

# Sustainable Farming and our Land - Consultation Response Form:

This response form provides an opportunity to comment on the content of the *Sustainable Farming and our Land* consultation.

If you have any queries on this consultation, please email:

[LandManagementReformUnit@gov.wales](mailto:LandManagementReformUnit@gov.wales)

## Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

## Confidentiality

Responses to consultations may be made public on the internet or in a report.

**If you do not want your name and address to be shown on any documents we produce please indicate here**

**If you do not want your response to be shown in any document we produce please indicate here**

Date:	
<b>Name</b>	Chris Higgins
<b>Are you responding as an individual or as an organisation?</b>	Individual <input type="checkbox"/> Organisation X <input type="checkbox"/>
<b>Are you or your organisation based in Wales?</b>	Yes X <input type="checkbox"/> No <input type="checkbox"/>
<b>If you are answering as an individual, do you identify as Welsh speaking?</b>	Yes <input type="checkbox"/>
	No X <input type="checkbox"/>
<b>Address</b>	Y Plas, Machynlleth. SY20 8ER
<b>E-mail address</b>	chris@higgins.myzen.co.uk

<b>Please indicate which of these best represent you or your organisation (please select only one)</b>	Farming	<input type="checkbox"/>
	Forestry	<input type="checkbox"/>
	Environmental	<input type="checkbox"/>
	Tourism/Hospitality	<input type="checkbox"/>
	Food and timber supply chains	<input type="checkbox"/>
	Public Sector	<input type="checkbox"/>
	Private Sector	<input type="checkbox"/>
	Third Sector	X <input type="checkbox"/>
	Trade Union/Representative	<input type="checkbox"/>
	Other	<input type="checkbox"/>

<b>If you have indicated that you are a farmer, please identify your main farm activity (please select only one)</b>	Sheep	<input type="checkbox"/>
	Beef	<input type="checkbox"/>
	Dairy	<input type="checkbox"/>
	Arable	<input type="checkbox"/>
	Horticulture	<input type="checkbox"/>
	Mixed	<input type="checkbox"/>
	Other	<input type="checkbox"/>

<b>Do you currently claim BPS?</b>	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>

<b>Do you currently have rights to graze stock on a common?</b>	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>

<b>Are you a tenant farmer?</b>	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>

Responses should be returned by **30<sup>th</sup> October** to

Land Management Reform Division  
 Welsh Government  
 Cathays Park  
 Cardiff  
 CF10 3NQ

Responses completed electronically to be sent to:

[FfermioCynaliadwy.SustainableFarming@gov.wales](mailto:FfermioCynaliadwy.SustainableFarming@gov.wales)

[FfermioCynaliadwy.SustainableFarming@llyw.cymru](mailto:FfermioCynaliadwy.SustainableFarming@llyw.cymru)

## Introduction

This response has been written on behalf of **ecodyfi**, and also takes into account the partnership working of the Dyfi Biosphere.

**Ecodyfi**<sup>1</sup> is a not for profit bilingual Development Trust delivering sustainable community regeneration in the area of the Dyfi Valley. The foundation of ecodyfi's work is the extensive network of contacts (including many who work the land) in mid-Wales built up over the 21 years of the organisation's existence. Ecodyfi runs a portfolio of activities; one of the most relevant, in respect of developing this response, is the current LEADER funded 'Mixed farming – histories and futures' project – whose aim is to work with the farming community and encourage movement towards sustainable mixed agriculture and a more resilient local food production economy.

The **Dyfi Biosphere**<sup>2</sup> Partnership (which includes Welsh Government (WG) and Natural Resources Wales) is the governing body of Wales's only UNESCO designated Biosphere Reserve. The status was awarded in 2009 in recognition of the broad community support in an area of high nature conservation value whose population expressed willingness to promote and explore ways of advancing the sustainable development agenda. This is reflected in the broad range of partners involved in the Biosphere's governance; several of whom will have submitted their own response to this consultation.

## Our Vision

*“The Dyfi Biosphere will be recognised and respected internationally, nationally and locally for the diversity of its natural beauty, heritage and wildlife, and for its people's efforts to make a positive contribution to a more sustainable world. It will be a self confident, healthy, caring and bilingual community, supported by a strong locally-based economy.”*

## Co-design

Ecodyfi and the Dyfi Biosphere Partnership would like to offer our assistance in helping with co-design (and possibly piloting) aspects of the proposed scheme as outlined in chapter 9 of the consultation. For example, we could start by arranging a workshop with farmers and other key stakeholders from the Dyfi Valley area to discuss how collaborative networks might be supported.

## Consultation response

Creating conditions for sustainable farming to flourish in Wales is a profoundly important undertaking with implications for the future of our Welsh environment, economy, society and culture. One immediate consequence of this observation is that the transition to sustainable farming should be clearly framed within a broader policy context.

WG has a track record of developing world class forward looking policies such as those manifested in the Environment and Wellbeing of Future Generation Acts and we agree that both the latter are of central concern in framing conditions for the future of agriculture in Wales. However, as the consultation recognises, the impacts of the agricultural practices we adopt extend well beyond food production and we would like to see greater evidence of joined up thinking with other policy areas such as trade, food, health, planning and climate.

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<sup>1</sup> <https://www.ecodyfi.wales/>

<sup>2</sup> <https://www.dyfibiosphere.wales/>

## Climate emergency

Taking climate as the preeminent example. In response to the International Panel for Climate Change (IPCC) considered statement of 2018 that we have 12 years to take the necessary steps to prevent a rise of more than 1.5C globally; climate emergencies have been declared in Wales at the National<sup>3</sup> and Local Authority level. Changes in land use – the subject of Sustainable Farming and our Land – will be an increasingly important factor in achieving both reductions in emissions and sequestering carbon if we are to meet the targets the scientific evidence requires.

The Committee on Climate Change has calculated that agriculture is directly responsible for 10% of the UK economy wide emissions. However, it has been calculated that the wider food system is responsible for more like 30%<sup>4</sup> of the UK economy wide emissions once we factor in:

- Indirect emissions from the supply chain: manufacture, transport, refrigeration, packaging, etc.
- Indirect emission from land use changes caused by global supply chains, e.g. burning and cutting rainforest to grow soya and palm oil

By definition, the climate emergency requires urgent action; if changes to the UK food system are to make a significant contribution to realising the targets required by the scientific evidence we need to cut emissions (both direct and indirect) and sequester more carbon. This requires a more holistic approach when considering the future UK food system and greater linkage across policy areas such as food, trade, health, planning, climate and agriculture.

We note that care has to be taken when considering local, regional or devolved actions based on conclusions from studies at the UK or global scales. This is particularly true when analysing how the Welsh agricultural sector can contribute towards climate change mitigation and adaptation. Much of Wales is Less Favoured Area and the main agricultural activity is forage-based livestock farming. This form of low intensity agriculture is highly important for Wales and should continue to have a significant role to play in terms of both food production and storing carbon.

We commend the WG for mentioning the climate challenge up front in the document. However, we do not feel that a sense of emergency permeates the consultation with the kind of urgent conviction the evidence requires.

## Sustainable land management

Wales needs a nature-based solution to producing food. The Food and Agriculture Organisation (FAO) of the UN<sup>5</sup> uses the term ‘agroecology’ for such an approach. It can be understood as farming that “centres on food production that makes the best use of nature’s goods and services while not damaging these resources.” This is a simple, globally recognised term used to communicate the central importance of understanding that sustaining the productive capacity of agriculture is entirely dependent upon the continued existence of intact, functioning, healthy ecosystems. Agroecology is simultaneously a science, a practice and a social movement. We would refer you to a significant report written

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<sup>3</sup> <https://gov.wales/welsh-government-makes-climate-emergency-declaration>

<sup>4</sup> <https://www.fcrn.org.uk/fcrn/publications/how-low-can-we-go>

<sup>5</sup> <http://www.fao.org/agroecology/overview/en/>

in 2015<sup>6</sup> by The Land Use Policy Group (of which NRW is a member) which also concludes on the importance of agroecology.

The consultation emphasises the use of sustainable land management (SLM - also a term endorsed by the FAO) as an over-arching concept, of which food production is a 'vital component'. Agroecology can be understood as an approach to the food production component of SLM<sup>7</sup>.

We would urge you, in the interests of clarity and the kind of shared language necessary to articulate a clear vision of what Welsh farming, capable of being sustained over centuries will look like, to make use of the terms agroecology and agroecological. Many of the "actions" you describe are widely understood as characteristic of diverse agroecological farming systems.

### **Targets, food security and vision**

For a variety of reasons, the Common Agricultural Policy being one, the Welsh agricultural sector has become less diverse and more specialised over the last two centuries. There is clear data<sup>8</sup> showing a pronounced reduction in areas devoted to arable production across the country.

All three of the significant challenges listed in the consultation:

1. sustainable food production
2. responding to the climate emergency
3. reversing the decline of biodiversity

can be addressed by measures that seek to reverse this trend and encourage mixed farming (arable as well as livestock) using modern agroecological practices.

Despite the evidence emerging from the scientific community through organisations such as the IPCC, we believe the threats to food security in the next few decades are underappreciated. Wales is less self-sufficient now than it was in the past and highly dependent on global supply chains that are going to become more fragile.

To address the challenges listed in the consultation and improve food security, we are of the opinion there is a need for firm targets set in the framework used by the document at the appropriate level, i.e. benefit, outcome or action.

These targets should be informed by the appropriate scientific assessment in the relevant policy area, for example, carbon sequestration as part of climate policy. Crucially, the targets should build upon best practice currently widespread in Wales in respect of low intensity pasture grazing but also encompass plans to diversify Welsh food production and increase the area of land under arable and horticultural cultivation as part of mixed agroecological farming systems.

Finally, to help achieve a collective understanding, make the document more coherent, set the context and flow better, we are of the opinion that WG needs to spell out more clearly at the start the vision of what sustainable farming will look like. The recently reported RSA Food, Farming and Countryside Commission's work<sup>9</sup> provides an example of how this can

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<sup>6</sup> <https://www.nature.scot/role-agroecology-sustainable-intensification-lupg-report>

<sup>7</sup> [https://www.researchgate.net/publication/327837497\\_Alternative\\_Approaches\\_to\\_Sustainable\\_Land\\_Management-Can\\_Agro-Ecology\\_Deliver\\_Multiple\\_Benefits\\_For\\_Scottish\\_Agriculture](https://www.researchgate.net/publication/327837497_Alternative_Approaches_to_Sustainable_Land_Management-Can_Agro-Ecology_Deliver_Multiple_Benefits_For_Scottish_Agriculture)

<sup>8</sup> <https://www.fuw.org.uk/images/pdf/fuw-cynefin-study-preliminary-findings-to-date-27th-July-2016.pdf>

<sup>9</sup> <https://www.thersa.org/discover/publications-and-articles/reports/field-guide-future>

be done. Ambition, courage and urgency in addressing the climate emergency needs to be reflected in this vision statement. We hope we have made it clear in our response what direction we think the evidence requires we travel and we will be available to help if required.

### Question 1 - Sustainable Land Management (refer to chapter 3)

What are your views on the Sustainable Land Management framework? You may want to consider:

- whether the structure of benefits, outcomes and actions is a useful tool
- whether the benefits and outcomes sufficiently cover the broad contribution of farmers, foresters and other land managers
- how we have described the Sustainable Land Management outcomes
- whether it is right to focus an income stream on environmental outcomes
- whether an alternative policy framework would be more appropriate

### Comments

In our opinion, the **structure** of benefits, outcomes and actions is a useful tool and Sustainable Land Management is an appropriate framework. When talking specifically about sustainable food production, we strongly recommend you lay down a clear marker and make specific reference to agroecology and agroecological practices.

We are sympathetic to the substantial difficulties of making the transition towards sustainable farming in the context of a globalized market economy. An example of this is reconciling observations such as *“a narrow focus on economic sustainability may be dependent on the unsustainable use of natural resources”* while WG is under pressure to focus on *“economic performance”* and *“productivity”* as conventionally defined.

WG has limited influence on the global market that the Welsh agricultural sector exists within. While the current global market economy continues to reward the production of cheap food without the full costs and multiple disbenefits down the supply chains being accounted for, it is going to continue to be difficult for food produced sustainably to be affordable on the high street.

We applaud the effort WG is making and agree you are right to focus on **income streams** for environmental outcomes. We would recommend less focus on economic **outcomes** as conventionally defined.

Agriculture is the bedrock of the Welsh economy, society and culture. For the reasons given above, we think greater effort is needed to incorporate targets and set these proposals within a broader **policy framework** that takes into account other policy areas such as food, trade, health, planning and climate.

**Employment** as a benefit of sustainable farming is notably missing. The kind of small, mixed family farms that were more common in Wales in the past employed more people. Aiming for this social benefit in the future would have the outcome of encouraging larger numbers of smaller traditional farms and other more innovative models, e.g. community supported agriculture; all characterized by being mixed, more diverse, labour intensive and using modern agroecological methods.

An action that flows from this is education to encourage greater appreciation of the importance of farmers; not only as food producers, but also at the heart of Welsh language, culture, cohesive communities and providers of real, socially useful jobs and rewarding employment.

**Soil:** It is page 41 before this statement appears “...such as an intact topsoil with healthy microfauna underpinning the productive capacity of farmland, pollination and natural management of the balance of predator/pest species)...” A foundational paragraph emphasising soil health as the absolute immutable basis of agriculture with an explanation what that means should appear earlier and be much more prominent in a document dealing with sustainable farming.

## Question 2 - Sustainable Farming Scheme (refer to chapter 4)

What are your views on the proposed Sustainable Farming Scheme? You may want to consider:

- how the Farm Sustainability Review and Farm Sustainability Plan could be delivered in a proportionate manner
- how best to reward farmers for outcomes through their actions
- how the Sustainable Farming Payment should operate
- what business support should be offered to farmers
- what eligibility criteria are needed
- whether there is a role for capped or diminished payments
- how best to design the scheme to leverage additional private finance
- alternative ideas for supporting farmers in a manner consistent with Sustainable Land Management

### Comments

For the multiple reasons cited elsewhere in this document, it is important to protect and nurture small Welsh family farms. Many smaller farms have, in the past, been deterred from taking advantage of available subsidies because of the disproportionate administrative burden. As a large number of benefits: economic, environmental and social, derive from small mixed farms it is important that delivery of the Farm Sustainability Review and Farm Sustainability Plan be **proportionate**. We recommend the administrative burden is minimised for smaller scale farms and gradually increased if necessary for larger scale farms or claimants for larger sums of money.

WG should consider expanding the list of mandatory actions in respect of reducing emissions and sequestering carbon, this is proportionate in the current climate emergency situation.

Farmers should be **rewarded** financially for sustainable environmental, economic and social outcomes through their actions where there is no market for the goods they produce and the goods are of public benefit. Care will need to be taken to ensure the full range of outcomes is accounted for as many are under-researched, not well understood and the current economic system is weighted against farmers who produce food sustainably.

For example, using agroecological methods to grow crops may result in lower yields and less income than those realised by farmers using mainstream agroindustrial methods. Under the Sustainable Farming Scheme, rewarding the agroecological farmer for the full range of sustainable outcomes will be difficult as the precise degree of sustainable outcomes can be difficult to quantify, e.g. additional carbon sequestered as a consequence of growing various crops using systems which rely upon soil organic matter as the source of fertility.

Compounding this is an economic system which treats the range of unsustainable disbenefits (such as diffuse pollution, damage to soil health, reduction in biodiversity and poor carbon balance) as externalities which are not accounted for in the costs of production. Note that the most egregious examples of the above are typically found *outside* of Wales, e.g. in regions of the UK with higher grade agricultural land or abroad where animal welfare standards are lower. Cheaper food from these areas impacts the Welsh food system.

Economic sustainability as conventionally measured using concepts such as performance and productivity is often at the expense of overall sustainability. Consequently, and in keeping with the integrated SLM approach, **business support** should focus on achieving environmental outcomes. To maximise the benefits, business support should be targeted at increasing the number of economically viable small mixed agroecological farms. In practice, this means Welsh farmers continuing with low intensity pasture grazing, but also diversifying food production, more arable and horticultural cultivation, and investment in land uses that store more carbon.

It is positive that capital investment is within scope as the machinery and knowledge necessary to engage in more diversified farming has become scarce in much of Wales – it is interesting to note that more widespread mixed farming is still within living memory and here in mid-Wales, many farmers report old (unusable) equipment from the 1960's rusting in barns! There should be no impediments to using secondhand machinery and novel methods should be explored for encouraging sharing or pooling of equipment.

A similar comment to the above applies to the knowledge transfer and specialist skills required for business development. Farming Connect has an important role in this respect though more emphasis on arable and horticulture is needed. There is a national need for upskilling in agroecological methods and better understanding of ways for farmers to collaborate and coordinate actions across landholdings.

On the subject of **eligibility**, we agree the “active farmer” test is crucial. Only farmers undertaking positive actions should receive a Sustainable Farming Payment. Landowners and farmers should not be paid for just owning land.

Greater consideration needs to be taken in respect of **new entrants**. If environmental and social benefits are to be realised it needs to be attractive and easy for young people to get involved with running, owning and working on small mixed agroecological farms. This means that barriers to leveraging the Sustainable Farming Scheme for new entrants need to be minimised. In particular, thought should be given as to how to keep the scheme flexible and open for new entrants, and how to enable payment from the scheme to be factored into new entrants business plans. There is also a case for better linkage with planning policy here – young Welsh farmers frequently cite lack of access to housing as a major disincentive.

To help revitalise the rural economy and realise the greatest number of benefits, **capped or diminished payments** should be used to discourage large landowners using agroindustrial methods and encourage small landowners using agroecological methods. How this is formulated will be important; for example, a per hectare cap is a bad idea as this would not encourage horticulture – one of the most labour and skills intensive but productive uses of

land, and if done using agroecological methods, a land use that brings multiple benefits concentrated on small areas.

**Additional private finance** is becoming available for what were previously public goods through the developing market in Payment for Ecosystem Services. For example, upland landowners with significant areas of certified peatland are being presented with the option of selling this sequestered carbon product to corporations who are willing to pay to offset their GHG emissions. This market is currently immature and works best for products like peat and trees where volume of carbon is relatively easy (though far from straightforward) to measure. In the future, this market could very well become more refined and the Sustainable Farming Scheme should be designed with this in mind. If the relevant linkage across policy areas could be achieved, it would seem reasonable to compel polluting organisations to focus on making real cuts to the emissions they are responsible for but also use some of their profits to offset and provide additional finance in support of SLM.

In respect of **alternative ideas for supporting farmers in a manner consistent with Sustainable Land Management** it is difficult to see other immediately viable alternatives. Many farms in Wales are entirely dependent for their financial viability on the BPS and there is a real risk of widespread bankruptcy if the value of low intensity pasture grazing is not fully recognised, access to the scheme is not made easy and the transition is not carefully managed.

When you talk to farmers many will tell you they would prefer to not have to rely on subsidies at all. But, as you correctly identify, “...*the true value of sustainable food production is rarely reflected in the price a farmer receives for their produce.*” This is not going to change until farmers and other stakeholders down the food chains using unsustainable methods of food production have to bear the full costs. As we live in a globalised market economy many of these stakeholders are where WG has limited or no influence. We think the best WG can do is have a vision of where we want to get to and work in this direction by supporting our farming community, link up across the relevant policy areas where you can, be evidence based, resist vested interests and corporate lobbying.

### Question 3 - Advisory service (refer to chapter 5)

What are your views on an advisory service? You may want to consider:

- whether you agree an advisory service should be established
- the functions of the service
- what the relationship should be between the advisory service and the Welsh Government
- the appropriate scale of delivery

#### Comments

We agree that an advisory service should be **established**. We support the overall model of using advisors to work with farmers to enable an outcome-based system.

A key **function** of the service will be enabling access to training and capital investment opportunities identified during the Farm Sustainability Review. This is especially critical as

this document anticipates a sea change in agricultural practices - much of the knowledge and many of the skills required are absent or have been lost in the last few generations.

In respect of the **relationship** between the advisory service and the Welsh Government, a mixed model comprising a general WG service drawing on specialists as required is probably more appropriate, noting that need is likely to be frontloaded during the transition period.

Sustainability driven rather than profit driven agriculture is not mainstream. Agroecological research, development and education in the UK has been neglected compared with the levels of funding available to agroindustrial models. Consequently, there will likely be a shortage of expertise and a need for a considered agroecological pedagogy with processes encompassing learning at different levels. The loss of agricultural skills and ageing demographic would indicate that, where possible, an intergenerational peer to peer approach would be sensible.

To make this transition successful, the **scale** should be national and every farm should be visited and supported in the development of its Farm Sustainability Plan. The costs of this are likely to be substantial and be subject to criticism. Given the existential challenges we face, the costs are justifiable. They should be more comprehensible and palatable to the public if the reasons given are framed, at least in part, in terms of responding to the declared climate emergency. Especially if WG eloquently makes the case that we need to address indirect food system related emissions (entire supply chain and overseas land use impacts) as well as direct emissions due to agriculture.

#### Question 4 - Industry and supply chain (refer to chapter 6)

What are your views on providing support to the industry and supply chain? You may want to consider:

- whether it is right for support to be subject to Sustainable Land Management
- whether the proposed priorities reflect the right areas of focus

#### Comments

To help achieve the stated benefits, improve food security and address the three significant challenges listed in the consultation:

1. sustainable food production,
2. responding to the climate emergency
3. reversing the decline of biodiversity

it is right that support for the wider industry and supply chain be subject to SLM – providing that local provenance of supplies can be guaranteed.

Farmers will often cite as a reason for the lack of diversity in Welsh agriculture the absence of markets and inability to compete with cheap imports from outside Wales. We therefore need to generate local demand by investing at different points in short local supply chains and work out how to make them economically viable.

The priorities should be presented in the context of agriculture, industry and the climate emergency – the need for greater self-sufficiency and production of more diverse, healthy

and affordable foodstuffs in Wales. *Shortening supply chains for Welsh products* is therefore the most important **priority**.

The updating of the Agricultural Land Classification (ALC) and underlying soils data with projected changes in ALC under different climate change scenarios is important information that will help our farmers and food producers adapt to climate change. It is also worth noting the need for integrating with planning legislation in respect of the use of ALC. For example, higher grade land as defined in ALC (of which there is not much in Wales) is protected from development. However, historically much of the 'lower grade' land in Wales was grown on and using modern agroecological methods can be both highly productive again and deliver multiple sustainability benefits. The conclusion is that the categorisation is not sufficiently granular and localised to meet the needs of sustainable farming.

Promoting sustainable brand values is fine but the focus on high value markets is wrong, we should be focusing on producing more diverse **affordable** and healthy foodstuffs nationally. The reality is that Welsh products will struggle in the supermarkets to compete with cheap food brought in as long as those engaged in unsustainable farming and food production elsewhere are not bearing the full environmental and social costs and prices are kept low.

WG should therefore prioritise finding ways of helping level the playing field and develop an agricultural policy framework within a broader scope encompassing trade, food, health, planning, climate, etc. In this respect, we would argue that WG should expand significantly on clause 6.32 "*We will work with the UK Government and the other Devolved Administrations to promote fairness in the supply chain*" and make the resulting material much more prominent in the document.

One or more worked examples in the document would help - analysed to show how sustainable outcomes are prioritised and delivered through local supply chains, e.g., healthy fresh Welsh bread baked using flour that is not highly processed with no additives from local mills using grain grown locally without agrochemicals.

### Question 5 - Regulatory framework (refer to chapter 7)

What are your views on our proposals to improve the current regulatory system and develop a new regulatory framework? You may want to consider:

- how the current regulatory framework can be improved upon
- the scope of a future regulatory framework
- the role a future regulatory framework would play in championing Welsh standards
- how compliance with regulation should be monitored
- how breaches can be fairly and proportionately enforced

#### Comments

The **current regulatory framework** has not been a huge success over the last few years<sup>10</sup> – many incidents of pollution have gone unpunished. It can be improved on by more support for farmers who want to clean up, stricter enforcement and the imposition of fines commensurate with the polluter's ability to pay. To be effective, fines have to hurt; too light

<sup>10</sup> <http://watery-news.co.uk/campaign-launched-to-reduce-agricultural-river-pollution-in-wales/>

and offenders will prefer incurring fines over investing in cleaner practices. It also puts those who do comply at a financial disadvantage.

At a minimum, there should be no drop in standards once we leave the EU. Regulatory bodies should be clearly separate from WG. The opportunity should be taken to improve standards in Wales and use this to champion sustainable brand values. Greater use should be made of technology, e.g. drones, ubiquitous low cost 'internet of things' environmental sensors and satellite data, to monitor the Welsh environment and alert when thresholds are crossed warranting field inspection.

### **Question 6 - Transition and funding (refer to chapter 8)**

What are your views on the purpose and design of a transition period? You may want to consider:

- the proposed principles for transition
- the relative merits of the three transition options
- alternative proposals for transition
- how the CAP can be simplified and improved while it is still in operation

#### **Comments**

The four principles listed as a proposed basis for discussion on scheme transition seem sensible. As many farmers in Wales are dependent upon BPS for financial viability and there will be an extensive need for upskilling in sustainable farming practices, more than seven years and greater emphasis on training will probably be required for the kind of evolutionary development being aimed for.

We need a focus on keeping established farming families working the land and attracting younger generations into the sector. The demographic of working farmers has changed in recent decades with young people deterred by low incomes, economic precariousness, difficulty in affording housing, hard outdoors work, isolation, being socially undervalued and the attractiveness of alternative more secure employment in urban areas.

Any transition option that removes BPS and does not replace it with a commensurate amount of funding risks the unintended consequence of causing bankruptcies and pushing people out of farming. For this reason, something like option A, gradual and phased, is probably to be preferred; scheme entry should be kept open and any capping of new scheme payments should take into account the income of the farm pre-Brexit, this is particularly the case for small family farms working to tight margins.

Option B seems less attractive as it risks a cliff edge (when BPS closes) for existing farmers who, for whatever reason, have not enrolled in the scheme. Neither is it a good idea to close enrolment; for the many reasons given above, it should be a national priority attracting young people and new entrants into sustainable farming.

## Question 7 - Analytical approach (refer to annex A)

What are your views on the analytical approach set out? You may want to consider:

- the different stages of analysis
- the different tools and techniques which may be necessary for different aspects of the analysis
- the range of impacts which we propose to consider with the Integrated Impact Assessment

### Comments

As explained above, we want to see the small family farms using low intensity pasture grazing typical of much of Wales protected and nurtured. We see this farming community as the core of a transition towards a revitalised rural economy based on more people working in a larger number of small, mixed, modern agroecological farms. This degree of transformation is essential if we are to maximise Wales's contribution to reducing GHG emissions and storing carbon to the extent necessary to meet the set targets and prevent the worst excesses of global heating.

In this respect, stage 5 of your analysis is crucial and it is important that maps showing where the opportunities for more diversified primary food production in Wales are produced. For example, the places where arable cultivation took place in the past and could again in a sustainable future where short supply chains are the norm. This is what the ecodyfi led, LEADER funded 'Mixed farming – histories and futures' project is piloting. This could be combined with information emerging from the improved Agricultural Land Classification project on what crops will grow in Wales in the future under the projected climate change conditions.

For food security reasons if no other, subsequent economic modelling stages in your analysis should incorporate the assumption that global supply chains responsible for significant GHG emissions will be curtailed. For example, let's be clear and work towards a future where rainforests are not being cut and burned to grow soya for export to countries like the UK to use in animal feed. Assume instead that nationally we will eat less meat and build on widespread best Welsh practice to feed our own livestock using pasture, forage crops and waste as part of mixed agroecological systems.

Your analysis should attempt to enumerate the broader sustainability benefits of larger number of small, mixed, modern agroecological farms. For example, the positive impact on rural communities, employment and health.

## Question 8 - Welsh language

We would like to know your views on the effects the proposals in this document would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English. What effects do you think there would be? How any positive effects could be increased, or negative effects be mitigated?

### Comments

The cornerstone of sustainable farming in this country is traditional small Welsh family farms, the farmers and their families. The extensive social networks built up over generations by predominantly Welsh speaking farmers in much of Wales is the foundation of the rural communities upon which we should build. Nobody knows the land like these people, many of whose families have been farming in Wales for hundreds if not thousands of years. This is sustainability.

We are proposing that WG builds on best practice in low intensity forage-based livestock production already widespread across much of Wales and aims for a more extensive network of highly productive small family farms, encourages diversification of food production and supports the development of local supply chains. This will increase employment opportunities in Welsh speaking areas to the benefit of the language.

Positive effects can be increased by concentrating effort on education; emphasising the importance of agriculture as central to Welsh culture, language and society. Farmers need to be more highly valued and local food used to connect communities more.

### Question 9 - Other comments

- If you have any related issues that we have not specifically addressed, please let us know.

### Comments

#### Co-design

Ecodyfi and the Dyfi Biosphere Partnership would like to offer our assistance in helping with co-design (and possibly piloting) aspects of the proposed scheme as outlined in chapter 9. For example, we could start by arranging a workshop with farmers and other key stakeholders from the Dyfi Valley area to discuss how collaborative networks might be supported.