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Committee

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NFU Cymru response to Environment & Sustainability Committee Inquiry - Water Quality

1. NFU Cymru welcomes the opportunity to respond to the Environment & Sustainability Committee Inquiry into water quality which seeks to examine progress towards meeting the statutory obligations under the Water Framework Directive and Bathing Water Directive.
2. Currently just over one third of our water bodies achieve good ecological status under the terms of the Water Framework Directive. Reasons for failure are complex and varied and were summarised in the Welsh Government Consultation Document 'A Water Strategy for Wales' (2014)
3. Evidence suggests that there are a range of issues and sectors influencing water quality in Wales and Water Framework Directive Failures attributable to agricultural pollution are shown to be between 14-15%.
4. It is clear that efforts to address water quality using a single issue approach will not deliver the necessary improvements to deliver on Water Framework Directive goals, in particular, the requirement to meet 100% compliance with the Directive by 2021. That said, NFU Cymru acknowledges the role that the agricultural industry has in improving water quality through addressing issues relating to agricultural pollution.
5. We would stress that in agricultural terms the word pollution can be considered inappropriate to the extent that often what is meant is raised nutrient levels. We would highlight that failures are higher due to changes to monitoring which now include assessment of both biological and chemical status. An increasing issue with Invasive Non-Native Species in riparian habitats which leaves riversides totally devoid of vegetation in winter as these plants dieback also contributes to an exacerbation of the problem.
6. NFU Cymru would take this opportunity to highlight the practical action that farmers are taking on a voluntary basis to improve water quality. This includes:
 - a. Reductions in fertiliser application rates since 1980s – 35% less nitrogen and 60% less phosphates – whilst achieving similar crop yields
 - b. Almost 560,000ha of land under Glastir agri-environment contract that benefit water and the wider environment
 - c. Over 275,000ha of land under management options aimed at improving water quality under Glastir Advanced
 - d. 310,000m of streamside corridor established through the Glastir Scheme alone
 - e. Approximately £16m of investment in farm infrastructure to improve water quality

- f. In excess of 1500 nutrient management plans part funded through Farming Connect, with a further 400 funded as part of Glastir Advanced. (The number of farmers with nutrient management plans developed outside of these mechanisms is not known)
 - g. Three quarters of the land area of Wales under voluntary farm assurance schemes which require inspection for compliance at 12-18 month intervals and which have clear requirements on manure, nutrient and pesticide management.
7. In addition there are initiatives such as the recent innovative project led by Dwr Cymru–Welsh Water aimed at reducing levels of the grassland herbicide MCPA in the River Teifi and Upper River Wye catchment areas. This initiative supports farmers to try alternative methods of controlling rushes and weeds through offering the free hire of weed-wiper equipment using Glyphosate between April and October 2015.
 8. The significant actions to improve water quality have led to acknowledged successes. The reversal in decline of the otter population in Wales arising from improved water quality being a case in point. The recent clean beaches awards are testimony to improvements to the quality of bathing waters
 9. NFU Cymru recognises the clear role that farmers have to play in contributing to further and sustained improvements in water quality in the years ahead.
 10. NFU Cymru are strong advocates of appropriate interventions where poor practices are responsible. It has been our long-held view that any approach must be evidence-based, providing local solutions to local problems working in partnership with industry to be effective.
 11. NFU Cymru would highlight the significant mechanisms at our disposal, which with some thoughtful design and implementation, have the potential to make very valid contributions to water quality.
 12. The Rural Development Programme (RDP) (2014-2020) which has recently been formally adopted following approval by the Commission offers, in our view, a number of clear opportunities.
 13. We understand that 60% of the £957m budget has been allocated to land-based measures via the Glastir scheme which has six strategic objectives, including *‘To increase the level of investment into measures to manage our water resources effectively with the aim of contributing towards an improvement in water quality in Wales and to meeting our obligations under the Water Framework Directive’*.
 14. Glastir has a number of elements including Entry, Advanced and Commons with a number of new elements proposed as we enter the new RDP which include Small Grants and Part-Farm/Habitat Network Schemes.
 15. It has been the long-held view of NFU Cymru that participation in agri-environment schemes should be voluntary but that the scope of the scheme should be such as to be open to any farmer irrespective of location or farm enterprise type. NFU Cymru believes that the ambition for Glastir should be to be simple, uncomplicated and transparent for the applicant with activity that is practical and achievable to implement on the ground. This is vital if the strategic objectives of the scheme are to be delivered.
 16. We would express some concern at proposals which appear to de-emphasise the entry level scheme which is accessible to all in favour of more targeted interventions through Glastir Advanced. We would reiterate that action on the ground relies on farmer participation.
 17. We would further highlight that the Glastir Small Grants and Part-Farm/Habitat Network Schemes offer new and significant opportunities for environmental action, particularly in the area of water quality, by engaging agricultural businesses (and sectors) not ‘traditionally’ involved in agri-environment work. We are disappointed that despite the budget allocation to these measures in the RDP that the roll-out of these elements is likely to be significantly delayed.

18. The new Sustainable Production Grant Scheme offers a further opportunity for measurable improvements in water quality, through 40% funding for a range of capital items such as slurry/manure storage and clean/dirty water separation. The environmental benefits of such investments are clearly understood, such investments leave a legacy beyond the lifespan of any project and farmer participation should, therefore, be actively encouraged. It is our strong view that the Sustainable Production Grant Scheme should be clear and easily accessible, the application process should be straightforward for farmers and not add additional, unnecessary costs.
19. We cannot emphasise enough that an application process that is shrouded in complexity will represent a barrier to uptake and ultimately lead to delayed progress in this area.
20. The Knowledge Transfer, Innovation and Advisory Service under the Wales Rural Development Programme 2014-2020 (Farming Connect) offers a further opportunity. We understand that Farming Connect will receive a budget allocation of £45m over the programme period to increase the emphasis on business focussed behaviour and therefore improve the profitability, competitiveness and environmental performance of farm, forestry and food businesses through knowledge transfer, innovation and advice.
21. On the issue of water quality, in our view, Farming Connect must now move on from its current approach of 'awareness raising' of generic issues relating to water quality, to providing advice to support farmers to take action in targeted areas in conjunction with the other measures available. This requires the concerted effort and co-ordination of all parties including Natural Resources Wales, Welsh Government and contractors which, hitherto, has been lacking.
22. It is our view that improved performance by Farming Connect in this area could support Natural Resources Wales whose key challenge, two years on from establishment, remains how to effectively engage with the 18,000 or so farm businesses across Wales who manage 80% of the total land area.
23. These businesses tend to be sole traders or partnerships that find themselves operating in a highly complex regulatory context – of which environmental management is just one of a number of important facets.
24. We would reiterate our concerns that the merger of three organisations and subsequent restructuring has led to the loss of a number of key personnel, particularly those who were employed previously by Environment Agency Wales. Others with suitable expertise and experience, whilst still employed within NRW, appear to be consigned to different roles and are less accessible to farmers who would have, in the past, approached them for advice on regulation and best practice.
25. In terms of making progress on this issue, NFU Cymru is of the view that a service similar to the Farm Liaison Service within Welsh Government, with knowledgeable and trusted staff within NRW providing practical advice and support on both regulation and best practice across a range of issues, including water quality, would deliver beneficial outcomes.
26. Turning to the issue of effectiveness of monitoring and enforcement, NFU Cymru would highlight the need for any monitoring system to be sufficiently robust as to be able to take into account exceptional weather conditions which are outside anyone's control and which in all probability will increase in frequency in future years.
27. We would also take this opportunity to reiterate that NFU Cymru does not support additional regulation or 'gold-plating' of regulation which is a blunt instrument which adds cost and places farmers in Wales at a competitive disadvantage to our EU counterparts. It is our view that far greater benefit can be achieved through voluntary action working in partnership with industry to drive improvements in water quality as described above.
28. We do not, therefore, support the introduction of additional regulation including general binding rules and would highlight farmers in Wales are already governed by a raft of

regulations including strict rules on the use and disposal of pesticides and on the use and disposal of sheep dips. Cross Compliance requirements established through the basic payment scheme deliver baseline standards and are subject to an inspection regime by Rural Payments Wales. Those participating in agri-environment schemes also follow the rules set out in the Whole Farm Code. It is our view that the introduction of General Binding Rules would effectively result in the introduction of another layer of regulation and NFU Cymru would conclude that it would be premature for NRW to have any additional regulatory powers at this stage.

29. The Inquiry into water quality is also timely as the Review of the Nitrates Directive is underway with revised maps and the potential for additional designated areas in Wales expected in the coming months. We would highlight the very significant restrictions placed on farmers in NVZ areas for the benefit of water quality. NFU Cymru is very keen to work with Welsh Government and NRW in a partnership approach to identify areas where voluntary action now could prevent the need for designation in the future. NFU Cymru would suggest that in such instances a concerted multi-agency effort is required to make targeted efforts to support the farmers to take action in these areas.
30. To summarise, NFU Cymru would agree that improvements in water quality are necessary if Wales is to meet the obligations of the Water Framework Directive. The agricultural industry has a clear role to play in making improvements to the 15% of Water Framework Directive failures currently attributable to the sector. We are able to identify a clear number of opportunities available to drive improvements in water quality including a number of measures in the new Rural Development Programme. NFU Cymru is very keen to work with Welsh Government to see the development and implementation of schemes that are fit for purpose, engaging to farmers and deliver transformational change.
31. We note the invitation to submit oral evidence to the Committee on Wednesday 10th June 2015. NFU Cymru looks forward to giving evidence at this event.