

Carwyn Jones First Minister
Lesley Griffiths Cabinet Secretary for Environment
Wales Government
By email

21st December 2016

Dear Ministers

River Teifi, Special Area of Conservation: recent pollution

I am sure both of you will be shocked and sickened on learning the extent of the recent agricultural pollution on this iconic Welsh river. It has dealt a savage blow to that part of the economy which depends on a healthy river system: angling, wildlife tourism and associated businesses. This river is one of eight in Wales that has received the designation Special Area of Conservation which places additional requirements on government to ensure there is no deterioration in its ecological status.

This point source pollution is the worst example of what amounts to a continuous long term assault on our rivers and their economic value, from farming. In the mid '90s the discovery was made that sheep dip was wantonly tipped into our rivers: a survey showed that of a sample of over 110 streams, 98% tested positive for sheep dip. More recently, Water Framework Directive analysis shows phosphates to be alarmingly high in areas of dairy and poultry farming and the loss of soils to rivers seem fairly universal. **Wales is fast becoming the Agri-pollution capital of Europe.**

We make the same points now that have been made many times before:

- Regulation of key agricultural practices are weak in the face of the damage that breaches can cause.
- Enforcement of existing legislation is poor and invariably retrospective and late.
- Farmers are able to 'diversify' into high risk practices such as intensive poultry and anaerobic digestion with minimal or no training or regulation, with inevitable consequences.
- Agriculture in Wales is reliant on farm support
- Under investment persists partly because the powerful farming lobby appears content to continue in the current status quo.

- Despite much talk and promises of evolution of rural economics via an ecosystem services approach, there has been no forward movement. This would place a much higher value on clean water and healthy environments and channel funding in the right direction.
- Agriculture contributes only £175million to the Welsh economy, yet farming lobbies hold disproportionate sway.
- The bulk of farm assistance and advice relate to attempts to increase profitability through intensification/diversification rather than through environmental protection and sustainable practices.
- No one Natural Resource should be exploited at the expense of another

Two of our Rivers Trusts work in both England and Wales (The Severn Rivers Trust and the Wye and Usk Foundation) In England, the separation of the regulator (Environment Agency) and the advisor (The rivers Trust) has allowed a more robust approach to diffuse pollution and ensuring that agricultural apparatus is up to specification and properly operated. This has enabled the trusts to deliver changes that really make a difference. We are witnessing a reduction in chronic pollution and at last, attainment of Directive targets.

This approach followed a judicial review of Defra's aspirations for the Water Framework Directive. Please spare us this route and put in place as a matter of urgency a full review of the whole regulatory, support payments and planning systems in relation to environmental damage and pollution. There should presumably be no further argument against the imposition NVZ.

Yours sincerely

Stephen Marsh-Smith

Dr Stephen Marsh-Smith OBE Chief Executive Afonydd Cymru, the Rivers trusts of Wales

Fish loss River Teifi SAC:

