

Agricultural Pollution Incident Data

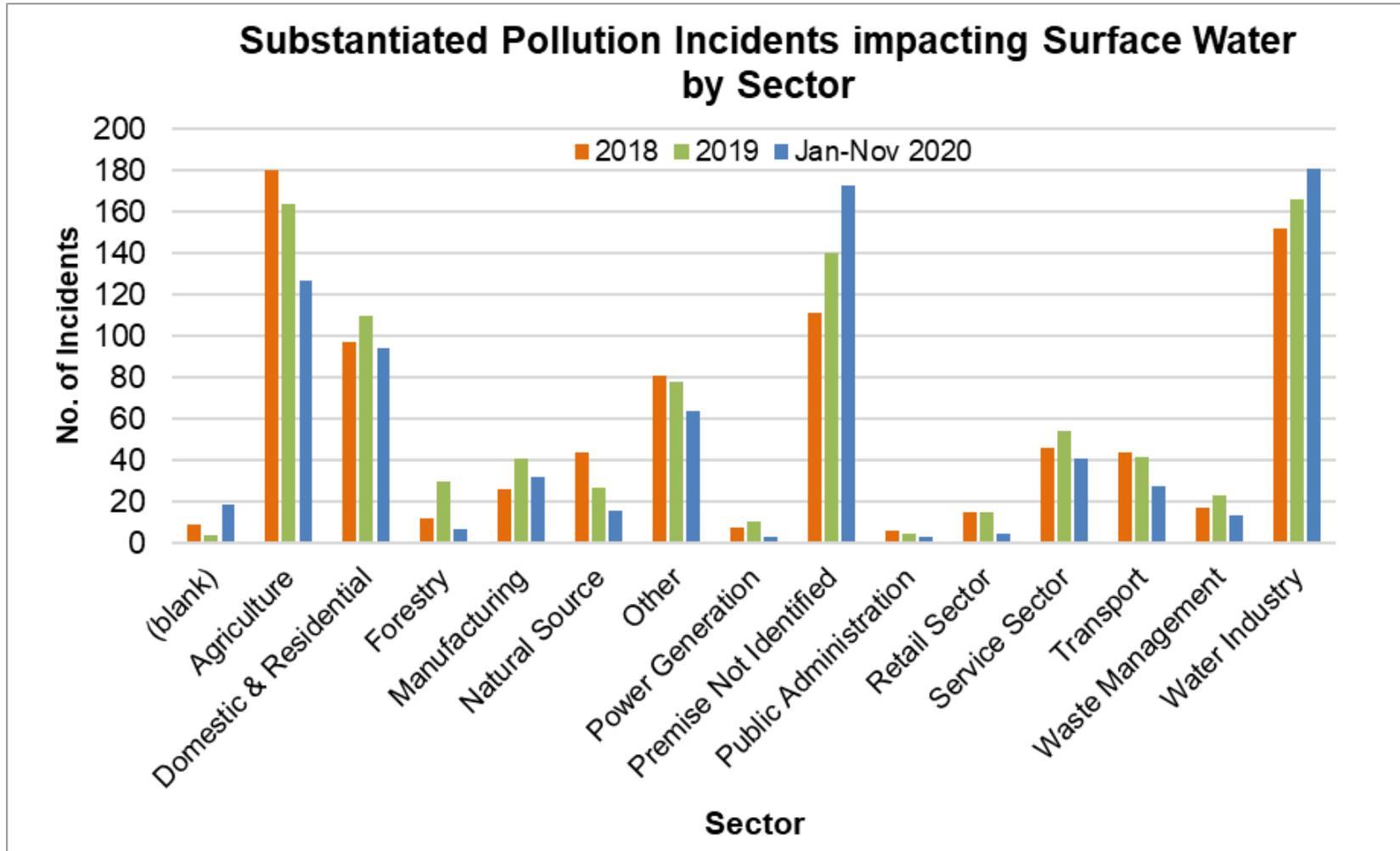


Figure 1. The graph shows the substantiated reported pollution incidents impacting surface waters by sector for 2018, 2019 and Jan-Nov of 2020. This indicates Agriculture and the Water Industry are the biggest contributors of substantiated reported pollutions reported to NRW. The 3rd highest is Premise Not Identified, this is where the pollution incident has been confirmed by NRW staff, but the source not identified. Due to the interim nature of some pollution

Doc 11

incidents it is not always possible to trace the source. In 2020 there have been a large increase in the number of Premise Not Identified which could possibly be due to limited access and Covid-19.

Water companies are responsible for the self-reporting of pollution incidents to NRW. The majority of incidents are self-reported by the water industry including any potential pollution incidents which do not have an impact. These are recorded on the NRW database. Most of the incidents are categorised as Low. In 2019 out of 166 substantiated pollution incidents 8 were categorised as High, the rest were low. In 2019 26 pollution incidents were resulted from Combined Sewer Overflows (CSOs) across Wales, all of which were categorised as Low. All CSOs are permitted under the Environmental Permitting Regulations (EPR) to discharge during storm events to prevent flooding of properties with sewage.

Water companies can submit further evidence in a 'no impact' claims form to support the final categorisation of pollution incidents. The agricultural sector has also self-reported pollution incidents to water albeit unfrequently. NRW's pollution incident recording system made a compulsory field on the database to capture self-reporting so data prior to August 2018 is limited.

For Agriculture in 2019, 27 High category incidents out of 163 substantiated reported pollution incidents were recorded.

Blanks have occurred if NRW staff have not completed all the relevant boxes (particularly in 2018) or if the primary cause of the incident is Flood or Amenity Issues and secondary impact is water there is no requirement to include premises. For impact to water the premises boxed is now mandatory and for 2020 the blanks are due to the incident still currently open, i.e. the investigation is not complete.

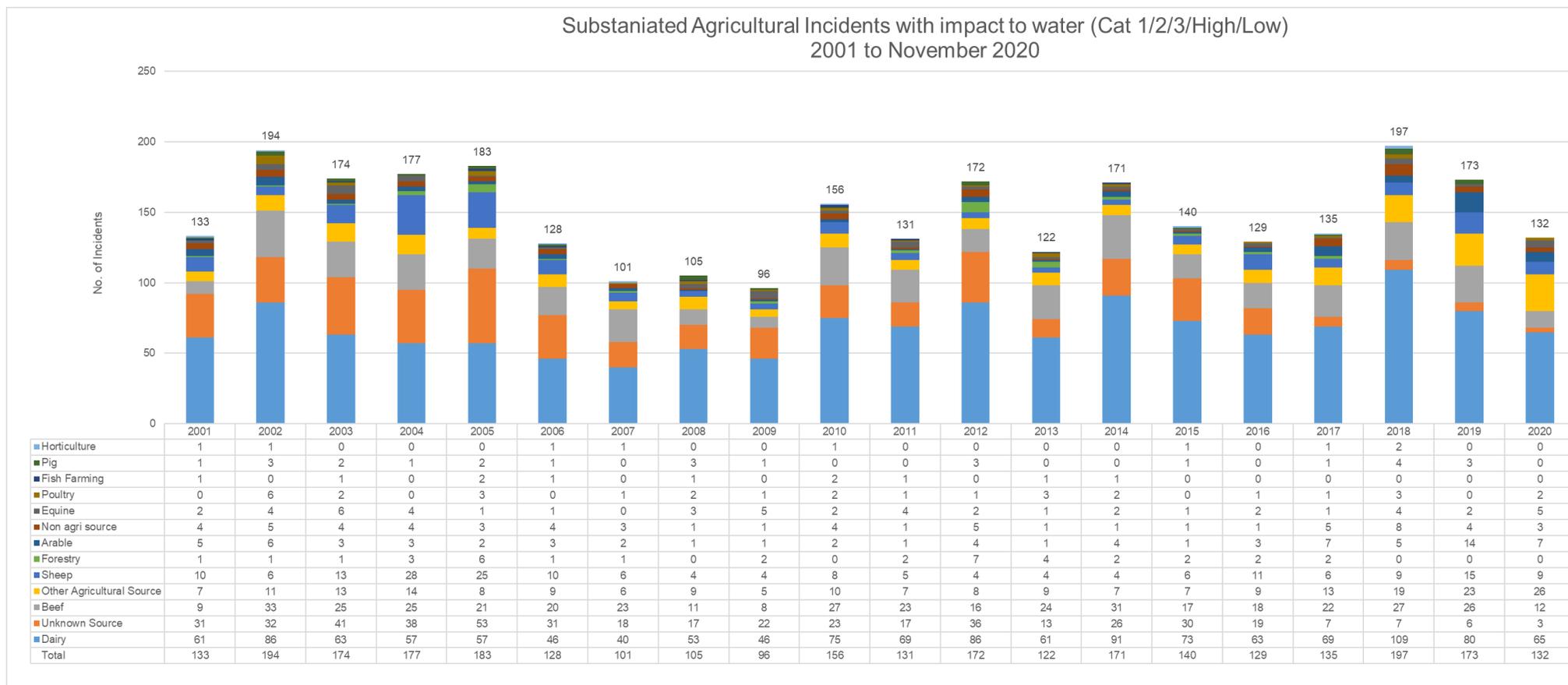


Figure 2. This graph was originally used in the WLMF Sub Group Interim Report produced in 2018. It has been updated including up-to-date substantiated reported pollution incidents data impacting surface water from agricultural sources from 2001 to November 2020. The dairy industry is the largest contributor to reported pollution incidents to surface water throughout all the years.

The source of the data is based on pollution incidents reported to the predecessor organisation Environment Agency Wales on the National Incident Recorded System (NIRS) and to Natural Resources Wales on the Wales Incident Recorded System (WIRS).

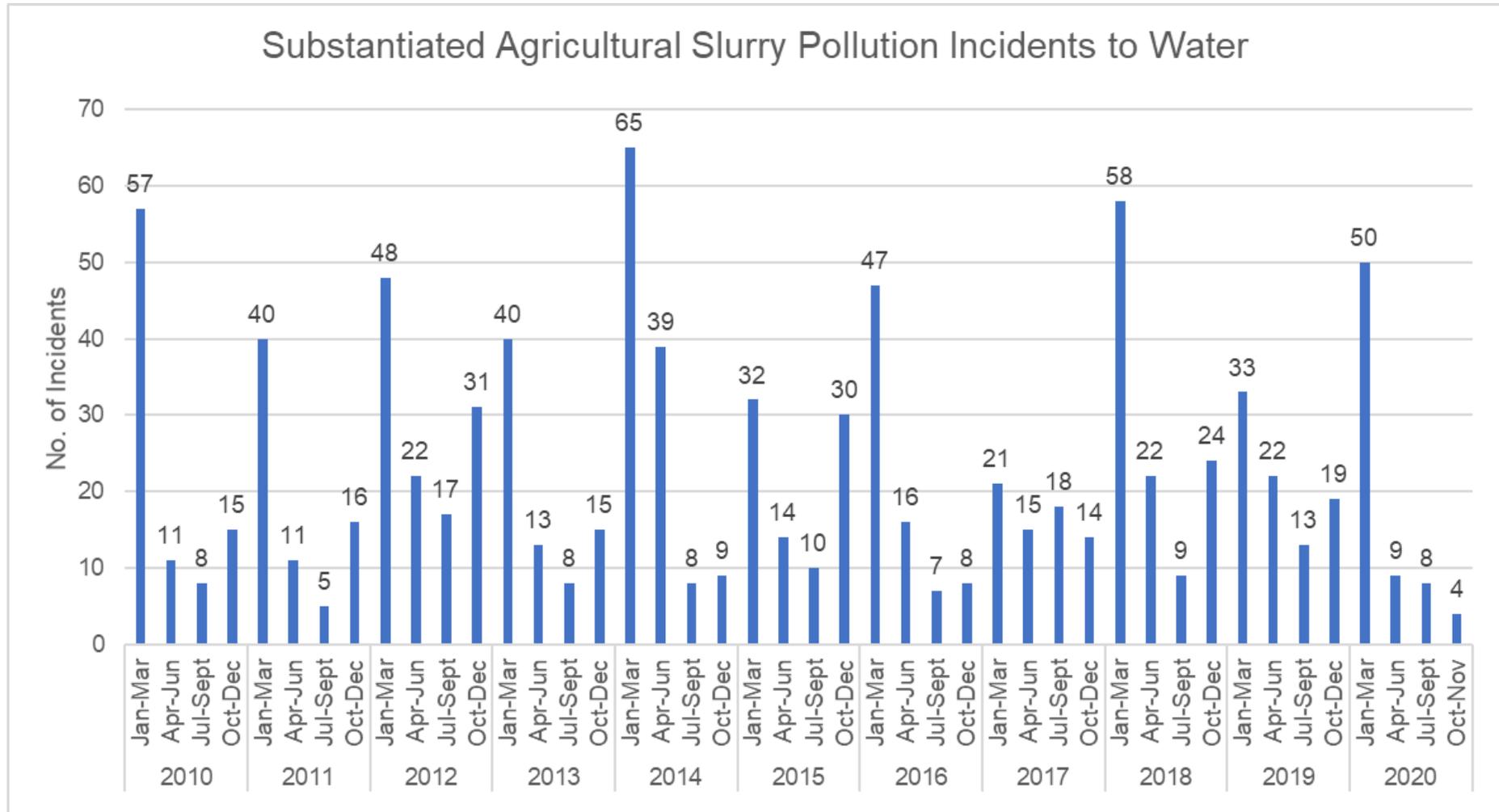


Figure 3: A breakdown of agricultural substantiated pollution incidents to water by quarter between 2010 to November 2020 demonstrates the seasonal variation in pollution incidents throughout the year. In all years the highest number of pollution incidents were recorded in Q1 between January and March.

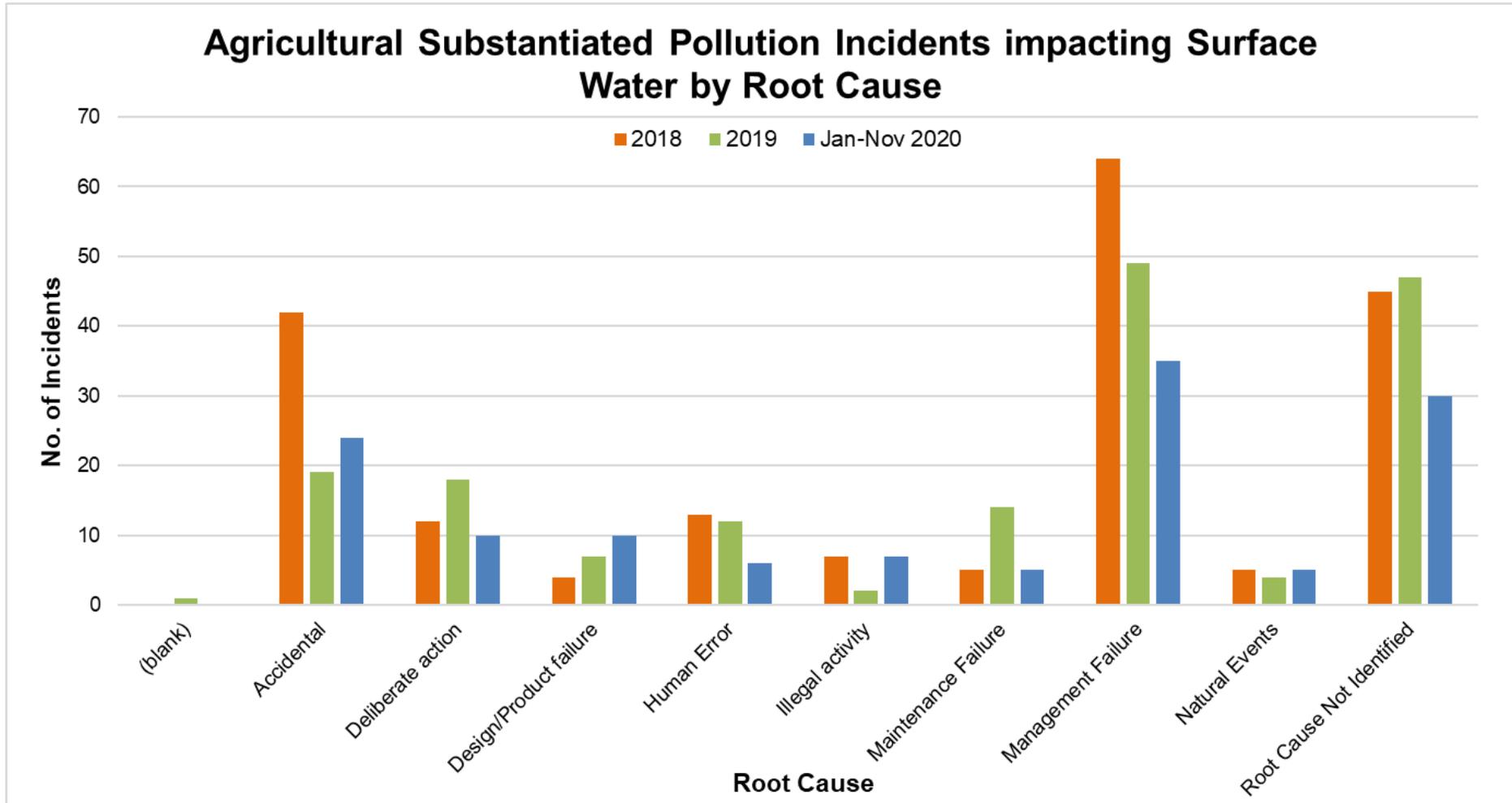


Figure 4. The root cause of substantiated pollution incidents impacting surface water from agricultural source between January 2018 and November 2020. The majority of the root causes for each year is as a result of management failure.

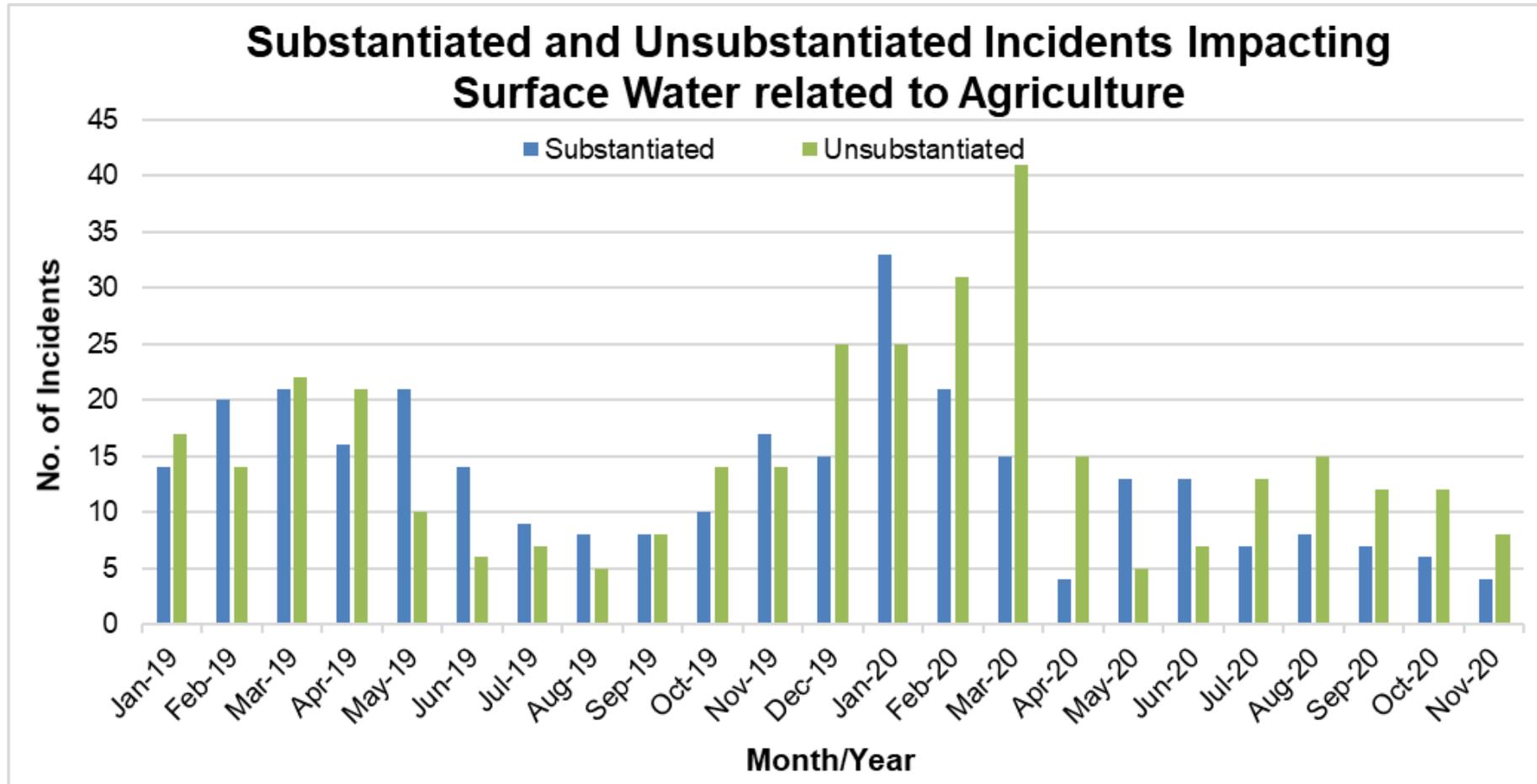


Figure 5. All substantiated and unsubstantiated agricultural pollution incidents relating to water pollution between January 2019 and the beginning of November 2020 are highlighted in Figure 5.

An occurrence is recorded as substantiated if what was reported actually took place. It does not have to have caused an environmental or operational impact, nor be attended. It is not necessary to attend an incident to be confident that what was reported occurred. Incidents can be set as substantiated and the impact classified based on the information or evidence (e.g. photographs) provided by the reporter. The reliability of the reporter and the nature of what is being reported should be taken into account. For example, a nuisance complaint or a description of a pollutant and its effect may be open to interpretation and not reliable. Multiple reports with the same description would indicate reliability, as would reports by local authorities, trusted sources and other professional partners.

Doc 11

An incident should be recorded as unsubstantiated where, based on inspection or assessment, there is no evidence of what was reported.

Due to Covid-19 and the start of lockdown on 23rd March 2020 the number of unsubstantiated incidents has increased. There was advice at the beginning of lockdown across Wales (Monday 23rd March 2020) not to attend any incidents until guidance was produced. This guidance was produced on Wednesday 25th March to NRW staff on incident management during the pandemic.

Incidents continued to be assessed and Officers would need to seek authorisation from the Duty Tactical Manager to attend incidents. Officers have attended pollution incidents during lockdown which are classified as High-Major under NRW Incident Classification Guidance, which includes fish kills.