

Scottish Executive Environment Group
Diffuse Water Pollution from Rural Land Use
Response from the Horticultural Trades Association

This response is written from a horticultural standpoint and does not reflect the views or approach of agriculture. Nowhere in the consultation is horticulture mentioned or the manifold differences of production, management and marketing of the plant material. Whilst some of the field growing operations may be similar in principle and the operations and effects of those operations result in similar consequences, no mention is made of container growing. The container growing of crops is expanding and in some product lines overtaking the field grown product. In container grown crops, the nutrients and even pesticides are incorporated into the growing media at the time of potting and are transported from the site when the plant is marketed. The nutrients incorporated into the growing media are in the form of a slow and controlled release. The nutrients required by the crop being adjusted according to growing media temperature and time. The nutrient release is basically geared to the same level as required by the crop with very little leeching of excess product into the drainage water. No reference in the report seems to take these points into consideration and particularly the increasing use of container grown plants which mostly have nutrients added at the time of growing medium production. To add to this point, the product is then transported complete with the nutrients and planted out in an amenity location or domestic garden, which may be several hundred miles away from the site of production. In view of this the pollution risks are extremely small at the place of production as the nutrients are not retained there for the whole crop life.

- 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?*
- 2. Do you consider there are other problems not identified?*

The problems identified by the report cover the main water quality issues. No mention is made of the specific nursery situations and the farm scale pollution audits did not include one of these for investigation. Many sites would use hand held sprayers and mix very small quantities in comparison to large scale enterprises. Fertilisers too are usually incorporated into the growing media prior to potting and no mention is made of this when addressing fertiliser risks.

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

Run-off from container growing areas is often viewed with suspicion but in reality research has shown that it is rarely a problem. Slow release fertilizers, growing media incorporated pesticides and targeted liquid feeding are measures nurserymen adopt to reduce run-off risks. With soil covered areas of container growing, soil rainfall absorption is lower but nurseries would normally incorporate a matrix of ditches and collection ponds to accommodate this to avoid soil erosion. We do not see any additional powers or regulation necessary.

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?*

Some reference to the nursery container bed environment is needed, together with advice on irrigation water recycling and rainfall harvesting schemes.

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

To incorporate container growers in this section would in one aspect increase the legislative burden on them. However, providing financial support for the construction of sand bed irrigation systems, water recycling schemes and rainwater harvesting projects would provide valuable water course protection.

The use of buffer zones on nursery bed areas would be disproportionate to the area of land in use for production. Land parcels are often quite small on nursery sites and the risks requiring wide buffer zones quite small. We want to see buffer zone areas for nursery container growing sites smaller than for corresponding arable sites.

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

Experience has shown that nurserymen are already carrying out audits on water use, water run-off, pesticide operations, alongside extensive staff training in the use of pesticides and nutrients. We would see the continuation of this self assessment as a natural step to be taken.

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?*

We would see that 'advice, guidance and training' would be the most effective method of helping nurserymen understand water pollution from their site. A structured audit and rigorous catchment officers that are so often biased towards agriculture with little or no understanding of horticultural systems can result in unrelated enforcements and misguided advice.

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

If GBR's, whether local or national are to be introduced these again should include products and processes that are relevant to the nursery industry. Where activities are relevant, the criteria and limits should be adjusted to small-scale horticultural activities.

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

We accept the proposed timetable as laid out in the consultation document. However, we would seek consultation on the levels and criteria as the process develops.

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

We accept that GBRs could be introduced for potentially polluting practices.

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?

We agree with GBRs for at risk catchments but stress the need for specific horticultural consultation to avoid inappropriate GBRs.

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

We agree with this approach to the subject.

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

- Grant aid as detailed in question 5 along side an expansion of the Enhanced Capital Allowance Scheme to include closed circuit sand bed irrigation systems. The availability of grants outside the competitive based schemes currently available to growers would increase the uptake of construction work.
- Exemption of sand used in capillary sand bed irrigation systems from Aggregate Tax.
- Details of current river catchment status.

14. How might the proposed approach best be developed?

Initially, the approach should be disseminated by the publication of information booklets mailed to all growers with details of sites where further information can be obtained. This should be followed by open days to sites where the work involved in reducing risks has been carried out showing the benefits to the environment.

15. Are there further factors we need to take into account?

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

The dissemination of information and advice should be provided through producer organisations such as Horticultural Trades Association, Horticultural Development Council and the SAC. These same organisations should also be the route for feedback. Utilising these existing channels of communication on these issues will increase the uptake of the scheme and ensure faster two-way dialogue.

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

As in horticulture there are several similarities in the systems but neither should be penalised or forced to adopt non-standard practices from the other.