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Agriculture and Horticulture Development Board response to the Environment Agency consultation on: Draft update to the river basin Management Plans.

Thank you for inviting the Agriculture and Horticulture Development Board (AHDB) to comment on this consultation.

AHDB is a statutory levy board, funded by farmers, growers and others in the supply chain. Our purpose is to make our agriculture and horticulture industries more competitive and sustainable through factual, evidence-based advice, information and activity. We cover the six sectors of Pig meat in England; Beef and lamb in England; Commercial horticulture in Great Britain; Milk in Great Britain; Potatoes in Great Britain and Cereals and oilseeds in the UK.

For more on AHDB and its activities please see our website www.ahdb.org.uk

In this response AHDB is making general comments on the content and focus rather than commenting on a specific River Basin Management Plan (RBMP), this is because our remit is national.

We consider that elements of the research, development, knowledge transfer, training and communication work we commission and deliver to farmers and growers is assisting them to manage their businesses in a way that delivers objectives of the WFD through improved practice and compliance with legislation.

An industry that is competitive and sustainable is also a better environmental performer as some of our research has demonstrated for the sectors we work for. Agriculture and horticulture industries rely heavily on both water and the environment, and are also often in the front line when it comes to risk of causing pollution, over abstraction and other negative effects. It is important that these industries are allowed and encouraged to take up technologies and techniques which deliver environmental protection.

It has to be stated that our production cycles can range from very short for horticultural crops to long term for some crops and livestock, thus change can take time. Also there are external factors including weather, market forces and the Common Agricultural Policy which may cause change both positive and negative. It is important that policies are joined up to minimise the negatives. The time delays between when a farmer or grower starts to implement change and this feeding through to measurable and reported changes in water quality does give us concern. We would like to see post data collection and projected change in practice included within plans as they are developed.

Question 1. Do you agree with the changes to the river basin districts and catchment, water body boundaries and artificial and heavily modified water body designations?

The AHDB believes the appropriate designation of Water bodies is important. We understand that water courses created for the storage or conveyance of water should be designated under WFD as 'artificial or 'heavily modified' and required to fulfil 'Good Ecological Potential' (GEP) while retaining the primary purpose of the created watercourse as the management priority rather than the 'Good Ecological Status' (GES) required for other water bodies.

We are concerned that there appears to be a 1.6% reduction in the number of artificial and heavily modified water body designations in the current drafts compared to the original 2009 plans and would like to see the guidance used for designating water bodies.

Question 2. Do you agree with the objectives for water bodies and protected areas?

The AHDB supports the principle of objective setting but remains concerned that the information and communication is too complex for a business audience and the general public. Smarter communication may improve awareness, understanding and practice change.

We are also concerned about the:

- 'One out all out principle' which results in the status of a water body being determined by the worst scoring elements that makes up the status assessment. Successful efforts are being made to improve catchments across the country and this approach means that these improvements are not reported. We are also concerned that this approach may focus resources on those catchments which can easily report 'improvements' for WFD purposes while delivering minimal benefit for people and the environment.
- We agree that there should be objectives, we have concerns about the quality and robustness of evidence (or lack of evidence) that is sometimes used to implicate certain sectors or activities causing them to perhaps incorrectly become a focus of attention where objectives are not being met. The five stage approach outlined in the consultation document must be applied robustly.
- Application of a single algorithm being applied to all water bodies to determine the amount of water available for abstraction.

Question 3. Where flexibility exists, should the priority be maximising the number of water bodies at Good Status or improving the worst water bodies?

The AHDB considers priority should be given to providing value for money by ensuring the maximum improvements for the resources invested. Acknowledging the primary purpose of a water body where it is considered artificial / heavily modified will prevent inefficient use of resources and allow the primary function of these water bodies to take priority over environmental considerations. Thereafter, assessing the opportunities for improving the worst natural water bodies to deliver the greatest return for the resources used and feasibility of these changes being delivered.

As stated previously, we would be concerned that maximising water bodies at good status could potentially result in a large number of small improvements and not the significant improvements needed to make a 'real difference to people and their environment'.

Question 4. Do you agree the correct measures have been identified?

The AHDB believes it would be helpful if the RBMP's showed how local actions link to, and support, national measures.

Within the measures and how they are assessed as presented we consider that practice change and projected practice change has not been included together with a projection of the timeframe

for this to have an impact, positive or negative. To include practice change may result in it being determined that some measures may not be required, so resources can be diverted to other area so achieving a better overall result.

Question 5. Do you agree with the way the economic appraisal process has been done?

The AHDB believes important considerations have not currently been considered; in particular we are concerned that the cumulative impact of measures on strategic food production and supply has not been considered.

The economic appraisal fails to recognise land use and the economic value, production capability of each piece of land be that agricultural or urban. The criteria as presented seem to place urban land as of being higher value for protection than agricultural. Thus a more comprehensive mechanism is required in order to provide better proportioned protection of land and economic activity upon it and water body status improvements.

We are also concerned that the economic appraisal process does not take account of the efforts made by the Association of Drainage Authorities (ADA) and the Internal Drainage Boards (IDB's) to make operations and maintenance of artificial and heavily modified water course more environmentally friendly; assuming a significant negative impact on the quality of the water environment arise from physical modifications to water bodies made to enable land drainage. There is also concern about the impact of Defra's funding criteria for the Environment Agency to carry out river maintenance. This currently prioritises funding for stretches of river in populated areas. We believe this could lead to for example, potato growing areas being more frequently and unnecessarily flooded as a result of the Environment Agency being unable to economically justify the river maintenance required, with the consequence that rural stretches of rivers have a reduced flow capacity and flood more easily. This appears to be a consequence of the economic appraisal of relative values for land use. If published guidance on the economic appraisal was available then this could be helpful in making more informed decisions.

Question 6. What measures can you deliver to help achieve the long term objectives?

The AHDB is working with its levy payer farmers and growers as well as other stakeholders to help deliver the long-term objectives of the WFD through science, research, development, communication and knowledge transfer. We have a wide range of mechanisms for delivery in a targeted way, structured for each specific audience.

We also actively participate in the promotion and engagement of industry wide initiatives such as the 'Campaign for the Farmed Environment' and 'Catchment Sensitive Farming' to make levy payer businesses have less of an impact on the environment. Results to date show that a consultative, partnership approach at local level is key to improving catchments and a commitment to long-term funding is critical to ensure appropriate measures are identified and delivered.

Question 7. Do you have any further comments on this consultation?

The AHDB is concerned that the process of delivering WFD in the UK has become overly complicated and difficult. The measures included in individual RBMP's are likely to affect many farmers and growers, who will have a legal obligation to facilitate the measures to meet the plan's objectives. However, the information they need is not readily accessible for a non-specialist to understand or make informed comment on. We believe it would help the delivery of WFD by stakeholders if simple, more accessible information was made available to all stakeholders; with the final RBMP's once again setting out who is responsible for delivering the actions and, in addition, providing a clear link between local actions and the RBMP objectives. This would avoid duplication of effort, simplify bureaucracy and ensure effective use of resources.

Any queries on this submission should, in the first instance, be addressed to:

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