

## Scottish Executive Environment Group

### Diffuse water pollution from rural land use.

#### Response to the consultation paper from Soil Association Scotland.

**Introduction.** The Soil Association promotes and campaigns for organic food and farming in the UK. The founding objectives of the organic movement are environmental sustainability and healthy food. We believe the main ways to realise these are through organically produced food and localised food economies. Organic farming now accounts for over 6% of Scottish farmland, compared to 4% in the UK as a whole. The UK organic food market is growing by around £2 million a week and is now worth over £1.1 billion; the Soil Association certifies about 70% of this. Soil Association Scotland is the devolved arm of the organisation and is based in Edinburgh.

Organic farming is a technically viable system for producing the whole range of Scottish agricultural produce. Recently, the Sustainable Development Commission called organic farming the “gold standard” for agricultural sustainability.

#### Summary of Soil Association Scotland position.

Organic farming has been developed as an agri-ecological approach to food production and land management. It is the practical delivery mechanism of a holistic approach and there is increasing evidence of its success in combining healthy production with environmental and economic sustainability.

The organic farming model has much to offer land managers concerned over diffuse pollution issues. It offers an entirely different approach to that which promotes practices that attempt to deal with the symptoms rather than the root causes.

We would strongly suggest that the Executive highlights the role that organic farming practice can play at a local and at a catchment area level. Land Management Contracts are intended to offer the opportunity for land managers to bid for support, in return for delivery of societal and environmental benefit. We would recommend that this opportunity is not missed and that organic farming is promoted as an important means of addressing issues of diffuse pollution from land use activity.

#### 1. General comments

- The Soil Association accepts the need to review the impact of rural land use on diffuse pollution.
- We accept the listed headings as being those outcomes of rural land practice that are of most concern.
- We would not accept that regulatory frameworks and adherence to specific identified targets are the best way to strategically plan. They are useful reactive processes to limit environmental damage from the worst excesses. Ambitions should therefore be above those of regulatory and statutory regulation.

- Diffuse pollution is an issue because pollutants are released into water and translocated to water courses where they have measurable impacts. The approach of much of this document is to mitigate the impacts on water. This is in itself inadequate. The polluting sources need to be addressed as concerns in the field and soils where the original biological and physical activity takes place. The use of buffer zones is symptomatic of an approach that is attempting to deal with measurable problems where they are manifest rather than deal with the root imbalance or inappropriate activity.
- Diffuse pollution is identified independently as an outcome of land management practices . Only brief mention is made of other environmental and policy priorities and next to no attempt is made to relate this issue with Scotland's human health issues. Nitrates and pesticides in the wider environment, in this case water, are of great importance in Scottish public health.
- Scotland's Sustainable Development Strategy has just been published, the SRDP strategy has just opened for consultation, the climate change programme has just been reviewed, and the Forward Strategy for Scottish agriculture is subject to refreshment. These must be fully integrated.
- Land management activities, primarily farming and forestry, need to be built around a holistic ecological approach where the systems are specifically managed so as not to deliver excesses of bi-products to the wider environment.
- Organic farming can potentially contribute to all of the identified targets.

We attach the summary from the DEFRA study into the environmental impacts of organic farming as relevant information. Annex a

1.1

1.2

### 1.3 Responses to Questions

**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?** Yes, we agree, but would like to encourage continued research into the impacts of diffuse pollution on the biological life in soils and consequent impacts on crops.

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

We would emphasise the importance of pollutants on soil and water biological diversity and activity. This has significant potential impact on wider ecological function, including farming practice and human health. There needs to be continued research into pesticide and nutrient activity in the environment.

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

Our emphasis is not on regulation as a means of achievement of environmental improvement, but rather to promote good practice.

We would accept the need for regulation and enforcement, and development of these options but would prefer along with the promotion of good ecological systems management, an increase in education and awareness raising.

**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?**

Cross compliance of farming practice with the PEPFAA Code and Forest and Water Guidance (F&WG) is essential and should be thoroughly integrated with GAEC in Tier 1 of Land management contracts. This should be the baseline.

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

There are a number of measures that we would support incorporated in Tier 3 and would refer to those submissions of LINK.

However we would like to see an emphasis of organic farming in Tier 3 as the best whole farm approach to the issue.

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

We would be concerned about overloading farmers with yet more bureaucratic procedures, particularly in an area where the expertise required is high. Reference is already made to these issues in organic conversion planning and manure management.

**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?

All will have some value but need assessing for cost effectiveness.

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

As stated before we do not think that a regulatory approach is necessarily the best approach but accept the need for baseline regulations.

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

Only if paralleled with a proactive approach to farming systems.

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

All such rules must concern themselves with the source of the pollutants and not just the measurable impacts.

**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?**

At risk areas do have to be dealt with, but the reasons for this high risk category must be addressed.

**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 suggest that education, research and promotion of agri-ecological approaches are the best means of long-term effective results.

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

**14. How might the proposed approach best be developed?**

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

Further monitoring of the impacts of the farming types and systems would be useful.

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

Integration of policies is important. Organic farming practice can contribute to this integrative approach.

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

Yes

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