

Executive Summary

¹Thank you for giving the Salmon & Trout Association (S&TA) the opportunity to respond to the Inquiry into the Implementation of the Nitrates Directive in England. The 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. We are especially concerned with promoting and communicating the environmental, social and economic benefits of game angling and fisheries management.

²Eutrophication is a very serious problem to waterbodies, with nitrates and phosphates from agriculture being the principal contributor. Eutrophication destroys aquatic food-webs and biological diversity, by starving the organisms of oxygen. Treatments and remedies are often impractical, temporary and costly; making it imperative that we treat the causes of eutrophication to prevent it occurring in our waterbodies in the first place. We therefore support integrated, holistic management of diffuse pollution, and believe that nitrates and phosphates should be considered together, as effective prevention of eutrophication requires all nutrient discharges to be controlled.

³Overall the S&TA supports the revised Action Plan proposals to reduce fertiliser and manure usage on farms, and improve slurry storage capacities. We support applying the revised Action Programme throughout England, and strongly support the introduction of the revised plans in April 2008.

⁴We believe the enforcement of new and existing regulations is an important step in achieving successful reductions in diffuse pollution. To achieve this we wish to see greater cross-compliance across the Common Agricultural Policy (CAP), with the use of more targeted General Agricultural and Environmental Conditions (GAECs). This would increase the farmer's incentives to comply, and add leverage to the competent authority's ability to reduce diffuse agricultural pollution. We would also like Defra to identify from where the necessary resources to facilitate this Directive will come.

Our responses to the individual questions set out in the inquiry are as follows:

⁵**Has Defra's implementation of the 1991 Directive been adequate and how levels of nitrate pollution changed since the Directive has come into effect? How effective has the current Action Programme been in reducing nitrate pollution?**

By Defra's own admission nitrate levels generally have shown little reduction in spite of the regulations imposed under the 1991 Nitrate Directive. We feel this is because the current measures and their limited coverage have not been adequate. This is made worse by the decreasing resources being made available to the regulating authority, the Environment Agency, to monitor and enforce the already limited regulations adequately.

⁶**Defra says that the area designated as Nitrate Vulnerable Zones (NVZ) needs to increase from 55% to 70% of England: is it right?**

The S&TA supports Defra's proposals to extend the area beyond the current 55%, as this is clearly inadequate. However, we feel there are excellent reasons for extending the Programme's measures throughout the whole of England.

⁷**Whether the proposed Nitrates Action Programme measures should apply throughout the whole of England, rather than only on land designated as Nitrate Vulnerable Zones**

The S&TA fully supports applying the revised Action Programme throughout England. We feel this will create a level playing field for all farmers and avoid problems with de-designation and determining boundaries. A 100% designation would send a clear and simple message to everyone that this is a serious problem which requires attention now. There also appears to be difficulties identifying the correct land to designate, therefore applying measures nationally would ensure all vulnerable sites are covered, and would make it easier to cooperate these measures with other Defra measures to reduce diffuse pollution sources.

⁸Currently many of the UK's salmon and trout rivers are outside designated NVZs. We feel that applying the Action Programme throughout England can only benefit fisheries, in that it will undoubtedly bring nitrate levels down in watercourses and lakes. We believe this measure will also have wider benefits; for example improving slurry storage will reduce the frequency of accidental pollution incidents. This can only be beneficial to the ecology of rivers and lakes in the future, and in meeting the objectives set out in the Water Framework Directive (WFD).

⁹Regulations, however important, that cannot be enforced will never achieve the required results, with failure to observe them playing a lesser role.

¹⁰What should be the timetable for introducing any changes in the way the Nitrates Directive is implemented?

The S&TA strongly supports bringing the regulations into force on the suggested date of April 2008, as measures such as fertiliser and manure spreading can be adopted straightaway. Obviously, farmers will require more time for measures, such as constructing slurry tanks. However, we feel this timetable is currently too vague and, if there is to be some temporary relaxation, the conditions under which they can be allowed must be rigidly defined.

¹¹What are the costs and benefits of Defra's individual key proposals for the revised Action Programme, namely: whole farm manure nitrogen loading limit, closed period (organic manures), manure storage, closed period (manufactured nitrogen fertilizers, crop nitrogen requirement limit, spreading locations, spreading techniques, record keeping and cover crops. Should any of these be abandoned or modified?

The S&TA welcomes the strengthening of the Action Programme, and believes they represent the minimum requirements needed. We strongly support the need to reduce fertiliser and manure usage on farms, and improve slurry storage capacities.

¹²We also support the inclusion of cover crops to minimise bare sediment exposed during the winter period. We feel this would not only help reduce excess nutrients, such as nitrates and phosphates, and agri-chemical contaminants, such as sheep dips, reaching the river systems, but would also reduce sedimentation of watercourses in heavy rainfall events. Excess sediment in rivers causes major problems to fish populations, particularly salmonids, where smothering of spawning gravels and oxygen deprivation of eggs and fry, result in reduced reproductive success. We feel guidance into cover crop management would be required, though, to ensure no other net negative environmental impacts would occur; for instance, during the destruction of the cover crops.

¹³What advice and support will farmers need from Defra to implement a revised Action Programme?

We feel farmers will need clear, comprehensive, written advice, explaining what they will be required to do, how they can achieve it, the penalties of non-compliance, and the benefits of following the guidelines. This support should also be backed up with technical visits.

¹⁴How can Defra encourage greater adoption of anaerobic digestion as a way of managing manure?

The S&TA supports the idea of anaerobic digestion and feels it could be an effective way of managing manures, as long as the scale of the operation is large enough to be viable and the location of any plant is close enough to the supply of manure, for the operation to meet sustainability principles.

¹⁵We feel the main barriers in its uptake are financial rather than technical. We therefore believe funding or incentives schemes would be required to facilitate greater uptake. Educating the farmers of the process of anaerobic digestion and its benefits are also an important step to gain support for the initiative.

¹⁶How the proposed new Nitrates Action Programme is affecting those with existing Entry Level Stewardship agreements in existing Nitrate Vulnerable Zones.

N/A