



The Chartered Institution of Wastes Management

CONSULTATION PAPER ON THE DIFFUSE WATER POLLUTION FROM RURAL LAND USE

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 6,500 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management industry and has various grades of membership determined by education, qualification and experience. Through its commercial subsidiary, IWM Business Services Limited, the Institution provides conference, exhibition, training and technical publication services to the waste management industry.

The Institution welcomes the opportunity to respond to the consultation on Diffuse Water Pollution from Rural Land Use. This is an area that potentially can have a huge impact if not managed properly. CIWM response includes a number of comments, further questions and suggestions as follows.

Question 1:

Do you agree that we have accurately identified the water quality issues that need to be addressed? If not, why and what supports your view?

The list broadly identifies those issues that require to be addressed.

Question 2:

Do you consider there are other problems not identified?

As the farming and forestry industry look to business diversification for sources of income a number of holdings will be looking at on-farm composting of organic material and the use of anaerobic digestion prior to land application. This process in itself can be a producer of significant run-off / leachate that will require to be treated on site.

Question 3:

What aspects do you consider may require regulation or to be more rigorously controlled using existing powers of enforcement?

As the results of key studies are known this may impact on the need for regulation where guidelines currently exist. The forests and water guidelines may require to be brought under legislative control. CIWM welcomes the introduction of BMP's for farmers as with all wastes management, the regulations can be somewhat overwhelming to deal with. As the CAP reform beds in and farmers change to LMC's



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this should have a positive impact on the reduction and control of diffuse pollution via the various tiers including the single farm payment.

Question 4:

Do you consider that advice on water pollution risks, within the PEPFAA Code and/or the Forest and Water Guidelines, is effective? If not, what else is required?

The PEPFAA code has served the industry well in terms of simplifying the legislative burden and providing a clear and effective practical guide to land users on how to minimize environmental impacts of their operations, including diffuse pollution.

Question 5:

Which measures to protect watercourses would you wish to see eligible for financial support under the planned Tier 3 of LMCs?

Financial support should be given to those measures that will create the largest improvement in water standards / reduction in diffuse pollution.

Question 6:

Do you agree with the idea for self-audit/environmental checklist of the farm's environmental practice?

The regulator would be best placed to determine the efficacy of self audit. Possibly a study period of contrasting self audit versus those farms audited by trained personnel (advisors) may be of better use.

Question 7: We think it is important to help farmers/foresters/land managers understand the likelihood of water pollution from their enterprise. What is most likely to be effective?

- Advice/guidance/training/codes of practice/voluntary initiative etc?***
- Seminars/farm visits/catchment officers?***
- Structured Auditing?***

In terms of communicating the message to farmers in an acceptable format it may be necessary to utilize all of the above options. Seminars can be very successful where well planned and well attended. Farm visits would be welcomed by most in the industry; however costs for this may be prohibitive. Advice tailored to the specific type of farm and the main sources of water pollution identified would assist farmers in making the best decisions.



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Question 8:

Do you agree that farming should be subject to a regulatory structure similar to that already planned for other activities under CAR?

Yes

Question 9:

Do you agree that measures should be introduced as early as possible to enable us to meet WFD Targets?

Yes

Question 10:

Are you content that there should be general binding rules (GBRs) for activities which contain potentially polluting practices?

In the first instance Yes. However, should after a period of time the GBR's provide evidence that further regulatory controls are necessary to improve water management, then this will have to be addressed by the regulator.

Question 11:

Do you agree that specific problems in "at risk" catchments should be dealt with through targeted GBRs to be developed in consultation with the industry?

No, "at risk" catchments should be dealt with through the assistance of trained advisors and or the regulator.

Question 12:

Do you agree with the proposed approach of combining regulations (GBRs) with the development of guidance, support and the promotion of voluntary action?

Further guidance to the industry would be welcomed in order to improve the overall level of knowledge and standard of environmental management required within the farming industry on the whole would be a positive move.



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Question 13:

Do you agree that the proposed GBRs and a suite of supportive measures is the right approach? What should they include?

We believe the proposed GBR's and supportive measures are accurate and appropriate to the industry.

14. How might the proposed approach best be developed?

Question 15:

Are there any further factors we need to take into account?

Targets could be considered but there will be difficulties in measuring and enforcement.

Question 16:

How should the Executive work most effectively with the agricultural sector?

Engaging with key stakeholders such as NFU, SAC local advisors and SEERAD advisors.

Question 17:

Can a similar approach be used for forestry as for agriculture?

In principle, Yes.

This concludes CIWM's response if you wish to discuss anything further contact Andrew Dickson.