Lesley Griffiths AM, Cabinet Secretary for Energy, Planning and Rural Affairs  
Welsh Government  
Cardiff Bay  
Cardiff  
CF99 1NA  
9th March 2018

cc.  
Carwyn Jones, First Minister  
Hannah Blythyn AM, Minister for the Environment

Dear Cabinet Secretary

AGRICULTURAL POLLUTION

We welcome that your Written Statement on the NVZ consultation recognised the significant adverse impacts of agricultural pollution and that you are ‘minded to introduce a whole Wales approach to tackling nitrate pollution from agriculture’. However, while we would welcome being consulted as part your work with stakeholders, we are disappointed at the apparent lack of progress regarding how to tackle the increasing levels of pollution from unsustainable agriculture.

As you know, agricultural pollution, despite existing regulation and codes of good agricultural practise, is one of the main reasons for waterbodies failing to achieve good status under the Water Framework Directive (WFD) in Wales[1, 2]. The State of Natural Resources Report (SoNaRR)[3] highlights that both point source (such as those caused by overflowing slurry stores) and diffuse pollution risks are increasing which, in part are leading to

- 63% of all freshwater water bodies, defined by the Water Framework Directive, not achieving good or better overall status
- Only 1 in 6 freshwater habitat types in ‘Favourable Conservation Status’

One of the principal reasons for agricultural pollution, which is poisoning our rivers, is the wide scale seepage of slurry, fertiliser and pesticides from fields and farm buildings into water bodies. In addition to causing water pollution unsustainable farming has recently been highlighted as the ‘single biggest cause’ of the worst air pollution in Europe [4].

If blatant breaches of existing environmental rules such as farm pollution[5] cannot be addressed effectively then what hope is there of agriculture moving to a place where sustainable management of natural resources is the norm.

This is a watershed moment, and a key test for Welsh Government’s new environmental legislation. If Wales is to sustainably manage its natural resources it is imperative that we take urgent action now to address agricultural pollution. We believe it’s time to align agriculture not only with the requirements of the WFD and Nitrates Directive but also the Habitats Directive and the requirements of the Well-being of Future Generations Act and the Environment Act.

The need to address this issue extends beyond legal requirements. This is highlighted in the Government’s recently commissioned report from Resource for Change, which identifies that a clear and enforced regulatory floor is essential in establishing the foundation on which future public policy and markets, including Payment for Ecosystem Services (PES) can operate.

We would like to take this opportunity to offer our help to Welsh Government in establishing an appropriate set of measures, including regulation in order to effectively address this chronic and pervasive issue.

We seek an urgent meeting with you to discuss solutions and next steps.
Yours sincerely,

Rachel Sharp
CEO

Dr Stephen Marsh Smith
CEO

Russel Hobson
Welsh Lead

Sharon Thompson
Head of Policy & Advocacy (Wales)

Richard Garner Williams
National Officer for Wales

Wildlife Trusts Wales

Afonydd Cymru
Butterfly Conservation Cymru

RSPB
Salmon and Trout Conservation Cymru

Anne Meilke
Director

WWF Cymru

1. NRW, Diffuse Water Pollution in Wales Issues, solutions and engagement for action.
5. The Bureau of Investigative Journalism (August 2017) - Dirty business: The livestock farms polluting the UK https://www.thebureauinvestigates.com/stories/2017-08-21/farming-pollution-fish-uk