

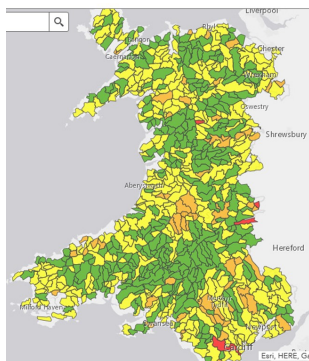
NFU Cymru NVZ Briefing

Welsh Government is expected to make a decision to introduce regulation to protect water quality from agricultural pollution shortly. Welsh Government proposes to designate the whole of Wales a Nitrate Vulnerable Zone (NVZ). All farmers will be required to follow the NVZ Action Programme as set out in the EU Nitrates Directive. The EU Nitrates Directive concerns the protection of waters against pollution caused by Nitrates from agricultural sources. **NFU Cymru categorically rejects the introduction of whole territory NVZ on the basis of :-**

Evidence

There is no evidence to justify a whole Wales NVZ approach

Many catchments in Wales have 'good' WFD status. Many catchments in



Wales have incurred zero incidences of agricultural pollution.

Analysis of NRW data relating to agricultural pollution incidence between 2001 and 2018 shows there is no discernible trend upwards or downwards. The Nitrates Review undertaken by NRW in 2016 identified an increase in NVZ areas from 2.3% to 8% of Wales.

Evidence shows many areas of Wales have good water quality and no agricultural pollution incidence, so an all Wales NVZ cannot be justified.

Effectiveness

There is no evidence that a whole territory NVZ will be effective in reducing agricultural pollution

Information obtained from NRW provides no substantive evidence of the effectiveness of the NVZ Action Programme in reducing agricultural pollution despite designations dating back to 2002.

NRW evidence has shown spikes in Nitrates prior to the start of, and at the end of the closed periods.

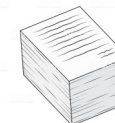
A farming by calendar approach (closed periods) is increasingly challenged by experts. Tony Juniper Chairman of Natural England has recently stated *"giving farmers flexibility is very likely to get better results than very specific, almost tick box prescriptions."*

In the context of the climate emergency, where there is growing consensus that Wales will experience more extreme and challenging weather events, it is vital that farmers are allowed the flexibility to undertake field operations appropriate to the conditions.

There is scant evidence to show that an NVZ approach will be effective. Indeed the unintended environmental consequences are likely to greatly outweigh the environmental benefits.

Impact

NVZ regulations will damage farm businesses and our rural communities



Every farmer in Wales will be required to undertake draconian record keeping, which is subject to cross compliance inspection and penalty.

In 2014 in England 58% was designated NVZ, and NVZ record keeping accounted for 16% of all cross compliance breaches.



New rules for slurry storage will be costly in the context of farm business incomes which declined by up to 43% in 2018/19.

43%



NVZ's impact on the day to day management of farm businesses. Closed periods work against Wales' temperate climate and our natural advantage for grass based production.

NVZ's represent a blunt, inefficient, bureaucratic and costly legislative instrument with high costs to agriculture.

A better way forward: NFU Cymru is not defending the status quo. We accept a regulatory backstop may be needed alongside efforts in the area of: advice and guidance, investment support, innovation and technology and voluntary approaches. Regulation must take account of the regulation that is already operational in this sphere, and it must be evidence based, proportionate to the risk and targeted to areas where water quality improvements are needed. NFU Cymru is hugely ambitious for the future of Welsh farming, our primary production underpins the £6.8bn food and drink industry. NVZ regulations will undermine and stifle our ambition and we urge government to put in place a system that improves the environment enabling our industry to reach its full potential.

Contact NFU Cymru for more information on 01982 554200