House of Commons
London
SW1A 0AA

Email:

Dear …..,

**Re: Farming Rules for Water**

I am writing to you regarding the Farming Rules for Water and the Environment Agency’s recently revised interpretation of Rule 1.

The Environment Agency’s revised interpretation has placed prescriptive limitations on the use of organic materials (livestock manures and slurries, and digestate), and has caused major disruption and concern in the farming industry over the course of this year, affecting both producers and users of organic material. The new interpretation has cast uncertainty on the 50 million tonnes of organic materials that are applied to farmland each year, with applications prohibited for use in most arable crops in the autumn, irrespective of risk to water quality. As one of the main livestock producing areas, those farming in the east have been particularly impacted by the new interpretation.

There is a widespread consensus that the revised interpretation of Rule 1 will cause the farming and water industries significant damage, with compliance in the short term being a real issue. There are also conflicts with the government ambition to improve soil health and soil carbon storage, improve air quality and to lower ammonia emissions. An independent impact assessment of the revised interpretation by ADAS underlined the risk of pollution swapping, with a reduction in nitrate losses, but an increase in phosphate and ammonia losses. When used in the right way, organic materials can be highly beneficial, increasing soil carbon levels and improving water storage capacity which reduces flood risk and improves resilience.

The farming industry remains committed to improving water quality and examining how highly valuable organic materials can be used without significant risk. The blanket approach taken by the Environment Agency is not the way forward.

In order to make progress, there is a need for:

* Defra and the Environment Agency to adopt a holistic approach to the use of organic materials, and their impacts on water quality, air quality and soil health.
* More research and data on how the use of organic material in different circumstances impacts on water quality.
* The Environment Agency to adopt a risk-based approach to the application of organic material, which takes into account the specifics of each situation, rather than the current prescriptive, blanket approach.
* A package of measures to ensure that producers and users of organic material can adapt their infrastructure and land management systems. For example, additional advice and grants through the Catchment Sensitive Farming Programme, and investment in new and upgraded slurry storage and management.
* A transition period to allow for planned investment in infrastructure and adjustments in farming systems over rotations.

This is a situation that must be rectified now. There have already been instances of farming businesses taking the decision to cease trading and others investing in alternative disposal systems such as incineration. It is wrong to squander such a valuable resource that when used appropriately has many benefits to soil health and the environment.

I would be grateful if you could review this issue urgently, and raise it with both the Minister, and at any opportunity you have in the House of Commons. I would be happy to discuss this matter with you further.

Yours,