

Patrice Mongelard
Catchment Sensitive Farming Delivery Team Leader
Room 207
55 Whitehall
c/o 3-8 Whitehall Place
London SW1A 2HH

May 22nd 2006

Dear Patrice,

Proposed Catchment Sensitive Farming Capital Grants Scheme

The Salmon & Trout Association (S&TA) is an international organisation representing the interests of 100,000 individual and club-based game anglers, fishery owners, managers and affiliated trades throughout the United Kingdom. On this occasion, we are also responding to the consultation document on behalf of the Fisheries and Angling Conservation Trust (FACT), the umbrella organisation representing the interests of the ten major angling and fisheries organisations in England.

We are grateful for this opportunity to comment on the Catchment Sensitive Farming Capital Grants Scheme consultation document, which we see as a positive move forward in the attempt to lessen the impact of agriculture on the aquatic environment, and so assist in delivering the objectives of the Water Framework Directive. However, while we appreciate the constraints on the overall Defra budget, we feel that the £5m of new funding made available for this scheme is but a fraction of what is required to deliver significant results in the 40 priority catchments to which it applies.

We discuss this in more detail below but, meanwhile, would make the following comments on your particular questions:

Should the Scheme be limited to low cost items?

Within the limitations of this scheme, with only £5m available in total, it would be sensible to limit grants to low cost items. However, each farm's individual situation will determine the size of project required to protect local river corridors, streams, lakes, ponds, wetlands and groundwater, and it may well be that much greater funding will be needed on specific sites. Therefore, close coordination will be required with other Defra schemes – Higher Level Stewardship, for example – to ensure maximum benefit throughout a given catchment. The priority is to address each catchment strategically, and to address the most pressing and damaged areas, whereas limiting the scheme to low cost items may not allow this approach.

List of Eligible Items

This would seem to be an extensive list which should cover most situations. However, should there not also be a clause included such as, *Any other item which might be considered relevant to individual situations?* This would cover all eventualities, with Defra representatives being the final arbiters as to the acceptability of individual grant applications.

Proposed Cap of £5,000 per Farm

Within the limits of the scheme as envisaged, a cap of £5,000 per farm would seem to be sensible. However, as intimated above, and discussed below, we believe that the whole scheme is under-funded and that individual farms should be eligible for much higher grants than the proposed cap, if the relevant application is considered of high enough significance in the overall protection of the local catchment. Even with farmers taking ownership of projects to limit diffuse pollution and meeting some of the costs themselves, we feel this is the only way in which the objectives of WFD can be realistically delivered.

Percentage Grant of overall project

We consider that there should be sufficient flexibility within the scheme for grants to cover between 30% and 50% of overall project costs. It is more important to take decisions on individual cases than to be too prescriptive on the overall scheme and, even with a 50% grant, farmers will still be contributing significantly to projects themselves and taking ownership. There is also an argument that the potential for a 50% grant will encourage farmers to apply, whereas they might be less than inclined to undertake important catchment-protection projects if they have to provide 60/70% funding from their own accounts in what, for many, is a financially difficult period for agriculture.

Should all capital items be funded at the same rate?

Here again, we believe that there should be enough flexibility within the scheme to allow decisions to be taken on individual applications and situations. Tying the hands of decision makers by making the structure too prescriptive we see as being potentially counter-productive.

Catchment Sensitive farming requirements beyond this scheme.

We see CSF as an obvious contributor towards delivering the objectives of WFD by 2015 and beyond. With 70% of diffuse pollution believed to emanate from farms, and 2.2 million tonnes of soil entering waters each year, it is essential that agricultural practices over land draining directly into water courses change dramatically in as short a time as possible, and we see this as a major target for Government help in funding. Cross compliance may assist, of course, as may other Stewardship schemes, but we still believe that greater financial commitment is required from the Treasury, coupled with regulation and enforcement (carrot and stick) to tackle the widespread damage caused to watercourses by diffuse pollution.

With this in mind, we were especially interested in section 2.14 of the document, in which it states that, under the Rural Strategy 2004 and in "Delivering the Essentials of Life", Defra is committed to greatly simplifying the way in which funding will be provided in future, bringing all land management and environmental protection schemes into one fund with a consistent approach. We believe that the best way of protecting catchments from agricultural impact is to look at the problem holistically, and that farmers should be properly supported by Government funding to help them change their farming practices adjacent to sensitive river and stream corridors, stillwaters and wetlands, and so aid delivery of the objectives of WFD. If this system is coordinated under one scheme, with one funding stream, we believe it will greatly benefit protection of the aquatic environment and its dependent species.

Agricultural research presently being undertaken – Advice to farmers.

Finally, we have recently been shown round the Allerton Project in Leicestershire, whereby the Allerton Trust and Game Conservancy Trust are researching ways in

which greater soil retention can be achieved within agriculture, with the corresponding benefit to water courses and ecosystems. We were greatly impressed by the various research projects being presently undertaken, especially the way in which ploughing and tilling the ground in different ways either increases or decreases soil retention. We understand that Defra are funding several of these research projects and we do encourage that the earliest possible advice be sent to farmers based on the results. Such advice would cost relatively little to distribute, but could have extensive and immediate benefits for river corridors and stillwaters, countering many of the impacts from agriculture without the need for either farmers or Government to dig too deeply into limited reserves.

Summary

While this CSF Capital Grants Scheme is a move in the right direction, we still consider that it is too small to have significant impact on a national scale. We urge Defra to move swiftly to a greatly simplified and better-funded single scheme aimed at changing land management practices within agriculture with a view to protecting fragile river and stillwater environments, and so better serving the Government's responsibilities in delivering the aims and objectives of the Water Framework Directive.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Knight', written in a cursive style.

Paul Knight
Director