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Dear Sir or Madam

PLANNING FOR THE THIRD CYCLE RIVER BASIN PLAN 2021-2027. CONSULTATION ON SIGNIFICANT WATER MANAGEMENT ISSUES

Thank you for the opportunity to comment on the above consultation. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,500 farming families from all sectors across all of NI.

In previous consultations on the Significant Water Management Issues, there were separate consultations for each of the River Basin Districts allowing regional issues to be identified and plans drawn up specific for those areas. DAERA appear to be moving towards a high-level broad-brush strategy which in our view goes against the principals of the Water Framework Directive and the need to look at issues at a local level and catchment scale. In addition, the WFD National Stakeholder Forum which used to meet at least biannually has not met since May 2019 which is disappointing given public participation requirement of the WFD.

Please find attached the UFU's full response to this consultation document.

I trust that you will fully consider the points highlighted in this response. If you wish to discuss further, please do not hesitate to contact me.

Yours faithfully

AILEEN LAWSON
Senior Policy Officer

ULSTER FARMERS' UNION RESPONSE TO THE CONSULTATION ON SIGNIFICANT WATER MANAGEMENT ISSUES

CHAPTER 3: SIGNIFICANT WATER MANAGEMENT ISSUES

3.1 Diffuse pollution from Agriculture

What are we currently doing to protect water bodies?

The Ulster Farmers' Union believe that there is sufficient legislation in place to address water quality issues in NI and water quality will take time to improve. Farmers are taking action to improve water quality and the UFU accepts that farmers have an environmental responsibility but there must be a balance between improving the environment and keeping farm families on the land. Agriculture is a major land user, responsible for around 80% of Northern Ireland and is dependent on the environment to produce quality local food and other public goods. Water is an essential part of farming. All farmers require access to clean water to support their farming systems therefore it is in every farmers interest to deliver improvements to water quality.

Farmers across NI have in recent decades have made significant gains in improving water quality. Across NI, the long-term trends show stable or decreasing trends in nitrates and phosphates in surface waters¹. Yet we recognise that meeting Water Framework Directive targets remain challenging. The UFU accepts that agriculture run-off has an impact on water quality but there is also a legacy of phosphorus in both soils and water bodies that is likely to continue to have an impact for many decades.

Whilst the consultation document highlights areas of concern, it fails to recognise the progress that has been made over the years by the agricultural sector. For example, the level of sales of nitrogen and phosphate-based fertilisers in 2009 were at their lowest since 1975 and 1938 respectively. Overall, compliance with Nitrates Action Programme measures, identified by NIEA at on farm cross compliance inspections, has been generally good during the previous NAP. It also should be noted that:

- From 1995 to 2017 P fertiliser use has declined by 9.9 kg Pha-1
- P efficiency has increased from 26% in 1995 to 42% in 2017
- From 1995 to 2017 the P balance has declined by 7 kg/ha

The document outlines many of the existing measures in place to control pollution from agriculture but the following additional points should be added to this list of current action.

Farmers in Northern Ireland have embraced agri-environment schemes over the years. Between 2007-2013 the Agri-environment Programme supported on average 11,699 farm holdings and 433,263 hectares (around 43% of agricultural land in Northern Ireland) with many of these farmers putting in

¹ The proposed Nitrates Action Programme (NAP) 2019-2022: Stakeholder Engagement Paper. February 2019.

place measures to protect and maintain the water environment. Many of these farmers would have liked to continue in agri-environment agreements however, delays to the launch of the Environmental Farming Scheme (EFS) and limits on participants due to resource issues have resulted in a gap between the expiry of NI Countryside Management Scheme agreements and new EFS agreements being put in and therefore lower numbers being involved in recent years. However, there are almost 5000 farmers from across NI currently participating in the Environmental Farming Scheme in Northern Ireland with a further 966 applicants to EFS Higher and further applications are expected to EFS Wider later this year. Agri-Environment schemes have included options to protect water bodies etc and farmers have implemented many of in these including watercourse stabilisation and the provision of buffer strips. As EFS tranche 4 progresses there will be further agreements issued to farmers again increasing participation in this scheme which will offer further enhancement of the local environment. It is disappointing that the 'watercourse stabilisation' measure within the Environment Farming Scheme has now been removed from the scheme despite significant interest and investment from farmers in fencing off watercourses to protect waterways.

Farmers are also inspected against environmental standards, including water quality measures, through the various Farm Quality Assurance Schemes. There are 11,500 members of the Beef and Lamb FQAS, and 8700 inspections take place annually with an inspection cycle of 18 months. In addition to checking the yards, silos and tanks, farmers are also required to provide soil testing records if chemical phosphorus is used. There are similar requirements for other sectors. There are around 2500 dairy farms operating under Red Tractor and almost all pig and poultry farms are quality assured. There is also a scheme for cereals. Some retailers may impose additional standards on farms who supply their market and some of the dairy co-operatives have introduced initiatives to deliver further environmental enhancement including a focus on nutrient management.

Farmers across NI are participating in the Voluntary Initiative (VI) for plant protection products (PPPs). Major targets agreed with Government to minimise the environmental impact of PPPs were met in the first 6 years of the VI in the UK and progress continues to be made. The VI has been extremely successful at getting farmers, advisers, and spray operators to ensure such products are used responsibly. Through the VI farmers are working to best practice to protect biodiversity and water quality by for example;

- ❖ using PPPs only when necessary,
- ❖ understanding more about the PPPs used on farm,
- ❖ filling sprayers in areas where the risk to water bodies is minimal
- ❖ Maintaining sprayers properly; stopping leaks and drips.
- ❖ When spraying farmers keep away from watercourses and use buffer strips to prevent drift.

The Plant Protection Products (Sustainable Use) Regulations 2012 require that farmers must undertake an assessment and obtain an approved certificate of competence if they are applying professional pesticides. This requires farmers to undertake training in PPPs application which includes a focus on protection of the environment including waterways. Another requirement for is the testing of application equipment, this will ensure more accurate applications and therefore further protect the environment.

While the consultation document outlines several current projects such as Catchment CARE and Source to Tap, farmers have actively participated in other projects such as those on the Blackwater and Ballinderry Rivers. The training and best practice elements introduced and promoted with some of these past projects is largely still followed by landowners in these catchments. There are other examples of farmers and anglers working together in local areas and with Rivers Trusts to tackle water quality issues and work being undertaken with other eNGOs. Individual on-farm initiatives are also enhancing knowledge and improving the water environment e.g. biofiltration with willows, trees planted alongside waterways as buffer strips and renewable energy projects. However, it is imperative that NIEA and others work with farmers to allow such innovative initiatives to be trialled and introduced in a timely manner.

Codes of Good Agricultural Practice for the Prevention of Pollution of Water, Air and Soil have been available to all farmers advising of good practice on farms however these now need updated.

Significant investments have been made on NI farms over the years to improve water quality. Some examples of this investment are outlined below (this does not include the significant additional investment made by individual farmers without Government support which is very difficult to quantify).

- Total Investment in slurry tanks etc from the Farm Nutrient Management Scheme (FNMS) (from 2008) was over £200million.
- 307 Low Emission Slurry Spreading equipment was funded over 3 Tranches of the Manure Efficient Technology Scheme (METS) representing a total investment of over £7 million.
- Over half of all EFS Tranche 1 Wider Level Agreements (55%) are doing water quality options. Some 490kms of watercourses will be protected. This was increased further in Tranche 2 and 3.
- The recent Farm Business Investment (FBIS) capital grant scheme has supported environmental schemes on farm as follows
 - FBIS Tier 1 Tranche 1 - £1.861 million towards equipment with environmental benefits
 - FBIS Tier 1 Tranche 2
 - *62 low emissions slurry spreading equipment worth £524,000 grant aid*
 - *77 advanced fertiliser sowers worth £418,000 grant aid*
 - *95 slurry scraping systems £645,000 grant aid*
 - *98 umbilical hoses £750,000 grant aid*
 - FBIS Tier 2 Tranche 1 - £230,000 funding issued to support environmental and efficiency equipment.

Around 3000 farmers are participating in Business Development Groups (BDGs). These groups undertake some environmental training and will be moving towards carrying out environmental benchmarking.

IPPC farmers are permitted and are inspected on average annually. The inspection frequency can be increased if non-compliances are noted. Nutrient management and protection of on-farm waterways are a key aspect of this regime and these farmers have more onerous requirements to meet than those operating under the NAP.

Do you think that these measures will be enough to address pollution from agriculture?

As outlined above and in the consultation document, farmers are highly regulated through various pieces of legislation in terms of water protection. The UFU believes there is sufficient regulation in place to currently address agriculture and the water environment. In addition to legislation, under the cross-compliance aspect of the Basic Payment Scheme all farmers are required to respect various environmental Statutory Management Requirements set down in European Legislation and follow the measures to maintain the land in Good Agricultural and Environmental Condition (GAEC). These generally focus on water quality.

What additional measures would you like to see happening?

It is imperative that any future agri-environmental scheme remains simple and attractive to farmers both financially and practically to ensure that farmers will join, take up the various measures and continue to maintain, protect, and enhance the water environment. It is vital that measures to protect waterways form a key part of future schemes.

The UFU believe that the existing level of penalties applied for cross compliance breaches is completely disproportionate to the breaches from which they arose. This often results in severe penalties being applied to farmers for very minor breaches and even when no water quality issues are detected. While the UFU recognise that the penalty mechanism was largely determined by the EC, there are now opportunities for DAERA and NIEA to revise the current penalty system to make it fairer and more transparent for local farmers. It is also unfair that farmers are often penalised twice for water pollution related issues through area payment penalties and through the Courts. The UFU do not believe this is appropriate. The UFU are concerned that farmers are easy targets for environmental inspectors and through the cross-compliance system. This system also means that penalties are likely to be substantial compared to those imposed by the courts on other offenders. The UFU believes that Figure 1 summarises how regulators should work with farmers. Almost all farmers want to be compliant to avoid hefty fines and penalties and it is vital that NIEA use this model and work with stakeholders to deliver compliance and more 'champions'. The CAFRE KAS should be given more opportunities to work with farmers in key catchments.

Compliance and engagement spectrum



Figure 1: Compliance and engagement spectrum (Source: NFUS)

The UFU believe that there is considerable scope for a more partnership working to dealing with diffuse pollution from farms. There are good examples of this working in practice across GB and in the Republic of Ireland with the Scottish Environmental Protection Agency (SEPA) previously taking the lead in this way of working. The UFU would like NIEA to seriously consider how they can better address diffuse agricultural pollution and work alongside farmers rather than against them to achieve water quality targets. Prosecution and penalties do nothing for the water quality and the UFU believe that if NIEA co-operated and worked with farmers in problem areas this would be more beneficial to the water environment. The Ballinderry Rivers Trust has an excellent example of this working in practice where they were able to identify issues on farms to ensure penalties were avoided and the water quality was improved. The UFU had proposed this type of approach and this was included as part of the NIEA/UFU MOU but has since fallen by the wayside and should be revisited.

In 2018, DAERA and NIEA operated a pilot scheme where DAERA staff conducted Farm Environmental Audits, the UFU actively supported this approach. This was a positive proactive approach allowing farmers to volunteer for a farm audit dealing with environmental issues in farmyards. This was focused on priority catchments and raised awareness of problems in farmyards that need to be addressed with those farmers that didn't participate. This type of work must be progressed with further roll out to more farmers. The new CAFRE Environment Advisers could also be utilised in this respect. Now that the UK has left Europe there are opportunities to progress this further without the fear of EC audits. This would also allow inspections to be focused on those who are less willing to engage and higher risk areas.

The Sustainable Agricultural Land Management Strategy has also outlined a series of recommendations to improve productivity on farms while addressing water quality issues including a catchment approach. The soils project across NI and then further targeted at specific catchment pilots has been proven to be successful and roll out of the soil testing, analysis, and training alongside LIDAR

mapping across NI is essential. LIDAR is a key part of this project to detect the flow pathways and identifying high risk areas so that a more targeted approach can be taken.

It is clear that catchment specific approaches working with farmers in an area are the best way of improving waterbodies as opposed to high level regulation and bureaucratic rules. However, this must be properly resourced with a long-term plan put in place to ensure that specific water quality issues are addressed at a local level. Having the right facilitators to carry out such work is vital to achieve results.

Training, guidance and awareness raising needs to continue across the agricultural sector in conjunction with other Departments and organisations to ensure farmers are aware of the issues and their requirements. The UFU are committed to communicating information and key water quality messages to members through the NIEA/UFU Memorandum of Understanding.

How can we support the farming sector to excel at innovative solutions which benefit both productivity and the environment? What should these solutions look like?

Catchment research projects through AFBI and partners must be continued to help address water quality issues. The monitoring of waterways must also be improved to give more accurate real time measurements to help further identify and focus on problem areas. This was recommended in the SALMS and should be progressed.

Agricultural land could be used to help address flooding in urban areas - tree planting, erosion control and wetland restoration on agricultural land can help to slow the flow of water upstream and therefore reduce potential flooding further downstream. This should only be carried out where the landowners are in full agreement with the authorities and sufficient financial compensation is paid to farmers for the agricultural land taken out of production.

Funding should be set aside for innovative pilot projects to improve water quality and environmental issues. In addition, NIEA must stop the risk adverse approach to new innovative solutions that are proposed by local farmers and others. There needs to be more proactive working arrangements put in place to encourage farmers and others to come up with innovative solutions and in addition to funding, support should also be given to help with the planning and implementation of such projects. The current processes appear to stifle innovation and investment on farms and a different approach is needed.

Other comments

UFU do not condone farmers who deliberately pollute waterways. Statistical reporting of agricultural pollution should reflect the degree and the size of the incident and the risk to waterways e.g. many small pollution spills from agriculture may not cause the same damage as a leak from an industrial facility yet statistically reflect the agriculture sector as being a major problem.

3.2 Urban Development

UFU welcome the investment to date in the sewerage infrastructure however, investment in sewage treatment works must continue to ensure water quality targets under the Water Framework Directive are met. NI Water should install treatment works in areas where there is currently no treatment taking place; it is unacceptable that raw sewage is being discharged into watercourses/sea.

Planners continue to permit housing development in areas despite there being a lack of infrastructure for sewage treatment - this must be addressed, and planners must fully consider the capacity of the local sewage works before granting planning permission. Planners and NI Water must work together to ensure that there are adequate wastewater treatment works for the growing population demands.

Where there are failures to comply with water quality standards, NI Water should be adequately penalised for polluting the water environment as would happen with other industries.

The UFU are also opposed to the use of combined systems carrying both foul and storm water which NIEA permit to discharge raw sewage under emergency conditions. This is unacceptable given that farmers and industry would be fined for releasing pollutants into watercourses in similar situations. Investment should be made in treatment works and storage systems to ensure that emergency overflows are not necessary, discharge consents for emergency situations should be revoked and NI Water fined if such a situation occurs as with other industries. A specific incident of this nature in the Neagh Bann River Basin District at Ballinacor works several years ago resulted in the discharge of raw sewage to the Closet River which flooded and spilled over onto farmland. This resulted in losses for the farmers concerned as this land could not be used for grazing due to the level of contamination and took several years and countless meetings and correspondence to deal with this issue. This practice is totally unacceptable and should be stopped and until such times, protocols must be developed to tackle the clean-up operation when such discharges occur.

3.2.4 Domestic Discharges / Septic Tanks

Rural diffuse pollution must not solely be attributed to farmers as research shows that septic tanks have a significant impact on water quality in rural areas. Past research on tributaries of the River Blackwater has clearly indicated that septic tanks are a significant problem at particular times of the day/year. Inefficient septic tanks can and are polluting rivers/stream/sheughs running through farmland which livestock are drinking from.

It is unacceptable that NIEA consider individual domestic discharges to be low risk and that NIEA are still unable to properly address the septic tanks issue. Poorly maintained septic tanks must be addressed and householders must be educated about their septic tank and the importance of ensuring that it is working properly. Many are not aware of their responsibility to ensure that this is working effectively and the need to de-sludge tanks. The public should also be educated into the use of household detergents and the potential negative impact these can have on the workings of a septic tank.

What additional measures would you like to see happening?

The UFU have a number of examples where members have raised complaints with NIEA regarding domestic septic tanks from neighbouring dwellings not working and discharging onto land and into waterways. The UFU has found that NIEA generally fail to investigate or respond to these concerns and appear to have a lack of interest in discussing compliance with the offending householders. This is an issue of concern for farmers who are regularly inspected and gives rise to double standards. NIEA must adequately address farmers' concerns around septic tanks and actively work with landowners and septic tank owners to resolve pollution and land contamination issues.

The UFU believes that NIEA should run an awareness raising campaign to make homeowners aware of their responsibilities, the service available from NI Water to empty septic tanks and how to maintain a septic tank. There is a genuine complete lack of awareness and this needs to be tackled. NIEA should start this task immediately and allocate appropriate resources to an education/awareness campaign. Given that the majority of farmers are likely to have a septic tank, the UFU has offered on a number of occasions to work with NIEA on such a campaign along with other stakeholders however, there has been a clear lack of engagement or will on the part of NIEA over the years to progress this.

Further research should be carried out on the availability of suitable effective septic tanks. There are concerns that the septic tanks currently installed in new houses are failing to adequately treat wastewater. The UFU would suggest that once a suitable effective septic tank is made available that Government should financially assist domestic households in upgrading their tanks.

NI Water needs to review their policy on de-sludging rural septic tanks where access is difficult. Currently if there is not lane or road access to a septic tank, NI Water will not provide a de-sludging service which is unacceptable.

Town sewers should be maintained to ensure that there is no sediment build up which could further impact on the ability to hold water and sewage. The UFU is concerned that continued development may lead to increased flooding incidents due to an increase in the number of hard surfaces resulting in increased flowrates in urban areas and a lack of infrastructure to cope with heavy rainfall incidents. Agricultural land could also be affected further downstream as the flow of water is increased resulting in flooding of land destroying crops etc.

The Ulster Farmers' Union policy on water charging is that meters should be introduced to all households to ensure more efficient use of drinking water. Farmers already pay for water and understand the requirement for efficient usage to avoid hefty bills. Users will only use water wisely in the knowledge that they will pay more for it if they use more. It will be virtually impossible to manage water resources effectively if we have no means of measuring its use, and the efficiency of the system. This would also help provide additional funds for NI Water to invest in the water and sewage network.

3.4 Abstraction & the physical condition of the water environment

In relation to the physical condition of the water environment, the consultation document does not mention that under cross-compliance, farmers may not remove ditches and sheughs without prior permission from DAERA. Farmers are encouraged to carry out watercourse maintenance on farms although it is only recommended that 'sheugh cleaning' is carried out during the autumn to late winter and only vegetation and silt should be removed. Deeping and widening of sheughs should be avoided and farmers are encouraged to leave vegetation untouched along one side as this is an important area for wildlife and biodiversity. The UFU previously welcomed the publication of the 'River Alterations' booklet now the 'Surface Water Alterations' booklet which contains clear information regarding all the rules and regulation around controls on watercourses and best practice advice. This useful resource should be regularly updated and promoted to landowners and other water users.

Given the amount of flooding in recent years, the UFU have concerns around River's Agency's handling of river cleaning operations, with many rivers being cleared only every six years. The method of clearing the rivers- using the claw of the digger rather than the bucket is also of concern, as is the irrational timing of river clearances which often results in farmer's crops being damaged. The UFU believes that much of the work done only serves to create bottlenecks in water courses which increase, rather than decrease, the risk of flooding. River's Agency should be looking into relieving these bottlenecks. A fairer balance needs to be struck in the sustainable management of rivers. This is particularly an issue in the Limavady area.

While it is estimated that around 2000 farmers currently abstract water, they do not abstract significant amounts and are therefore not seen as a significant threat to groundwater. Farm abstractions are covered by the Abstraction and Impoundment (Licensing) Regulations NI 2006 and abstraction for irrigation is part of the cross-compliance regime.

The UFU believes that more work could be done on educating all sectors and especially the public on using water more efficiently at all times not just in times of water shortage. Further incentives should be provided to encourage rainwater harvesting and other methods to conserve water. NI Water must also be seen to be working more efficiently to reduce leakage in their own network and therefore set an example in efficient use of water in Northern Ireland. The UFU would be supportive of working collaboratively on such messaging.

3.5 Forestry

The UFU believes that all sectors must play their role in contributing to enhanced water quality. The application of nutrients to forests needs to be better controlled in line with regulations placed on agricultural land. Sediment loss to waterways following deforestation also needs to be managed better in many locations.

As DAERA promotes more forestry plantations across NI, it is important that afforestation is carried out in the right places to avoid detrimental impacts to waterbodies. DAERA must be able to provide clear advice on suitable planting areas and on the protection of waterways to those interested in afforestation.

The UFU is concerned about the spread of invasive species from forests to adjacent agricultural land which could also impact on waterways. The Union is particularly concerned about the spread of conifers from forestry plantations. We believe that wild conifers are having an adverse impact on the natural landscape; that wild conifers are a threat to biodiversity; that wild conifers are a wildfire risk; that there is considerable cost involved in the removal/control of wild conifers.

The UFU believes that forest owners have a duty of care to the environment and need to take responsibility for wild conifers that are spreading. Additionally, in situations where wild conifers are already established new enforcement measures should be introduced which ensure that forest keepers control and remove wild conifers; or that neighbouring landowners be compensated for the control and/or damage to their property.

3.6 Chemicals

The majority of users of dangerous substances are aware of their responsibilities under the current legislation.

In relation to agriculture the use of sheep dip is regulated under the Groundwater Regulations which state that farmers must have a Groundwater Authorisation to dispose of spent sheep dip. The number of farmers dipping sheep is declining due to the use of 'pore-on' alternatives. Groundwater authorisations also apply to the disposal of spent pesticides. These regulations are also part of the cross-compliance regime and are checked in Farm Quality Assurance Schemes.

Disappointingly the consultation document does not refer to the Voluntary Initiative and the Plant Protection Products (Sustainable Use) Regulations 2012. As outlined above, the UFU is involved in the Voluntary Initiative (VI) (a UK wide scheme along with National Farmers Union (England, Scotland and Wales), agri-chemical companies, contractors, Government and environment groups). The VI encourages farmers to build on best practice when using pesticides with a focus on maintaining and improving biodiversity and water quality. This is another example of how farmers are positively engaging with other stakeholders to successfully address water quality issues without the need for strict legislation. There is a need for local Councils and the amenity sector to participate in VI and other pesticide schemes to ensure appropriate use and to minimise the risk to water bodies.

As outlined in the consultation document, the UFU is a member of the Water Catchment Partnership which is working to address plant protection product issues in waterways across NI. Since its inception in 2013 it has focused on tackling issues with grassland pesticides in specific catchments and in assisting the agricultural and amenity sectors in how they can help by following best practice when using pesticides. The Partnership has produced Northern Ireland specific resources including a leaflet focussing on grassland weed control and protecting the water environment. There has been a continued focus on the Derg catchment which is a major source of drinking water. The Partnership has been active in the area at agricultural shows and has visited individual farming businesses.

The 'Rush Solution without Pollution' weed wiping trial was a successful Water Catchment Partnership initiative within the Seagahan catchment in County Armagh. MCPA used for rush control

has resulted in exceedances of this active ingredient within watercourses in some areas of Northern Ireland. During 2017 and 2018 NI Water funded a weed wiping trial using Glyphosate instead of MCPA. Five hundred acres in this area of County Armagh were treated resulting in 320 litres less MCPA per year being applied and the MCPA detected in raw water is less than half of average levels for the previous 5 years within the treated catchment. A similar initiative was progressed in Finvoy, Co Antrim and this practice is also part of the Source to Tap Interreg Project. This is another excellent example of partnership working in catchment areas to address a specific issue can be successful and should be continued and rolled out further.

There needs to be better education of the public in the use and disposal of household detergents and chemicals including containers of these substances to ensure that potential pollution of waterways is minimised. The UFU would suggest a public information campaign is put in place with DAERA partnering with other stakeholders.

3.7 Non-Native Invasive alien species

Farmers are required to control invasive species under the cross-compliance system. There needs to be more advice and guidance around the identification and control methods permitted to tackle invasive species.

3.9 Additional Issues impacting the water environment

Farmers in the North Eastern River Basin District have expressed concern in the past about the erosion of the banks of the River Bann due to water skiing, boating etc and valuable farmland is being lost. Controls on the speed of boats on the river in vulnerable areas should be investigated, implemented and policed where necessary.

Farmers in the Neagh Bann River Basin District have serious concerns with the current operational water levels of Lough Neagh and the effect which this is having on their farming business. The UFU has raised concerns with the relevant Agencies about the amount of productive agricultural land lost due to flooding. This is also linked to the sedimentation at the mouth of the Upper Bann.

NIEA must continue to tackle the illegal waste issue as this poses a significant threat to the water environment particularly in rural areas.

The UFU has concerns about 'fly-tipping' in ditches, water courses etc and littering. This is a problem throughout Northern Ireland and needs to be tackled and not only leads to deterioration of water quality but can result in flooding if a waterway is blocked. The Union feels that local councils must take more responsibility in the clean-up of fly-tipping incidents. Local farmers are often penalised when someone else has dumped material on their land outside of their control and are left with the cost and responsibility of dealing with the waste and this is unfair. Many farmers with waterways through their land are also seeing a lot of litter in rivers and streams which has moved downstream. There are risks to livestock from litter and more needs to be done to make the public aware of this. Community groups

may be willing to help with clean up actions along roadsides etc. and more education is needed to prevent waste and litter ending up in waterways.

Food take-away outlets should be made more responsible for the disposal of packaging. It has been proposed by some that a packaging should be printed with customers vehicle licence plates of details to encourage the correct disposal or to fine those who continue to pollute local areas.

3.10 Emerging Issues

3.10.2 Antimicrobial Resistance (AMR):

The agricultural sector across the UK has been dealing with the issue of AMR for some time and has seen a decline in antibiotic usage on farms. In the UK, around 36% of antibiotics dispensed are for animal use and of that 36% only about 26% are used in food producing animals.² In the UK total antibiotic sales for animals has fallen from 448 tonnes of active ingredient in 2014 to 226 tonnes in 2018 (down 49%).³

The overall trend of estimated use in food producing animals over the same period has been a 53% reduction from 62.5 mg/kg to 29.5 mg/kg. Our use of Highest Priority Critical Important Antibiotics (HPCIAAs) has fallen by 68% since 2014 (0.67 mg/kg to 0.26 mg/kg). The Highest Priority Critically Important Antibiotics actually make a tiny amount of the overall use in food producing animals in the UK.

RUMA currently coordinates the agri-food industry action on AMR. The UFU is a member of RUMA and the Union subscribes and promotes their principle of responsible use – i.e. “as little as possible but as much as necessary” to maintain animal welfare. The RUMA targets task force is currently in the process of developing new targets for the UK industry for post 2020.

This downward trend in antibiotic usage should ultimately result in lower levels found in slurry with less detection in waterways of substances coming from an agricultural source. The UFU welcomes the continued monitoring of antibiotics in waterways and will continue to work on promoting responsible use of antibiotics in the agricultural sector.

3.10.3 Cypermethrin

If cypermethrin has been identified in certain catchments and an agricultural source is suspected, the UFU would urge DAERA and NIEA to take a partnership approach and work with the Union and other key stakeholders to address this issue at an early stage. The Water Catchment Partnership approach

² <https://www.gov.uk/government/publications/uk-one-health-report-antibiotic-use-and-antibiotic-resistance-in-animals-and-humans>

³ <https://www.gov.uk/government/publications/veterinary-antimicrobial-resistance-and-sales-surveillance-2018>

has been shown to be effective and this type of initiative should be progressed to tackle cypermethrin without delay if it is felt necessary.

3.10.4 Climate change

Farming is on the frontline of climate change impacts, being particularly vulnerable to extreme weather events. In recent years farmers have had to deal with severe weather events including snow, flooding, and drought with all of these having potential to impact on the water environment. Further research and advice will be needed to advise farmers on how to adapt to changing weather patterns whilst protecting waterways.

CHAPTER 4: WORKING TOGETHER

While the UFU recognises that NIEA has developed a number of initiatives to encourage partnership working, the Union does not believe that this has gone far enough particularly with working with the agriculture sector. The UFU believe that too much emphasis is put on the regulatory approach when dealing with water quality issues and that a more sustainable option would be to work with farmers and other sectors and partners to ensure better compliance.

There are excellent examples of partnership projects working on the ground in NI e.g. Ballinderry Trust and the Water Catchment Partnership. These have proven to be effective in tackling water quality issues and have delivered results.

While in more recent years, NIEA have started to recognise the benefits of partnership working, the UFU believe that NIEA must take a more serious approach to adopting these types of arrangements on a wider scale across NI. DAERA and NIEA need to realise that this is a cost-effective method of achieving targets on water quality by working with others and engaging business, landowners and the public to protect and enhance waterways.

APPENDIX 8:

The UFU notes in the general section that there is a commitment to investigate measures for sustainable agriculture and mutually beneficial outcomes. It is disappointing that the Sustainable Agricultural Land Management Strategy is not included under this heading as much of the focus of this strategy is on mutually beneficial outcomes.

The consultation document also discusses buffer strips and improved access to the countryside.

The UFU recognises that paths across farmland in Northern Ireland allow the public to benefit from the countryside. Many local landowners and farmers have signed up to allow walkers to enjoy the NI landscape. However, livestock worrying, litter, fly-tipping, disease risks, safety issues and particularly liability are all issues that farmers have concerns around when access to farmland is proposed. These problems have come further to light during the lockdown period as the public have accessed private land illegally across NI and caused many issues and problems for local landowners. Even in areas with agreed access on pathways, a small proportion of users cause significant problems for landowners.

Once access is agreed it is extremely difficult to regulate people therefore it is vital that proper planning is put in place.

Access to the considerable area of publicly owned land in rural areas should be fully exploited before pursuing access onto private land including these suggested buffer strips. Much of this public land is underused. The UFU is supportive of agreed and organised access to private farmland if local landowners are in full agreement and landowners are indemnified against litigation. Disappointingly the genuine concerns of local farmers are not been recognised on this issue in this consultation document and landowners/farmers are not even listed in the final bullet point in paragraph 50 amongst the organisations that need to work together on this issue. A key failure of the greenways programme has been the complete lack of engagement with landowners and farmers particularly at the early stages. If DAERA are seriously considering this aspect, then it is imperative that they engage with farmers and landowners before any further work is progressed on this issue.