



Dr Alan Woods (Hon Secretary)
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By email
Alex Malcolm
Fisheries and Biodiversity Officer
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Dear Mr Malcolm

ENVIRONMENT AGENCY ADDITIONAL HERBICIDE CONSULTATION

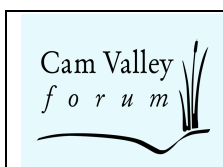
I am writing on behalf of the Cam Valley Forum to comment on the proposed programme of herbicide spraying on which you have recently consulted a range of organisations.

We were passed this information by one of our members and would be most grateful if you could automatically include us in your standard list of consultees for all future programmes of works affecting all the watercourses that the Agency manages within the River Cam Catchment.

We understand that this work is being undertaken using funds collected through the General Drainage Charge. I gather from your [website](#) that this charge applies to mainly agricultural land outside internal drainage board districts and contributes towards the cost of maintaining and improving main rivers. The work carried out can include dredging to remove silt, weed clearance and maintaining structures such as barriers, sluice gates and pumping stations.

If the focus of the weed removal work is purely to assist land drainage and improve flows we would strongly question its continued relevance. The policy priority now is surely no longer to remove water from farmland as quickly as possible, so as to enable land previously suitable only for seasonal grazing to be used for arable crops, but to 'hold back the flow', slowing the passage of water through the landscape by using natural flood management measures. In addition, faced with current soil moisture deficits, farmers (the charge-payers) are surely more interested in maintaining high water tables in the summer than in lowering them still further to the detriment of their crops.

We also consider that there is an element of tackling symptoms rather than causes here. Nutrient enrichment through inputs from farmland and treated sewage effluent undoubtedly enhances plant growth, especially when flows are low (when discharges from sewage treatment works can account for nearly all the flow in some watercourses). Concerted action needs to be taken to protect watercourses from sediment and nutrient inputs from farmland and to strip nutrients from sewage effluent.



The Cam Valley Forum is an unincorporated association, registered with HMRC as a charity.

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We understand all too well the need to control invasive non-native aquatic species such as Floating Pennywort, Water Fern and New Zealand Pigmyweed, and the bankside scourges of Himalayan Balsam and Giant Hogweed. Our volunteers have, with great success, spent many thousands of hours removing irruptions of these from watercourses and/or their banks using mechanical methods.

We recognise that highly targeted spot-spraying of herbicides on individual plants, as distinct from stands, or entire stretches of banks, may sometimes be necessary, for example to control Giant Hogweed. What we cannot see as being justifiable in any way is the blanket spraying of broad-spectrum herbicides such as glyphosate on extensive stretches of banks, as appears to be proposed.

We note your concern to safeguard SSSIs and local wildlife sites but this ignores the danger that such spraying poses to those sparsely-distributed native species that hang on in only a few locations. We lost nearly all our flower-rich floodplain meadows to the drainage onslaught of the 1960s and 1970s; blanket spraying threatens to further deplete our local flora by creating yet more local extinctions.

We have canvassed the views of four eminent local botanists on your proposals. They comment:

- *'It does seem that permission should never be granted for blanket spraying as the application of glyphosate is guaranteed to pollute the aquatic environment - see <https://www.gov.uk/government/publications/application-to-use-herbicides-in-or-near-water>. I note that they have used 10 figure grid references - that does open them up to action if they spray a metre in the wrong direction. It would be interesting to know: (a) have they made site visits first. (b) what vegetation they are intending to control. On Bin Brook it may be Giant Hogweed, for which spot spraying is a reasonable procedure.'*
- *'I ... would find it hard to condone any such programme of spraying except in the most exceptional cases - is it any wonder that the flora of our watercourses becomes impoverished if we take this sort of action? It would seem to be part of the exaggerated risk management response we see today to many problems.'*
- *'"Exaggerated risk management" indeed! For example they propose to spray "River Cam wet woods" by Dernford House. How could that feeble chalk stream ever flood? If there is absolutely no flow ... the effects of glyphosate spray would be very local. However, if there is even a trickle, it would be carried downstream and would harm aquatic vegetation for some distance.'*
- *'I agree completely about the unjustified use of herbicides along small water courses.'*

There is always a risk in any case that however targeted the spraying, operatives will lack the necessary equipment and knowledge to discriminate between plants that need to be sprayed and those that should not be harmed, and will simply apply spray indiscriminately 'to get the job done'.

We consider that the current programme is misguided and should not be taken forward. Where there are significant problems, the Agency should use only mechanical methods and then only where consistent with the aims of natural flood management to 'hold back the flow'. In any case, farmers at the moment are more likely to want the Agency to raise water tables, rather than lower them, to safeguard their crops.

The resources that would otherwise have been used for this misguided programme of spraying should be deployed instead on works to correct the damage caused by historic channel modifications and to enhance, rather than further threaten, the biodiversity of our watercourses.

A further fundamental review should then be undertaken of the purposes for which the receipts from the General Drainage Charge are used with the aim of refocusing this on natural flood management measures to 'hold back the flow' rather than on works with the opposite effect.

We would welcome the opportunity to discuss these matters further with you and your colleagues and look forward to hearing from you.

Yours sincerely

Dr Alan Woods
Hon Secretary
Cam Valley Forum

cc:

Lesley Saint, Environment Agency
Kye Jerrom, Environment Agency
Rob Clapham, Environment Agency
Rob Mungovan, Wild Trout Trust