

Consultation by the Scottish Executive Environment Group: Diffuse Water Pollution from Rural Land Use

Thanks for allowing me to submit this response two days after the deadline. It is much appreciated. WWF was joint contributor to the Scottish Environment LINK response, which you have already received. However, since diffuse pollution is such a serious problem for Scotland and the approach to the solutions must be an integrated and broader one, WWF would like to comment also on the following issues independently.

Overall issues raised by the consultation text

There is limited information about the geographical extent of the proposed strategy. We assume that it applies in estuarine and coastal waters to three nautical miles from the coast, in keeping with the jurisdiction of the Water Framework Directive. WWF considers it important that more and more zones with hugely diminished biodiversity are being identified in European coastal waters. These zones have been closely linked to nutrient enrichment from land, particularly from agricultural activities. In this context, the **marine component** of the geographical extent is very important but appears to be absent from the strategy.

This loss of nutrients to the rivers and sea also raises another related issue with the strategy. No description or analyses of the **economics** involved are provided. There is no examination of the economic drivers or the economic consequences arising from the present policy or the proposed strategy. The WFD demands that the economics of the issues are examined and that action is taken on the basis of, for example, cost effectiveness. The text of the consultation describes the huge waste of fertilisers and soils contributing to the degradation of the water and other environments. Yet, it makes no attempt to describe the economics involved. This is a major gap and one which carries powerful drivers for change particularly in the light of the polluter pays principle.

Further linked to the economic issue and marine degradation is the disturbing fact that fertiliser production, storage and use are major sources of **greenhouse gases**. The strategy does not describe this link nor does it then offer solutions for reducing the levels and potential for contribution to the UK/Scotland climate change impact reduction programme.

It would have been helpful if the strategy had touched upon **wider issues**, linked to the water environment, in other factors. It did not describe other areas than water that are at risk nor does it offer any strategic view on the impact of pesticides or herbicides on wildlife, their habitats or our environment.

WWF is committed to working with others to reduce Diffuse Pollution and its impacts. We are major partners in the group that produced the 4 Point Plan and the Farm Soils Plan. WWF wants this strategy to work. This is a major opportunity to address diffuse pollution issues in Scotland in an ambitious, pro-active way. For example, the restoration of wetlands on farm land. These not only remove pollution from the water but also provide flood mitigation, carbon sequestration, amenity and higher biodiversity. The Scottish Executive should grasp the opportunity to link much of this with the River Basin Management Planning and Catchment Flood Management processes. This would produce the **broader, inclusive and integrated approach** to resolving the issues of Diffuse Pollution that is sorely overdue. The alternative is

higher costs to society, our environment and the agriculture industry at a time when resources are shrinking and pressure for effective change is increasing.

Yours sincerely,

Mike Donaghy
Freshwater Policy Officer
WWF Scotland