

Environmental NGOs unite in call for a moratorium on intensive poultry units

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Background

Wales' sensitive habitats are under threat. Agricultural pollution is currently one of most significant contributors to the poor health of Welsh rivers and is the most significant source of diffuse water pollution¹. Intensive livestock rearing and inefficient storage and spreading of manures, slurries, digestate and other fertilisers are the main causes of this pollution. Whilst point source pollution is heavily regulated across different industries, including agriculture, diffuse pollution is not. In the last five years, incidences of point source agricultural pollution have been repeatedly noted in the media whilst the impacts of diffuse pollution are under-reported due to lack of regular monitoring.



Algal bloom in river Wye

Environmental NGOs and members of the public are increasingly reporting first-hand experience of increasing pollution impacts in certain areas of Wales. Water quality impacts are most visible: the Wye catchment is particularly severely affected and is rapidly reaching the point where wildlife that relies on the Wye ecosystem may be permanently affected. The impact on public amenity and local people of this proliferation of intensive poultry units has resulted in NGOs seeing increased numbers of reports and complaints from their own members about the impact the smell is having on their daily lives. Air quality impacts are also significant: the Clean Air Plan for Wales recognises that elevated ammonia levels have a negative impact on public health as well as causing long-term damage and loss of species in Welsh woodlands, meadows and other sensitive habitats.

Long-term investment may be needed to help farmers understand the environmental impacts of their operations, to put in place the right infrastructure management, including the appropriate use of nature-based solutions to tackle these problems. However, evidence from Powys clearly indicates there is currently no effective enforcement of existing pollution measures. This includes a large and significant gap between the planning and environmental protection systems through which responsibility for this issue is falling. **We cannot wait until longer-term aspirations for improvement are met. Immediate action must also be taken** if we are to halt the loss of biodiversity and restore our declining water and air quality.

¹ NRW - Diffuse Water Pollution in Wales Issues, solutions and engagement for action
<https://naturalresources.wales/media/4059/diffuse-water-pollution-in-wales.pdf>

In England, there are recent examples of legal interventions to limit the damage caused when the cumulative impacts of pollution are not properly considered through the planning system, such as in Herefordshire² and Sussex³. These cases demonstrate that stronger action can be taken on the basis of cumulative impacts on the environment.

Facts and figures

- 156 intensive poultry units (IPUs) approved by Powys Council alone in the last 5 years, with another 27 still to be determined. Since April 2017, Powys has received 5 times as many applications for IPUs as the rest of Wales.⁴
- 2nd reporting cycle to the EC on the condition of the Wye SAC showed it failing on the basis of elevated Soluble Reactive Phosphate levels in 2012
- From 2014 – 2016 significantly elevated levels of phosphate were detected at certain locations across Wales by NRW when gathering Water Framework Directive data – these levels were deemed anomalous and the data were discarded. The next set of results won't be published until 2021.
- Ammonia concentrations exceed critical levels in 56% of Wales' land area, 73% of SACs and 62% of SSSIs according to the Defra Trends Report 2020.
- Agriculture has been responsible for between 115 -165 substantiated pollution incidents annually in Wales during 2010 - 2018, with around half of these linked to dairy farms.⁵ These issues continue.



Cow manure deposited directly into stream

Our call to action

1. **The Welsh Government, NRW and Powys Council introduce a moratorium on all new intensive poultry units in Powys until**

² Judgment in the case of Cooperatie Mobilisation handed down in November 2018 by the Court of Justice of the European Union (Joined Cases C-293/17 and C-294/17) known as the Dutch Case and used by Herefordshire Council and Natural England in their decision to impose a moratorium on intensive poultry units affecting the Lugg.

³ The Wealden Case: <https://www.landmarkchambers.co.uk/resources/cases/wealden-district-council-v-secretary-of-state-for-communities-and-local-government-lewes-district-council-and-south-downs-national-park-authority-2017-ewhc-351-admin/>

⁴ Statistics collected by CPRW and via an FOI requested by Elgan Hearn, reporter at the Powys County Times

⁵ <https://naturalresources.wales/about-us/news-and-events/blog/together-we-can-tackle-agricultural-pollution/?lang=en>

- peer-reviewed research has been undertaken on the cumulative environmental impacts of the currently operating units;
 - evidence is provided that negative impacts have been reduced; and
 - effective measures are in place to manage these impacts in the future, including any necessary changes to the planning system and permitting thresholds.
2. **NRW to extend the environmental permitting scheme** to intensive cattle units in Wales and lower the existing thresholds for pig and poultry units. Effective monitoring and enforcement should ensure that a moratorium in Powys does not displace the problem elsewhere.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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