



Sustainable Farm Management Team, Defra
Area 5C, 9 Millbank,
c/o 17 Smith Square
London SW1P 3JR

15/05/2009

Dear Sustainable Farm Management Team,

This response to the consultation on '*Environmental standards for farming: proposed changes to standards in cross compliance Good Agricultural and Environmental Condition (GAEC) and related measures in England*' on behalf of the Salmon and Trout Association and Atlantic Salmon Trust.

The Salmon & Trout Association (S&TA), which was awarded charitable status due to our work concerning fish stock management and aquatic conservation, has over 100,000 individual and club members. We represent the public interest over issues relevant to the management and conservation of fish, water, the aquatic environment and all its dependent species.

Established in 1967, the Atlantic Salmon Trust (AST) is a UK-wide organisation which champions the wild salmon and sea trout. It does not represent any other interests or body, only the fish themselves. It:

- a. Works for the conservation and improvement of wild salmon and sea trout stocks to a level which allows sustainable exploitation.
- b. Conducts and supports marine and freshwater research.
- c. Gives practical advice on the management of fisheries and rivers.
- d. Gives independent research based advice to governments, international and national authorities and to commercial enterprises.
- e. Coordinates activities with other conservation, environmental, fishery, heritage and wildlife agencies and organisations.
- f. Holds and supports seminars and workshops to investigate specific issues.
- g. Publishes high quality reports and booklets to inform and educate the public.

S&TA and AST believe this is a crucial consultation given the adverse impact diffuse pollution from farming has on the aquatic environment and fisheries. We feel a greater use of effective buffer strips can reduce soil run-off and hence siltation, as well as reducing other forms of pollution, is imperative to improving the quality of our water bodies.

The value of buffer strips to the aquatic environment as a whole is not just as a means of improving water quality, paragraph 3.5.8 in the paper states: '*Buffer Strips are primarily of value for resource protection but depending on management can provide some biodiversity benefits*'. But the value of buffer strips to the aquatic environment as a whole is not just a means of improving water quality; but it is a key to the

Fishmongers' Hall, London Bridge, London EC4R 9EL

T: 020 7283 5838 | F: 020 7626 5137 | E: hq@salmon-trout.org | W: www.salmon-trout.org

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implementation and delivery of the Water Framework Directive (WFD). Diffuse pollution from agriculture is having a detrimental impact on ecological status under WFD, with agricultural sources contributing 60% of nitrates, 25% of phosphates and 70% of sediments reaching our water bodies.

Excess fine sediment, derived from agricultural activities, is a very important cause of deterioration in water and habitat quality and aquatic biodiversity. The WFD objective of 'good ecological status' cannot be achieved without addressing this pressure. Excessive fine sediment, in suspension or deposited, can have damaging impacts on all life stages of fish, particularly salmonids. This has been made worse for salmonids by a shift in the timings of arable cultivation in the UK, from spring to autumn sown cereals, which now coincides with their egg incubation time. The effect on increased suspended solids concentrations in the water column for fish can include:

- Mortality through impaired growth, gill irritation/trauma and/or reduced feeding;
- Reduced reproduction and growth through the degradation of spawning habitat/redds and smothering of eggs and yolk-sac fry;
- Impediment of movement, which can effect migrations;
- Reduced river bed habitat and shelter for fish fry and parr, leading to lower fry and parr density;
- Changes in invertebrate communities in response to high and persistent sediment loads changes can negatively impact invertebrate assemblages and abundances, effecting food sources, particularly for juvenile salmonids.

Agricultural sediments also represent an important vector for contaminants such as phosphorus; heavy metals and organic pollutants like sheep dip substances. Excess fine suspended sediment represents a major threat to aquatic biodiversity; we therefore feel buffer strips are a very valuable tool in helping to achieve the objectives of WFD, and realise improvements to our native fisheries.

We support the response from Wildlife and Countryside LINK, but would like to reiterate a few key points from fisheries perspective;

Q4. Do you agree that the short term outcomes (for example, area, distribution, management of uncropped land) and longer term potential of any measure adopted should be assessed at the end of the first year of implementation?

It would be appropriate for assessment at the end of year 1, but we would expect that later assessment may also reveal further successes or failures.

Q5. For Option A which alternative would you prefer to see implemented, A1 or A2, and why?

We believe the Government should opt for Option A2 now, without delay, in order to meet the objectives of the WFD. We believe A2 has the potential to provide a wider range of environmental benefits for fauna and flora, whilst providing wide choice of management options for farmers, including options related to production.

Q6b. Do you agree that the Option A requirement should only apply to farms with more than 20ha of cultivated land?

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We are not clear why this limitation should remain or why it is required, as the purpose of Option A is to provide environmental benefits, whereas the primary purpose of set-aside was as a production control mechanism.

Q8. *Do you have suggestions for changing the existing GAEC 12 (agricultural land which is not in agricultural production) as part of Option B?*

We do not support the introduction of Option B, and therefore we do not have any suggestions to make.

11. *Is Option A an appropriate mechanism to act as a fallback should Option B (a voluntary approach) fail to deliver?*

We are deeply sceptical that the voluntary approach can deliver the environmental benefits required by the appropriate date – or even at all. We believe Option A should be the primary mechanism of delivery not a fallout option.

12. *Which option would you prefer to see implemented, Option A or B? Please state why.*

As previously stated we support Option A.

We do not believe Option B will deliver the environmental objectives required to meet the WFD, as it presents more risks to delivering successful outcomes than Option A, particularly in the timescales required. We are particularly concerned with the weakness of the 'failsafe' trigger mechanism, which requires Option A to be implemented if the area of uncropped arable land falls below 50% of the minimum area identified as being necessary by Natural England for two years running. This is unacceptable; any failsafe needs to be immediate.

Introduction of new GAEC standard on buffer strips next to watercourses

We welcome the proposal to introduce a new GAEC standard on buffer strips next to watercourses. We are concerned the document sets out a firm preference for option 3, (Advisory/incentive targeting of buffer strips), and the questions in the consultation appear to prejudge the outcome by not providing an opportunity to state a preference for options 2 or 4.

If the Government is determined to try the voluntary approach, which we would strongly advise against, we believe it should opt for option B for set aside combined with options 2 or 4 for buffer strips. This might, of course, result on some farms in a greater area being left uncultivated than if a fixed percentage was left uncultivated under option A, but it would ensure that all watercourses were protected and minimise the risks from agricultural diffuse pollution to the aquatic environment and WFD.

We believe Defra's preferred Option 3 is unlikely to prevent further deteriorations in water quality in the future, a key requirement of the WFD. The huge task of achieving WFD targets or facing infraction, along with the lag-times for water quality improvement, means that effective measures must be adopted now by all sectors that impact on water quality.

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15a. What guidance and advice will be necessary to assist farmers in deciding where to locate buffer strips next to watercourses?

Farmers will need to be supported with the same information to help them understand where buffers will be effective whether targeting is made advisory or mandatory. Defra should provide clear guidelines on where buffers will be effective; to ensure buffers are not being placed in ineffective locations.

Q16a Do you agree that the success of policy option 3 (advisory targeting of buffer strips) is likely to be reduced if Option B for recapturing the benefits of set-aside is undertaken?

Yes, we agree if a voluntary approach is implemented the success of policy option 3 will be reduced.

Q16b How would you mitigate this risk?

This risk could be mitigated if policy option 4 was chosen. This would ensure that all farmers in target areas would be required to place buffer strips where they are needed to improve water quality and where they can be most effective. It should be remembered that the main reason for implementing this measure is to achieve WFD targets.

We would suggest a more targeted approach under ELS, with higher rates for buffer strips along water courses; a further possibility would be to restrict the higher rates to land that would be covered by option 4 (i.e. excluding sloping land). Another option would be Water Protection Zones (WPZs) for localised failures; however a universal requirement for buffer strips would be preferable.

Summary

The measures discussed in this consultation can assist in delivering the objectives of the WFD; therefore Defra should base its decision on the urgent need to implement the objectives of the WFD. Buffer strips should be placed alongside watercourses where they will be most effective in reducing run-off and diffuse pollution; this requires a mandatory, targeted approach to be included in cross compliance requirements.

Yours sincerely,

Paul Knight

Salmon and Trout Association Chief Executive, on behalf of the Salmon and Trout Association and Atlantic Salmon Trust

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