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Julie James AM  
Minister for Housing and Local Government

By Email

2<sup>nd</sup> February 2020

Dear Julie

I write on behalf of Afonydd Cymru. We have been described as the 'Wildlife Trusts for Rivers' and work continuously, with our member Trusts, to maintain and restore the ecology and fisheries (and hence income to our rural economy) of all 33 of them. You will already be aware that there are significant river issues and the problem is best summed up by your ministerial colleague, Lesley Griffiths thus: ***"Agricultural pollution in Wales is causing considerable environmental damage and is detrimental to public health"***.

We sit on the Intensive Agriculture Planning Working Group and like many in the environmental sector, view the agricultural planning process as significantly less of a formality than the planning system that the rest of the country faces. On a daily basis Wales breaches every aspect of our environmental controls especially the Water Framework and Habitats Directives and this can be attributed to the completely unsustainable development of the agricultural industry. For example, the expansion of the Dairy industry has not been measured against the ability of our environment to absorb the waste – slurry, dirty water and the never ending supply of black plastic silage wrap.

Indeed, the Wales Land Management Forum (pollution subgroup) on which AC sits, has resisted every effort to make even a broad-brush calculation of the ability of Wales' farmland to cope with the current level of waste output in relation to available land. It's clear that the business model for dairy and poultry farming relies on an unhindered disposal of any waste material, minimal level of investment in infrastructure and, currently, they are unencumbered with any significant legislation and face zero enforcement.

By continuously expanding the industry and with it, their negative effects on the environment, farmers have managed to achieve record low farmgate prices for eggs and milk, for example, and there are many that feel entitled to avoid voluntary environmental considerations. Today there are more polluted Welsh rivers than even during the peak of the Industrial Revolution. Will there be fields to

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grow grass and crops at the current rate of soil loss? Experts think we have about 60 years left at the current rate of loss.

The point of writing is to point out that in our opinion, the direction of travel of advice from the Intensive Agriculture Planning Working Group is very much towards business as usual. In March 2018, Afonydd Cymru made a formal complaint to the EC about breaches of the Water Framework Directive (WFD). This cited failure to put in appropriate regulation to control agricultural pollution, failure to create water protection zones and in respect of planning: **failure to take into account the in – combination effects of planning decisions.**

The latter was followed by an instruction from WGs Head of Planning (enclosed) requiring this to occur. **We believe this could have provided a solution to the over intensification (and together with enforced regulation), the consequential environmental damage.** We have found no evidence that this has ever happened and have discovered a raft of wheezes plus a blame culture of other organisations for the continued ignorance of this crucial requirement.

Rivers and water quality remain the best indicator of how a country manages its Natural Resources: Wales' river quality show we are doing very, very badly. This despite the Future Generations Act 2015, the Environment Act 2016 and the Declaration of Climate Change Emergency 2019 in which Lesley promised a "Wave of Action". May we suggest that this starts with the effective control of agricultural planning to reduce further environmental damage and yet more Green House gases. Finally we enclose our letter to Hywel Butts, the very efficient Chair of the Intensive Agriculture Planning Working Group which sets out our concerns more fully.

We would be delighted to explain all our concerns at a meeting in Cardiff.

With best wishes

Yours sincerely

A handwritten signature in black ink that reads "Stephen". The signature is written in a cursive style with a long horizontal stroke at the end.

Dr Stephen Marsh-Smith OBE

Executive Director Afonydd Cymru