

**Written evidence submitted by Geo E Gittus & Sons Ltd and Symonds Farm Power Limited
(FR0085)**

UK Parliament Committees Call for Evidence – Farming Rules for Water

Submission on behalf of Geo E Gittus & Sons Ltd and Symonds Farm Power Limited

We are farmers and AD owner / operator and are totally and utterly appalled at the way this whole issue has been handled by the EA. The EA has shown a complete lack of understanding of;

- a. how farming works

- b. how the water companies have worked with agriculture to turn what was once considered a waste only fit to be discharged to the sea into a valuable fertiliser that has done a great deal to improve soil health and replace artificial fossil fuel derived fertiliser.

- c. and the same can be said of the anaerobic digestion industry whether it the food waste sector or the on-farm sector. Again, both sectors are trying to reduce waste, emissions and replace fossil fuel in so many ways.

It seems incomprehensible that the EA, who I have heard say so many times that there is no such as waste, is hell bent on forcing all sectors of the industry to restrict the use of the organic materials to such an extent that in the case of sewage sludge it is likely to get incinerated. How can that possibly be an environmentally sound thing to do, it isn't, on so many levels.

Whilst of course no-one will deny that in some case there has been pollution and a loss of nutrients to the water system. In the vast majority of cases this is not deliberate and the ban on autumn application of organic manures is not going to stop either deliberate pollution or unintended loss of nutrients. Indeed, it is highly likely to increase the risk of both on a greater scale. The natural world does not work to calendar dates, regular seasons or predictable weather events. It is because of this unpredictability that no two years are ever the same even when looking at the same crop rotation on the same field from one rotation to the next. This is because, no matter how good your soil biology is, if the crop's growth stage and it's nutrient requirement does not match up with the natural breakdown of the respective organic manure, regardless of an autumn or spring application, then the crop will not take it up. The natural breakdown of organic manure is multi-faceted and is reliant on soil temperature, moisture content, microbial activity and many other factors being in synchronisation and this happens beyond any ability for us to control it. We know a certain amount about it but still have a great deal don't know. It is therefore dis-ingenious at best to suggest that RB209 is the only manual that has to be obeyed. It was not created for this purpose and therefore drawing the conclusions from it that have been drawn to try and validate this ban is just plain wrong. RB209 was created as a guide for the economic viability of the use of artificial fertilisers. A far more precise science than the utilisation of organic manures.

Whilst we can apply many liquid organic manures into growing crops in the spring and also some solid organic manures in the spring before cultivation and subsequent planting the latter is rarely a viable option on heavy land. In our experience a spring application of conventional FYM to heavy land provides hardly any nutritional value to the spring crop planted especially if it is a cereal crop

because the release of nutrients only starts to become available when the crop is about to be harvested. Where is the benefit in that, it increases the risk of leaching.

We have used solid pig manure, pig slurry, cow manure, cow slurry, liquid and solid digestate on our farms over many years. They have always been treated as a valuable resource and applied to the best of our ability to maximise their utilisation and thereby their cost-effectiveness. Organic manures are not however cheap to apply, nor are they a reliable source of crop nutrition in the same way as artificial fertilisers are. They are however reducing our reliance on fossil fuels.

Soil conditions are not uniform from one season or year to the next. Whilst I acknowledge with the extreme weather events that we are seeing more organic manure storage needs to be built this in fact re-enforces the argument that we need to be able to keep our options open and allow both autumn and spring applications to remain. What is going to happen if we get to the spring having been told no autumn applications and the spring turns out to be too wet to apply these manures because either the damage to the soil structure will be too great or because the window ends up being so small there is physically not enough time to apply it? You cannot spread FYM reliably at more than 12m so the potential for compaction is massive if the soil is not in good condition.

This is before one considers that condensing everything into one spring window will require a huge additional resource of equipment and labour to even stand a chance of achieving it.

We are constantly being told Defra and the EA to improve soil health and increase organic matter to help increase its water retention capability and reduce our reliance on fossil fuels. It would appear to me that the current stance, interpretation, of The Farming Rules for Water is completely contradictory to this aim. The EA is being completely stubborn in this and it should be brought to heel to carry out constructive, continual dialogue with agriculture and the water companies to work out a balanced holistic approach which we can all agree reduces the risk of diffuse and point source pollution.

I am convinced it can be achieved but there has to be a willingness on behalf of the EA to engage and engage meaningfully. All parties in this have still got a great deal we can learn and we intend to keep learning.

George Gittus,

Director of Geo E Gittus & Sons Ltd and Symonds Farm Power Limited

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