



Lesley Griffiths MS
Minister for Environment, Energy and Rural
Affairs
Welsh Government
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Your Ref:
Our Ref:
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Date: 5 January 2021

Dear Minister

We are writing to you as a broad coalition of organisations across farming and the supply chain who have an interest in a thriving and sustainable food and farming industry in Wales.

We are all agreed the development of future agricultural policy in Wales provides an opportunity to foster a sustainable, carbon friendly model of farming building on our reputation as producers of safe, high quality and affordable food to world leading standards.

We are also all agreed that farming's role in improving water quality must be central to that vision. Whilst the evidence shows that agriculture is not the only factor affecting water quality in Wales, we are clear that farming has a key role to play in reducing its impact through addressing current levels of point source and diffuse pollution.

Addressing agricultural pollution is a complex issue, one that will require a spectrum of approaches including regulation, advice and guidance, capital to support on-farm investment as well as the application of the latest technologies, innovations and approaches to drive positive change at the farm level.

As a coalition of organisations, we are all agreed that regulation forms part of the solution to tackling agricultural pollution. However, we have a difference of opinion with Welsh Government on what shape that regulation should take.

In April of last year, you announced the publication of the draft Control of Agricultural Pollution Regulations, you indicated that you are minded to introduce the regulations when the COVID-19 crisis is over. The draft regulations introduce the Nitrates Directive in Wales with a whole territory, All Wales approach.

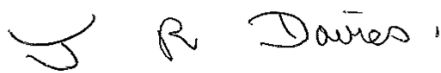
We do not believe this will be an effective regulatory solution that delivers for our environment or the Welsh economy. We are concerned that the benefits to water quality and levels of agricultural pollution will be relatively insignificant and dwarfed by the negative economic impacts of an All Wales NVZ approach on the Welsh farming sector and wider supply chain, already burdened by the effects of the COVID-19 crisis and the significant uncertainties brought about by Brexit.

Given our shared interest and commitment to this issue we are keen as a broad coalition of organisations to work with government on finding a regulatory solution that delivers the improvements to water quality we all want to see at the same time as supporting a thriving and sustainable Welsh food and farming industry.

We believe this requires working collaboratively with a focus on better regulation with effective enforcement underpinned by proportionate sanctions.

As a coalition we are opposed to the introduction of an all Wales NVZ and we would urge you to reconsider your position. We are committed to working with Government on the development of a solution and we look forward to hearing from you.

Yours sincerely








John Davies
President, NFU Cymru















Aled Jones
Deputy President, NFU Cymru




CC – Rt Hon Mark Drakeford, MS, First Minister

LIST OF SIGNATORIES

Name	Position	Company	Logo
Ifan Lloyd	Director	Iechyd Da	
Don Thomas	CEO	Welsh Lamb & Beef Producers	
Richard Collins	Head of Agriculture	Muller	
Glyn Roberts	President	Farmers Union of Wales	
Sue Cope	CEO	Holstein UK	

Melanie Harmitt	CFO	The Cattle Information Service (CIS)	
Meurig James	Head of NBDC	The National Bovine Data Centre (NBDC)	
Rhys Lougher	Partner	Ty Tanglwyst Dairy	
Christopher W. Dodds, FLAA, ARAgS	Executive Secretary	Livestock Auctioneers Association Limited	
Graham Wilkinson	Agriculture Director	Arla Foods UK	
Walter Simon	Chairman	CCF Farm & Country - Gwlad a Fferm	
Michael Smith	Non Executive Director	First Milk	
Gwynedd Evans	Branch Manager	Emyr Evans	
Don Thomas	CEO	The Welsh Agricultural Organisation Society Ltd	
Dafydd Lewis	Partner	W.D. Lewis & Son	
Neil Shand	CEO	National Beef Association	

Nick Allen	CEO	British Meat Processors Association	
Peter Alvis	Chairman	Royal Association of British Dairy Farmers (RABDF)	
Dylan Jones	Milk Procurement Manager	Glanbia Cheese	
Christopher Hanks	Chair	Future Farmers of Wales	
Helen Roberts	Regional Development Officer	National Sheep Association	
Dr Glenda Thomas	Operations Director	FWAG Cymru	
Edward Morgan	Corporate Social Responsibility Manager	Castell Howell	
Edward Morgan	Corporate Social Responsibility Manager	Celtic Pride	
Victoria Shervington-Jones	Owner	Country Fresh Eggs	
Sue Evans	Director	Game and Wildlife Conservation Trust (GWCT)	
Don Thomas	CEO	Quality Welsh Food Certification	
John G. Jones	Managing Director	Mona Tractor Co. Ltd.	

Mark Langslow	Director - Liquids	County Milk Products Ltd	
Alan Wyn Jones	Managing Director	South Caernarfon Creameries Ltd	
Mary Rees	General Manager	PMR Ltd	
George Workman	Managing Director	Cotteswold Dairy Ltd	
Elfyn Davies	Partner	Sancler Organic	
Gary Yeomans	Vice Chairman	The Milking Goat Association	
Elgan Evans	Managing Director	Brodyr Evans Bros	
Julie Thomas	Director	Simply the Best Training Consultancy Ltd	
Huw Thomas	Director	Llaeth Cymreig Cyf	
Katie Davies	Chairman	Wales Federation of Young Farmers Clubs	
Rory Hutchings	Director and head of Rural Practice	JCP Solicitors	
Norman Perkins	CEO	Hay and Brecon Farmers	

John Reynolds	Milk Supply Manager	Dairy Partners (Cymru Wales) Limited	
David Powell	Managing Director	Powells Chartered Surveyors	
Tony Rimmer	Director	Rostons – Chartered Surveyors & Agricultural Valuers	
Neil Adams	Managing Director	Promar International	
John T Davies	Chair of the Board of Directors	Royal Welsh Agricultural Society (RWAS)	
Iwan E Price	Business Consultant	Cymru Agricultural & Rural Advice (CARA) Ltd.	
Nerys Llewelyn Jones	Managing Partner	Agri Advisor Legal LLP	
Robert D Jones	Chairman	Farmers Marts (R G Jones) Ltd	
Ceidrych Davies	Regional Business Manager	Genus PLC	

*As an intermediary in the Welsh food supply chain, Castell Howell Foods Ltd recognise that we have a responsibility to support and work alongside our suppliers and associated stakeholders. From our dialogue with NFU Cymru it is evident that there are differences of opinion with the implementation of the draft regulations. Admittedly we are not 'hands on' farmers any more, however feel that it is imperative that both Welsh Government and NFU Cymru reach a satisfactory conclusion that will benefit Welsh farmers, the environment and those who live and work in these areas.'