

Responses received

26th March 2006

Water Division
Scottish Executive
Area 1 – H
Victoria Quay
Edinburgh
EH6 6QQ

Dear Sirs

Consultation on Diffuse Pollution from Rural Land Use

The AIC welcomes the opportunity to provide input to the consultation exercise. Through its member companies this Confederation represents inputs and services to agriculture worth over £6.5 billion.

It represents those companies involved in the trading of combinable crops from farm to end-users, the manufacture and distribution of animal feed, the manufacture and distribution of fertilisers, multiplication and distribution of combinable crop and herbage seeds, the distribution of agrochemicals and associated agronomy advice to growers and the distribution of forage additives.

AIC also operates 3 assurance schemes covering combinable crops, animal feed and feed material supply and a 4th, launched last month, covering fertiliser industry assurance. Across these areas, we represent over 1,500 companies, ranging from sole traders to national companies.

Our members are a critical link in the agricultural industry and are in daily contact with a broad range of growers throughout Great Britain both directly and indirectly. These professionally qualified people are therefore both well placed to deliver key messages and advice to farmers and to meet the necessary commitments to develop measures to promote farm management practices which reduce the risk to water quality.

We are committed to reducing the environmental impacts of farming practices achieved through our professional approach to research products that are fit for this purpose and to provide supporting professional advice to our customers.

Our primary objectives are to:

- raise awareness of diffuse pollution issues
- update/refine our tools and guidance
- improve their uptake
- increase efficiency to make best use of inputs on farm
- increase leverage and co-ordination within and between organisations with common interests

- provide support to the Water Framework Directive process and to the proposed Catchment Officers

Generally, we appreciate the logical approach to this strategy and the combination of policy measures that are considered. Provided these are based on science, our role mainly comes into the fore at the stage of developing the details of General Binding Rules. We look forward to achieving consensus in this regard as widespread respect for the rules is essential for successful implementation. We note with interest that SEERAD is interested in setting conditions through registration and, for activities posing the greatest risk to the water environment, that licensing is an option. In respect to farming practices, we suggest that these severe options are considered only after thorough consultation to ascertain that this is the most appropriate approach. In most cases self auditing would be the preferred approach to managing risk and we believe that efficient land use management can co-exist with environmental protection.

We do not feel the need to provide specific answers to the consultation questions, given the macro picture and timetables we are subject to, but in the process of your gathering information from consultees, we would like to take this opportunity to advise you of our statistics in relation to fertiliser and feed inputs and a recent publication (**AE Johnston and CJ Dawson*) and of the recent document we presented to Defra – providing collated information on the professional (voluntary) approaches in relation to nutrient management (attached).

Annex 1a to 1c summarise the work that has been done on the development of phosphorus efficiencies in livestock diets.

Annex 2a, (shows *i, overall N use in Scotland and ii, changes in fertiliser application rates, England and Wales,*). These figures question the statement that fertiliser P use has doubled since the 1950s (Page 5). The longest continuous dataset on fertiliser nutrient application rates is for England and Wales, dates back to 1952 and shows that P use increased post war to the mid 1980s peak (fertility building phase) and then has since decreased to post war levels. 2b *shows the relationship between price index and N use:* - N use remaining remarkably inelastic to price fluctuations (clarifying the issue raised, Page 35).

With respect to references made to quantities of a pesticide in drinking water (page 13, 2nd box) the maths is correct however this refers to the EU Drinking Water Directive and the limit is an arbitrary figure. Environmental Quality Standards (EQS's) are a more relevant measure of the potential of a substance to effect the environment. In many cases the EQS value is higher than the 0.1 parts per million standard set in the DWD.

Re. Annex A, c) should read "Any staff involved with the application of pesticides" rather than 'use'.

Our sincere apologies for this late submission due to the pressure of other consultations at this time. However, we trust that the information provided is as useful to the WFD timetable going forward as at this stage.

Yours sincerely



Jane Salter