



Paul Davies MS
Chair
Economy, Trade and Rural Affairs
Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

Your Ref:
Our Ref:
E-mail: dylan.morgan@nfu.org.uk
Phone: 01982 554200
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Dear Chair

Review of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations

We write concerning the Review of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations currently being undertaken by the Economy, Trade and Rural Affairs Committee.

We listened with interest to the contributions of the environmental organisations at the evidence session on Thursday 25th November 2021. We note, at paragraph 125, Rachel Sharp - Director of Wildlife Trusts Wales and representing Wales Environmental Link stated in the context of whether there were any gaps in the regulations that:

“Remember, that slurry isn’t just faeces, it’s also vet meds, it’s also growth hormones”.

We write to bring to the Committee’s attention the fact that this statement cannot be correct. The use of hormonal growth promoters for livestock is banned in the UK. The practice has been banned in the EU since 1981 (Directive 81/602/EEC) and this ban was incorporated into UK law as part of the EU withdrawal agreement.

Welsh farmers are proud to operate to some of the highest standards of food safety and animal welfare in the world. As a result, we are dismayed to see such misinformation about our food production methods and standards being propagated by individuals who should better understand these matters.

At paragraph 127, in response to a question about where agriculture is in terms of where it fits in with the range of polluters, Rachel Sharp responded:

“It depends which river you’re talking about. So, on the River Wye, we’ve got an intensive poultry unit issue....”

Again, we are concerned this statement does not reflect the true position. The Natural Resources Wales (NRW) [Compliance Assessment](#) of Welsh River SACs against Phosphorus Targets published in January 2021 determined that:

“...the overall pattern of failures in the Wye does not support the hypothesis that poultry units are the main or even a particularly important reason for nutrient failures on the Wye”.

Further, at paragraph 168, Rachel Sharp stated:

“Because remember, these rivers then spill out into our marine environment, and we’re trying to do things like develop seagrass beds. Where seagrass beds get smothered in slurry or chicken manure, then those beds become ineffective”.

We take this opportunity to refer the Committee to bathing water quality monitoring undertaken annually by NRW which has found Wales’ [bathing waters](#) to be 100% compliant with strict water quality standards for the fourth year in a row, with 85 out of the 105 designated bathing water sites classed as excellent.

We trust that the Committee will have no regard to the comments made, and that the witness will be invited to clarify and correct the comments.

Yours sincerely

A handwritten signature in black ink that reads "D S Morgan". The letters are cursive and slightly slanted.

Dylan Morgan
Head of Policy
NFU Cymru