

Minutes

Title of meeting:	Wales Land Management Forum (WLMF) Sub Group on Agricultural Pollution
Location:	Microsoft Teams Meeting
Date of meeting:	6 November 2023
Members present:	Rhys A. Jones, NRW Board Member (Chair) Jon Goldsworthy, NRW Sarah Hetherington, NRW Dennis Matheson, TFA David Ball, AHDB Einir Williams, Farming Connect Gareth Parry, FUW Matt Walters, Welsh Government Delyth Lewis-Jones, AHDB Russ Thomas, Hybu Cig Cymru Ieuan S. Davies, NRW Dylan Morgan, NFU Cymru Chris Mills, Afonydd Cymru Rachel Lewis-Davies, NFU Cymru Fraser McAuley, CLA Chris Thomas, NRW Andrew Chambers, Welsh Government Ruth Johnston, NRW Sarah Jones, Dwr Cymru Welsh Water Creighton Harvey, CFF Kate Snow, United Utilities
Additional attendees:	Brian Price, NRW (Item 4) Chris Lindley, NRW (Item 4) Sue Buckingham, NRW (Item 4) Nick Thomas, NRW (Item 4)
Apologies:	Nichola Salter, NRW Katy Simmons, NRW Marc Williams, NRW
Secretariat:	Bronwen Martin, NRW

Item 1. Introductions, Apologies and Declaration of Interest

1. Professor Rhys A. Jones (NRW Board Member and WLMF Sub Group Chair) welcomed all to the Microsoft Teams meeting and noted apologies.
2. The meeting is being recorded for the purpose of capturing the minutes and the digital file will be deleted once the meeting minutes have been approved.

3. No declarations of interest were raised in respect of agenda items.
 - NB: All members of the group have completed declaration of interest forms already but should also declare if they have an interest in anything on the agenda.

Item 2. Review of Minutes and actions

4. Rhys confirmed that once the meeting minutes have been reviewed and formally agreed by the group, they will be published on the NRW website for the public to access. Therefore, it is important that the minutes are an accurate record of the meetings.
5. The group reviewed the previous meeting minutes from 2nd October. No comments or suggested amendments were received in respect of the October meeting minutes.
6. Bronwen shared the outstanding actions log and verbal updates were provided where possible.

Item 3. Matters Arising

7. The group was encouraged to discuss any matters arising from the previous meeting minutes, relevant documents, or recent topics.
8. No matters arising were raised by the group.

Item 4. Update: Ammonia Modelling Work Near SSSIs

9. Brian Price, NRW joined the meeting to provide an overview and update of the Ammonia Modelling work NRW are undertaking near Sites of Special Scientific Interest (SSSI) – Atmospheric Nitrogen and Site Nitrogen Action Plans (SNAPs). There are two positions being created within NRW to look at reducing ammonia levels in close proximity to SSSIs.
10. Brian began by showing a schematic of pollution sources and deposition. Sources of ammonia are predominantly from agriculture, sulphur dioxide from combustion and Nitric oxides which is the oxidised form of nitrogen. There is a transportation mechanism which is atmospheric prevailing wind. There are two types of deposition a wet deposition and a dry – dry deposition is the gaseous form of nitrogen, which is ammonia, and that tends to occur quite close to sites and the wet deposition is when it combines with rainwater and other particles and gets carried as clouds and is deposited further afield. Wet deposition is very hard to control because it comes in from Europe. Dry deposition is closer proximity and tends to be the gaseous form of pollutants. These both deposit on the ground they give you oxides, ammonium particles and they lead to changes in soil nutrients, cycling, decrease plant biodiversity and eutrophication of lakes and rivers. The important thing to note is that dry deposition is very much a local pollution source.
11. Ammonia is generated through agriculture, it's a by-product of agriculture and is basically from faeces and urine mixing. Brian described the impact on the environment and showed some photos to demonstrate the negative effects of elevated nitrogen on sphagnum in the Black Mountains SSSI. Brian discussed indicator species reflecting the effects of pollution.

12. Brian described the modelling work undertaken which included using a nitrogen profiling app to measure emission density around sites and understand the impact on SSSIs. The tool has helped develop a league table of sites based on an inventory and a three-year rolling average which indicates which sites are the worst. This is used to try and understand what issues are contributing which might allow us to perhaps have better discussions with the farmers and Welsh Government about what sort of solutions we can put in place and how we can work together to try and reduce these levels.

Brian provided a brief overview of measuring ammonia using different samplers and monitoring units.

13. Brian described the report for Dinefwr Estate SSSI in Carmarthenshire. It has the richest assemblage of parkland lichens in Wales. The 2017 survey showed 'clean' in the centre and 'N-polluted' on the edges. There has been deterioration in lichens since between 2017-2019 and extremely high pollution from dairying which is the predominant farming activity in that region. Samplers have been deployed around and on the site, to better understand the situation. Brian described the results across the 15 monitoring locations using a graph.
14. When it comes to reducing emissions, there are a number of measures which are best available technology including covering slurry stores and digestive stores, low emission spreading, less crude protein in feed, reducing stocking density, switching to ammonium nitrate or using protected urea fertiliser, considering housing practises (acidification of manure and washing down regularly etc., nitrogen fixing crops, legumes and Clover swards and ammonia reduction through trees (e.g. tree capture tree belt around emission sources).
15. Brian summarised the framework for reduction including different measures for bovine pig, poultry and fertiliser. Going forward from a policy point of view, funding for that and a clear direction is important.
16. Brian mentioned the Site Nitrogen Action Plans which is where NRW develops a plan for a particular site. We identify local emission sources contributing to emissions exceedances and enable collaboration to address excess nitrogen deposition and ammonia within protected sites.
17. Sue Buckingham, NRW provided a brief update on the aerial emissions in Wales statistics and some of the synergies between air and water quality. Sue provided an overview of ammonia within the national context by showing a graph. Wet deposition is when ammonia combines with other pollutants and forms a particle known as PM 2.5. Air pollution is a major public health risk and causes more harm than passive smoking. The World Health Organisation says, 'there is no safe level of PM 2.5.' Farms are the biggest pollution source for UK cities. In Wales, long term exposure to man-made air pollution shortens lifespans by 6-8 months and the cost to Wales is £1 billion/year. There is a big drive to reduce ammonia from a human health point of view. Researchers have identified critical levels for certain species and the lower plants have this critical level of 1 microgram per cubic metre, above which there will be harm done to the plant and the higher plants 3 micrograms per cubic metre. Sue summarised the ammonia impact on designated sites. Ammonia usually has a relatively short range and is a short duration pollutant. The highest concentrations usually occur within a few hundred meters of the source, creating a higher peak followed by a long tail of diminishing emissions. Sue used graphs to demonstrate the concentrations of

atmospheric NH₃ in a landscape with poultry, beef and sheep farming in the vicinity of a SSSI.

18. Sue mentioned that ammonia is a valuable nutrient. The value of nitrogen lost to air as ammonia in the UK is £185.5 million and £10.78/ha of agricultural land in the UK. Welsh Government has committed to reducing ammonia emissions overall by 16% by 2030. There is the Clean Air Plan for Wales, and they've also published a Code of Good Agricultural Practice for reducing ammonia emissions, which highlights some of the measures that can be taken. We need to reduce the damaging deposition of reactive forms of nitrogen on Wales and protect our priority habitats, and Welsh Government has committed to try and reduce the PM 2.5 concentrations across the UK.
19. Sue discussed the [Assessing and Addressing atmospheric nitrogen impacts on Natura 2000 sites in Wales \(AAANIS Report, 2015\)](#) and the plans to reduce the impact of local ammonia emissions on sites through the Site Nitrogen Action Plans (SNAPs). Sue summarised some of the action matrix which aim to address the impacts throughout the whole farm system. In Europe, where people have adopted a lot of these measures, they've actually reduced ammonia emissions by 50% and proved that it's possible.
20. Sue mentioned that NRW will be looking at bespoke Section 16 Agreements for some farmers to help them where they can't get grants from Welsh Governments or support from the proposed Sustainable Farming Scheme. Sue shared some synergies and the integration between managing nutrient nitrogen and managing ammonia, fertiliser, slurry, farm yard manure and other organic compounds.
21. Chris Mills said the management of SSSI is tightly regulated within the actual SSSI itself and suggested that a buffer zone around an SSSI which is also controlled is needed as an effective means of actually protecting the features. Chris asked if NRW had considered this. Brian said that's what we're trying to instil on the ground because it's probably the easiest to achieve, subject to funding. Brian mentioned the new Habitat Wales Scheme which has just been announced, some of the scoring for that scheme involves looking at buffer zones with regards to the selection process for gaining habitat funding. Although that's not necessarily for the SSSI itself, it's for a farm. Regarding the buffer zones, management of the SSSI is fine, but everything we're talking about is from external sources so ideally that would come through the SFS and funding in 2025 going forward validate that. Chris suggested that maybe that's something that needs to be considered when designating new sites in the future. Sue said it's also about identifying how big the buffer zone should be which is very critical. From a farming industry point of view, obviously you don't want to disadvantage those farmers who are near a SSSI compared to those who are not near a SSSI. Brian reminded the group that actions and changes need to be viable and profitable for farm businesses.
22. Gareth discussed how complex these systems can be. The agricultural sector can help reach Welsh Government targets, but we need to avoid a knee jerk reaction in the future with blanket measures that cover Wales if certain areas perhaps have more prevalent ammonia emissions. Gareth recalled concerns around more slurry being stored/housed for a longer period of time over the winter. Gareth asked whether ammonia emissions increase (not necessarily due to the increased amount of slurry) if the same amount of slurry is stored for a longer period of time. Brian said we don't have those sorts of answers and is linked to current research. However, from a practical point, we have to be conscious that we will be storing an emission source for a longer

time. One of the other growing areas is digestate and anaerobic digestion (AD). Ammonia levels are increasing and that's predominantly because of the move to AD and farming for energy. Farms which grow crops for digestion are limited to the amount of land they can grow crops on, but some of the waste generated AD plants are actually hauling in waste from the south of England and digesting it locally in Wales and then also spreading it locally. We need to be aware of that, understand the scale and find potential mitigation measures. Brian mentioned a recent press article about contaminated biosolids. This is an evolving science, and the solutions are being developed but this is complicated. Sue discussed the importance of the store design to reduce ammonia emissions, which is critical.

23. Andrew Chambers, Welsh Government discussed the Control of Agricultural Pollution Regulations (CoAPR) and the impacts on ammonia. Welsh Government consider the potential impacts of pollution swapping when bringing in the Regulations. Andrew recalled the discussion about the differences with Silage, Slurry and Agricultural fuel oil (SSAFO) and CoAPR. For most farms, there is a move between four- and five-months storage but using different rainfall data. There's some considerable nuance there in terms of what that actually means for the potential ammonia emissions linked to the amount of slurry being stored. Andrew offered to have a conversation with Brian and Sue outside of the meeting.
24. Rachel Lewis-Davies, NFU Cymru asked whether the modelling stood up to the ground truthing that NRW undertook through the site sampling. Brian said the samplers used on site are not as stringent as the UKCEH in the quality standards or their accuracy at lower levels. They're fine for farm levels because the difference of 1 microgram or 100 is obviously not as important when you're looking for a background level of 1. They're showing higher levels than the model but they have been used to give spatial differences, not accurate levels – it's indicative, not finite.

Rachel wanted to understand the interaction between the SANP that's been proposed and the actual management plans for designated sites. This could add a level of duplication and confusion as it's very complex. Brian said the difficulty is that most site management plans are concerned with the site, whereas we're looking at the areas around the site because the emissions are not on the site itself (they are deposited on the site from an off-site source). We're part of strategic projects and have got Section 16 Agreements in NRW, which allows us to enter into an agreement with a landowner outside of a SSSI. For anything going forward with the SFS, it would have to be formalised within that process, whether it's a scoring system or something like that which rewards based on activity. This is complicated as the things that actually happen on the site will not really reduce the levels that affect the site, that would be done through an agreement with the farmer who manages land next to it. There's no clarity on that with regards to the SFS yet and we are hoping to feed into the process. Rachel asked for Brian's contact details so that she could send him the NFU Cymru response to the Interim Environmental Assessor for Wales who did a piece of work on the protected sites. There's a lot of talk around the SFS being the mechanism to support these individual bespoke things even through the optional tier. However, it is unclear whether that is going to be an effective model.

Rachel asked about the scope of the specific project. Farmers are trying to invest in infrastructure to meet the requirements of the CoAPR and are hitting barriers in the planning system because of the statutory advice that NRW was giving on ammonia. Rachel asked if this is a process Brian is feeding into. Brian said he is not involved with

the planning side at the moment, we're just focusing on the SSSI part. There is a need for a more comprehensive approach which is why we are having discussions like this. Brian said he wasn't aware of the issues Rachel has highlighted and suggested that a conversation outside of this forum would be helpful to understand that. Rachel referred to the NRW Ammonia Screening Guidance which is inhibiting the ability of some farmers to reach compliance. Rachel and Brian agreed to have a joined-up conversation. Sue said there is a National Ammonia Monitoring Network and there are 4 sites in Wales currently. There is a desire for Welsh Government to fund more because then the ammonia modelling will be more accurate. That's something that could be really important going forward, particularly to understand the background ammonia levels.

25. Andrew mentioned that Welsh Government have been working on releasing an SBRI challenge related to ammonia and agriculture. The idea is that it will be a phase two competition aimed at demonstrating technology that's already in operation (e.g., Pruex). The challenge launched on Thursday and closes on 5th January 2024. Andrew said he would send through the information.

AP 6th November 01: Andrew Chambers, Welsh Government to share information about the Welsh Government SBRI Challenge around ammonia and agriculture.

AP 6th November 02: Bronwen Martin to share contact details for Brian Price and Sue Buckingham, NRW.

26. Sue mentioned that Farming Connect have some really good tools on their website regarding ammonia. Sue is also talking to Farming Connect about developing more material for their advisors and discussing how ammonia mitigation measures could potentially be incorporated into some of their on-farm programmes.
27. Rhys said this is potentially something for us to take forward as a group. Perhaps we could return to this topic and focus on some of these initiatives.

Item 5. SAC Rivers Agricultural Technical Group Report

28. Ieuan S. Davies, NRW and David Ball, AHDB gave an update on the draft report produced by the SAC Rivers Agricultural Technical Group (ATG).
29. David provided a summary of the contents of the report including the role of phosphorus, regulatory landscape, future policy, challenges and opportunities and recommendations.
30. Ieuan mentioned some of the next steps. The report is yet to be finalised by the ATG. The report will be shared with the WLMF Sub Group and Welsh Government once it has been finalised. It is intended that the report will be circulated on 30th November to coincide with the First Minister's Third River Pollution Summit. Ieuan mentioned that the First Minister and Welsh Government want to continue the dialogue with the sector and there will hopefully be a decision about how the WLMF Sub Group might fit in to this.
31. Creighton Harvey, CFF said we have heard about protected sites this morning and noted that one of the headings for the report was engagement with the Welsh Government on SAC Rivers. Creighton said it concerns him that the concentration on protected sites and SAC rivers is really neglecting a huge area of Wales where there is

considerable bad agricultural practise. Creighton provided a specific example where there is bad agricultural practise in terms of both fodder production and slurry management. There is the danger that other areas will be neglected and the air and water quality in those areas will continue to decline but also be ignored. Ieuan said the remit of this report was to focus on those protected sites. This report has brought together a range of evidence, techniques and recommendations that feed into other areas like this group, Welsh Government and also the Nutrient Management Boards. The timetable has been around the Summits and the protected sites, but it has the potential to be rolled out right across Welsh catchments. Creighton acknowledged that there will be a fair degree of monitoring on other catchments to highlight the continuing bad practise in those locations. Obviously, those examples will be reported to NRW, but we would expect a response from NRW which is appropriate to the seriousness of the offence, not necessarily to the fact that it's not a protected site. The legislation is national and should apply to everybody, and it's important that everyone bears that in mind, including the industry and the regulator. Ieuan said there is a recommendation within that report for increased resolution of monitoring, both for soils and water. Perhaps that might come through in the actions within the SFS or perhaps it might be through Citizen Science. We've also had feedback from Welsh Government on the Citizen Science policy for water quality testing for the action groups that are within some of the SACs and elsewhere. All of that will feedback into the information that's being received by NRW as the regulator.

32. Dennis Matheson pointed out that phosphorus isn't all bad, it's essential for plant growth. Dennis recalled his time in Western Australia where the only fertiliser used on the wheat was super phosphate – without that, it wouldn't grow at all. Dennis compared that with his farm, where he doesn't have to put any on at all after soil sampling, because there's enough legacy phosphate there. Dennis discussed the importance of the lime status of the land. Historically, the main source of phosphorus was basic slag (a by-product of the steel industry), which was a much slower release than modern bagged fertiliser. Dennis said he believes this group should be encompassing all pollution, including rivers, phosphates, ammonia, clean air and everything else.
33. David said the SAC Rivers has been an instigator for the report and highlighting the importance of those areas. However, the result of the report really is applicable to all rivers across the whole of Wales and any recommendation would also be applicable to those as well.
34. Ieuan said a lot of these pollution issues are becoming so complex now, but the supply chain is really a root cause problem for a whole range of issues that are impacting terrestrial ecosystems, freshwater and human health.
35. Rhys clarified that the final draft will be circulated to this group after it has been signed off by the ATG. Ieuan said this report is from the from the Agri industry and has been developed by that group. NRW have provided the secretariat and Marc Williams, NRW has attended meetings to ensure regulation and policy has been accurately reflected in the report. Ieuan said they would welcome feedback but not really for incorporation into the report itself.
36. Creighton recalled the possibility or ambition of rolling out the findings on this report from the SAC Rivers to wider Wales including non-SAC rivers. Creighton said he would expect to see an acknowledgement of that in the report itself. Ieuan said he would

certainly feed that back for the final draft, but it would be for the ATG to accept whether it goes into the final report.

37. Rhys discussed possibilities regarding what happens to the report once it's published and what the WLMF Sub Group can do in terms of taking things forward. Rhys recalled that the members of the ATG don't see themselves being able to commit to this longer term and perhaps there is an argument that it was set up as a specific time limited Task and Finished Group. This is all likely to become clearer once we see the report itself following the First Minister's Summit. However, it would be a good opportunity for us to discuss that in next month's meeting.

AP 6th November 03: Bronwen Martin to add the next steps following the circulation of the SAC Rivers Agriculture Technical Group Report and First Minister's Summit to the December meeting agenda.

Item 6. Update: Next Steps Following Licensing Scheme Consultation

38. Matthew Walters, Welsh Government gave a brief a verbal update following the [Written Statement: Nutrient management – Managing the application of livestock manures sustainably \(10 October 2023\) | GOV.WALES.](#)
39. This was the conclusion of the Licencing Scheme Consultation process from last year and it has been agreed as part of the Corporation Agreement with Plaid Cymru. In essence, the Enhanced Nutrient Management Approach brings forward a lot of the measures that were originally consulted on, however it removes the licencing element of it. That was largely brought about by the feedback through the consultation. There was broad support for a time limited scheme, but the consultation responses suggested that it should be more straightforward and simpler for farmers to apply for.
40. The notice process will be a submission of an Enhanced Nutrient Management Plan to Natural Resources Wales and that will incorporate phosphorus into the Nutrient Management Plan. The Control of Agricultural Pollution Regulations as they stand only have a requirement for nitrogen, but this notification process is a requirement for a phosphorus assessment. That must be based on soil sampling and soil samples must be undertaken within the last three years and that will determine limits for individual crops based on existing best practise values of RB209 or where those values are to be exceeded, it must be under the Fertiliser Advisers Certification and Training Scheme (FACTS) qualified advice. Maximum application limits will be brought in based on the phosphorus levels currently within individual field areas of the farm.
41. That must be completed by the 31st March 2024 (e.g., notices must be received by NRW by the end of March). This is a one-year scheme and that has been made very clear.
42. Alongside the Enhanced Nutrient Management Plan, there are additional actions that farmers must undertake to enhance environmental protection. This includes measures such as using low emission spreading techniques and increasing buffer zones. We're bringing in some additional practise measures to mitigate against the fact that there will be higher levels of livestock manure being applied to the land by allowing an increased up to the limit of 250 kilogrammes a hectare.

43. There are a few other measures included that are currently within Cross Compliance, particularly around soils like soil compaction and the locations of supplementary feeders and supplementary drinking locations. We recognise that soils have an important role in phosphorus losses, so maintaining soil on farm is very important and bringing in those additional soil protection measures will be part of that.
44. Regarding the timeline, the Written Statement committed to bring a delay to the Regulations by the 30th November. It is currently going through the final legal drafting, so it is not far off being signed off. At the end of the month, we hope to have an outline of the Regulations to be laid and our guidance to support farmers in what they will need to undertake in order to complete the Enhanced Nutrient Management Approach. That will allow until the 31st of March for those plans to be submitted to NRW. This will cover the period from 1st January 2024 to the 1st January 2025 but farmers will have until March 2024 to submit it. This will also allow those plans to be developed, undertake any soil testing and to analyse the results needed to inform it.
45. Welsh Government want to be fairly flexible in the approach as there is good practise already in the sector around nutrient management and the use of Nutrient Management Plans, so we're not specifying exactly the format it should be sent in. We don't specify exactly how the nitrogen plans are completed under the current Regulations, but we do obviously have minimum requirements. Essentially, they can be submitted in any format as long as they meet the minimum calculations, and the calculations are done in the way the Regulations required. This allows some flexibility if a farmer has already got a Nutrient Management Plan developed as part of their Farm Assurance or general best practise then they can utilise that going forward
46. Gareth asked if Welsh Government will be designing a supplementary workbook for the Enhanced Nutrient Management Approach. Welsh Government are not intending on providing a workbook because there's a lot of good practises out there already. Nutrient Management Plans form part of various Farm Assurance schemes, or various other schemes which can be utilised (e.g., prevent duplication).

For those that are hoping to complete a submission by the end of March, will they be able to continue with their current farming system which would involve being over the 170-kilogramme limit from the 1st of January; on the assumption that the submission will be accepted. Matthew said there won't be an assessment taken by NRW, the Nutrient Management Plans will need to stack up as they stand. The requirements will have limitations of applications depending on the index of the soils. Therefore, anyone undertaking that approach understands what that means, and they might have to make adaptations to their current system. There's no guarantee of compliance just by undertaking a notification, farmers are going to need to meet the requirements. It is an individual farm calculation and an individual assessment, so it will depend on particular situations. We are continuing with the 80% grassland requirement so there are some requirements to meet as part of the notification process. It won't be an assessment by NRW, it would be held for information and part of an inspection process.

47. Chris Mills asked how compliance with the requirements of the scheme will be monitored. Matthew said it will be monitored as part of the current SLA with NRW. The new SLA is in place to bring forward the additional enforcement and inspection regime. New NRW Officers have been recruited and are undergoing their training. The notified holdings will be considered high risk and under the agreement with NRW we're targeting high risk farms (e.g., farms undertaking actions which we deem a higher

chance of causing pollution) and these farms are prioritised for enforcement and inspection under the SLA.

Chris asked what about the farms that don't notify NRW. Matthew said that will have to be field based or intelligence led. IF NRW know they're handling slurry, they'll be on the high-risk list anyway. There is an element of ground truthing in terms of not notifying and they're exceeding 170kg/ha then they will be in breach and there's an enforcement route. Chris suggested that there would have been more of a guarantee if you had a licence. Andrew Chambers, Welsh Government said there was the potential for a reduction in the enforcement activity if resources were needed to assess a licence. An assessment of a licence is really just an assessment that the sums add up on the papers that are provided rather than a more intensive inspection regime. Perhaps there is an improvement in taking this approach rather than a licencing approach. Chris disagreed and said it will be good if the monitoring and compliance inspection regime data is actually provided from NRW. This will help to understand what level of inspection actually goes on and what the level of compliance is. Rhys agreed and said it would be useful for this group to have a future presentation from NRW on the enforcement and inspection approach.

AP 6th November 04: Bronwen Martin, NRW to look into a possible presentation on NRW's enforcement and inspection approach regarding the Control of Agricultural Pollution Regulations.

48. Einir Williams, Farming Connect asked how new and enhanced NMP needs to be. Matthew said it needs to be based on soil sampling undertaken in the last three years. So, it needs to cover the year. That would need to cover the 1st January 2024 to the end of 2024 period. It will depend on individual farms and what they've got in place already. It might be that a revision of an existing plan is possible rather than writing a whole new plan, but it depends on what the numbers say. Einir Williams asked if all the fields that are used for spreading slurry need to be included within that plan. Matthew said yes, all the fields where nitrogen is deposited. Einir said Farming Connect consultants usually do packages of about 20 fields and it's not enough for the larger farms. Andrew clarified that it is every 5 hectares of the same cropping regime and each management regime. It could be incorporated but it would have to be looked at on a case-by-case basis. Matthew said this is an area for the guidance in terms of exactly what individual farmers will need to do based on the requirements in the Regulations. Einir asked what happens after 1 year. Matthew said currently, it's going to be contained within the four years reprocess. Once we've got this process is done, we'll turn our attention to the four-year review. Hopefully we will have more intelligence about where the farms are that are applying above 170 kilogrammes per hectare and what the soil and nutrient status is of those holdings. This information will be incorporated into the 4-year review process. It must be undertaken by the 1st April 2025. We hope to have an outline of what can happen next, but currently our position is that it reverts back to the 170-kilogramme hectare limit. Andrew said the purpose of the consultation was essentially to provide farmers with more time to adapt to the 170 kg/ha holding limit.
49. Jon Goldsworthy, NRW provided a brief update regarding the new NRW staff. NRW has been through a recruitment campaign. There is a bit of a recruitment pause within NRW currently but most of those posts were appointed and have started their training. We are really pleased with the mix of experience that we've been able to bring into that

team. We're looking to get them out on farms as soon as possible. An update will be explored ahead of the next meeting.

50. Rachel said if you're collecting data and potentially publishing it to this group on levels of compliance, then you need to gather some basic information. For example, the land tenure of that farm, whether the farm is a tenant farmer who is unable to meet the compliance with the regulations because of the infrastructure and getting permissions etc. You also need to collect data on farmers that are under restrictions due to Bovine TB, because these are key issues that prevent compliance with the regulations. Rachel recalled that this is a time limited approach, but actually we need a long-term solution to support those farm businesses in these challenging circumstances.
51. Gareth asked Welsh Government about increasing the buffer strips. Matthew said there will be more manure going onto the holding which increases the risk of a pollution incident occurring as a result of run off. It is quite a small measure to mitigate against the fact there is more nitrogen and phosphorus being applied to the land. It is an additional mitigation measure.
52. Dennis said some of the requirements for the new approach are covered by Farm Assurance and in order to be qualified you have an inspection, it's now every two years for Red Tractor and that covers nutrient management plans and risk maps. However, this group did look into that sometime back and concluded that the Farm Assurance inspection regime wasn't robust enough to replace any inspections carried out by NRW. Perhaps in the future, this could be sorted because it's just duplicating everything.
53. Dennis recalled that the inspection regime by the new NRW staff is still being set up, but there is also an inspection regime for cross compliance with RPW. At the moment, these two bodies are taking a different approach to how they deal with any non-compliance. Dennis said he has been trying but unsuccessfully, to get RPW to take the same approach as NRW for tenants. This is really important to get the two integrated, otherwise you might get sanctioned by RPW, but not by NRW. Andrew said they're different regimes, so they are enforced in different ways. Cross compliance has a penalty matrix and NRW works in accordance with the government structures that it has in terms of enforcing regulations. Inevitably there will be a different approach for the regulatory approach and the cross-compliance approach. NRW are involved in the enforcement of the Control of Agricultural Pollution Regulations through cross compliance as well. So, there is some continuity in terms of the approaches that are taken. Matthew said the requirements of the Enhanced Nutrient Management Approach will form part of cross compliance as well because they will be structurally part of the CoAPR and there will be additional Sustainable Management of Natural Resources (SMNR) requirements for those farms undertaking the approach.

Item 7. Any Other Business

54. The next meeting will be held on 4th December.
55. Meeting dates for 2024 will be circulated in due course.
56. No other business was raised.