

Wildlife and Countryside Link¹ response to the ‘Reducing ammonia emissions from urea fertilisers’
consultation
January 2021

Nitrogen pollution has harmful impacts on climate, biodiversity, soil health and water. According to Government data, of England's nitrogen-sensitive habitats, 95% are adversely affected by nitrogen deposition². Furthermore, nitrous oxide lives in the atmosphere for an average of 114 years and it 300 times more potent than carbon dioxide³. We welcome initial efforts from government to tackle nitrogen pollution, not only for air quality and health, but also for biodiversity and the health of our natural world.

We support the proposed ban on solid urea fertilisers as a cost-effective means of reducing ammonia emissions. However a ban must be phased in over a short period, and must be followed swiftly with a comprehensive strategy to deliver a suite of measures to reduce nitrogen emissions. Voluntary action by the farming sector has not delivered any progress in the last decade, with ammonia emissions rising and the 2020 NECD target very likely to be missed. Adopting **an integrated approach is vital to avoid the trade-offs** caused by a straight switch from solid urea fertilisers to ammonium nitrate. Such a switch would be likely to increase diffuse water pollution and nitrous oxide emissions, as set out in the Impact Assessment. An integrated approach will also be more easily understood and delivered by farmers and easier for regulators to ensure compliance.

We are concerned that the proposed action on solid urea fertiliser is **presented as an alternative to delivering other Clean Air Strategy commitments, rather than as part of a suite of measures**. The Clean Air Strategy commits to delivering all of the listed measures and all of these are required to reduce the severe impact of ammonia emissions on the natural environment and public health. It is unclear (in the National Air Pollution Control Programme) that delivery of the CAS commitments will be sufficient to meet the 2030 emissions target and these commitments should not be treated as a menu of optional actions.

We recommend:

- Defra should reconsider other options relating to **the restriction and reduction of liquid urea fertilisers (primarily Urea Ammonium Nitrate)** and investigate the perceived barriers to this in more detail, in particular consulting and commissioning work to improve production, handling and application of synthetic fertilisers. In the short term, Defra should prioritise a renewed focus on advice and enforcement of the Farming Rules for Water and Nitrate Vulnerable Zones to avoid adverse effects on the freshwater environment in particular.
- Clean Air Strategy commitments for the farming and land management sectors should be delivered **as a coherent and integrated package of measures** to reduce ammonia emissions, nitrate leaching and nitrous oxide emissions from agriculture for air quality, water quality and climate change mitigation. This can be achieved through better nutrient (inc. manure) management and nutrient use efficiency to achieve an **overall reduction in (organic and inorganic) fertiliser use**.
- The development of a **National Nitrogen Balance Sheet** to quantify all nitrogen flows into, within and out of the country and to identify action needed across government departments, agencies and the

¹ *Wildlife and Countryside Link is the largest environment and wildlife coalition in England, bringing together 58 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.*

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729820/State_of_the_environment_air_quality_report.pdf

³ <https://www.soilassociation.org/causes-campaigns/fixing-nitrogen-the-challenge-for-climate-nature-and-health/the-impacts-of-nitrogen-pollution/>

private sector. This will help to demonstrate the public benefit of a multi-pronged approach to reducing nitrogen losses, to set targets and to quantify progress made in future.

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This evidence is supported by the following Link members:

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