British Egg Industry Council

Draft river basin management plans consultation:

consultation questions form

If you are unable to use the online consultation response form, you may use this document to enter responses to the consultation on the draft river basin management plans. You can email your response to:

[RBMPConsultation@environment-agency.gov.uk](mailto:RBMPConsultation@environment-agency.gov.uk)

If you need to send your response by post, please enquire using the email contact above.

### How we will use your information

* The Environment Agency will look to make all responses publicly available during and after the consultation, unless you have specifically requested that we keep your response confidential.
* We will not publish names of individuals who respond.
* We will also publish a summary of responses on our website in which we will publish the name of the organisation for those responses made on behalf of organisations.
* In accordance with the Freedom of Information Act 2000 and the Environmental Information Regulations 2004, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.
* For more information see our [Personal Information Charter](https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter).

Implementing the plan

1. What are your views of these principles? When thinking about your answer, you may wish to consider how easy (or hard) you would find adopting the principles.
2. take a collaborative place-based approach – align initiatives on water, and pool resources to achieve more than partners can achieve alone
3. Make evidence led decisions – work with partners to build the evidence base and use it to make evidence led decisions that are explicit about the intended benefits of actions and transparent about the assumptions used.
4. take account of future and changing risks to delivery – in particular, the effects of climate change and population growth to make sure actions perform as intended over their lifetime
5. consider a range of possible futures (for example 2°C and 4°C temperature rise by 2100) and use flexible approaches that enable solutions to be modified in the light of changing circumstances or new information
6. contribute to net zero – minimise greenhouse gas emissions and maximise carbon capture aiming for net zero
   1. restoration of the natural environment offers the potential to deliver carbon sequestration as well as other benefits
   2. many partners have already committed to ambitious net zero targets
7. build catchments resilient to warmer water temperatures, more frequent floods and drought, and rising sea levels – choose measures that help natural assets cope with or recover from shock
8. work with natural processes – where possible choose nature based solutions to protect and improve natural water assets and deliver multiple benefits
9. Promote restoration and recovery of freshwater, estuarine and coastal habitats and species – this will provide resilience to climate impacts.

It may also sequester carbon and provide many other benefits for people and wildlife.

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| 1. Collaboration:  * collaboration and linking up [at government level]is key so that our industry is not trying to comply with competing measures. The industry is already complex enough. * We need consistency or there will be a disparity across the country. * Collaboration with other government departments is needed e.g., in the industry, anaerobic digestors that do not adversely affect producers could be used if there was a grant to install them. We could change things that help to solve another government department’s problem - that is, the energy-environment conflict therefore we need collaboration so there are no conflicts.   b) Working with partners to build an evidence base:   * we need to know the level of contamination that producers contribute to the environment, for example soil and atmospheric pollution * We need evidence so we can decide where to investigate * We need guidance – what is good and bad practice * We need consistency in analysing the results. Evidence is needed but with consideration of local environmental factors. * The number of partners needs to be minimal e.g., consistent partners across the country because many producers operate nationally. * We need a ‘what good looks like’ structured framework which will bring discipline. * The evidence base: a lot is anecdotal, especially what gets into the media. * Consistency: interpretation can lead to issues. Eg, planning authorities, catchment [partnerships] and EA can interpret evidence differently therefore we need guidelines because it is very frustrating otherwise.   c)Plan long term:   * This is not an issue for us because the temperature does not affect chicken sheds if the ventilation can cope. * We are a long-term industry. We plan for 10-20 years hence because this is the investment term for the industry. * This level of long-term planning is becoming standard across all industries * We must link to the IPCC and latest evidence base due to the rapid changes taking place.   d) Adopt adaptive management approaches:   * most of our investment plans would be affected if we had to suddenly adapt – that would be very hard * therefore, we take an adaptive approach as soon as possible. * Technology is becoming available to help if the situation changes * If investment is needed, will there be grants available? We would like there to be the facility to get grants.   e) Greenhouse gas emissions:   * the industry is a low contributor to greenhouse gases but most of it is through the feed – we are looking to reduce this. However we aren’t in control of feeds. * Eg electricity prices– it will not make much difference to the industry. * Net zero is difficult because no one has defined it or set out how to reduce it. Our industry is based on carbon. * There will also be an impact on many other sectors. * It is very difficult to measure net zero and we need standardisation. * Greenwashing is rife * Net zero is the balance of carbon emission and carbon sinks – there will always be carbon use from producing food for people. * We need to acknowledge that carbon sinks contribute to the bigger picture therefore we need to think of the bigger picture. * Do you look at us as an industry or as an individual producer – is this an industry or an individual objective/principle?   f) climate resilient catchments   * This takes us into the realms of difficulties with planning permission because [the limitations of planning permission] restricts best practice * is there an example of a climate resilient catchment as it is hard to define what is meant here? * this is vague. We should all do/try and achieve this but what does it mean? * Multiple benefits – this includes natural flood management and not just water quality   g) work with natural processes   * We support this if the EA are not advocating us to install lots of new rivers and ponds! * We are already looking to contain pollution from free range farms - Eg reed beds from roofs; nitrogen absorbing crops etc * We are encouraging SuDS therefore we are doing it [advocating it] if the producers can [implement these measures]  1. Restoration and recovery:  * We are trying to decrease pollution, not directly increasing restoration and recovery. It is not that we don’t care but if a farm is 50 miles inland, it can’t have a direct influence on downstream. * Producers in that environment [where there were pressures] would be willing to decrease their impact by for example planting trees, putting in reed beds, slowing the flow but it would be dependent on where their farm is. * Bathing waters – even if you are upstream, you affect the water. * Case study: In Scotland – SEPA did a project where they were working with farmers, going from farm to farm in priority catchments and made recommendations to each farmer. SEPA explained the wider public benefits and the whole catchment benefits. The thought of this put fear into the farmers because they saw their impact. It was clear people are keen to do this [make improvements] but may not see the whole picture on that land. The fear was worse than the actual learning and the project worked well. * Therefore, the initial message needs to be clear * Eg prevent planning permission to reduce runoff * Must be a whole catchment approach * All participants in the catchment - if there is a bigger restoration activity - even if it is not on your land. * PPC – must do it. * Smaller sites – how [are these improvements] achieved? * Not all the industry is permitted. if not, some producers would do [actions] voluntarily or not at all. |

Environmental objectives

1. Do you agree with the environmental objectives in the draft plans?

All / Most / Some / None

Which, if any, objectives would you like to see changed and why?

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| In general, if the environmental objectives are looking to improve water quality, we would agree. The detail and the conditions and legal obligations are the key part.  We support in principle. |

Programmes of measures

1. Are you aware of any funded measures that are missing from the programmes of measures?

Yes / No

Please let us know what measures are missing

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| Planning permission imposes measures the industry then must do. This can impact the industry - we don’t make progress because there is no incentive for planners to consider this [some of the improvements we want to make].  Eg, BEIC advocate the producers have covered manure stores, but it is difficult to get planning permission for these.  Eg, we advocate that chicken sheds are above the river but planning guidance says the sheds need to be by the river, so they are out of sight or next to existing buildings - where there is already a runoff problem. |

1. Do you have any comments on the potential new measures set out in the draft plans? Please tell us about any other new measures that could be taken forward with support from partners to achieve the objectives in the plans.

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| To comment offline. |

Working at the catchment level

1. Do you have any comments on the challenges and measures suggested as priorities in your local catchment partnership’s page?

Please give catchment specific examples and tell us where, by working together, more benefits can be achieved.

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| Because there are so many catchments partnership pages it is hard to comment – our members could look at these locally, but we can’t comment nationally. |

If you're response is regarding a specific catchment partnership page, please type the name below.

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| n/a |

Updating the plans

1. Do you have any further comments on the draft river basin management plans, not covered by the previous questions?

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| * **Regional differences can result in different approaches – BEIC needs an industry-wide approach though this is difficult.** * **These issues are a priority for agriculture – there are a lot of environmental, agriculture and sustainability issues to balance therefore we need the outcome to be clear and fair especially because it affects enforcement, funding, planning decisions.** * **The approach needs to be clear and link to funding and enforcement.** * **BEIC asks for policy and regulation to be simple because it is currently very complex for members to follow.** * **Nitrogen trading – how could it work [effectively]?** * **Please be aware of societal and economic changes because they will have an impact. The industry is in a unique position in Europe -e.g., the change to free range eggs and chickens, higher welfare standards - there will be more of an impact on the environment as a result.** * **Consistency around the country in how to approach these issues is needed.** * **A lot is happening in the industry – avian flu, economic pressures, water quality so making it easier for BEIC to understand each other’s objectives is important – it feels like there is so much to understand.** * **Be clear – what are we trying to achieve e.g., water objectives** * **The collaborative approach works** * The EA has been underfunded therefore we need good advice to our industry: what policies are there? * EA need to increase its level of enforcement of those in the industry that do not comply, otherwise the BEIC’s reputation is tarnished because bad practice in the industry is not penalised. This is not fair on our industry.   **PLEASE COMPLETE INFORMATION BELOW** |

About you

7. Are you responding as an individual or on behalf of an organisation or group?

When we come to analyse the results of this consultation, it would help us to know if you are responding as an individual or on behalf of an organisation or group.

Please select from the following options:

Responding as an individual

Responding on behalf of an organisation (please specify which organisation or group and include what type it is, e.g. business, environmental group, etc)

Other

Name of organisation or group, if you don't want to leave the organisation name, please tell us what type it is.

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If you selected other please specify.

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8. Contacting you about your response

In some cases, we may wish to follow up a consultation response where there is an offer of help or provision of evidence. If you're happy for us to do so, please provide your details below.

We can also use it to let you know when we have published the Summary of consultation responses document.

Name

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Email address

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9. Please select which river basin district your response to this consultation applies to (you can select more than one or submit a national response by selecting 'England').

**(Required)**

England (all river basin districts)

Anglian

Humber

North West

Northumbria

Severn

South East

South West

Thames

You can use the [catchment data explorer](https://environment.data.gov.uk/catchment-planning/v/c3-draft-plan/) to identify which river basin district your response relates to. The map on the landing page allows you to zoom in to specific locations.

10. If your response relates to a specific management catchment, please write in the box below

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You can find your local management catchment on the [catchment data explorer](https://environment.data.gov.uk/catchment-planning/v/c3-draft-plan/).

11. Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

Yes

No

12. Finally, it would really help us if you let us know where you found out about this consultation.

Social media

Internet search

Advert in newspaper

Government website

Meetings/calls with the Environment Agency

Email from the Environment Agency

Other (please specify below)

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