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By email to: [Correspondence.Lesley.Griffiths@gov.wales](mailto:Correspondence.Lesley.Griffiths@gov.wales)

Dear Ms Griffiths,

While we have written to you on a previous occasion I would firstly like to remind you that the Angling Trust is the representative body for all disciplines of angling with thousands of individual members and members of affiliated clubs in Wales. It is united in a collaborative relationship with Fish Legal, a separate membership association that uses the law to protect fish stocks and the rights of its members throughout the UK. Angling is one of the UK's most popular pastimes and also makes an important contribution to the economy, generating £4 billion and supporting 40,000 jobs. We represent more than 1,800 of the many angling clubs, fisheries and riparian owners throughout the UK, whose fishing rights are worth at least £1 billion, a significant proportion of which are in Wales. The value of those rights is largely dependent on the health of the aquatic environment.

The Angling Trust is deeply concerned about the endemic levels of slurry pollution that have developed in the intensive dairy farming areas of Wales. To highlight the scale that this issue has now reached, Natural Resources Wales recorded 18 individual slurry related incidents between 1<sup>st</sup> January and 3 April this year, and at one point in that period there were three serious incidents reported in three consecutive days. Many other incidents will have gone unreported. As a further example, on the 4<sup>th</sup> April 450,000 litres of raw slurry escaped from a lagoon, some of which ended up in the River Honddu and the surrounding streams – and this was a year of moderate rainfall.

As you will be aware, slurry poses a major risk of serious water pollution because it strips oxygen from the water and poisons fish and invertebrates. The potential impacts on angling are severe, particularly against a background of declining salmon and sewin stocks due to a variety of other causes, with a decline in angling-related tourism and negative impacts on the wellbeing of local people who go fishing as their main escape. There are also potential health risks for anglers and other water users, such as swimmers, kayakers and canoeists, in addition to risks to all water users of Cryptosporidium contamination of public water supplies. Furthermore, slurry pollutions increase the costs and environmental impact of water treatment, which increases bills for water customers.

The causes of the problem are numerous, but a key issue is that many storage facilities have insufficient capacity for modern industrial dairy farming. Older units were built above ground adding to the risk. Poor farmyard water management often means that dirty (from yards) and clean water (from roofs) is not separated properly and thus the volume channelled into storage is much greater than it should be. Less capacity requires more frequent emptying and spreading, which causes soil compaction, making the ground impermeable and consequently causing increased run off of slurry into nearby water courses and drains, which are tributaries of larger rivers. The fact that

those built prior to 1991 are exempt from SSAFO regulations is also a contributory factor as it positively discourages investment to increase capacity and security. The Angling Trust emphasises the necessity to make all facilities subject to the regulations.

We have anecdotal but reliable evidence suggesting that many farmers are breaching The Code of Good Agricultural Practice published by Welsh Government, particularly the guideline that states slurry should not be spread within 48 hours of forecast heavy rain. This issue causes the greatest concern to anglers and conservation organisations but it was omitted from the NRW board paper from July 2016 that was provided to those attending the NRW Local Fisheries Group meeting in Carmarthen on 9<sup>th</sup> May 2017. The problem is linked to insufficient storage because farmers are under pressure to empty their stored slurry. This results in severe but often unreported pollution incidents through direct run off from fields and may now be the main cause of spot and diffuse pollutions.

Natural Resources Wales is under-resourced, with insufficient staff to enforce existing regulations effectively, and it is also under political pressure not to take action against farmers. The result is a lack of meaningful action in all but the most serious of pollution cases and fines are often negligible. This has created a culture where lack of compliance is encouraged because farmers are prepared to accept the occasional fine rather than properly disposing of slurry because it is cheaper for them to do so. NRW has also failed to work effectively with Rural Payments Wales to withhold basic payments to farmers who break the regulations. As you may be aware, we generated significant media coverage on this subject in the past few weeks, with the story being the lead item on the BBC Wales news.

The Future Generations and Environment Acts require the Welsh Government and its regulators to tackle these problems but there is no clear strategy. Slurry pollution has become one of the greatest threats to the water environment. While the Angling Trust is not calling for lots of prosecutions, we would emphasise that the regulator needs to threaten prosecution unless preventative measures are taken when pollution is identified so that farmers can take heed of advice from Farming Connect, river trusts and other organisations to reduce the risk of pollution. The compliant farmers need to know that those who have not complied with the regulations are being held to account for the damage they are doing to public resources otherwise they are granted an unfair competitive advantage at the cost of the environment, taxpayer and water bill payer.

The Angling Trust wants to see a clear strategy from Welsh Government setting out how it intends to tackle the ever growing problem of slurry pollution and the impacts it is having on fish stocks. We are meeting with some of your officials to discuss this and other issues relating to agricultural pollution on the 19<sup>th</sup> of June and we hope that there will be a significant initiative arising from that meeting that will have your support.

Yours sincerely,

Mark Lloyd

Chief Executive, Angling Trust & Fish Legal

