

Wales Land Management Forum (WLMF) Sub Group on Agricultural Pollution

Minutes

Title of meeting:

Wales Land Management Forum (WLMF) Sub Group on Agricultural Pollution

Location: Microsoft Teams Meeting

Date of Meeting: 17th January 2022

Present:

Zoe Henderson, NRW (Chair)

Dennis Matheson, TFA

Bob Vaughan, NRW

Sarah Jones, Dwr Cymru

Marc Williams, NRW

James Ruggeri, HCC

Edward Davies, NRW

Chris Mills, WEL

Einir Williams, Farming Connect

Shane Thomas, Carmarthen Fishermen's Federation

Geraint Hamer, Welsh Government

Bernard Griffiths, FUW

Ruth Johnston, NRW

Creighton Harvey, Carmarthen Fishermen's Federation

Chris Thomas, NRW

Fraser McAuley, CLA

Andrew Chambers, Welsh Government

Charlotte Priddy, AHDB

Kate Snow, United Utilities

Spencer Conlon, Welsh Government

Mathew Walters, Welsh Government

Adriana Kiss, Welsh Government

Nichola Salter, NRW

Additional Attendees Present:

Rhys Evans, Chris Clark & Hywel Morgan, Nature Friendly Farming Network (Item 4)

Fergus O'Brien and Steve Wilson, Dwr Cymru Welsh Water (Item 5)

Mark Squire, NRW (Item 5)

John Richards, Hybu Cig Cymru (Item 6)

Secretariat:

Bronwen Martin, NRW

Apologies:

Rachel Lewis-Davies, NFU Cymru

Sarah Hetherington, NRW

Elizabeth Franks, Hafren Dyfrdwr

Item 1 Introductions, Apologies and Declaration of Interest

1. Zoe Henderson welcomed all to the Microsoft Teams meeting and noted apologies. Please note that the meeting is being recorded for the purpose of capturing the minutes and the digital file will be deleted once the meeting minutes have been approved.
2. No declarations of interest were raised in respect of Agenda items.
 - NB: All members of the group have completed declaration of interest forms already but should also declare if they have an interest in anything on the agenda.
3. Zoe welcomed the guests to the meeting including Rhys Evans, Chris Clark & Hywel Morgan (Nature Friendly Farming Network), Fergus O'Brien and Steve Wilson (Dwr Cymru Welsh Water), Mark Squire (NRW) and John Richards (Hybu Cig Cymru).

Item 2 Review of Minutes

4. The Chair confirmed that once the meeting minutes have been reviewed and formally agreed by the group, they will be published on the NRW for the public to access. Therefore, it is important that the minutes are an accurate record of the meetings.

5. The group reviewed the previous meeting minutes from 13th December 2021. Zoe recommended that an action should be included after paragraph 45 referring to the suggestion for Sarah Hetherington to lead a session on her Rural Economic Strategy work.

AP January 01: Bronwen Martin, NRW to discuss adding an additional action point in the December 2021 meeting minutes with Sarah Hetherington regarding her Rural Economic Strategy work.

6. No further comments or amendments were received in respect of the December meeting minutes.

Item 3 Matters Arising

7. Zoe welcomed the group to discuss any matters arising from the previous meeting minutes, Update Paper or relevant documents.
8. No matters arising topics were raised.

Item 4 Nature Friendly Farming Presentation

9. Rhys Evans introduced the Nature Friendly Farming Network (NFFN) which is a network of farmers across the UK who have come together to champion a way of farming which is sustainable and good for nature and the environment. This farmer-led network includes steering groups within each of the 4 nations who are passionate about this farming system – [Nature Friendly Farming Network - About NFFN](#)
10. In Wales, there are around 275 farmer members. There are three key areas of the NFFN including engaging with the public, engaging with fellow farmers, and engaging with government and policy makers.
11. Chris Clark gave a presentation on some of the key findings from the 'Nature Means Business/ Maximum Sustainable Output' work. Chris described that they have seen over 100 farms across the UK and have found that when farming is at maximum profitability, then nature is at maximum value. Chris said there is a sweet spot where farming and nature coincide to their mutual benefit and described the calculations of this theory.
12. Chris summarised the UK Land Management and the five concepts:
 - 1) Food is a fuel, a form of energy
 - 2) Nature demands a balance / equilibrium with any land management
 - 3) Unless there is an equilibrium there will always be a stress on nature
 - 4) Maximum Sustainable Output (MSO) is the point of equilibrium between a land-based regime and nature
 - 5) Farming beyond MSO or re-wilding at levels below MSO will not avoid further stress on nature and the outcomes will defy prediction.

13. Chris outlined that farming works within a managed landscape:

- A landscape that has been nudged along for 1,500 years in the quest for produce and productivity
- Since 1914, the industry has been forced along to deliver output at all costs
- The managed landscape should occupy a position of equilibrium between Nature and commercial farming – a position technically of unstable equilibrium in the sense that good husbandry, crop, or livestock is essential for its maintenance.

14. Chris said nature provides farm businesses with free issue of sunshine, rain, fertility, and grass and explained the 'obvious and convenient model' of how farm businesses work with revenue and costs (£) versus output volumes (£).

15. Current situation in farming:

Most farms are working beyond MSO -

1) By coming down to MSO levels:

- Increasing degrees of biodiversity
- Improving soil fertility
- Improvements in animal health
- Increasing profitability

2) Inevitable decrease in farm outputs (despite increase in profitability) must be offset by a new focus on business assets

- Treating Natural Capital as a marketable product
- High-quality branded produce with greater degree of added value on the farm

16. Chris discussed future farm business planning and highlighted the following:

- Promote a proper balance with nature
- Profitability improvement
- Ending the commodity producer status
- Encourage the development of added-value products

17. Hywel Morgan outlined the benefits of this approach on his own farm. Hywel is an upland sheep and beef farmer situated on the western edge of the Brecon Beacons. Hywel farms around 230 acres (including some rented ground and undertakes

conservation grazing). Hywel has about 400 sheep which was reduced from around 560 and has 35 suckler cows.

18. Hywel said he joined NFFN as a steering group member about 12-months ago which was an excellent opportunity for him to meet likeminded people and was inspired by some of the farmers he met through the group.
19. In 2015, Hywel entered the Glastir Advanced scheme and put some fields into reversion or no inputs, not just for the extra payment but Hywel recognised that the inputs he was buying were not giving him the return which was needed. Hywel described how he stopped using fertiliser completely three years ago (were using 18-20 tons of fertiliser a year). Initially, Hywel said he was not sure he was doing the right thing because of peer pressure but the cost saving he experienced made it clear. Hywel described some of the other changes he has made, including:
 - Reduced animal feed – now only used to supplement during lambing
 - Reduced use of chemical sprays – now uses a min till method which works well
 - Reduced animal medicines – previously using far too much through routine but treatments are now set by the calendar. Hywel monitors and analyses the animals (faecal egg counts etc) to help.
20. Regarding soil, Hywel said that previously there was too much emphasis on testing for nitrogen, phosphate, and potassium (NPK) but he now focuses more on pH, organic matter, and minerals. Hywel's soil pH has risen without the use of fertiliser. Hywel uses farm yard manure (FYM) and increased his cows so that he has more, therefore, herbal lays and clover is his fertiliser along with the 'free options' of sun and rain.
21. Hywel mentioned that initially, his bale count was quite depressing as he went from 7 bales an acre to 4 bales an acre. However, the following year the bale count was 5 bales an acre and then last year Hywel had 6 bales an acre. Hywel acknowledged there is pressure trying to work within the MSO but working with NFFN and other likeminded people has given him confidence in this system. He also took part in a management exchange on low input farming in 2018 and met some really inspirational farmers who he keeps in touch with. When Hywel first saw Chris' report in 2019, he knew it was right but a part of him did not want to believe it. Hywel described how his turnover had dropped but the profits were rising and every year his profits continue to rise.
22. Hywel said he thinks he will be in a good position to step into the new proposed Sustainable Farming Scheme (SFS). Hywel sells direct to consumers (lamb, hogget, mutton and beef). Hywel is not certified organic but farms using organic principles. Hywel suggested that there is an opportunity to brand Welsh produce as 'nature friendly'.
23. Reducing inputs has also helped Hywel with reducing the likelihood of pollution. Hywel described how pollution costs money in many ways, not just a potential fine but wasting valuable nutrients.

24. Hywel concluded by saying nature will always win so farmers need to work with nature not just for biodiversity, the environment and climate change but also for profitability and sustainability.
25. Zoe thanked Rhys, Chris and Hywel for their interesting presentation and discussion.
26. Chris Mills, WEL asked what evidence is there that nature declines below the MSO. Chris explained that nature does not decline, it is different below the MSO and described the energy and inputs involved in the process. Chris Mills suggested that there may be circumstances where different nature is required and therefore rewilding might be an appropriate response. Chris agreed but you need to understand the energy lost that goes into achieving that.
- Rhys said his farm is probably operating under the MSO and are not taking full advantage of the free assets that nature provides. Rhys said the farm is about 450 acres and is grazed by 180 sheep, but it needs more grazing not by sheep but by cattle to improve. However, if they did introduce cattle it would need to be in line with the MSO principles with hardy native breed cattle (low input and low output) instead of commercial breeds (high input, high output). Operating under the MSO is having negative effects on biodiversity with some areas becoming too rank with Molinia.
27. Einir Williams, Farming Connect said she is involved with a Government funded project called 'Our living trails' and would like to connect with Rhys Chris and Hywel to discuss this project. Rhys, Chris and Hywel agreed for their contact details to be shared.

AP January 02: Bronwen Martin to share Rhys, Chris and Hywel's contact details with the group.

28. Creighton Harvey, CFF said it was good to hear both the down side and the up side from Hywel. It was encouraging to hear about the gradual increase in bales per acre and this is something which should be shared with others so that they are aware. It was also good to hear about the reception that Hywel received from other farmers which demonstrates some farmers see the only way forward is through increased intensification. Hywel agreed that a lot of farmers think that getting bigger is the only way. Hywel discussed the situation with supermarkets and suggested that consumers are powerful and must demand that farmers are working with nature to produce sustainable food.
- Creighton and Hywel discussed the situation with dairy farms in the area. Hywel mentioned that a dairy farmer recently told him about a bank offering to lend him more money to increase his herd size, but the farmer refused as he had more than his farm and family could cope with. Zoe suggested that the influence of banks and others on farmers could be explored further.
29. Ed Davies, NRW asked how many members NFFN has in Wales and how they hope to increase their membership. Rhys said there are around 275 members in Wales. Currently, it is free to join NFFN as the main funds are through the Esmée Fairbairn Foundation. The best way of engaging with farmers is face to face farm visits but that has been difficult due to covid. There are plans to increase engagement with an e-newsletter, monthly training/workshop events, discussion group on Facebook and NFFN page on farming forum.

Ed asked whether NFFN has contacted the big supermarkets to boost and market this type of farming method. Rhys said there has been some discussions at a UK level with the supermarkets, but this engagement needs to be increased as they are the ones who can drive change with standards in place. Hywel reminded the group that supermarkets are a commodity market and therefore control the prices. However, supermarkets could help promote nature friendly farming system. Hywel suggested that supermarkets could be more involved in policy and be part of the solution rather than driving production. Rhys suggested that it is all interlinked, by increasing the public and consumer appetite for sustainable nature friendly farming systems then it will put more pressure on supermarkets. Rhys mentioned the proposed Food (Wales) Bill which could bring exciting opportunities through food policy in Wales.

30. Charlotte Priddy, AHDB asked about the different sector representation within the NFFN membership, particularly dairy. Rhys said he would need to look at the membership database but there are dairy members in NFFN. Pigs and poultry are areas which are lacking representation within the membership.

Zoe asked whether the benchmarking activities of AHDB have some opportunities to look at this model we have heard about today. Charlotte said yes, there is scope to look at these closely.

31. Bernard Griffiths, FUW said what Hywel has described is an example of the system we largely have in Wales anyway, with 80% of farms located within less favourable areas (LFA's) which tend to be a low input and low output system. Bernard asked how you think it would work if this model that Hywel is using was rolled out with the vast majority of farms across Wales, especially as the free trade deal has been signed with New Zealand. Hywel said that regarding his box system, some meat goes to consumers, but some goes to through the market. Hywel described what he understood about the trade deals but essentially, he is not worried about them. Bernard said the farming systems used in Wales are because of peer-reviewed published information and asked Chris and Rhys to put information into the public domain so people can make decisions. Chris Clark said they have a paper called ['Less is more: Improving profitability and the natural environment in hill and other marginal farming systems' \(Nov 2019\)](#), there will also be another paper coming out this year. Chris also mentioned a paper by Tim Benton ['The paradox of productivity: agricultural productivity promotes food system inefficiency \(2019\)'](#) which discusses how over production is bad for the economy and bad for health.

AP January 03: Rhys Evans, NFFN to share links to further information for Bronwen Martin, NRW to circulate to the group.

32. James Ruggeri, HCC reminded the group that Hybu Cig Cymru undertook a benchmarking survey a few years ago. James acknowledged that there are probably a lot of farmers in Wales in the middle ground with high inputs but are not really getting the outputs. However, you have to remember that there are farmers at both ends of the scale, for example very high input farmers which are very profitable as well as some low input farmers who are very profitable. Therefore, we should not say that all high input farmers are unprofitable. Chris Clark said of the farms they have seen, if you take the support out and have a correct definition of 'profitability' then they found that they are not profitable before support.

Item 5 DCWW: SAC Phosphate Update

33. Fergus O'Brien and Steve Wilson, Dwr Cymru Welsh Water joined the meeting to provide an update on the SAC Phosphate work.
34. Fergus gave a brief overview of the programme for delivering the improvements with a specific update on the modelling stage of the programme. Fergus also outlined the preliminary investments and delivery dates for each of the sites.
35. Fergus discussed the model data; what the data is, where it comes from and how it is produced. The Source Apportionment Graphical Information System (SAGIS) modelling framework looks at all of the different sources of phosphorus (estimates them coming down the river) and looks at what proportion of that can be allocated to different sources and sectors. The data that feeds into it breaks down into two general types; measurement data (including monitoring data for flow, quantity and quality of what comes out of sewage works) and river quality itself (based on the NRW assessment). There are also some exclusions which includes pollution incidents. They are testing a new methodology for the Usk because Combined Storm Overflows (CSOs) flows in the Wye are small it was not required there; it is estimated that CSOs account for 1.5-2% of the total phosphorus but will be slightly higher in the Usk. Other data is known as 'sector data' which includes diffuse non-sewage works loads. In this instance they consider what comes off land, particularly agricultural land. Phosphorus and Sediment Yield Characterisation in Catchment Modelling (PSYCHIC) is used to estimate the amount of phosphorus coming off agricultural land which is run by ADAS. This model estimates how much phosphorus will run off the land, looks at how much would come from manure, how much phosphorus is imbedded in the sediment etc. However, the current PSYCHIC model uses 2010 data based on the agricultural census data of that time, there is no choice, and this is the data they have to use. Some farmers in the Wye have taken steps to reduce their inputs but it will not account for the big increase in poultry in the Wye Catchment.
36. Fergus mentioned a key question is 'how well does the model represent the real world' and illustrated the successful calibration process of the Wye model using a graph. There are other tools used to indicate whether the model is good or bad like the 'goodness-of-fit'. This map showed monitoring points colour-coded based on the level of agreement between observed and simulated concentration values.
37. Fergus showed an exercise where they compared two situations in the Upper Wye Catchment; one with sewage works inputs only and one without sewage works inputs (just agricultural inputs). The key message is DCWW cannot do this alone, it must be a joined up multi-sector approach to improve water quality.
38. Fergus briefly discussed the progress regarding the Usk modelling including the challenges with calibration.
39. Fergus summarised some preliminary AMP26 results from the River Wye model. These models will be produced, and the model data will be shared as it all becomes available.
40. Mark Squire, NRW said in terms of the approach taken, NRW have always done the calibration work for the modelling DCWW do after the event. What has worked well here, is that the calibration has been done alongside DCWW so NRW have been

dynamic in how they have adapted that model which has meant that questions from the regulator have been able to be fed in early. Regarding AMP, there is PR24 planning and are working with the water companies to ensure the investment is in the next AMP period.

41. Steve Wilson, DCWW said it will be key to set up Nutrient Management Boards for the rivers. It will require a lot of partnership working to improve water quality and there is lots of opportunities for this. The key thing they are working on is the planning cycles of investment periods. Steve mentioned that there are lots of small catchments and small waste water treatment works so there are lots of small sites to look at. DCWW will not just do their fair share, they will try and tackle more than that but DCWW customers should not have to pay for more than their fair share. This is where working collaboratively with the Nutrient Management Boards on these rivers will help to make progress.
42. Adriana Kiss, Welsh Government asked when this project is going to be completed and available in the public domain. Fergus said they are still finalising what the non-technical report will look like. Zoe asked whether the technical information will be available for those who are able to understand it. Fergus said the model information and datasets will be made available for transparency.
43. Chris Mills, WEL said it is encouraging to see the progress being made towards managing the problem from the point of view of the water industry and the fact that there will hopefully be the funding to deliver it. Chris asked where the parallel process is to reduce phosphorus from agricultural and wider sources and how will it be brought together in a coordinated way to deliver improvements. Mark Squire said the answer probably lies within the Nutrient Management Boards being set up. Regarding the funding, we would have to work with Welsh Government to look at how some of these environmental improvements are funded. Adriana Kiss, Welsh Government said that the new Sustainable Farming Scheme would need to be one of the key delivery options for the future. The Welsh Government Water Quality Team have also secured Capital Funding for the next three years so there will be funding available for water quality improvements. Chris asked whether the funding would be anywhere near the amount required to address this. Adriana could not comment on how much money is going from the agriculture side and through the SFS. Capital funding is limited so there is a prioritisation process and the most important aspects where they can deliver water quality improvements. Mark said the capital money NRW receive that will be put towards programmes going forward are targeted at where we can get water quality improvements in some the SAC rivers, opportunity catchments and how we can best deliver that. Bob Vaughan, NRW said that this group was set up to bring all the different parties together. Money is always one of the key parts but coming up with the types of different approaches is where we can influence the markets, banks, funders, farmers etc. Chris said that what we have just heard from DCWW is highly planned, structured and has hopefully secured sources of funding but we have not seen this on the agricultural side yet and there needs to be more certainty. Other ways, the investments will be made on the water industries side but there will still be a major problem. Bob said that is where we have to move this forward and have the programme in place. This is looking at an end of pipe solution but there is also the issue of where these things come from in the first place for example the cost increase for fertiliser may put some people off and push some towards a different farming system like that of the NFFN. But there are also products that a consumer in the household uses which may contain

phosphate and ends up being flushed down the toilet. There may be a need to look at those types of things and start to incentivise or disincentivise those uses (looking at the front of the system rather than the end). Steve described how DCWW have carried out some trials around phosphorus containing products (washing detergent, washing powered, dishwasher tablets etc.). Ultimately, customer behaviour at home is a very difficult to change.

44. Fergus mentioned that one of the major chicken producers in Herefordshire have reduced the phosphorus in chicken feed that they are using/supplying. This company is also developing plans to recover and recycle all of the chicken manure to then take it through a process to recover the phosphorus. During a meeting with DCWW, this producer recognised that they are part of the problem but are also part of the solution. Fergus hopes to hear more about this work soon.
45. Andrew Chambers, Welsh Government asked why they are limited to using the 2010 data and whether there is any consideration to the [RePhoKUs: Re-focusing Phosphorus use in the UK food system \(Lancaster University\)](#) work and this approach. Fergus said the methodology for the modelling has very strict processes and the most comprehensive dataset is the PSYCHIC dataset. The SAGIS modelling is not just DCWW and NRW, it is nationally used by regulators and water companies. Fergus agreed that it is an issue. Regarding the RePhoKUs work, it is a fantastic piece of work and gives confidence in the direction of where we are going, and they will be looking at it as they progress, but it is a long process. The PSYCHIC dataset is a well-managed and well understood dataset. Andrew said it is important to recognise where there are deficiencies in the model and take account of them.
46. Bernard asked if DCWW customers were exonerated of the cost with dealing with the agricultural phosphate, do they actually have the capacity in the treatment works infrastructure to deal with the on-farm waste if the money was found to help that. Steve said they would be looking at two things, one is from a nutrient perspective. If they know what it will cost to take 1 milligram per litre of phosphorus out from a waste water treatment works, but there are certain stretches where they could effectively take out more phosphorus by spending that equivalent money with farmers to fence buffer strips, do some planting or do some land management improvement works for example to think about slurry stores. Steve said they have no problem in spending that money they would have spent in other ways if that gets more phosphorus. In terms of capacity to deal with waste, the more phosphorus they take out at sewage treatment works, the more phosphorus which is bound up in the sewage sludge and currently all of the sewage sludge in Wales is spread back to agriculture in lieu of fertiliser. This is process is managed very carefully. What we do need to think about is what the long-term strategies are for that waste as well. Steve said at the moment, there is not much scope in DCWW being able to take those animal manures and do anything with them.

AP January 04: Bronwen Martin, NRW to share DCWW SAC Phosphate presentation with the group.

Item 6 Hybu Cig Cymru Presentation: The Welsh Way

47. Zoe welcomed John Richards from Hybu Cig Cymru (HCC) to the meeting to discuss HCC's report [The Welsh Way - Farming and a sustainable environment](#).

48. 'The Welsh Way' was launched in December 2020 and highlights the economic and cultural importance of red meat production in Wales and also the positive environmental benefits that agriculture supports. The report explores the differences in greenhouse gas (GHG) lifecycles and the implications for the red meat sector.

49. In October 2021, HCC launched [Perfecting the Welsh Way](#) which is an industry facing practical guide to sustainable sheep and beef farming.

50. Within the document, they highlight areas to target and suggest that an increasingly sustainable Welsh red meat industry can be achieved if efforts are made to optimise productivity, grassland management, carbon capture and sequestration and renewable energy and reducing impact on natural resources. The publication also looked at the National Atmospheric Emissions Inventory and from those figures they looked at different scenarios by modelling potential improvements for the different sectors.

51. The work looked at a life cycle assessment by carrying out a carbon audit of 20 farms across Wales. Carbon audit work was conducted by Bangor University (they include sequestration in their Footprinting Tool). The farms selected were representative of the Welsh red meat sector with a mix of systems, types, and finishing. John illustrated the carbon audit results using a graph. The results showed that hill farms that were audited had less emission associated than upland/lowland. The greatest sequestration was seen on hill farms and whilst not easy to compare, results showed that Welsh farms can produce beef and lamb with a low carbon footprint.

52. The key industry messages include:

- Climate change is a challenge for all industries, including agriculture
- There is no silver bullet, just a series of incremental changes/improvements
- Improved animal health and nutrition, increased use of genetic information and better utilisation of grassland all key for beef and sheep sector. Other key areas for industry are nutrient management and the need for businesses to increase level of benchmarking
- Important to look for new and innovative actions to support industry mitigate overall emissions

53. John summaries that:

- Policy regarding agriculture and climate change should consider new research on the relative impact of different GHGs
- Whether old or new methane calculations are used, there is potential for agriculture to reduce its emissions and increase positive contribution to mitigating climate change
- By taking advantage of its natural advantages, the 'Welsh Way' of producing lamb and beef can be a global exemplar of a sustainable, low-emissions system

- The impact of hill farming in particular may be lower than previous studies have reported
- Radical changes in land-use do not offer the most effective way to maximise rural Wales' contribution to mitigating climate change
- Wales should prioritise efficiency measures which reduce emissions while maintaining production
- A sustainable Welsh lamb and beef industry can also have positive benefits in terms of soil health and biodiversity

54. John said he would make the slides available for them to be shared with the group.

AP January 05: Bronwen Martin, NRW to circulate John's presentation on the 'Welsh Way'.

55. Bob recalled that one of the graphs showed that soils were adding to the carbon production and asked whether that was material lost from soils. John said yes as well as soil management and some elements of fertiliser use. Soil testing is important but also implementing something after and acting on the information available is very important.

56. Creighton Harvey, CFF asked whether there has been any increase in members going out of the sector and into dairy. John said that Welsh Government statistics do show a decline in the number of beef and sheep farmers over the last 5-10 years. However, the number of sheep in Wales is relatively stable. If you also look at the statistics for dairy farms in Wales, they have also reduced but the number of cows on the remaining farms has increased. John said that have also seen less suckler cows if you compare the statistics which is slightly worrying because they have an important role particularly in upland and hill farming systems not only for farmland management and grazing management but also for biodiversity and environmental management.

Creighton asked whether they have seen an increase in heifer rearing for dairy farms in the uplands. John said there is an opportunity for this but not specifically within the uplands.

57. Zoe asked John whether HCC members are more aware of pollution and whether they acknowledge that they are not just part of the problem but also part of the solution. John said people are far more aware of pollution now and as an industry people are becoming more aware of the value of their nutrients along with the opportunities of having more of an on-farm cycle to make better use of them. Zoe thanked John for joining the meeting and sharing information about the 'Welsh Way'.

Item 7 T&F Group on Alternative Measures Update

58. Chris Mills, WEL (Chair of the Task & Finish Group on Alternative Measures) provided a brief update on the progress of the Task & Finish Group.

59. There have been three meetings and the group have been working through the existing regulations so that everyone understands what they are and what the purposes are.

60. The group has carried out an assessment exercise on the potential effectiveness and some of the issues are on some of the regulations. Comments have been collated in a spreadsheet. Chris said he would welcome any comments from those in the WLMF Sub Group about any specific regulation(s).

61. The next steps are to evaluate what we want to achieve by considering two points:

- Prevent point source pollution (e.g., from slurry)
- Prevent diffuse pollution (e.g., from excess nitrate)

62. This group have identified three key areas to explore further:

- Storage
- Spreading
- Carrying capacity of the land/limits

63. Chris said there are several other factors to consider, particularly regarding how things are done. This includes enforceability, monitoring, record keeping, exemptions and practicality. The group will use the discussions around the existing regulations to look within that framework about how you might deliver some alternative measures or the same measures perhaps in a slightly modified way.

64. The group will not rule out looking at some of the wider issues for example should these regulations be applied pan-Wales or should they be more targeted.

65. Regarding the timeline, the draft report should be produced by June with the aim of reporting back to the WLMF Sub Group at the June meeting. Comments from the wider group would be welcomed in July and then a final report would be brought back to the WLMF Sub Group in September. The final deadline for submissions of alternative measures to Welsh Government is October 2022.

66. Chris said key messages and actions have been recorded from each of the meetings and would be happy for them to be shared with the WLMF Sub Group. Chris mentioned that members are also welcomed to contact him to discuss.

AP January 06: Bronwen Martin, NRW to circulate the T&F Group meeting notes with the WLMF Sub Group.

67. No questions were received.

Item 8 Any other business

68. Zoe mentioned that Farming Today is featuring pollution all week. Marc Williams mentioned that Chris Thomas, NRW was interviewed by ITV regarding the Dairy Project.

69. Bob mentioned an update regarding silage clamps and the procedures. Bob said he had a short-written report which can be included within the minutes:

Topic - Silage clamps not constructed to the required standards in the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 and Cross Compliance

- 1 April 2021 WG introduced the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (CoAPR) with a transition period.
- CoAPR is included in Cross Compliance under Statutory Management Requirement 1 – Water Protection (SMR1) as and when measures transitioned into law.
- Inclusion of CoAPR in Cross Compliance has been stated in communications relating to the introduction of CoAPR.
- Construction requirements for all silage clamps constructed after 1st March 1991 need to meet Reg 26 CoAPR. Any clamps constructed before 1st March 1991 but have been substantially reconstructed or substantially enlarged (see WG guidance annex 4) lose the exemption from Reg 26 CoAPR and should be built to the construction standards as detailed in schedule 5 of CoAPR and in WG guidance.
- CoAPR construction requirements for silage clamps are identical to those in the now revoked Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (Wales) Regulations 2010 as amended. This is not a new legal requirement, but it is a new requirement within Cross Compliance SMR1.
- WG Rural Inspectorate of Wales (RIW) inspect a percentage of farms (circa 200) who claim Basic Payment Scheme payments and land based agri environment schemes for compliance with Cross Compliance Standards including SMR1.
- Those farms in breach of Cross Compliance Standards are awarded breaches and may face a financial penalty as detailed in the Verifiable Standards [Cross compliance: verifiable standards 2021 | GOV.WALES](#)
- NRW are aware that during 2021 RIW have found a number of breaches of SMR 1 (CoAPR) in relation to construction standards stated in schedule 5 of CoAPR and Annex 4 & 5 of WG published guidance [The Water Resources \(Control of Agricultural Pollution\) \(Wales\) Regulations 2021: guidance for farmers and land managers | GOV.WALES](#)

70. Einir Williams, Farming Connect said the uptake on the on farm 'Infrastructure' clinics that Farming Connect have been funding has been great. The reports from the on-farm visits have been coming back and are positive. The consultant has been out on farm identifying any issues which does not bring them up to the current standard and how to go about rectifying that. Einir said there is funding still available and applications are still open and said it would be good if WLMF Sub Group members could spread the word – [Farming Connect one-to-one on-farm clinics](#).

71. Marc gave an update regarding the action to draft a letter to the Minister highlighting the tenancy issues. This letter has been drafted and Marc will circulate it following the meeting.

AP January 07: Marc Williams, NRW to circulate the letter to the Minister regarding tenancy issues.

72. Andrew Chambers, Welsh Government mentioned that Spencer Conlon will be starting a new role within Welsh Government and will not attend WLMF Sub Group meetings going forward. Andrew passed on Spencer's thanks for the help, support and challenges he received over the years. Zoe asked Andrew to pass on her congratulations and thanks to Spencer.

73. The next WLMF Sub Group Meeting is Monday 21st February 2022.

Close meeting