

Written evidence submitted by Mr Andrew Watts (FR0073)

EFRA Committee Call for Evidence.

10/12/2021

With regard to the various EA Statements on Farming Rules for water and their interpretation of the regulations - I refer to the last paragraph of their written response to EFRA

'You also raised concerns about the EA's Regulatory Position Statement 252. We introduced this at the request of the NFU and the water companies, who provide treated sewage sludge to farmers for land spreading. The RPS is specifically designed to help farmers this autumn, by making clear that if farmers follow its conditions the EA will not normally take enforcement action against them where they apply organic manure to agricultural land that may exceed the needs of the soil and crop on that land if there are no feasible alternative options and provided this does not cause a risk of pollution. We have asked farmers to contact us if they want to use the RPS in order to provide details of what is being spread where, or if they believe they cannot operate within the RPS and need more assistance. This is designed to help us help farmers and manage the risks of pollution. When the government introduced the Farming Rules For Water it made clear that while all farmers must follow them, the EA would provide advice on how to comply, and that the EA's enforcement of the rules would be proportionate and fair, with the emphasis on working with farmers to achieve compliance. That is the approach that the EA has been following since 2018. We will continue to follow it.'

I should say at the outset I have a BSc hon in agriculture, am BASIS and FACTS qualified and have been in farm management for nearly 40 years.

The approach taken by the EA demonstrates a serious lack of understanding in the way in which organic manures work within the soil and also the way in which the various components of farming and allied industries interact. Further there is a real failure in recognising the wide range of soil types, topography and annual rainfall across the country.

Farmers have a duty to minimise their impact on the environment; all of society should share in that ambition. I would suggest that the EA are failing to take a holistic view of the use of organic manures and are being somewhat naïve in their response as detailed in the paragraph reference above.

For example, many of the trials involving digestate use as part of their decision-making process were carried out on Norfolk sandland with full rates of application in the autumn. I would suggest that such a situation should be prevented, BUT that does not reflect what is possible to achieve both crop benefits and reduce reliance on inorganic sources by a judicious use of such a product. We would usually (before the rule changes) on our soils have applied a 1/3 full dose in the autumn and the balance into the growing crop- with suitable equipment this is possible with this type of product. Material with a higher dry matter is not as likely to be able to be accurately applied into a standing crop. This low autumn dose acts as a starter fertiliser for the crop and in our experience the crops develop much stronger rooting systems and more robust plants – which may better withstand pest and disease, offering the potential to use fewer chemical inputs later.

Work carried out in recent years at Rothamsted (I am sure other submissions will reference this) by Andy Neal and William Rickard, amongst others show the value of an autumn application in boosting the soil ecosystem, improving soil health and providing this much better environment for plant roots and hence plant growth. Drought tolerance was improved with better rooting systems etc.

There is another aspect to the EA position which I find somewhat contradictory – we are told that we should limit ammonia emissions by incorporating the organic material when possible. This means autumn crops to have the autumn component of any application incorporated would need to be applied before crop establishment. The EA would also prefer us to use systems which reduce the risk

of leaching – with the autumn restrictions placed upon applications the risk of higher ammonia emissions in the spring is clearly a challenge.

Anecdotally and off the record, a senior EA member of staff told me ‘we don’t have an issue with what you are doing, but we have to have one set of rules’ – ignoring the wide variations between soils, rainfall and topography that are typical of the UK.

Regarding crop requirements and with reference to the quantities applied, I would note that for many years farmers have applied products on a biennial or even triennial basis. RB209, which the EA reference is indeed a well-respected guide, but it is a guide and should be used as such, not as a stick with which to beat farmers.

I would ask you to consider what I consider to be serious contradictions in the EA approach to water course monitoring. That there are still so many incidents where sewage works discharge into water courses, whether authorised or unauthorised it really doesn’t matter, should be a far greater cause for alarm. The EA should be encouraging water treatment plants to improve their operations – we should be making much better use of treated sewage as a source of nutrients for crops instead of pouring it away into watercourses. Regarding waste food, the same principle applies. We should of course be minimising wastage, but nevertheless there will be waste food and it should be an ambition that it is all processed through an AD plant, producing power for the grid and a valuable nutrient source for crop production. Both situations are vital in our bid to reduce our carbon footprint and work towards net-zero.

I come back to my original point – farmers have a responsibility to the environment – but it the whole picture that counts, not a narrow view of one part of the equation. Properly managed autumn applications of organic manures (and this means all types) are part of the solution whereas it seems to me the EA just regard them as a problem. An AD plant with which I am familiar takes in ~45,000t of waste food per year, produces electricity for 4000 homes and provides the bulk of the fertiliser requirements for ~4,000 acres of arable cropping. Such operations are under severe pressure to remain viable as a result of the EA interpretation of Farming Rules for Water.

Rather than focus on the very low or negligible risk posed by diffuse pollution of autumn applications in well managed systems, the focus should surely be on situations whether by water companies (or farmers or whoever) who pose much greater and well publicised risks to water quality.