

Written evidence submitted by Mr Glenn Buckingham (FR0070)

EFRA committee evidence, farming rules for water RPS252

Simply what will happen to all human biosolids and FYM produced if there is no or limited access to arable land in the autumn? Is there anyone in the EA with practical skills to understand this?

Why has it taken since February 2018 to get to the August 2021 announcement?

RPS 252 contradicts SFI, SFI incentivises building OM in soil and encourages reduced reliance on artificial fertilisers that have a high carbon footprint (even if manufacturers claim it will be green ammonia in the future, it is like saying its ok to continue using fossil fuel, but with carbon capture) or detrimental to soils and water and not sustainable (Artificial Nitrogen 'the godfather of pollution')

Is it a contradiction to allow water companies to continue to release nutrients to water and attempt to restrict farmers using FYM and biosolids? (Most water companies are foreign owned and the 'profit' on pollution leaves the country!)

Where did the 5kg/ha figure come from? (EA webinar on RPS 252, EA said we had to put a figure in so as to stop farmers feeling free to apply excessively), there was no science behind it and no way a farmer or the EA can practically measure a loss of 5 kg/ ha and in any case it would be post event.

So how to manage it? Good analysis of manures applied evenly to autumn sown crops or grass that will capture the nutrients, these can be crops for production or cover crops before spring crops, the steps within SFI are correct, this will allow improved biomass development in the crops and reduced need for artificial N in the spring, recycling other macro and micro nutrients at the same time, reducing the need for mined finite nutrients from around the world. No applications to land that would be bare all winter.

If the products have to be composted/dewatered for even spreading then producers need financial assistance to improve the quality and spreadability of FYM, but this would have to be done with a mind to control ammonia emissions, I don't know how this could happen, but someone will!

Are we talking mini digesters on farms to recover/generate energy for local use on farms?

Should RB 209 be completely reviewed re organic manures and crop autumn/annual need considering the ability of crops to capture nutrients applied? It's in living memory that artificial N was applied to autumn cereals, what impact on water did stopping this have?

Should there be limits in catchment for applications, should farms be more diverse to prevent the intensity of application that happens in some areas, but then there would be need for compensation or FYM treatment/systems to allow transport to deficit areas of organic manures. Seems crazy...

Can we not have help for farmers in assessing live Soil N availability and then live crop take up and in season requirements so that we can be more efficient with N use and therefore reduce losses to the water environment, the CSFO and FWAG network of advisors could surely help with this? Should artificial N not be the limited product?

Trade and fertiliser agronomists must be more responsible in recommendations? Relevant to crop potential, and biomass maps, would the YEN ADAS research be a good starting point?

In general terms an organic can produce 5 tons/ha of cereals without artificial N, therefore a conventional farmer is using 150-200 kg/ha of artificial N to produce 3-5 tons/ha of extra yield, national average yield is around 7.5-8 tons/ha. How efficient is this compared to using biosolids and FYM?

A phased resolution for autumn 2022 and onwards needs to be in place by May 2022 for farm planning... considering product is being produced daily! A cliff edge situation is unworkable, surely?

Glenn Buckingham

December 2021