

Sea Trout Wales

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Well worth a read

AN OPEN LETTER TO SIR JAMES BEVAN (CEO ENVIRONMENT AGENCY), THE Rt Hon MICHAEL GOVE (MINISTER OF THE ENVIRONMENT, FOOD AND RURAL AFFAIRS) AND LESLEY GRIFFITHS AM

24th January 2018

Dear Sirs and Madam,

I have been studying the wildlife, both aquatic and waterside, of the rivers of northwest England for 53 years. From a cursory glance little appears to have changed. The waterside fields are nice and green and the rivers seem to flow pleasantly through their pools and riffles. However things have changed and are continuing to change for the worse.

Much of the riverside habitat in the northwest is dairy farmland and that used to consist of grazing pastures and hay meadows, the latter providing some of the food (hay) required to feed the cattle when they were kept indoors through the winter months. Because the production of hay depended on dry weather within a short summer period (July-early August) there was a move to harvest the grass for silage instead, with the first cut in mid to late spring and a second cut, sometimes a third cut, in summer-early autumn. And to get the maximum from the meadows, high nitrogen level fertilisers were used.

Then, starting in northwest England during the late 1970s and early 1980s, genetically more productive strains of grass were introduced. Former hay meadows had the native vegetation destroyed with weed-killers, wet areas were drained, the fields were ploughed and the new grass strains grown as a monoculture.

The outcome was the destruction of the wild meadow flora and its associated insect fauna, and the wiping out of ground-nesting birds. At first some of that traditional grassland flora and ground-nesting birds survived in the grazing pastures. However in recent years dairy farming has changed dramatically. Farmers have built or modified old buildings to produce computer controlled dairy factories that hold far more cattle than the old traditional dairy farm could. The cattle are kept indoors throughout the year, and are milked and fed automatically. The pastures, no longer needed for grazing, have been turned into monoculture silage grassland, and the remnant wild meadow flora, insect fauna and ground-nesting bird community wiped out.

Thus, in the Ribble/Hodder, Lune, Eden, Ure, Wharfe and Aire valleys, species such as the lapwing, skylark and yellow wagtail no longer nest on the bulk of dairy farmland and the latter, which was a common summer visitor to Lancashire's grasslands, no longer nests in the county.

The great increase of livestock living in factory conditions provided one major problem for dairy farmers: what to do with the urine and faecal waste. The answer

was to pump it into and store it in huge slurry tanks. The problem then is what to do with the year-round supply of slurry when the tanks are full. The solution has been to spray it on the silage meadows, and in our valleys the rivers are bordered by such meadows.

Despite there being a code of practice that farmers should follow when it comes to getting rid of slurry by spraying it on their meadows (see below), including a minimum distance from the water, farmers have not been following that code of practice. This has been most clearly seen in the very wet 2017-18 winter.

For instance: On 11 December 2017 I drove up the Lune valley from the M6 to Hornby and noted four farmers spraying slurry on riverside fields; my journey continued from Hawes to West Witton (alongside the Ure) where seven farmers were spraying riverside fields with slurry. That journey was repeated on 8 January 2018; three farmers in Lunesdale and six in Wensleydale were spreading slurry, one of the former and two of the latter spraying to the river bank. On 12 December 2017 I drove eight miles down the Ribble valley from Long Preston to Gisburn, noting nine farmers slurry spreading, two to the banks of waterside fields.

On those three days the ground was frozen hard in weeks of otherwise extremely wet weather and it was clear that the farmers involved were taking the opportunity to drive their tractors and slurry spreaders onto fields that the otherwise wet weather prevented. And with the first rains some of that slurry would have been washed, or some of its chemicals been leached, into the rivers.

Recent studies have shown a great decrease in insect species whose nymphs (the immature growing stage) live in only clean rivers: stoneflies and some mayfly species. Agricultural pollution has been blamed for the decline, which has been so marked that some city streams (for instance, the Irk and Bradley Brook in Manchester) have more clean water insects than some rural streams. Please note that I call this “unseen pollution” for it does not result in mass deaths of fish. Instead the trickle of this unseen pollution wipes out those species demanding the cleanest of water: stoneflies and mayflies such as *Serratella ignita*. The adults of this latter are beautiful creatures that hatch mainly in summer and there are reports from rivers across England and Wales of hatches dying out. The more of this unseen pollution the more species disappear from our rivers. One tiny stream flowing into the Hodder had several stonefly and mayfly species in the 1991, when I first surveyed it; today it has none (though it has lots of freshwater shrimps that can tolerate a degree of pollution).

The rivers of northwest of England are not alone in suffering from pollution from dairy farms. A study by The Guardian revealed that, between 2010 and 2016 there were 5,300 cases of agricultural pollution recorded in England, Wales and Scotland, 536 of them severe. But note that incidents of “unseen pollution” will rarely appear in these statistics. Dairy farming was the greatest source of pollution, with more cases in the southwest and Midlands, yet there were only 134 prosecutions in England during those six years. However such figures do not tell the full story, for in England and Wales the E.A. now employs very few bailiffs (I have not seen one for six years), the people who patrolled rivers, so the sort of slurry spraying I recorded recently – and will be contrary to the redefined set of rules that come into force in April 2018 (below) - would be overlooked. Even worse, the Guardian reports farmers in

Carmarthenshire and Pembrokeshire, where pollution from dairy farms has been affecting river quality, threaten EA officers investigating cases of pollution with violence. Such farmers appear to pollute, threaten, and get away with it!

This April 'farming rules for waste' come into force. These rules "encourage land managers [farmers?] to take reasonable precautions to prevent diffuse pollution from run off or soil erosion".

- Slurry should not be sprayed on ground with a slope greater than 12 degrees; many silage fields now sprayed with slurry in our river valleys are on slopes greater than 12 degrees.
- Slurry should not be spread within 10 metres of a river (some were in December-January, above).
- The presence and condition of agricultural land drains should be considered; in the Hodder valley, for instance, some land drains that empty directly into the river drain riverside fields regularly spread with slurry.
- The rules state that timing of slurry spreading should take into account the weather and weather forecasts, and slurry should not be sprayed on fields that are waterlogged, flooded or snow covered, or on ground that has been frozen for more than 12 hours in the previous 24 hours. The three days noted earlier in this letter shattered this rule. The fields were waterlogged and then had been frozen, and on 11th and 12th December there was a slight dusting of snow. Yet a high proportion of farmers whose fields bordered rivers spread large amounts of slurry.

The government has recently talked of farmers opening up their land and being more public- and wild life-friendly. DEFRA and the EA are responsible for legislation relating to farming practices, the latter in identifying and prosecuting those who pollute our once clean rivers. However the latter now have no bailiffs monitoring our rivers as once they did, so the polluters mostly get away with it and, according to the Guardian, "regard the fines incurred if caught as a cost of doing business". What is most galling is that farmers who have been caught causing pollution continue to receive tax-payer subsidies!

Were we dealing with 'spectacular' birds of prey or ancient oak woodlands or a stretch of beautiful coastline the press, TV and radio would be protesting loudly with the public behind them. Vast publicity about the plight of (visible) bumble bees because of insecticide sprays led to action. But underwater and out of mind. After all, the fields are green and the river runs nicely through its pools and riffles. In this respect, both DEFRA and the EA are failing in their responsibilities. And does it matter if what should be a clean river is polluted, and that the river has no stoneflies, few mayflies and the dippers are fewer and farther between?

I feel it does and that DEFRA and the EA should make a concerted effort to prevent our rivers and riversides being despoiled by pollution.

So will we see the April 2018 rules applied, farms monitored especially at times when farmers ought not to be spreading slurry, and prosecutions of all farmers who break the rules and pollute?

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There is one other source of insecticide pollution, imidacloprid. This has recently been found in streams in Scotland (Cairngorms), and in Bedfordshire (Great Ouse), Manchester (Thame), Leeds (Wyke Beck), Lincoln (Sincil Dyke), Norfolk and Suffolk (Wensum and Waveney), and Kent (Somerhill Stream). Buglife suggests that the main source of this extra pollution is veterinary practice, for it is the chemical often used to kill fleas in dogs, cats, rabbits and ferrets. The imidacloprid is simply poured away and ends up in the stream where it kills insects into which it comes into contact (rather like the now banned sheep-dip did until it was banned some years ago).

Both DEFRA and the EA ought to prohibit imidacloprid use immediately.

Yours sincerely,

Dr Malcolm Greenhalgh

Vice President Wild Trout Trust

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