

RESPONSE TO “DIFFUSE WATER POLLUTION from RURAL LAND USE”

A) Brief responses to the questions, as numbered in the document.

1) Yes.

2) Yes. There is a localised but important problem relating to the overwintering of beef cattle in the fields. I will elaborate on this below.

3) See (2) above.

4& 5) No comment.

6) No! A rigorous, independent, external audit, backed by sanctions (fines or loss of subsidy) where necessary, is essential.

7) Education backed by suitable sanctions.

8) Yes.

9) Yes.

10) Yes.

11) Yes, but the “consultation with the industry” should not be a whitewash exercise conducted by the farming lobby..

12) Yes, provided there are financial sanctions to fall back upon.

13) No further comment.

14,15 &16) Voluntary or optional approaches will be inadequate, as will self-auditing. Education and help are the right initial approach but these need to be backed by financial sanctions for persistent “offenders” or they will not work. Achieving the objectives by means of payments would be unfair to the taxpayer. Most of us expect to be admonished, fined or imprisoned when we behave in an antisocial manner. Why should farmers be paid **not** to act in antisocial ways ?

17) In some respects, yes: but some of the problems arising from forestry are different and some may not be reversible.

B) Comments on a specific issue.

In Wigtownshire a substantial minority of farmers overwinters beef cattle in the fields, usually at sites some distance from the silage stores. This results in a lot of mud, together with some silage residues, urine and dung being spread on the public roads on a daily basis. This raises three issues.

a) Public nuisance and cost to other road users. These deposits on public roads can cause accidents, especially in frosty weather. They also add to the motoring costs of the local public in terms of increased frequency of the need to wash vehicles and increased rates of vehicle deterioration through corrosion.

b) In the eyes of some, there is an animal welfare issue consequent upon cattle being kept out in the fields in all weathers, often standing up to their knees in muddy water. I am not qualified to comment on this matter.

c) Items a & b above get farmers a bad name with regard to their lack of sense of responsibility to the public (who give them their subsidies !) and, possibly, lack of consideration for their stock. A more important issue, however is the fact that, during rainy weather, much of this accumulated material finds its way into watercourses where it can cause damage to the aquatic environment (including fish stocks) through siltation and increased oxygen demand. (Please see Appendix 1 for title page and part of a relevant page from my recent book).

This topic has led to appreciable correspondence in the local newspaper (Galloway Gazette) in recent years but not to any improvement in the situation. I understand that it is within the powers of the Police to “ speak” to the relevant farmers and, if necessary, to get the Local Authority to clean up the roads at the expense of the perpetrators. I also understand that it is within the powers of the Local Authority to take similar action on its own initiative. I understand that this is, in fact, the practice in most other parts of the United Kingdom and comparison of the state of our local roads with those outwith Dumfries and Galloway certainly suggests that this is the case! Despite appreciable concern about this amongst the general public in the area, the problem continues. I had hoped that the reform of the CAP might give some impetus towards improvement but there is no evidence of this so far. Most people consider this problem to be simply one of nuisance but it is, I believe, also an important environmental issue and in the absence of local solutions it should be taken very seriously by the Scottish Executive.