

01 March 2017



Dear Sir

Please find attached response to Lesley Griffiths comments regarding Nitrate Vulnerable Zones (NVZ) in Wales

The safeguard to Human Health was included in the ministers comments, , in the case of the proposed Milford designation there is a need to be clear this is a eutrophic designation rather than surface or ground water designation where the levels of nitrates are a magnitude lower (less than a quarter of the levels)

In addition the British Survey of Fertiliser Practice shows the use of nitrate fertiliser in England and Wales has followed a general declining trend since the mid-1980s. The overall reduction in Nitrate use since its peak is 32% with the use of Nitrate by grassland farmers declining by 61% and by 8% on tillage land over this time period. There has also been an overall decline in the amount of manure produced due to a decline in livestock numbers and more efficient production systems. There has been a 21% reduction in nitrogen input from manures since 1990

A comment was made that the main objectives of the directive was that it would be compatible with Welsh Government sustainability principles enshrined in the Wellbeing of Future Generations Act 2015, and Environment (Wales) Act on the rural communities of. 2015) and the Environment Wales Act 2016. This is not the case, specifically, the Well-being of Future Generations places an emphasis on the economic, environmental, social and cultural well-being of Wales – no information has been provided through a regulatory impact assessment on the economic impact of proposals – nor the social and cultural impact Pembrokeshire.

A large proportion of Young people are employed in the Agricultural sector or businesses that rely on it, if this Directive is implicated those Young Welsh Speaking people will be forced to move from their home counties to find work else where thus leaving our Pembrokeshire a giant "Center Parcs" for seasonal visitors, and a retirement area for city people with no connection or interest in our rural way of life.

The Milford designation is eutrophic and levels of nitrates are a magnitude lower than drinking water standards this is not a public health issue at all. In terms of Wales natural resources – designation is likely to lead to unintended negative consequences for the environment. WG have provided no evidence whatsoever on the extent to which the Action Programme is expected to be effective in reducing levels of nitrates. Overall the a decision to designate will go against the Well-Being of Future Generations Act and the duty on public bodies to ensure the economic, environmental, social and cultural well-being of Wales, the Environment Wales Act provides opportunities to suspend regulation to explore alternative approaches why is WG not pursuing this?

The Nitrates Directive approach and measures taken to comply do not support the Environment (Wales) Act 2016 and the collaborative evidence-based principles of working it establishes. A sustainable management of natural resources approach would examine all the sources of Nitrates and seek to address Water Framework Directive failures in the round using collaborative approaches.

It is clear from the evidence that a focus which imposes costly regulation on one sector will not, on its own, deliver good chemical or ecological status in line with WFD. The Nitrates Directive does not refer to other drivers of WFD failures or say what steps will be taken to address these. NVZ designations and the implementation of the Action Programme cannot be considered to represent an integrated or indeed a partnership approach to tackling diffuse pollution in water courses.

Further – the requirements of the Action Programme will lead to unintended adverse consequences in the environment with spikes in nitrate levels immediately prior to and after the closed period. No information has been provided on the extent to which the Action Programme is expected to be effective in reducing levels of nitrates in the Milford. There is a requirement to do this under the terms of the Directive.

The Action Programme will be costly to farm businesses and difficult to comply with. Farmer concerns can be broadly categorised as costs associated with designation – both upfront in terms of slurry storage and ongoing; demonstrating compliance with the NVZ Action Programme; together with concerns about restrictions on day-to-day farming operations. The Nitrates Directive reduces farmers' ability to make good management decisions relating to resource management based on their knowledge of their own farm, prevailing weather and ground conditions.

The letter refers to the fact that Action Programme Proposals have been underpinned by detailed scientific evidence. We know that at the time of consultation the research had not been finalised or made public!

We are Agricultural Contractors and employ up to 9 members of staff 12 months of the year. Should the directive be implicated we will have to close our business in October and reopen in February, in that time I would assume that those staff and their families would have moved out of the area to find work therefore taking their knowledge and abilities elsewhere.

With respect I was privileged enough to listen to Lesley Griffiths in the chamber at the Senedd in December and when the question was asked regarding the Contractors situation she commented that she had spoken to many in the "Construction Industry" I feel that possibly she hasn't been informed of our existence!

I have invited the Minister to meet with me to discuss this further and work together on this Directive my invitation as been declined. There are many other alternatives that we could implement which would allow the Directive to go ahead with minimal cost and damage to the Rural Communities.

Thank you

Nicola Savage