

Written evidence submitted by Nature Friendly Farming Network (NFFN)(FR0074)

**Environment, Food and Rural Affairs (EFRA) Committee Call for Evidence
– Farming Rules for Water**

Response by the Nature Friendly Farming Network (NFFN)

About us:

The [Nature Friendly Farming Network](#) (NFFN) is a farmer-led independent organisation, established in November 2017, uniting farmers across the UK who are committed to managing their land for wildlife and public goods at the same time as growing and providing safe, healthy, and nutritious food.

We come from a [range of backgrounds](#) big and small, organic, and conventional. We are passionate about ensuring our countryside is productive and bursting with wildlife. We hope to highlight that farming and nature can go hand in hand, feeding the nation, including during challenging moments such as the ongoing [COVID-19 pandemic](#).

We hope that, given our experience as farmers and land-managers, this response is of interest to the committee, and we would welcome the opportunity to discuss this further or provide additional information as required.

1) What impact, if any, are the EAs implementation of Farming Rules for Water Regulation prevents farmers from spreading organic fertiliser?

The [Nature Friendly Farming Network \(NFFN\)](#) strongly feels that the EA's current implementation of Farming Rules for Water Regulation is failing to align with Defra's SFI standards – to increase organic content – and restricting farmers who want to go above and beyond with their management of natural (organic) fertilizers.

Many NFFN members work hard to ensure that they farm with nature, preserving their soils and using natural fertilizers on their farms. They recognise that these can still pose a pollution risk, so take practical steps – such as cover crops – to reduce this impact. The EA's current implementation of these regulations, however, does not appear to take into account information from farmers or reflect this activity on the ground – indeed, it is limiting good behaviour and creating a 'perverse incentive' to put fertilizer down in conditions that are not appropriate (e.g., large distributions in, increasingly wet, spring periods or left on bare land). An example of this is the EA using RB209, which the NFFN does not think is fit for purpose for more regenerative soil caring farmers – which we support.

The NFFN calls upon the EA, and others, to work closely with us and the rest of the farming community, to find a practical solution to 'rapidly transfer' into better farming practices; not causing pollution. We need to establish a clear distinction between highly-polluting manure vs slowly-polluting manure – e.g., chicken manure – and encouraging a supported move away from artificial fertilizers. Further to this, we need clear and consistent information for farmers, coupled with education and financial support, followed by enforcement as a final resort – see steps below.

We would stress that cover crops are a clear example of steps that can be taken, and this information should be shared with farmers and supported – many water companies are already paying farmers for this, to reduce pollution into water courses.

2) Are there change that should be made to the rules or how they are applied?

The NFFN would support the following, key changes:

- Ensuring locally targeted and soil/weather dependent regulations, to reflect different conditions and circumstances - this autumn (2021) has demonstrated a period with good weather conditions, with crops-growing; when farmers should be encouraged to appropriately use their stock
- Align EA regulations with other Defra plans – e.g., slurry and investment plans – to ensure consistent approaches across farming and effective delivery
- Improve guidance/support/education for farmers - assisting farmers to go in the right direction; working with organisations like the NFFN to deliver peer-to-peer education and share best practice
- Delivering a clear plan for farmers – many have lost faith with mixed-messaging and lack of consistent approaches, and therefore are not farming as well as they could be. As well as the above improvement in education, we need to see enforcement, particularly in the worst-affected areas, to ensure change and improvements in our water courses.

3) What are the best ways methods of preventing agricultural diffuse pollution?

The NFFN believe that all farmers applying organic material should have it tested annually and should do a nutrient management plan and a soil management plan – many NFFN members already do that, applying best practice (as currently stands) as they recognise the benefit to their farms and the surrounding environment. However, many famers do not currently do this (as we are aware) partly due to lack of guidance/awareness and also lack of enforcement. If this were enacted, we would witness a large shift and improvement in our water quality.

Resources need to be targeted at the most polluted water courses (by agriculture) and highest-risk areas, and those in these areas need that education/support/enforcement. This data is already held by the EA and should be followed closely, with appropriate resources allocated to areas that most need it.

Additional Points:

The NFFN passionately believe that to achieve net zero we need to move away from artificial fertilizers and manures. We need to find ways to grow crops that ensure the health of our soils, with good structure and biology; that will hold and capture the water better.

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