

## **Written evidence submitted by Mr Stephen Doble (FR0079)**

I am a mixed beef and arable farmer. My family drinks the water from our borehole so I care more than anyone about preventing diffuse pollution.

We have been complying with NVZ rules since 1996. Having moved from a slurry based system to a straw based system, we have been applying farm yard manure in the autumn ahead of winter wheat sown in September to improve our soils and reduce our reliance on artificial fertiliser. The wheat grows away rapidly, clearly showing a response to the nitrogen which means it is not available to leach over the winter.

The EA's interpretation of the Farming Rules for Water prevents us from doing this so now the manure will be left in field heaps over the winter, leaving the nitrogen to leach away. Furthermore when we apply manure in the autumn, when the subsoil is dry, little damage is done to soil structure but spring applications, when the subsoil is generally wet, are far more damaging to the soil.

The overall impact is an increased risk of nitrogen leaching, increased soil damage and lower crop yields all of which increase our carbon footprint and cost of production per tonne.

The rules should be changed to allow the application of manures with a low readily available nitrogen content ahead of winter cereals.

In order to limit diffuse pollution application rates of manure in the autumn could be limited ahead of winter cereals.

Well grown crops, having taken up the nitrogen are the best way of reducing diffuse pollution.

Yours sincerely

Stephen Doble

December 2021