or Cadw.

This is where it becomes messy since any S.26 restriction would need to be well defined and soundly based on a 'citation' as is written and published when creating new SSSIs, and this would be open to appeal and legal challenge. There are five classes of cave visitor: BCA club cavers, non-BCA club cavers, BCA individual caving members, independent but competent cavers not any club or the BCA, the general public. For the purposes of this discussion, foreign cavers would be classed on the basis of their direct or club membership of their equivalent national body to the BCA. A citation to underpin a S.26 restriction might be hard to write or uphold if any distinction is made between the access rights of these visitor classes. In other words, it is more straightforward for CCW to argue (for example) that nobody can in future go into Agen Allwedd on conservation grounds than it is to argue that club cavers can enter Aggy but everyone else is excluded because the former will do no harm, or that a club caver is needed to lead any group that includes non-club cavers, and so forth. Having allowed cavers into Aggy for decades, it would be impossible now to argue that experienced cavers represent an unacceptable conservation risk. Having decided experienced cavers are an OK-risk, how does one define experienced and an OK-risk? This is not the sort of approach that can be taken when defining law, as courts generally will not be drawn on specifics and tend more to rule on generalities.

In practice, in Wales, very little is likely to change on the ground as a result of the QC Opinion. The public is not usually interested in visiting wild caves and the caving community in Wales seems to be fairly content, though not universally so, with the existing conservation systems involving cave gates. But we need to be prepared for when, say, a competent Yorkshire or French caver, asks for an OFD2 key, or a scout group wants to go in Agen Allwedd, none of whom are linked to BCA, or if a BCA club requests a permanent loan key for OFD2 or when a non-BCA club or direct members of BCA request a permanent key to a "CRoW cave" or an amateur geologist wants a key. In other areas of the UK the normal practice may be different to ours in Wales, and the issues and views on how to approach the issues may be different too, and managing this diversity is going to be a challenge for BCA particularly in Yorkshire where an access free-for-all seems to be underway.

These are the issues that Cambrian Caving Council itself needs to address, and then BCA in turn, and we need the CMC input to guide us. Where we need to end up is with national policy adopted and supported by the BCA, applied consistently across England and Wales.

I am not sure my initial table below is all correct – it is only my best efforts right now. For example, the Craig a'r Ffynnon entrance appears to be at the edge of the Access Land but the cave itself is obviously within it. I am not sure if NWCC treats OLP as a leader system caver or just provides the key if requested, and if so to whom. Some open caves without a paper permit system currently fall into the category of “ask the landowner or farmer for permission each time you visit” whereas others have open access by tradition and no specific access request is made.

The strategy suggestions in the boxes (i.e. the bits in blue text) on the table overleaf are only my own ideas to get the discussion moving, not Cambrian's ideas. I am not suggesting that any of the present gates are removed, but at the same time I cannot see the justification for any new gates at natural cave entrances particularly those where there are off-putting physical obstacles to entry such as narrow wet passages. So this is where Cambrian is seeking guidance from you, with your responses back to me by 22 October so as to allow us enough time to collate this information, get any clarification from you, and hopefully we will be in a position to present BCA with a consensus for Wales in time for circulation with the calling papers for the 22 November meeting. If other regional councils adopt a similar timetable it will enable everyone to consider the views from other UK regions in the calling papers ahead of the actual C&A meeting making it more informed and productive.

Remember please, we are only discussing “CRoW caves”, and then focusing mainly on the big ones. So the scope does not include Ogof Capel, Ogof Draenen No.1 entrance or OFD1. CRoW does not provide access rights for commercial purposes, so Outdoor Education Centres and university geology departments are not within its scope, although an amateur not-for-profit activity like a boy scouts visit or a hobby geologist would be in scope.

Also, in preparing your response, think about what the other CMCs or access-controlling clubs might say both in Wales and elsewhere, as BCA needs to develop an easily understood and acceptable national position. And do not forget that “policing is done by consent”. There have been enough incidents over the years of gates and locks going missing or being damaged to know that conflict gets us nowhere, and in the end agreement has to be reached ultimately by near universal consent to demonstrably reasonable systems and solutions.

Stuart France
Conservation/Access Officer
Cambrian Caving Council

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"CROW CAVES" STRATEGY GRID	Open caves without a paper permit system	Open cave with a paper permit system	Gated cave, no paper permit	Gated cave, paper permit	Gated cave with leader system
Examples of major caves in each access category	Bryn Alyn Caves Pwll Dwfn, Pwll Swnd, Herberts Quarry Caves, Drws Cefn (Draenen), Eglwys Faen, Pen Eryr	Pant Mawr Pot	Ogof Cnwc (Daren Cilau), Tunnel Top (OK, it's a kind of mine but it needs an answer too)	Ogof Llyn Parc shaft? Agen Allwedd, Craig a'r Ffynnon? OFD2, Cwm Dwr	Ogof Llyn Parc shaft? (OK, it's a kind of mine but it needs an answer too)
BCA Clubs and Club Caver access	To remain as open caves. Continue to ask farmer on the day if it has been the tradition to do so prior to entering cave.	To remain as open caves. Withdraw the paper permit system.	Provide temporary key by post or pick it up locally. Provide permanent key at a reasonable cost.	Provide temporary key by post or pick it up locally. Provide permanent key at a reasonable cost. Withdraw the paper permit system.	Provide temporary key by post or pick it up locally. Provide permanent key at a reasonable cost. Withdraw the leader system.
BCA Direct Individual Member (DIMs)	As above	As above	As above	As above	As above
Non-BCA Clubs including foreigners	As above	As above	As above (*)	As above (*)	As above (*)
Non-BCA independent cavers including foreigners	As above	As above	As above (*)	As above (*)	As above (*)
Member of the public including historians, geologists etc	As above (**)	As above (**)	As above (*) (**)	As above (*) (**)	As above (*) (**)

(*) Issue of keys requires prior written agreement by visitors to uphold the BCA cave conservation code and to respect any SSSI restrictions. Signing a participation statement which acknowledges the risks (similar to the one the BMC have published) seems an advisable precaution too.

(**) If approached for permission or advice, suggest they join in on a club trip, or provide them some names to establish contact with a club.

DEVELOPING AN ACCESS MANAGEMENT STRATEGY FOR CAVES ON "CROW ACCESS LAND" IN WALES AND ENGLAND – FURTHER INFORMATION FROM CCC

Since I circulated my discussion paper on the CROW Act and cave access earlier this month, more information has come to light that I would like you also to consider in providing your feedback. It looks as if BCA will circulate a paper at Hidden Earth saying it believes that CROW does apply to caving. This is still in draft as I write.

There is a BCA council meeting in October to discuss, amongst other matters, the effect such a stance will have on BCA's policies and its relationship with the statutory conservation bodies, cave management committees, landowners and so on. The effect may be that changes to BCA's Constitution could be the logical progression.

BACKGROUND

Land which is "CROW Access Land" is being interpreted as the 3-dimensional material which landowners own in the UK down to the centre of the planet, defined as such by various statutes including the Law of Property Act 1925.

CROW is designed to provide the freest possible land access to the public without hindrance and with the fewest necessary restrictions that may be required for the conservation of natural features and monuments or for the national defence. If CROW applies to caves, then restricting cave access, such as padlocking a gate to a cave entrance or operating a permit system to control the numbers accessing a cave, without legal authority would be a civil tort of denying public access to places on Access Land to which access is a civil right. The person so denied would thus have a right to sue the access controlling body applying the restriction. Erecting a notice to discourage open access is a criminal offence under CROW and publishing access permission forms or written terms and conditions could fall within that scope. It is unlikely any insurance company would cover a landowner or access controlling body who knowingly placed themselves in breach of the law.

CROW permits restricting access for various reasons. Section 2(3) covers cases where other law prohibits access. The best example of this is the Forestry Commission bye law prohibiting access to mines on their land. Under CROW the landowner can also restrict access under Section 23 for limited periods of time.

CROW SECTION 26

Section 26 provides the most relevant safeguards in a caving context. It allows for a direction by a Statutory Conservation Body (SCB), Natural Resources Wales or Cadw, to restrict access for nature conservation or heritage reasons. A reasoned argument is required to support a Section 26 direction.

Natural England has already published a process document describing how it goes about developing Section 26 and related directions:

http://www.naturalengland.org.uk/Images/RAG%20V4%20for%20website_tcm6-12375.pdf .

Discussions within BCA are inclining towards a view that any Section 26 directions would only be appropriate for caves which are **gated** and **padlocked** and which operate **an existing leadership system**. No CROW cave in Wales fits these requirements except for the Columns area within OFD2. BCA is doubtful that a direction could be given for CROW caves which are just gated and padlocked. Thus it would appear that if CROW does apply to caving, then all caves on 'access land' in Wales would have to have their locks removed, leaving just visits to the Columns area in OFD as a locked-off leader-only trip.

NATIONAL NATURE RESERVES AND SSSIs

It is assumed that the citation creating an NNR or a SSSI does explicitly cover the caves in the SSSI. Landowners of SSSIs have a duty not to perform or commission or allow any operations likely to damage conservation interests (OLDs) without first obtaining SCB consent. These used to be known as potentially damaging operations (PDOs). We are not sure of the situation across Wales because NRW has not been entirely cooperative in disclosing its citations and PDO/OLDs lists to CCC en masse. These vary from place to place: for example the PDO/OLD lists for the land around OFD and that above DYO are phrased differently when clearly from a caving point of view they are equivalent. Some of the Welsh SSSIs cover massive tracts of upland tens of kilometres across, and most cavers are simply unaware of such indiscriminate and massive SSSI scheduling, nor understand its legal implications for their activities, and NRW too might feel they are short on good explanations for their SSSI strategy.

It is thought that SSSI/NNR legislation does not provide SCBs with any rights to restrict access to the public themselves, such as erecting gates or grilles or permit systems, or to compel private landowners to create similar hindrances. There is no provision to put access control measures into place on a contingency basis to prevent hypothetical damage.

The above applies to SSSI everywhere, not just to CROW Access Land. However, it is hard to imagine how an SCB or landowner could provide access to some types of cavers and not to others. Restrictions applied inconsistently or indiscriminately may not work out well in practice on the ground and this could lead to even greater problems that undermine the very conservation ideals being pursued.

MINES

It is understood that access to operational mines is required to be controlled under Health and Safety legislation and are thus outside of the scope of CROW. However abandoned mines are only required by Section 151 of the 1954 Mines and Quarries Act to have their entrances safeguarded against 'accidental' entry. This duty is placed on the mine owner unless the mine was abandoned before the 9th August 1872. In such cases, or where the mine is not adequately safeguarded, or if the mine owner fails to undertake or maintain the safeguarding of an entrance, then the local authority can step in and install the safeguards.

A "mine" is defined by the Mines and Quarries Act 1954 as underground workings used to obtain minerals for commercial exploitation by persons working underground who are employed for that purpose. It follows that no cave or cave dig in Wales which has been dug out by cavers is a mine since no minerals are being obtained

and nobody is employed. This means the Tunnel Top entrance, for example, while man-made is not strictly a mine and is therefore is not excluded from CROW.

FORESTRY AND OTHER CROWN LAND

Forestry Commission Wales (now in NRW) has a bye law which prohibits access to their mines without permission. This trumps the CROW Act since CROW does not over-rule situations where existing access is controlled by other statutes. The Forestry Commission can also block access to other kinds of underground sites such as caves on their land by erecting prohibition notices under the same bye law and they can invent new bye laws as they go along, essentially doing as they wish.

In Wales we hope to have a legal access agreement in place with the Forestry Commission Wales (i.e. the Welsh Ministers) shortly for a list of a dozen or so sites initially, mainly old mines, that can be added to in the future. This agreement results from their managers giving up on compulsion and instead trying co-operation as a means of managing responsible access.

In the Forest of Dean there already are access agreements which are working very well most of the time, and so there seems no justification to change anything there.

RECENT DEVELOPMENTS

BCA has held discussions in September with Natural England who it seems do not yet appear to want to change their position. However, Natural England is prepared to listen to further argument. As the Welsh Government has not yet developed its own powers on the environment, it would appear that NRW will find itself in some difficulty to do otherwise than to take a similar line to that of Natural England.

THE ROUTE MAP

BCA has said it now needs to develop an official policy on CROW which will be addressed by the October meeting of BCA's Council. This seems likely to include a proposal to change to BCA's constitution and thus seek the views of its membership.

BCA's C&A committee asked Regional Council representatives to "prepare a list of the caves that are most at risk from a possible change in application of the CROW Act and, where possible, provide some justification of the form of control that may be necessary" and report back to the next meeting scheduled on 22 November. The aim is to move towards a nationally agreed interpretation and access policy. As I have said already, in Wales this seems to imply unlocking a number of major caves.

What I am asking you is "Do you agree with BCA following this route map in whole or in part and why?" Please do not shoot the messenger – this is not my timetable, and it is in the nature of trying to make over-arching political progress that there is space left to explore uncertainties, and so the questions that you are being asked to consider do not have simple clear cut yes/no answers.

Stuart France
Conservation/Access Officer, Cambrian Caving Council
September 2014

Response by FoDCCAG to CCC discussion paper re CRoW & Caves

1. Forest of Dean

At the most basic level we support anything which improves access to caves. However we must insist that it be accepted by all concerned that whatever the merits of the concept of a common Cambrian or British access policy it must take separate account of the position in the Forest of Dean and all Forestry Commission access land.

To restate the situation in the Forest of Dean and elsewhere – section 2(3) of CRoW excludes from the right of access those places which have prohibitions on access under other law. All sites on Forestry Commission access land are subject to the over-riding Forestry Commission bye-laws and access is only available in the Forest of Dean and any other land in England or Wales which is subject to the same bye-laws with the prior authorisation of the Forestry Commission.

We are fortunate that since 1998 a local agreement has ensured that access to all sites in the Forest of Dean is available to all members of BCA by FoDCCAG permit. We hope that no action will be taken by cavers which may lead to this agreement being put at risk.

2. Wales

The north-west corner of the Forest of Dean is in Wales and contains a small number of sites. They remain subject to Forestry Commission bye-laws and access is available in accordance with the terms of our local agreement with the Forestry Commission.

We do not disagree with the suggestions in the strategy grid included in the discussion paper and specifically accept that the suggestion in respect of open caves without a permit system is uncontroversial and that if a single system across Wales proves to be realistic then the other suggestions may work. In general terms we support the concept.

In particular we would like to see access to all controlled systems extended to include all BCA members; that is to individual BCA members as well as to members of BCA clubs.

We must express our doubts, however, that a single system for access to caves currently gated would work in practice and mention that for sites in the Forest of Dean, for example, we think it very unlikely that the Forestry Commission would allow keys to be held by clubs outside the immediate area.

We understand that many of the sites in Wales have SSSI status and one is a national nature reserve. It seems likely that local conditions will require local solutions and in particular, if CRoW does apply to caves then, in respect of any site for which it is felt that controls are required, an application to implement s26 will be necessary.

As any such application will be site specific it could only be effectively made by the body which controls access and we do not think it would be practical or desirable for any such applications to be under the control of any other body.

We note that the constitutions of BCA & Cambrian contain broadly similar clauses in that each body is required to offer support to clubs and other bodies which control access.

We assume that, in accordance with the requirements of their constitutions, BCA and/or Cambrian would take all possible steps to support the decision of that body.

It follows that any national policy adopted in Wales can only be advisory and must be fully supportive of those bodies which actually control access.

Robin Weare
Forest of Dean Cave Conservation & Access Group
6th October 2014

PDCMG RESPONSE TO CROW CAVING ACCESS CONSULTATION

Many thanks for forwarding various documents regarding CroW and cave access strategies over the last month. These have been circulated amongst the PDCMG and I have received a number of different pieces of feedback. Bringing these together I would summarise the main points as follows:

- There appear to be two different issues being addressed. One relates to CRoW and what actions should be taken if this proves to apply to caving. The other relates to a stated ambition to harmonise access arrangements either across Wales or nationally within the UK. These are actually quite different topics that need addressing on different timescales – the CRoW issue in time to tie in to the BCA timescales and the harmonisation issues as we see fit, and certainly as a matter of less urgency (perhaps if CRoW does not apply?).
- Taking harmonisation first, the general opinion of those who commented was that this will be very difficult to achieve and is not necessarily desirable overall. While harmonisation may make things easier for an individual caver it does not take into account very real differences that occur between different sites, with differing landowners and conservation and safety requirements. In summary, it is felt that any sort of “blanket policy” would be unworkable.
- There was also a general view that there remain many good reasons for retaining gates on certain sites, such as public safety and cave conservation. However, if CRoW is found to apply then some current gates may become untenable under this new interpretation of the act. In such cases the CCC should be working with the various affected cave managed bodies to put in place any Section 26 restrictions on access that may be considered to be required. Given this may take some time to achieve, such

tasks should be taken forward from the present time as a matter of urgency so that the access management bodies are ready should the change in interpretation of the act come to pass.

· If CRoW is not found to apply to caving and no change in interpretation of the act is forthcoming then a number of members of the PDCMG saw no need for change of the current access arrangements.

· With respect to the so called BCA Route Map it is hard to provide comment as no details of this route map have been provided. However we comment that as far as we are aware “a nationally agreed access policy” has not been suggested. All regional councils and cave access bodies will of course need to act within the law should the interpretation of the CRoW act change to include caving.

· Finally it was considered that it is imperative that as these discussions move forward the CCC and the relevant cave access bodies need to work together to address the issues raised. It is particularly important that the CCC represent the cave access bodies to the national body.

Given that the next C&A meeting is not scheduled until the 22nd November we hope that there will be further opportunities to comment should additional relevant information come to light (eg as a result of the recent BCA council meeting).

With best regards,

Fleur. PDCMG Hon. Sec.

SWCC Response to BCA/CCC discussion on CROW and CAVES

Some background:

- Natural Resources Wales (NRW) is an amalgamation of the former CCW (Countryside Council for Wales) along with the Wales arms of the Forestry Commission and Environment Agency.
- NRW is a statutory/regulatory body in relation to (inter alia) SSSIs and National Nature Reserves in Wales. It has no connection with Natural England.
- The CROW Act does apply to Wales as well as England. However there are separate Regulations - The Countryside Access (Exclusions or Restriction of Access) (Wales) Regulations 2003 - that can modify its effect in Wales.

Significant Caves in the Swansea Valley Area

There are three significant entrances on CROW land in this area:

- Ogof Ffynnon Ddu Top Entrance
- Pant Mawr Pot
- Tunnel Cave Top Entrance.

For the avoidance of doubt, Ogof Ffynnon Ddu 1 and Cwm Dwr Entrances are not on CROW land.

Ogof Ffynnon Ddu Top Entrance

This entrance is on CROW land and is in a location which is readily accessible. The surrounding land is owned by NRW and the underlying cave is a National Nature Reserve, which was the first ever underground NNR in the UK. The area also lies within an SSSI but the level of protection applicable to an NNR is even greater than that applicable to an SSSI.

Access is controlled by the OFD Management Committee (OFDMC) which is joint between South Wales Caving Club (SWCC), other caving representation, and NRW and is under NRW Chairmanship. The arrangement was set up in 1976 in close collaboration with the then (UK-wide) Nature Conservancy Council and has worked well since. The entrance is gated to prevent casual public entry, for reasons of safety and conservation and, sadly, because of incidences of wilful damage to caves in the area. However, the access mechanisms appear to be widely respected and accepted by the caving community.

An area within the cave, the 'Columns' is further gated for conservation reasons. This was done, reluctantly, following incidents of damage in this area, both accidental and wilful. Access to this area is available on publicised dates and times under the supervision of NRW-appointed wardens.

Pant Mawr Pot

This entrance is a vertical shaft located in a remote area of CROW land and within an SSSI. Its location and nature in themselves provide a reasonably effective means of protection for the cave. SWCC and the landowner are on good terms and the formal access arrangements require approach to the pot via Penwyllt and the use of the destination board at SWCC HQ.

Tunnel Cave Top Entrance

This entrance lies within an SSSI and is a vertical shaft that was sunk through solid rock to the roof of a high aven in a known cave below. Unless securely closed, it presents a significant danger to the non-caving public. The key is held by SWCC and access is available to bona-fide cavers.

Potential Effect of CROW on these caves

For reasons stated above, the situation regarding Pant Mawr and Tunnel Cave would appear to be unaffected by CROW. In relation to OFD Top Entrance, access is only available to cavers who are in some way BCA-affiliated. The provisions of the 'Try Caving' scheme extend this to some extent but inevitably there is a potential issue relating to non-BCA affiliated cavers. Because of the ownership (NRW) and high level of statutory protection (SSSI and NNR) to which this cave is subject, any change to this situation would require detailed negotiation with NRW.

Conclusions

- The CROW legislation if applied to caves would have little or no immediate effect on the three entrances considered above. Any potential changes in relation to OFD Top Entrance would be dependent on negotiations with NRW as landowner and statutory protection agency.
- Conservation should be the prime concern in relation to cave access arrangements. Damage to surface features generally recovers over time. Damage to caves does not.
- Even the three cases considered here illustrate the diversity of detail in relation to different caves and must throw considerable doubt on the feasibility of formulating an overall policy in relation to caves and CROW other than in very general terms.
- Given that diversity, it is not feasible to formulate any blanket policy as to whether or not to gate any caves that will be discovered in the future.
- Individual landowners must be involved in discussions on relaxing access controls. Even if landowners potentially are exempted by the CROW legislation from personal liability in relation to caving, this would have to be tested in the courts and in the meantime it would not be unreasonable for landowners to insist on cavers holding BCA or equivalent insurance. Furthermore, it would seem that, as now, landowners could in principle be prosecuted for damage caused to caves that lie within an SSSI or NNR.
- The potential differences in CROW legislation between England and Wales need to be recognised and could lead to the need for different 'national' policies.
- In all specific cases the interests of the relevant stakeholders need to be considered and these include cavers and landowners, along with such bodies as National Parks, regulatory and environmental protection bodies and possibly other Government agencies. Any 'national' policies should take full account of this.

JJR 1/10/2014

MLCMAC Response to the CRoW Discussion Paper

The Current Situation

MLCMAC currently administers access for bona-fide caving clubs on behalf of Natural Resources Wales to two caves, namely Agen Allwedd and Craig a Ffynnon. Access is by permit, issued either for dated trips or on a recurring annual basis. Any commercial use of these caves falls outside of the permit system and NRW themselves scrutinise any such applications. NRW have an agreement with Duke of Beaufort's Estate to manage access to these two caves. Presently there is no provision under the permit system for applications from BCA DIMs.

One other cave within MLCMAC's area of responsibility – Ogof Cnwc – is also gated. There is no permit system, and keys are available from Chelsea SS either on short term loan or a permanent basis. Exit does not require a key, so through trips are possible without one.

All three caves require different keys to open the gates.

The original Agen Allwedd entrance is blocked by a metal grille a short distance into the cave. This is to prevent disturbance to bats which roost in this area.

All other caves are ungated and have no access restrictions. Some lie within nature reserves at Craig y Cilau and in the Clydach Gorge.

Implications of CRoW

MLCMAC considers that gates are necessary at Agen Allwedd and Ogof Craig-a-Ffynnon for conservation reasons. In particular, a large population of bats uses Agen Allwedd Entrance Series as a winter roost. Also, both caves contain fragile and vulnerable formations. Agen Allwedd entrance is clearly visible at the end of the tram road, and an open entrance would certainly attract the interest of non-cavers. The possibility of rapid flooding in Craig-a-Ffynnon means there is also a safety risk to the general public who are unaware of this situation.

Similarly, the gate to Ogof Cnwc was installed to preserve the readily-accessible and well decorated Prices Prophecy, although the muddy entrance crawl would probably deter most non-cavers.

In the first two cases, presuming that CRoW is deemed to cover caving, NRW could apply for the gates to be retained under section 26. Ogof Cnwc might need to have its gate removed.

It is not expected that there would be any implications to the present free access to any of the un-gated cave entrances.

Access Procedures

The present paper based permit system at Agen Allwedd (more recently extended to Craig-a-Ffynnon) has operated for many years with only minor changes. The system is increasingly seen as being too bureaucratic and inflexible, and it is not even clear that having such a system significantly contributes to protecting the caves. Permit applications generally need to be made in advance by post, and only clubs can apply. Clubs who arrange to stay at Whitewalls cannot borrow cave keys held at the cottage unless they hold a permit.

Changes to the permit system will need to be ratified by NRW, however it is intended that a proposal be put forwards that any BCA club member or DIM, or similarly recognised caver from another country, should be entitled to borrow or purchase a key to access Agen Allwedd or Craig a Ffynnon, and that the paper-based permit system be abolished. It is not envisaged that these changes would lead to a large increase in numbers of trips in Llangattock caves, nor be to the detriment of cave conservation, however they may be met by resistance from NRW.

Another possible change, which has been discussed in the past and will be considered again, is that the same key should open both Agen Allwedd and Craig a Ffynnon gates.

Adrian Fawcett
Secretary MLCMAC
31/10/2014

No response had been received from North Wales Caving Club by 1 November 2014.

CCC'S SUMMARY OF THIS CONSULTATION EXERCISE

Forest of Dean – FODCCAG does not believe that CROW applies to them because of the Crown land status. They are supportive of better access for DIMs to sites in Wales. They do not want to be governed by any national CRoW access policy.

PDCMG – believes policy harmonization at national level, what has been termed a "blanket policy", will be unworkable. No comment was made on Drws Cwfn and the other small open caves inside their territory that are on Access Land.

OFDCMC – this reply was written by SWCC. They believe that CroW if applied to caving would have little or no effect on the caves which they manage on Access Land, and that a "blanket policy" is infeasible.

MLCMAC – in common with all the other cave management committees above, they also envisage S.26 of the Act being used to restrict access at the existing caves with gates on CRoW Access Land as is done at present. However, MLCMAC would like to see access arrangements created for DIMs and foreign cavers and the paper-based permit system run by NRW abolished as it appears perfunctory. No comment was made on "harmonization" other than suggesting having the same key to open both of the caves this committee manages.

Stuart France
Conervation/Access Officer
Cambrian Caving Council.