

## Responses to the DEFRA plan (received so far):

### Friends of the River Wye

#### **Despite marginal improvements, Defra's River Wye Action Plan lacks scope and ambition**

Sadly this plan falls far short of what is needed to restore the Wye, which is especially disappointing after such a long wait.

Incredibly, this plan only seems to cover England, not Wales. Where is the cross-border plan for the whole river that everyone has long called for? Why has Defra not worked with the Welsh Government to produce a joint action plan?

We're glad the plan frankly acknowledges the facts about the declining state of the River Wye, with the majority of the phosphate pollution in the catchment coming from agriculture (72-74%) and the rest largely coming from sewage.

We wholeheartedly welcome the news that Defra will support the creation of wide, wild river buffers (with trees and shrubs) through a premium SFI payment, that will handsomely reward farmers for better protecting our watercourses. River buffers use land alongside rivers to create habitat corridors for wildlife, provide shade to cool the water, filter and absorb pollution, and prevent soil run-off. This policy is a win for farmers and nature.

Alongside the neglect of Wales, the other glaring hole in this plan is the fact that it doesn't even mention enforcement of environmental regulations. We consistently hear from staff within the Environment Agency and Natural Resources Wales that they don't have sufficient resources to investigate pollution incidents and take enforcement action against polluters. This plan offers nothing to address this colossal failure.

Failure to enforce the law only penalises good farming practices. At the moment, farmers and businesses who have invested in good slurry storage and manure management are undercut by less responsible actors. When bad practice goes unpunished, there is no deterrent for it. Farmers and agri-businesses need to compete on a level playing field, and that requires robust and reliable enforcement of environmental regulations.

The immediate thing we need to do on the Wye is to dramatically reduce the application of fertilisers, no matter their source. This plan misses the mark.

The plan promises significant funds of up to £35 million will be made available as grants to poultry producers to install combustors for their manure. We understand that something must be done with the waste from over 20 million chickens, and burning the giant manure mountain and turning it into ash makes it much more exportable outside the catchment, which should reduce input to the river. However, we believe such a policy must, at the very least, be accompanied by a moratorium on all new intensive livestock units and a progressive plan to reduce livestock numbers in the catchment. We also wonder if any assessment has been done showing how this policy is compatible with targets to reduce greenhouse gas emissions from agriculture?

Why not incentivise poultry farmers to reduce their stocking densities? Why not offer grants to farmers who would like to transition away from intensive poultry production and repurpose

their buildings? We fear that a myopic focus on 'tech solutions' to deal with poultry manure risks locking in an unsustainable model of factory farming which is reliant upon importing feed (including soya from Brazil), exporting waste, and which comes with risks of avian influenza, air pollution, and poor animal welfare - all at the expense of the public purse.

We are also deeply concerned by the plan to equip livestock farmers with micro Anaerobic Digesters. AD plants are highly complex to run and when they go wrong, they're dangerous. We already have an issue in the Wye catchment with maize being grown to feed into AD plants, which is a waste of agricultural land and a major source of soil erosion and run-off into our rivers.

The plan focusses on 'permitted' poultry farms, which we note only applies to farms with over 40,000 birds, as those with fewer birds don't require a permit. Many free-range egg farms fall below this threshold and therefore go unmonitored, despite posing a serious pollution risk. Why isn't Defra reducing the environmental permit threshold to ensure these sites manage their manure responsibly?

Finally, we were pleased to see the "great work" of our citizen scientists acknowledged in the introduction to this plan, though disappointed that we weren't consulted about its content. Actions speak louder than words, and the best way to respect the work of our army of volunteers would be to draw on our local expertise. Instead, all of our approaches to collaborate on this plan have gone ignored by Defra. We lament this as a missed opportunity to co-create an ambitious plan that could actually restore the river.

We're wary of another plan being added to the many others already in development, especially when it lacks timescales and delivery targets. A great deal of time, effort and money has gone into a new plan being developed - collaboratively - by the [Wye Catchment Partnership](#). Will the government commit to aligning with this plan, which is being driven by the [latest science](#)?

We hope to meet with the newly-appointed 'River Champion', Anthea McIntyre, at the earliest opportunity. Whilst she reportedly lives in the region, we've not encountered her to date.

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## **Country Land and Business Association (CLA)**

Link to CLA page: River Wye Action Plan analysis - <https://www.cla.org.uk/news/the-river-wye-action-plan-analysis/>

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## **The Wildlife Trusts**

Link to 'Building from the UK Government's 'Plan' for the Wye - it's time to build a true Catchment Plan' page: <https://www.wildlifetrusts.org/blog/ali-morse/building-governments-plan-wye>

