

## **Brecon and Radnor Branch of the Campaign for the Protection of Rural Wales 2/11/2020**

Please would the CCERA committee members promote decisive action to halt further development of the intensive poultry industry in Powys and take preventative and restorative action for the ongoing environmental harm caused.

Wales Environment Link, the consortium of national environmental, countryside and heritage NGOs has called for a Moratorium on intensive Poultry farming in Powys<sup>i</sup> and this letter supplements that call with some general considerations and local information.

### **1. Climate change, pandemics, global responsibility and future food policy**

The IPCC report ‘**Climate change and land**’<sup>ii</sup> (August 2019) recommends, among its conclusions, that wealthier countries reduce emissions by supporting an overall reduction in meat consumption, accompanied by a focus on the sustainability of remaining meat production, with resulting benefits for climate, environment and human health. The report also expresses concern over accelerating rates of deforestation associated with the release of land for agriculture. Intensive livestock production is implicated, given its huge demands for land to grow feed crops, including soya. In this way the Welsh poultry industry offshores substantial environmental harm to poorer parts of the world and is also reliant on heavy fossil fuel use for the production, import and delivery to remote farms of poultry feeds.

The rising human demand for meat protein and consequent intensification of production is recognised in the United Nations report ‘**Preventing the Next Pandemic: Zoonotic diseases and how to break the chain of transmission**’ (July 2020)<sup>iii</sup> as one of the seven human-mediated factors driving the increasingly rapid emergence of zoonotic disease. As Dr Michael Greger, author of ‘How to survive a pandemic’ succinctly puts it ‘If you actually want to create global pandemics, then build factory farms.’ **The Intergovernmental Platform on Biodiversity and Ecosystem Services Pandemics Workshop Report** just issued on 29/10/20<sup>iv</sup> addresses also these issues.

At the same time the health consequences of closely confining animals drives up antibiotic use, raising the risk of anti-microbial resistance. The additional health costs of the typical meat-heavy, processed ‘Western’ diet include rising rates of obesity and chronic disease. The urgent necessity for UK policy makers to support genuinely sustainable food production and enable all citizens to access healthy foods are key messages of the recent **National Food Strategy Part One** report (July 2020).<sup>v</sup>

### **2. Welsh intensive poultry and pig livestock rearing units (ILUs) are disproportionately concentrated in Powys.**

We estimate that 80% of the intensively reared chickens in Wales, are in Powys Local Planning Authority Area (3,856km). Although total numbers are less extreme, over 60% of the intensively reared pigs for fattening in Wales are also in Powys LPA area. Powys hills and valleys form the headwater catchment of the Wye and Severn rivers. The planning area excludes the Brecon Beacons National Park and is just under one fifth of Wales.

Only roughly 1/4 of the chicken units are over the 40,000-bird threshold (mainly the larger broiler units as opposed to free-range egg units) for NRW regulation through the Environmental Permitting system. None of the pig units are regulated, the largest being 1998 pigs (threshold: 2,000). We recognise that unregulated intensive cattle farming is also a problem which affects other parts of Wales more than Powys.

#### **Poultry: June 2019 Statistics for Wales say**

*“The total poultry in Wales was 8,489,800 in June 2019 – the majority of these were table chicken or broilers (4.9 million) and chicken kept for eggs (2.3 million birds).”* Therefore **7.2 million** can be assumed to be chickens.

Our figures derived from planning applications approvals in Powys (deducting any units we know not to be operating) suggest there are approximately **10 million** chickens in Powys.

A series of FOIs to Welsh LPAs revealed that between 1/4/2017 and 1/4/2020 Powys received 96 applications for intensive poultry units and all the rest of Wales received 20 in total, one of which was withdrawn. Powys received 5 times the number of applications as the rest of Wales put together.

#### **Pigs: June 2019 Statistics for Wales say:**

*‘There was a 5.3 per cent increase in the number of pigs in Wales in June 2019. The current total is 24,400. The majority (87 per cent) of these animals are kept for fattening (meat production) with the remainder used for breeding.’* Therefore **21,200** pigs are for fattening.

Our figures show applications for pig fattening units for just under **7,000** pigs. There are also another 6 units representing just under **6,000** pigs where we know intensively reared pigs have been installed, **although this use was concealed in the application** thus avoiding any environmental planning scrutiny by NRW. Applications are typically for multiples of 999 pigs. The true figures are likely to be very much higher therefore it is likely that well over 60% of pigs for fattening in Wales are in Powys, interspersed with the poultry units which adds to the huge negative environmental impact of intensive poultry farming.

### **3. Impact on rivers: intensive livestock units (ILUs)**

ILUs introduce nitrates and phosphates which cause eutrophication and so impoverishment of freshwater ecosystems. Diffuse pollution from agricultural sources can account for over 60% of river phosphates.<sup>vi</sup> ILU operation potentially causes contamination with other pollutants/poisons such as pesticides, veterinary medicines, cleaning products, heavy metals etc. Manure comes from intensive rearing sheds and “free-range” egg-layer ranges and is mostly spread on adjacent land although a small proportion goes to anaerobic digesters, yielding digestate that is also spread on land. Manure/slurry enters watercourses via surface run-off or hydrological pathways from storage or dirty water leaks. Manure Management Plans, are provided for planning purposes. These use a spreading allowance of 250kg/Nitrogen/Ha/Yr., approximately 150% of the allowance in a nitrogen vulnerable zone. NVZs are absent in Powys and cover less than 3% of Wales compared with 55% of England.<sup>vii</sup> The plans rely on the voluntary Code of Good Agricultural Practice (CoGAP).

The state of the river Wye in 2020 has prompted questions about the proliferation of intensive livestock farming in Powys and the reliability of NRW river monitoring for phosphate and nitrate concentrations.<sup>viii</sup> NRW has initiated a review and recently confirmed that widespread failure of SAC rivers throughout Wales against the phosphate targets is predicted. NRW says it is likely to advise that all phosphate producing development within failing SAC catchments will have to demonstrate neutrality or improvement of phosphate levels. Also, exploratory visits by NRW to Powys poultry units have revealed a “general issue” of Manure Management Plans and other protective measures not being followed. (statement to multi-agency, cross-border Wye Nutrient Management Plan Board on 30/9/20)<sup>ix</sup>

### **4. Impacts on other Habitats/Biodiversity**

Ammonia emissions and nitrogen deposition from air-borne ammonia continue to rise due to agricultural sources. These are reducing plant biodiversity throughout Wales and will inevitably lead to further extinctions, not only of plants but of whole ecosystems depending on habitat preservation. Ammonia emissions also contribute to the human health impacts of traffic pollution. Pollution from ILUs is largely regulated at the planning stage by NRW guidance which sets allowed thresholds for internationally designated nature sites, SSSIs and Ancient Woodland. The impacts are modelled using geographical grids derived from only 5 recording sites in Wales (APIS)<sup>x</sup>. Complex industry soft-ware, not available to the public or decision-makers, uses this coarse data to provide deceptively fine predictions which are never questioned. The allowances for Ancient Woodland permit any new unit to contribute ammonia or deposited nitrogen sufficient to eradicate populations of lower plants, with no reference to the background level which is often already above the risk threshold. The modelling is not applied to any other sites, habitats or local nature reserves. It only considers sheds and chicken ranges and not the emissions from manure/slurry which significantly increase the impacts.<sup>xi</sup>

### **4. Legislation and Regulation**

The Welsh Government is understandably proud of its “ground-breaking” legislation in the Environment (Wales) Act and its link to the Resilient Wales Goal in the Well-Being of Future Generations Act. This legislation should have prevented the environmental catastrophe which we are facing in Powys but it has not. The SMNR duties required of NRW and the Section 6 duties required of public authorities have not been met. The Chief Planner has written to LPA Planning Heads about achieving a net increase in biodiversity and considering cumulative impacts but this advice has been consistently evaded. Potential harm to biodiversity outside SACs and SSSIs is simply ignored. Cumulative impacts are not considered properly. Mitigation in the form of manure export to anaerobic digesters and minimal tree planting is readily accepted without any evidence or understanding of the impacts.

Just this month, after a summer of publicity about the destruction of Wye ecosystems from algal blooms and days after the Powys Head of Planning was present for NRW’s statement about failing Special Areas of Conservation, Powys approved an IPU with manure spreading on riparian fields of the Wye SAC, the 13th approval in the past 5 months.<sup>xii</sup>

The Welsh Government has been advised about the impacts of the concentration of intensive livestock farming in Powys and has failed to come up with the promised Water Pollution Regulations or a promised Technical Advice Note addressing the issue. A huge amount of damage has already been done and continues to occur, all needing to be remedied. The Welsh Government champions a “vibrant industry” and “Welsh Brand” of farming produce ignoring the fact that this is a globally irresponsible, unsustainable farming practice whose direct harmful environmental impacts are outsourced to Powys by large international companies with English headquarters.

The First Minister made biodiversity and environmental growth a top priority for his delivery over the remainder of this Assembly term, declaring a climate emergency in April 2019. We also note that the WG **Nature Recovery Action Plan** published on 15/10/20 has a Governance theme including “Implementation and evaluation of the section 6 duty across the public sector”.<sup>xiii</sup> Urgent action is needed to support these welcome aspirations.

**We ask CCERA to consider the future of our natural species, air, water and soils upon which future generations will depend and to use its influence to support the urgent WEL call for moratorium on intensive poultry farming in Powys.**

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- i WEL call for a moratorium on intensive poultry units in Powys:  
<https://www.waleslink.org/publications/position-statements>
  - ii IPCC report: Climate Change and Land 2019:  
[https://www.ipcc.ch/site/assets/uploads/2019/08/4.-SPM\\_Approved\\_Microsite\\_FINAL.pdf](https://www.ipcc.ch/site/assets/uploads/2019/08/4.-SPM_Approved_Microsite_FINAL.pdf)
  - iii United Nations Report: Preventing the Next Pandemic 2020:  
<https://www.unep.org/resources/report/preventing-future-zoonotic-disease-outbreaks-protecting-environment-animals-and>
  - iv IPBES Workshop Report on Biodiversity and Pandemics:  
[https://ipbes.net/sites/default/files/2020-10/20201028\\_IPBES\\_Pandemics\\_Workshop\\_Report\\_Plain\\_Text\\_Final\\_0.pdf](https://ipbes.net/sites/default/files/2020-10/20201028_IPBES_Pandemics_Workshop_Report_Plain_Text_Final_0.pdf)
  - v UK National Food Strategy Report: Part 1:  
<https://www.nationalfoodstrategy.org/wp-content/uploads/2020/07/NFS-Part-One-SP-CP.pdf>
  - vi Catchment maps and apportionment with reasonable worst case P predictions: Evidence Review Environment Agency / Natural England: Phosphate in the Wye/Lugg SAC Catchment: Paper for Wye Nutrient Management Plan Board Meeting 9/7/20
  - vii Natural Resources Wales Information about Nitrogen Vulnerable Zones:  
<https://naturalresources.wales/about-us/what-we-do/water/nitrate-vulnerable-zones/?lang=en>
  - viii Daily Mail 26/6/2020 article on algal blooms in Wye:  
<https://www.dailymail.co.uk/debate/article-8464853/Conservationists-claim-Britains-hunger-free-range-eggs-turned-river-putrid-swamp.html>
  - ix Wye and Usk Foundation report on NRW position statement 30/10/20:  
<https://www.wyeuskfoundation.org/news/new-stance-on-phosphate-offers-hope-for-the-wye>
  - x see discussion in Natural Resources Wales Report on Lichen surveys 2019:  
<https://cdn.naturalresources.wales/media/689206/nrw-evidence-report-no-298-lichen-surveys-to-investigate-ammonia-impacts.pdf>
  - xi Natural Resources Wales. Guidance Note GN 20 on assessing impact of ammonia and nitrogen:  
<https://cdn.naturalresources.wales/media/684017/guidance-note-20-assessing-the-impact-of-ammonia-and-nitrogen-on-designated-sites-from-new-and-expanding-intensive-livestock-units.pdf>
  - xii Powys web-site for 19/0229/FUL | Erection of a poultry rearing unit including silos and all associated works:  
<https://pa.powys.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PMLT99MPITY00>
  - xiii Welsh Government Nature Recovery Action Plan:  
<https://gov.wales/sites/default/files/publications/2020-10/nature-recovery-action-plan-wales-2020-2021.pdf>