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Materion Gwledig
Rheoliadau Llygredd Amaethyddol

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Ymateb gan: Ymateb unigol

Welsh Parliament
Economy, Trade, and Rural
Affairs Committee
Agricultural Pollution
Regulations

Evidence from: Individual
response

Thank you for the opportunity to respond to the Welsh Government NVZ Review. We note that responses should reach you on or before 10th September 2021.

Background

We are a family farming business consisting of me, my wife Margaret and our son Graham, 34.

We are dairy farmers milking around 300 cows with 300 followers, although ideally, we would have slightly less stock on the holding, but movements are severely limited by TB restrictions. We also grown winter and spring cereals and this year around 40 acres of forage maize. We farm a total of around 550 acres, partly owned and the remainder on short term tenancies. All the crops grown are consumed on farm.

We employ a full-time herdsman together with 3 regular part time general farm workers and make ready use of different contractors, one who specialises in slurry and muck spreading, another in silage harvesting, and a third contractor who we regularly use for field work and arable cultivations. We also make use of local tradesmen such as electricians, refrigeration engineers, dairy engineers, plant operators and builders along with all too frequent use of other skills. All this ensures that most of our turnover of just under £1m is quickly redistributed into the local economy.

NVZs

We responded to the original proposals. We made it clear that we understood the Welsh Government's desire to regulate slurry and farmyard manure spreading in certain catchments. We farm in the Cleddau catchment and are surrounded by a SSSI and the Western Cleddau and respect and enjoy the biodiversity of the area. We always expected the catchment to be part of a regulated area and would have looked forward to working with NRW and WG in maintaining a dairy industry in the area that met the needs and aspirations of those whose interest lay solely in maintaining a healthy river and surrounding lands.

We believe that the root of effective management of slurry is good storage and well-managed and timely spreading of the slurry, and

that any regulation should be backed up with generous government grant aid. It is reasonable to suggest that targeted grant aid would be best achieved by limiting the area to which it might be applied - i.e., in vulnerable catchments such as the Cleddau. I understand that by making all Wales an NVZ, it has been estimated that the industry cost is going to be in excess of £300m, while WG has made £11m pounds available. One has to ask whether the WG really wants to clean up the environment and keep farming as we know it - together with the culture that rural Wales enjoys - or whether the politicians of the day see this as an opportunity to change rural Wales into something different.

Would it not make sense to limit the areas that are brought into regulation and then target funding at those areas. As for the total amount necessary, I believe that Northern Ireland have made funds in the region of £150m available, recognising the massive amount of investment necessary to bring intensive food production into the mid-21st century.

As for some of the regulations that have been cut and pasted into the Welsh NVZ, the most ill-thought out is the concept of expecting the weather to comply with the calendar. Jeremy Clarkson's recent farming series has highlighted the fact that the weather does not respect the farming year and that farmers have to change their plans to suit the weather. I believe that the NVZ calendar was devised to prevent farmers in Eastern Europe and Germany, from spreading slurry on frosted ground. Transferring this logic to West Wales's temperate climate is naive, to say the least.

I believe the WG should justify why there is no grassland derogation of the nitrogen limit, leaving it at 170kg/ha - the only country in the world, as far as I know, to have such a limit. Again, this appears to imply a not-so-hidden agenda that there is a belief that Wales does not need food from its own resources.

The farming industry is left mystified by the Environment Secretary's repeated statistic that there are 3 agricultural pollution incidents a week, whilst being apparently deaf and blind to the fact that total pollution incidents are ten times this figure. Agriculture has a part to play in the solution to the problem, but agriculture is not THE problem.

The Environment Secretary has chosen to ignore proposals from the industry to regulate itself ("Blue Flag") after welcoming it.

To sum up

1. Target any regulation to areas proven to have a problem
2. Make a realistic sum of money available to carry out effective works (follow NI's example) to separate clean water and build sufficient storage in those areas.

3. Review the nitrogen limits. Why limit to 170kg/ha (climate change requirements will limit N use in the future anyway. Why no grassland derogation?
4. Find a way around the "farming by calendar" imposition.
5. Justify why farming - and the culture surrounding it - has been targeted whilst ignoring 90% of the problem.
6. Revisit the Blue Flag scheme proposed by Pembrokeshire farmers.

Thank you for the opportunity to respond to the NVZ review

Regards

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