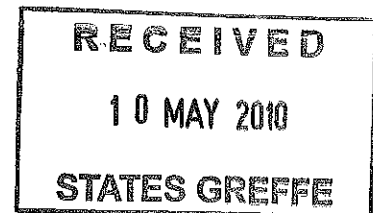


Deputy C.F.Labey
Chairman
Rural Economy Strategy Scrutiny sub-panel
Scrutiny Office
States Greffe
Morier House
St Helier
Jersey JE1 1DD

Friday, 07 May 2010

Our ref HNS/Scrutiny



Dear Deputy Labey

Rural Economy Strategy

Thank you for your letter dated the 13th April 2010, regarding the above strategy, which your panel is about to scrutinise. We welcome the opportunity to comment on the proposed strategy as follows :

We are pleased to see that the strategy recognises the effects that land use has on the quality of the Island's water resources.

The diffuse pollution of both surface and ground water resources from nitrates is an issue for both Jersey Water and private water supplies. The levels of nitrates recorded in most water resources during the spring months are above the 50 mg/l limit. Jersey Water has time-limited dispensations under the Water (Jersey) Law 1972 which allows nitrate levels in treated water to be above 50 mg/l, but not exceeding 70 mg/l for 30% of its annual regulatory samples. The present dispensation period (which is the second) is for 5 years duration and expires on the 31st December 2013. Continuing dispensations may not always be forthcoming in future years and action needs to be planned to make serious efforts in reducing nitrate levels in water resources.

We are pleased to note that Clauses 3.11 to 3.15 and Issue E6 in the strategy makes note of the issues around diffuse nitrate pollution.

Since the introduction of the Water Pollution (Jersey) Law 2000, Jersey Water has advocated the designation of Water Catchment Management Areas (WCMA) under the law as the most sustainable and environmentally friendly way of reducing nitrates and generally improving the quality of water resources.

We note and welcome that the strategy indicates options (Policy Options 6a, 6b and 6c) that can be taken following the outcome of the Diffuse Pollution Pilot Project (DPPP), which is presently underway. However, we note that there is no timescale indicated within the strategy (clauses 3.16 to 3.20) and would recommend that a reasonable timescale be defined for the completion of this Project. It is also very important that timescales for implementing actions to

reduce nitrates is stated, given the time-limited dispensations Jersey Water has in place and given the relatively long lead time for the effects to be seen in water quality following implementation of any of the options.

The Nitrate & Pesticide Joint Working Party submitted a report (RC17) to the States in 1999, which made several recommendations, two of which were to; investigate possible modifications to farming practice 'as a matter of urgency' to effect a reduction in nitrates and another was the need to set up a Nitrate Sensitive Area around Val de la Mare Reservoir. None of the recommendations were acted upon.

We also advise that we have made similar comments on the need to reduce diffuse nitrate pollution and the need for WCMA's to effect this, to the Minister for Planning & Environment, in response to the draft Island Plan consultation.

We trust the above comments are constructive and helpful to the scrutiny sub-panel.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H Snowden', with a stylized flourish at the end.

Howard N Snowden
Managing Director & Engineer