

Response to Developing Measures to Promote Catchment-Sensitive Farming

Wildlife and Countryside Link

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Wildlife and Countryside Link brings together 33 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of almost 7 million people in the UK.

This response is supported by the following organisations:

The Bat Conservation Trust
Buglife - The Invertebrate Conservation Trust
Butterfly Conservation
Campaign to Protect Rural England
Council for British Archaeology
Friends of the Earth
Herpetological Conservation Trust
Marine Conservation Society
Plantlife International
Ponds Conservation Trust
Royal Society for Protection of Birds
Wildfowl & Wetlands Trust
The Wildlife Trusts
Woodland Trust
Worldwide Fund for Nature

A summary of Link's position on Diffuse Water Pollution from Agriculture

If we are to achieve national targets for biodiversity and to protect landscape quality it is critical that the problem of diffuse water pollution is tackled. To achieve significant change the Government will need to establish interdepartmental aims and objectives supported by appropriate targets and indicators of progress as outlined below:

- The Government's aim must be to reduce and eventually eliminate environmental damage from diffuse pollution, by implementing integrated catchment management and putting sustainable farming at the heart of agricultural policy.
- Link believes the Government's targets should be to:
 - Prevent further deterioration in the quality of our rivers, lakes and seas.
 - Stop damage to important wildlife sites, key species and archaeological remains by 2010.
 - Achieve good water quality (as defined under European law), for all our waters by 2015
- Link proposes that appropriate indicators of progress will be:
 - Levels of nutrients in lakes, rivers, ponds and ditches
 - Trends in pesticide incidence in freshwater
 - Condition of agricultural soils
 - Numbers of important wildlife sites damaged by diffuse pollution

Furthermore, the Government should set ecologically relevant standards for major diffuse pollutants of water, including nutrients, silts, pesticides, and veterinary medicines, as soon as possible. These standards should be type specific, allowing for natural variation across the water environment.

Link recommends that the Government implement 5 key steps to deal with diffuse water pollution from agriculture:

- 1) FARM PLANNING: Secure nutrient, crop protection and soil management on all farms. This should be implemented through all available mechanisms and measures.**
- 2) ADVICE: Provide an integrated and well-resourced nationwide Farm Advisory Service to support farm planning, and appoint Catchment Officers in 'hotspot' areas.**
- 3) SMARTER RULES: Introduce new powers for the Environment Agency to control diffuse pollution. These should include simple, base-line rules for all farms and the power to take more stringent action in problem areas.**
- 4) INCENTIVES: Provide short-term incentives to help farmers prepare for changes to standards, and longer-term support for extensive land uses, where these help to manage diffuse pollution, protect and restore biodiversity and enhance landscape quality. Improved grants may also be necessary to help farmers upgrade buildings and equipment.**



- 5) POLLUTER PAYS: Consult urgently on the use of ‘green taxation’ to tackle diffuse pollution problems (nutrients and pesticides), including a commitment that any funds raised would be re-invested to help farmers adapt to new standards.**

Questions and Answers

Q1. Do you agree that there is a significant problem with agricultural emissions to water that will require action beyond current and planned policies?

Diffuse pollution is damaging habitats, species and the historic environment. It contributes to an overall debasing of the coastal waters and affects the quality of landscape through damage to its constituent parts. It also costs tax-payers and water customers millions of pounds every year. If we are to achieve national targets for biodiversity, EU targets for water quality and protect landscape quality, it is critical that the problem of diffuse water pollution from agriculture is tackled now and that this is sustained to ensure long term beneficial change. The consultation to Develop Measures to Promote Catchment-Sensitive Farming recognises this and moreover recognises the need for an integrated approach. Link welcomes this recognition. However, current actions are insufficient to address this crisis, and more will be needed to meet the Government’s obligations under national and international law.

Q2. Which aspects of the evidence base presented in Section 1 do you think require extra investigation as a basis for policy development?

Link believes that there is a substantial and sufficient body of evidence demonstrating the nature of the impacts of diffuse pollution on wildlife and water uses and that further investigation into specific aspects of the evidence base should not delay action on government policy now.

However, in order to fine tune further action more detailed analysis is needed in the following areas:

- Increased understanding of the impacts of pollution
- Increased understanding of the interaction between ground water and dependent ecosystems
- Increased understanding of the value of creating wetlands
- Increased understanding of the ameliorative effects of certain habitats, such as woodland, established as riparian buffers to prevent diffuse pollution entering watercourses¹
- Increased understanding of erosion sedimentation and nutrient transport effects on archaeological sites and historic water features (lakes etc)

- Increased understanding of effects of agro-chemicals on archaeological objects in the soil
- Increased understanding of how catchment management can contribute to the enhancement of landscape character and diversity
- Assessing the scale of the problem
- Identifying emissions and transport paths
- Assessing remedial measures

Q3. Do you think that farmers have sufficient access to the information and skills required to respond to the causes and effects of agricultural emissions to water and to develop and implement solutions?

Link does not believe that farmers currently have access to the information and advice required to implement the necessary changes. We recommend that the government provides farmers with advice and training as recommended as one of our five key steps.

Q4. Do you agree that we will need to address farm inputs, land management and land use? Should any farm practices be priorities for implementation at a national or targeted level?

As a priority, Defra needs to develop integrated catchment management and catchment level strategies to deal with diffuse pollution. This should then be followed by mechanisms to address farm inputs, land management, land use and farm practices, ensuring that measures are catchment relevant. Farm planning is essential, with nutrient, crop protection and soil management required for all farms. In particular, plans should identify problem areas where risk of diffuse pollution is high and the action that needs to be taken to reduce the risk. Investment in farm planning should be treated as a core part of the output with a strong training element, not an administrative overhead.

Q5. Do you agree with the proposal to take early action to promote catchment-sensitive farming to:

- a) deliver pressing water quality and conservation targets
- b) help farmers to prepare for forthcoming regulatory requirements
- c) pilot action and improve our knowledge of the action required

Yes. Diffuse pollution from agriculture is already damaging our wildlife, our coastal waters and our heritage, and costs tax-payers and water customers millions of pounds every year. Link believes action is urgently required to deliver water quality and conservation targets, help farmers prepare for regulatory requirements, and pilot and improve our knowledge of the action required.

Q6. Do you agree with the proposal to begin any targeted action in priority conservation catchments?

Yes, Link believes that action is required urgently across the country – although this should be fast-tracked in priority conservation catchments and those areas where the problem is worst and threatening the more common wildlife associated with the wider countryside and irreplaceable heritage.

Q7. We have characterised four broad approaches on which we are seeking views, but these are not mutually exclusive and indeed we expect that the optimum approach will probably contain elements of several of them. Based on the options set out in section 4:

- a) what is your assessment of each of the four options for possible approaches and the individual policy instruments within them? How could each be improved?
- b) do you think that a combination of policy instruments would be the best approach to promoting catchment-sensitive farming?
- c) how would you rank the combined approaches in section 4.69 in terms of effectiveness and acceptability? Please explain why you would prefer each approach to less favoured alternatives.
- d) what would be the optimum package of policy instruments for promoting catchment-sensitive farming?

Link strongly disagrees with the suggestion that ‘no action above existing/prospective policy initiatives’ be taken. Link believes that a combination of the 3 other broad approaches (b, c & d) is required. Link believes that the formulation of a ‘green tax’ to tackle diffuse pollution is a priority, with a commitment that funds raised are re-invested to help farmers adapt to new standards.

Q8. What would you expect the overall and distributional impacts of the possible approaches to be including:

- a) costs; in particular in relation to farm incomes, competitiveness, agricultural suppliers, the food industry, consumers and others?
- b) benefits; in particular in relation to environmental effectiveness of the approaches?

Some of the costs of diffuse pollution are currently met by the consumer. These are outlined in Ofwat’s draft price determinations (part of the fourth periodic review of water prices), which includes action by water companies over the next five years to address nitrate in drinking water, costing £292 million in capital expenditure and extra operating costs of £5.5 million per year from 2010. Action on pesticides in drinking water will cost a further £74 million, with extra operating costs of £2.1 million per year from 2010 and action on cryptosporidium will cost £107 million and £2.7 million

in annual operating costs. However, this does not include the cost of damage to our wildlife, countryside, marine environment and heritage. Furthermore, diffuse water pollution also negatively affects tourism and recreation.

Link believes that public policy should ultimately be based on the Polluter Pays principle and although a move towards this may involve extra costs for the farming and food industry, the benefits will accrue to those who have previously had to bear the costs of diffuse pollution – the general public and the environment. However, a commitment will need to be given to ensure that proceeds from the implementation of ‘green taxation’ are re-invested to help farmers adapt land management practices to meet the new standards. Case studies produced by the Environment Agency indicate that tackling diffuse pollution can in some cases be cost-neutral or even beneficial for farmers over the longer term².

Q9. Do you agree with the approach we are taking to develop indicators to assess the effectiveness of policies to reduce water pollution from diffuse agricultural sources?

We commend the government on its plans to develop a comprehensive range of output indicators. However, we believe that the government needs to look at input and process indicators in a more effective manner including monitoring and evaluating use of fertilisers, phosphates in animal feed, faecal waste from livestock, pesticides, as well as farmer attitudes and understanding. In addition we believe it is important that a mechanism is put in place to provide feedback to farmers – to demonstrate the benefits to the environment that the required changes and their actions are bringing.

¹ The Pontbren study showed that only 2 years after tree planting on formerly intensively grazed land, the land planted with trees had a 90% increased infiltration rate. Reference: Bird SB, Emmett BA, Sinclair FL, Stevens PA, Reynolds B, Nicholson S & Jones T 2003. Pontbren: Effects of tree planting on agricultural soils and their functions. Report to CCW, NAW and FC.

² Farming, Environment and hard cash (2004). Environment Agency website – www.environment-agency.gov.uk