

Written evidence submitted by Dan Dines, Wessex Agronomy Services Ltd (FR0082)

Should the Farming Rules for Water or how the Environment Agency applies them be altered?

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I am in full agreement with the objectives of the Farming Rules for Water, i.e. reducing diffuse pollution from agriculture. However, I feel the Environment Agency (EA) interpretation of the rules is excessive, unworkable and unreasonable.

In my role as an independent agronomist I advise farmers on fertiliser and organic manures. In order to do this, I have undergone training and gained my FACTS qualification, and am required to undertake Continued Professional Development.

I have always been an advocate of organic manures as they are a source of nutrients and organic matter, both vital elements for soil health. Full allowance is made for the nutrients contained within organic manures through the use of tools such as PLANET and MANNER. Applications are also made in accordance with NVZ rules and according to 'good agricultural practice'.

Nutrient applications (in the form of organic manures & inorganic fertilisers) are carefully managed and planned according to soil analysis and crop requirements (based on RB209). Nutrient balances are carried out from one crop season to the next, so for example if an organic manure application exceeds crop requirements a positive balance is carried forward to next season's crop.

Organic manures applications are carefully planned across the crop rotation, e.g. if a farm is running a 5 year rotation organic manure applications may be planned for two crops within the rotation. This means applications are effectively rotated around the fields, and no one field receives excessive applications.

I consider the Environment Agency interpretation of the rules fails to recognise the measures we undertake (outlined above) to ensure safe, responsible and effective use of organic manure applications.

The literal interpretation of RB209 in respect to 'not being able to apply organic manures if there is no crop requirement' fails to recognise that we run nutrient balances from season to season and plan organic manure use across the crop rotation. Organic manures contain multiple nutrients, which also makes complying with 'only apply if there is a crop requirement' virtually impossible in many instances.

Different organic manures contain different concentrations of nutrients. The blanket ban on autumn application on crops other than grass and OSR therefore seems an overreaction. Would it not be logical to differentiate between different organic manures, and permit autumn application of those with lower nutrient values. Also, lower application rates for autumn use seems logical.

Some farms, for various reasons, do not have any spring cropping. If they don't grow OSR or grass the current interpretation of the rules effectively precludes them from using certain

organic manures, i.e. those that cannot be applied to growing crops in the spring (Biosolids as they have to be incorporated or Farm Yard Manures). This hinders our ambitions of improving soil health and is in conflict with the wider objectives of agricultural policy.

In summary the EA's interpretation of the Farming Rules for Water seem disproportional, unreasonable and unworkable. They fail to acknowledge that many farmers are using organic manures effectively, safely and responsibly. i.e. following good practice. These farmers have nothing to fear from sensible and workable rules, and for those who fail to comply there should be tougher sanctions. The industry is willing to work with the EA and arrive at workable compromises – something the EA seems totally unwilling to do.

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