

Thursday 3rd March 2022

Rt. Hon Rebecca Pow MP
Minister for Nature Recovery and the Domestic Environment
Department for Environment, Food and Rural Affairs
2 Marsham Street
London SW1P 4DF
CC: David Davies MP, Fay Jones MP, Jesse Norman MP, Bill Wiggin MP

Dear Minister Pow,

We are writing as local groups supportive of the '[Plan to Save the Wye](#)' published recently by [River Action](#), and further to Charles Watson's letter of 9th February and your recent visit to the Wye catchment.

We are glad that you had the opportunity to visit the area and to see first-hand the ecological devastation of this river, widely attributed to the vast expansion of intensive poultry production.

However, we are most disappointed that on your fact-finding visit you chose to meet primarily with government agencies and the farming community and their representatives, and not with representatives of the large number of local NGOs and citizen science groups that have been actively working towards resolving the pollution crisis of the Wye. These local groups on the ground in particular would have been able to give you an invaluable insight as to why current pollution mitigation activities do not go anywhere near far enough. We could have also used the opportunity to discuss the measures which we have outlined in the Plan to Save the Wye, which have now received widespread support.

While a growing number of farmers in the catchment are successfully implementing important measures to reduce nutrient run-off from their land, as you witnessed on your visit, unfortunately too many are not. The Wye Catchment has over 5,000 farmers registered with Basic Payment Subsidy, yet only approximately 10% of these are supporting the voluntary pollution mitigation measures that you witnessed. Furthermore, the diminished state of our environmental protection agencies due largely to severe budget cuts in the last decade means there is too little incentive for improvement when polluters know they are likely to go unpunished.

For these reasons, it is our view that voluntary farmer-based initiatives will never adequately resolve the river pollution crisis on the Wye. Instead, we call on you to support the immediate implementation of a new plan on a catchment-wide basis with the Environment Agency and Natural Resources Wales working in close collaboration. This must include:

1. A **planning moratorium on the construction of new (or expansion of existing) intensive livestock production units** (poultry, pigs and bovine), and on the construction of any new anaerobic digestors (ADs) unless their digestate outputs are nutrient-neutral.
2. A **requirement for all Intensive Poultry Units (IPUs) within the Wye catchment to have approved by the end of 2022 a Manure Management Plan (MMP)**, to be fully implemented by the end of 2023, whereby sufficient chicken litter, as assessed by independent scientists, is exported out of the catchment to UK locations with a phosphate deficit, to reduce the phosphate excess in both soils and rivers within the Wye catchment.
3. A **requirement for all free-range egg producing IPUs to have a Nutrient Runoff Mitigation Plan (NRMP) approved by the end of 2022**, to be implemented by the end of 2023, whereby

water courses are protected from nutrient run-off from chicken ranges by nature-based solutions.

4. **A significant reduction in 'number of bird' thresholds for IPU's coming within the permitting jurisdictions of the EA and NRW** to be implemented over the next five years on a progressive sliding scale, thus bringing medium and smaller sized IPU's within the scope of environmental regulations.
5. **A requirement for all watercourses within the Wye catchment to be protected by continuous river buffers of a minimum of 10 metres**, providing a nature-based separation zone between all agricultural activities and running water.
6. **The allocation of additional funding by the UK and Welsh Governments to the Environment Agency and Natural Resources Wales** to a) conduct inspections of all IPU's and AD's to ensure MMP's and NRMP's are approved and implemented, and b) conduct an annual audit to ensure they are adhering to the provisions of their respective MMP's and NRMP's.
7. **Any non-compliance to result in the closure of the IPU or AD in question** until compliance is demonstrated and reapproval obtained.

With some now estimating there are just a few years left before the Wye is irreversibly damaged, it is our firm belief that nothing less than the scale of action outlined above has any hope of preventing the destruction of this iconic river.

We urge you to support the immediate implementation of the Plan to Save The Wye and would be delighted to meet with you to discuss further.

For information, we are also copying this letter to the local MPs whose constituencies are most affected.

Yours sincerely,

Charles Watson, Chair, River Action UK

James Hitchcock, CEO, Radnorshire Wildlife Trust

Adam Taylor, CEO, Gwent Wildlife Trust

Helen Stace, CEO, Herefordshire Wildlife Trust

Nick Measham, CEO, Salmon & Trout Conservation

Andrew McRobb, Director, Campaign for Protection of Rural England (Herefordshire)

Jonathan Colchester, Chair, Campaign for Protection of Rural Wales (Brecon and Radnor)

Tom Tibbits, Chair, Friends of the Upper Wye

Mike Dunsbee, Founder, Friends of the Lower Wye

Christine Hugh Jones, Founder, Friends of the Lugg

Richard Tyler, Founder, Save the Wye Coalition

Rob Hawnt, Project leader, Lugg Catchment Citizen Science Monitoring Network Group

Mariam Wilding Jones, Founder, River Dore Citizen Science Group

Reverend Simon Lockett, Chair, Golden Vale Action Group

Stuart Smith, Chair, *Wye Salmon Association*

Rob Leather, Chair, *Ross on Wye Angling Club*

Anne Cottinger, Chair, *Hereford Yazor Brook Restoration Project*

Franny Armstrong, Founder, *Rivercide Productions*

Mary Miller, *Monmouthshire Rowing Club*

Kim Waters, Founder, *Welsh Rivers Union*

Angela Jones, wild swimmer & activist - <https://www.angelajonesswimwild.co.uk>

Alison Caffyn, Cardiff University - <https://alisoncaffyn.co.uk>

