

## Written evidence from River Action

### Introduction

There is no doubt that our rivers are facing an existential crisis, with virtually every single river in England now polluted beyond legal limits.<sup>1</sup> Raw sewage discharges from the UK's water companies and the impact of ever more intensive agricultural practices have combined to create an escalating environmental disaster across the majority of river catchments. The increasing inability of an underfunded Environment Agency to enforce regulations and penalise offenders also appears to be part of the problem.<sup>2</sup> While compelling cost-effective nature-based solutions to this challenge do exist, for example reed-bed filtration of sewage and agricultural discharges, insufficient progress has been made thus far in implementing these.

Both local activists and environmental campaigners and also groups such as this Committee have achieved considerable success recently in raising public awareness of the threat posed by river pollution and in calling for action. This inquiry provides a welcome opportunity for translating awareness into tangible action, and we urge the Committee to provide urgent and ambitious recommendations to Government.

Through this submission we also wish to highlight that much of the focus so far has been on the role of water companies and that equivalent attention and national mobilisation is also required in the context of agricultural pollution, which may pose an even more complex problem. As opposed to the water companies – who comprise a small number of regulated major corporations – agricultural polluters tend to be hundreds of privately-owned farms whose activities are often difficult to identify and monitor. In that context, the Environment Agency has publicly stated recently that it no longer has the resources to effectively tackle agricultural pollution.<sup>3</sup> In stating this, the EA has effectively washed its hands of responsibility for monitoring one of the major sources of river pollution in the UK.

River Action is a newly created campaigning organisation, led by former businessman Charles Watson, whose purpose will be to apply direct pressure on major agricultural suppliers and producers to take responsibility for the environmental conduct of their supply chains. Given the EA has stated it is incapable of monitoring agricultural pollution given the number of farms nationally are beyond its reach – we believe that the agricultural processing businesses (be they dairy, eggs, sugar beet etc) are in a much better position to know their farming supply chain, region by region.

We will launch our first public campaign in February 2021 and the recruitment of an advisory board is currently in motion. The following Advisory Board members are presently involved: Richard Benyon, Ben Goldsmith, George Monbiot, Isabella Gornall, James Macpherson and James Wallace. For further information and updates on our campaigns as they develop, we will shortly be launching our website and social media platforms.

We would be delighted to share any further information required by the Committee in its preparation for evidence sessions.

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<sup>1</sup> <https://www.theguardian.com/commentisfree/2020/sep/25/england-rivers-polluted-beyond-legal-limits#:~:text=Every%20single%20river%20and%20lake,accompanied%20by%20lashings%20of%20slurry>

<sup>2</sup> <https://www.endsreport.com/article/1705037/ea-heads-blame-budget-cuts-decline-enforcement-monitoring>

<sup>3</sup> <https://www.endsreport.com/article/1696294/bevan-ea-lacks-powers-resources-tackle-farm-pollution>

### ***What is the impact of plastic pollution and other materials on drainage and water quality in rivers and what should be done to mitigate it?***

In the context of the introduction above, we have prepared this submission to provide a brief overview of the impact of agricultural pollution on water quality. We urge the Committee to consider this aspect of the river crisis alongside the role of water companies and make recommendations as to how this can be addressed with the urgency required.

#### Agricultural pollution

Agricultural pollutants are transported in water runoff from farmed land. There are four distinct types of pollution associated with agriculture:

1. Fertilisers
2. Pesticides
3. Sediments (2.9 million tonnes of soil are lost from fields every year in England and Wales<sup>4</sup>)
4. Faecal bacteria

Considering that 70% of land area of England is farmed, the resultant scale of pollution is significant (and has been reported to have increased significantly in recent years<sup>5</sup>), with estimates that those four types of pollutant account for 50-60% of the nitrates, 20-30% of phosphates and 75% of sediment in England's waterways.<sup>6</sup> Therefore, the potential benefit of action to address agricultural pollution specifically could be enormous. The rollout of the new agricultural subsidies system this year and the ongoing work of the National Food Strategy may provide opportunities for action. Likewise, as the interest of both consumers and investors in environmental issues and ESG criteria continues to rise, the business case for action is strong.

#### River Wye

One prominent example of the damage reportedly caused to rivers by agricultural pollution is the case of the River Wye catchment, which has attracted considerable attention in recent months.<sup>7</sup> The river has experienced a severe decline in ecological and chemical health, with monitoring and surveys by environmental groups unanimously confirming that algal blooms have multiplied in number in recent years<sup>8</sup> and appear to be lasting longer and occurring further upstream. River health has declined to the extent that Natural Resources Wales has disclosed data showing that 60% of the Wye is in ecological crisis<sup>9</sup> and the river has also been described as a "wildlife death trap".<sup>10</sup> Wales Environment Link has warned that "the river is rapidly reaching the point where wildlife that relies on the Wye ecosystem may be permanently affected".<sup>11</sup>

Reports on status of the Wye (including those referenced in this document) reflect a growing body of evidence attributing that ecological deterioration to the unprecedented and disproportionate growth in poultry farms around the headwaters of the Wye. According to the

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<sup>4</sup> <https://salmon-trout.org/projects/water-action/agricultural-pollution/>

<sup>5</sup> <https://www.theguardian.com/environment/2017/aug/21/serious-farm-pollution-breaches-increase-many-go-unprosecuted>

<sup>6</sup> Parliamentary Office of Science and Technology POST Note No. 478 October 2014 *Diffuse Pollution of Water by Agriculture* <https://post.parliament.uk/research-briefings/post-pn-478/>

<sup>7</sup> E.g. <https://www.thetimes.co.uk/article/free-range-egg-farms-choking-life-out-of-the-wye-rt3c763qc>;

<https://www.theguardian.com/environment/2020/jun/20/its-like-pea-soup-poultry-farms-turn-wye-into-wildlife-death-trap>;

<https://www.bbc.co.uk/news/uk-wales-54181261>

<sup>8</sup> <https://www.wyeuskfoundation.org/news/nations-favourite-river-facing-ecological-disaster>

<sup>9</sup> <https://www.bbc.co.uk/news/uk-wales-55345302>

<sup>10</sup> <https://www.theguardian.com/environment/2020/jun/20/its-like-pea-soup-poultry-farms-turn-wye-into-wildlife-death-trap>

<sup>11</sup> <https://www.theguardian.com/environment/2020/oct/05/river-pollution-leads-to-welsh-demand-for-halt-to-intensive-poultry-units>

Campaign to Protect Rural England (CPRE) Shropshire, as of July 2020 in the counties of Shropshire, Herefordshire and Powys there were 500 farms with a total of 1420 intensive poultry units/ sheds, containing over 44 million birds.<sup>12</sup> In a public statement, Wales Environment Link notes that sites producing 6 million birds have been approved in the Wye catchment in the past five years alone.<sup>13</sup> This is believed to have led to a two-fold increase of phosphate levels in the lower Wye in the past six years,<sup>14</sup> causing the river to now exceed the levels permitted under the Water Framework Directive.

A Natural Resources Wales report<sup>15</sup> published in December 2020 provides a comparison of phosphorus concentrations in the Wye against targets and indicates widespread failures. Cross-comparison of the failure zones with a map detailing the concentration of poultry farms produced by CPRW and CPRE<sup>16</sup> reveals a direct correlation between target failures and the presence of poultry farms. While linking individual instances of agricultural pollution to individual farms is often difficult to do, the overwhelming evidence appears to point to the fact it is in significant part the responsibility of intensive poultry farming and concern is such that in 2020 environmental groups and communities publicly called for a moratorium on planning approval for new intensive poultry farms.<sup>17</sup>

### Reducing the impact of agricultural pollution

Turning to mitigation, it is clear that urgent action to reduce impacts of agriculture and food production on the ecological status of rivers is crucial. In the case of the intensive poultry industry for example, in the rush to end battery egg farming and move chickens out of cages, it would appear that literally many millions of birds were put out onto open land without any consideration to the environmental impact that the run-off of the resultant chicken excrement would have across the river catchment. Chicken manure is one of the richest in phosphate content – and it is simply a scandal that this situation has been allowed to exist.

Farms and production facilities must have adequate processes in place to prevent damaging run-offs; nature-based remedies such as holding lagoons combined with reed bed filtration systems are now proven low cost solutions. To install such facilities help is on hand across the UK from the Rivers Trust Movement – whose local catchment-based trusts are on hand to work with farmers.

However, it is vital that actions at the farm level are supported and enabled by overarching policy measures. These must in part place responsibility on the food processing companies to co-invest in ensuring their supply chain is environmentally compliant. It is up the production chain within the food processing sector that the financial capabilities to do this exist.

In summary, it is critical that a strengthened regulatory framework is created which both incentivises and rewards good practice at the farm level – while ensuring that the food processing industry pays its share in supporting farmers financially in implementing the necessary remedies.

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<sup>12</sup> <https://www.cpreshropshire.org.uk/poultry-farms>

<sup>13</sup> [https://www.waleslink.org/sites/default/files/wel\\_statement\\_on\\_nrw\\_phosphate\\_in\\_river\\_wye\\_sac\\_final.pdf](https://www.waleslink.org/sites/default/files/wel_statement_on_nrw_phosphate_in_river_wye_sac_final.pdf)

<sup>14</sup> <https://www.brecon->

[radnor.co.uk/article.cfm?id=112425&headline=The%20nation%E2%80%99s%20%E2%80%98favourite%E2%80%99%20river%20is%20facing%20ecological%20disaster&sectionIs=news&searchyear=2020&cat=Environment](https://www.brecon-radnor.co.uk/article.cfm?id=112425&headline=The%20nation%E2%80%99s%20%E2%80%98favourite%E2%80%99%20river%20is%20facing%20ecological%20disaster&sectionIs=news&searchyear=2020&cat=Environment)

<sup>15</sup> <https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/river-wye-compliance-report/?lang=en>

<sup>16</sup> <http://www.brecon-and-radnor-cprw.wales/wp-content/uploads/2019/07/IPU-ALLdataV4-Master-20190707-3-Counties-FINAL-2.0-20190711.pdf>

<sup>17</sup> <https://www.theguardian.com/environment/2020/oct/05/river-pollution-leads-to-welsh-demand-for-halt-to-intensive-poultry-units>

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