

Dear Sirs,

The Environmental Statement may be designed with the best intentions to persuade planners and the public that this development differs radically from other intensive pig units. However, it contains ambiguities that reveal that when it is in production the unit may not in fact be able to follow the procedures advocated.

The Ambiguities

Welfare:

The proposal refers to 'the *potential* elimination of tail docking'. If this turns out to be wishful thinking, they, like most intensive pig farms, will '*potentially*' have to routinely tail dock which is illegal under EU and UK regulations. Tail docking would prevent the pig unit from achieving the RSPCA Freedom Food Certification – the anticipation of which has kept the animal welfare groups silent.

Human Health Hazards:

The Environmental Statement also describes the sows' living conditions. The floor incorporates an '*innovative* concrete and plastic slatted floor which allows all pig waste to pass through into the water tanks below'. The partially slatted floor system is not an innovation; it is used by many factory pig farms. The toxic fumes from the faeces and urine in the 'water' tanks under the slates will no doubt damage workers' health. A US report found that 25% of people working in intensive pig units suffer permanent lung damage. See the report:

Occupational Health Risks for Swine Producers: Inferences for Public Health Risks of People Living in the Vicinity of Swine Production Units by KJ Donham, University of Iowa.

Environmenta Issues

The Slurry Storage Tank:

The Environmental Statement says,

'The large areas of slurry storage under the buildings together with a *further water storage tank* will provide water or slurry storage during months of rainfall' Is this the 75 X 25 metre uncovered tank shown on the plans?

Will this tank contain pig waste? If so it will emit gasses, cause fly infestation which can spread antibiotic resistant bacteria, and potentially lead to another outbreak of swine flu.

See www.jhsph.edu/water_health/_pdf/AntibioticResistantEntero.pdf

Experience with lined tanks like this in the US has shown that, under the weight of the slurry water, with age the soil underneath them settles causing sharp rocks to

move and puncture the lining material causing them to leak; thus contaminating the water table with pig waste and nitrates.

Antibiotics and Gases:

As Midland Pig Producers propose to use bare slats for most of the floor space and wean piglets at only 3-4 weeks they will need to use preventative antibiotics routinely to keep the pigs alive in a cocktail of gasses from the biodegrading faeces under the slats.

The result of routine antibiotic use will be antibiotic resistant bacteria diseases that can pass to humans. This, the WHO says is a, 'serious concern given the alarming emergence in humans of bacteria, which have acquired, through this use, resistance to antimicrobials.' The antibiotic bacteria like e-coli, salmonella, campylobacter and the pig strain of MRSA will be inside the shed and could be spread from the farm itself or its workers, via flies from the 'sealed' barns and any open tanks can be spread to neighbouring residents via flies and lorries transporting pigs to slaughter.

Anaerobic Digester:

Although the digester destroys some antibiotic resistant bacteria, research suggests that it is not hot enough to destroy *clostridium difficile* which has been found in British pigs and may pass to humans.

A 2010 report by the Agri-Food and Biosciences Institute found that although anaerobic digestion lowers the pathogen load in digestate, there is incomplete kill of some bacterial pathogens such as *salmonella*, *listeria*, *E. coli* and *campylobacter*.

The neighbouring Prison:

If, after all there turn out to be the same problems of smell, disease risk and contamination as there are with almost all other intensive pig farms, the people who will suffer most will be the inmates of Foston Hall Prison. Their cells and yards are downwind from the prevailing westerlies, and their windows open towards the slurry and water tank, a likely breeding ground for flies which a recent US report has found can spread antibiotic resistant bacteria.(see above)

Earlier this year the British Government was found to be in breach of the European Convention on Human Rights by denying voting rights to prisoners. Have the prisoners at Foston been informed of the application, and has the planning committee considered their views? If the prisoners are denied an input into the process, the council might find itself in breach of the Convention and liable for damages to prisoners whose rights have been denied them.

Increased Traffic Problems:

I notice that the plans do not offer solutions to the myriad of other external costs attributed to giant pig farms. Operating the site could mean 28 HGV movements every weekday, severely impacting the amenity and house values in the area. The anaerobic digester will require 45,000 tons of additional organic waste (which the

developers say will include turkey offal and chicken manure plus their antibiotic resistant bacteria and odours) to be imported onto the farm every year, which could account for 8 HGV movements a day, seven days a week.

The Wider Issues

In the UK we have already lost half our pigs to unfair, low welfare competition from intensive farms, most of which operate illegally in breach of the EC Pig Directive. We are now being told our small farms must consolidate to compete. Yet, most of our pork needs could be met by small scale independent farmers from outdoor or deep straw pigs that seldom use antibiotics and where their waste is a valuable fertiliser to grow their own feed.

The Solution

Rather than supporting a mega farm on green fields, our elected bodies could lobby for a CAP that shifts the subsidies that Foston will receive for providing renewable energy to farmers whose benefit the community, local economy, animal welfare and who presently are not remunerated by the market. Farmers should be paid a fair price at the farm gate. Councillors could encourage more local production for local consumption via community supported agriculture schemes and farmers markets where the farmer and consumer get a fair price, transport is reduced and work in the neighbourhood is revitalised.

If pork costs were to rise, consumers could be advised to eat less meat. This would save their money and reduce the likelihood of excess meat related diseases like cancer, heart disease and diabetes so reduce cost to the national health service.

Conclusion

If given permission, the mega-farm at Foston will only accelerate this race to the bottom for UK smaller scale farms who, in an economy of scale, will be unable to compete. Based on government figures up to 350 of the smallest pig farms could lose all their sales if the pork from Foston hits the market.