



P-05-815 Control Rapidly Expanding Intensive Poultry Industry in Wales

Welsh Assembly Petitions Committee Meeting 21/1/20: Response to Letters from Ministers.

Since 5/6/18, when our petition first came before the Committee, nearly 2 million (1,916,000) further bird places have been applied for in Powys.

The largest application is for 200,000 birds.

Two thirds of the 36 applications are under the permitting threshold of 40,000 birds.

We are exceedingly disappointed in this round of responses to the Petitions Committee and do not believe our Ministers have demonstrated any willingness to understand the impacts of the poorly controlled “*vibrant poultry industry*” on particular areas of Wales. Our Welsh Government has declared a biodiversity emergency and NRW’s Simon Bareham describes the agricultural ammonia threat as “*one of the biggest threats to biodiversity I have come across in my working career of 30 years*” but our Ministers are refusing to face up to the impacts of intensive poultry units on our natural species and our river quality. At the 9/7/19 meeting, the Petition Committee was clearly shocked by the statistics we produced, expressing their concern about the cumulative impacts of the “*phenomenal*” growth demonstrated in our data (see official transcript). While this growth continues apace, the impression is of official heel-dragging and business as usual.

We do not know either the dates or contents of the letters sent by the Committee Chair to the Ministers and so we cannot fully assess the scope of the responses. **May we suggest that it would help Petitioners if they could see these letters?**

It was not clear, from the transcript of the last Petitions Committee Meeting, whether both the Minister for H&G and the Minister for EERA would be asked for responses. In any case, there have been no answers about ammonia and phosphates, cumulative impacts, prospects of reinforcing PPW, the ability of Technical Advice Note to set policy as opposed to simply explaining it, or the principle of ‘polluter pays’. The Committee had already asked about some of these issues after the 9/11/19 meeting.

In spite of the Petition Committee’s sympathy, we are stuck in a cycle of pointless repetition.

Lesley Griffiths’ letter of 19/11/19 is in response to requests dated 31/7/19 and 6/11/19 and therefore does not address either our last submission (sent on 13/11/19) for the meeting on 19/11/19 or any request arising from that meeting.

Julie James’ three letters to you repeat information about the TCIAWG and its Terms of Reference, the latest making excuses for the extremely slow progress. The draft Terms of Reference, which do not match the breadth of the Minister’s description, have not yet been signed off even though Winter 2019/20 was meant to be devoted to the draft TAN consultation.

Lesley Griffiths’ 19/11/19 letter mentions the TCIAWG, the CPO letter about cumulative development and neighbours, the draft Clean Air Plan and the forthcoming agricultural pollution regulations to protect water quality. Disappointingly, she has not delivered these. Apart from the draft Clean Air Plan, which is seriously weak on action to reduce ammonia emissions, all these issues are recycled from previous responses.

The 19/11/19 letter insists that Poultry farms are regulated by Environmental Permitting regulations 'to make sure they do not affect the environment' whereas both the Minister and NRW are well aware (and we have repeatedly pointed out) that **the majority of units are below the Permit threshold of 40,000 birds**. Both these, and the permitted units over 40,000, have a considerable impact on the environment. According to the only piece of NRW research we are aware of, the smaller free-range egg units were having a worse impact on ammonia levels than the larger broiler ones (NRW Powys Poultry Pilot Study 2015), although there are often greater impacts of these large broiler units on landscape as well as manure-storing and spreading issues, shorter cycles with more traffic and frequent shed-clearing nuisance.

The minister wrote to you on 13/12/18.

*"My Officials continue to work with NRW to keep the issue of Environmental Permit thresholds under review. Until further evidence suggests lowering the EP threshold is the most efficient way of improving environmental outcomes for poultry units, I do not intend to propose any amendments."***

In view of the lack of progress and continuing expansion of industry in areas which are already 'saturated' we have opted to repeat points we have already made.

We request that the Committee looks back over our last submission and ask **the Ministers to answer our questions**.

We would also like to see **NRW brought back into the debate** since forthcoming **Area Statements** could be a tool for controlling development and protecting rivers in areas which are already suffering unacceptable impacts. NRW has not provided any clear answers about whether Area Statements can or will address the issue of impacts of IPU's on biodiversity.

- 1. Ask the WG to co-operate with NRW in providing a strengthened PPW and NRW guidance about ammonia/phosphate impacts on habitats both for "top-tier" tier designations and for "lower tier designations" and other important habitats, including ancient woodland and veteran trees.**
- 2. Ask NRW/WG to set out who is responsible for assessing cumulative impacts, given that:**
 - development ammonia consultants are saying they cannot do this**
 - NRW say it is for LPAs to make the analysis of in-combination impacts**
 - LPAs expect to rely on NRW advice and cannot produce adequate accounts of the clusters of units in question and their emissions**
- 3. Ask the Minister for EERA and NRW to outline the evidence they have been working together to consider about lowering Environmental Permitting thresholds.(see above**)**
- 4. Ask the Minister to ensure incorporation of the "polluter pays" principle into WG regulation of agricultural pollution and apply this to all IPU operators (whether or not they opt into extra environmental services for enhanced payments).**
- 5. Ask the WG to reconsider its unsustainable blanket support for intensive poultry farming and to require and fund proper mapping of intensive livestock units across Wales matched to updated background ammonia/nitrogen levels in order to define areas where a threshold has been reached and no more units are acceptable.**
- 6. Ask NRW whether they will address the problem in Area Statements, particularly for Mid-Wales.**

We invite you and our Ministers once more to read the attached Plantlife publication:

"We need to talk about Nitrogen" Jan. 2017

This is exactly two years old now – but is our Government listening?