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30th October 2018

**Gweithwyr y Tir/ Landworkers' Alliance**  
**Cymru Response to:**  
**Brexit and Our Land: Securing the**  
**future of Welsh farming Consultation**  
*(Llywodraeth Cymru/Welsh Government)*

**Question 1 of 20**

From Chapter 4: Land Management Programme

**We propose a new Land Management Programme consisting of an Economic Resilience scheme and a Public Goods scheme. Do you agree these schemes are the best way to deliver against the principles?**

1. Yes
2. No ✓
3. Unsure

**If NO, what alternatives would be best?**

The creation of a new agricultural policy for Wales offers a unique, once in a lifetime, chance to change the way that Welsh land is farmed by supporting agroecological and regenerative agriculture approaches to farming. Such approaches, which are already practised by our members, simultaneously produce food and deliver the public goods listed in the consultation document.

The principles

We strongly support the five principles stated. However, we have a number of amendments.

With respect to Principle 1, Keeping land managers on the land, we call for an ambition to increase the number of people engaged in land based activities, not simply maintain it.

Based on the Welsh Government's own figures<sup>1</sup> we estimate that only a third of holdings employ more than one person.

For Principle 2, the document refers to "continuing to support the economic activities of farmers where it is sustainable and financially viable to do so". However, it is not clear what is meant by sustainable. It is essential that the definition include economic, environmental and social sustainability.

With respect to Principle 4, that future support will encompass provision of public goods, this should explicitly include the following societal public goods: Food Sovereignty; Social Cohesion and Cultural Integrity, and Health & Wellbeing. We provide more detail of these additional public goods in response to Question 10. Their inclusion should be explicit because when it comes to provision of social goods in public policy, these can all too often become buzzwords that are paid lip service to, instead of being core policy aims.

We note that there appears to be no focus on connecting Welsh farming policy with Welsh food policy or connecting Welsh agriculture with healthy food for the people of Wales. We believe that the production of healthy food for the people of Wales needs to be at the core of Welsh agricultural policy. An integrated food and agricultural policy should consider what is needed for a healthy diet and ensure that as far as possible the production of this in Wales is supported. It should also ensure that healthy and locally produced food is accessible to all people in Wales. A failure to include this would represent a missed opportunity to develop a truly integrated food and agricultural policy that improves the health and wellbeing of the people of Wales.

### **A whole farm management scheme**

We argue that sustainable food, farming and forestry systems can only be achieved where the food production system itself delivers environmental benefits, including many of those identified as part of the 'public goods' scheme. This being the case, it makes no sense to separate 'economic resilience' from 'public goods'.

We advocate a Whole Farm Management Programme, with one cohesive strategy incorporating and supporting both economic resilience and public goods. There should be options in terms of which areas should receive support, which would include transitional funding to shift towards organic and agroecological systems.

Crucially, payments should only be made to active land managers (including foresters) practising environmentally sustainable farming/ forestry, for example agroecological, organic and agroforestry-based systems. Land managers would need to follow stringent rules for environmental protection and animal welfare. Significant resources should be made available to support producers to move towards such production systems, along similar lines to the previous Organic Conversion Information Service. We refer you to pages 12 – 16 of the Landworkers' Alliance's Recommendations for a post Brexit Agricultural Policy<sup>2</sup> for further details on our proposal for a single scheme.

Our main concern with the two schemes approach is that it could allow farms to split into

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<sup>1</sup> According to Farming Facts and Figures 2018 available at <https://gov.wales/docs/statistics/2018/180620-farming-facts-figures-2018-en.pdf>, 38,470 holdings in Wales provide an income, whole or part, for 51,900 people suggesting that less than a third employ more than one person.

<sup>2</sup> Recommendations for a Post Brexit Agricultural Policy available here: <https://drive.google.com/file/d/0B6eRd6MaabyucmdySjBLaTRScjQ/view>

areas that are used for intensive environmentally destructive agriculture and small sections that are set aside for environmental purposes, with public funds supporting both of these areas. Such an approach is what is currently incentivised and therefore frequently practised today and has led to the depletion of fertile soil, loss of biodiversity, pollution and high carbon emissions from agriculture. We note that under the Economic Resilience programme, payments will be linked to ensuring improvements in animal welfare and environmental standards. We welcome this principle, but are concerned that without proper oversight and ambition, the standards may not be sufficient.

A policy of simultaneously supporting environmentally destructive practices in one place and environmental public goods elsewhere - as is currently the case - is not good enough to address the challenges we face and therefore should be ended.

A one scheme approach, by contrast, would enable support and recognition of farming practices that simultaneously produce food and have environmental benefits, and encourage those that are not currently sustainable to amend their practices.

In the Welsh context, we stress the importance of upland, livestock-based systems, and highlight both its economic vulnerability and the need to promote ecologically sustainable practices. There has recently been significant concern about the damage to ecosystems caused by ruminants and this has led to calls for sheep and cows to be removed from our uplands entirely. However, this ignores the potential for livestock to play a positive role in environmental management, when the right practices are employed and the specific features of the landscape accounted for. It is not livestock upland farming per se that is a problem, but rather particular management practices. The Pumlumon Project<sup>3</sup> and PONT Cymru<sup>4</sup> both have examples of environmentally positive livestock management. See Annex A for more information on these.

A key issue in these and other examples identified is that farmers do generally need economic support to help them adopt environmentally positive approaches to upland farming. The changes that they need to make may lead to both economic resilience and public goods. Their eligibility for support should not be limited to one scheme if they are bringing multiple benefits.

Our second concern with a two schemes approach is based on previous experience, which suggests that linking two separate schemes can be problematic and burdensome. For example, the double funding elements of Tir Gofal & Organic Farming scheme, which vexed civil servants and led to a perception among farmers that they were being penalised for participating in both schemes. The greater danger is that this perception becomes a reality and those farmers that already practise sustainable farming are unable to receive funds under both schemes for public goods and economic resilience schemes.

### **If a two scheme approach is taken**

If the Welsh Government does nonetheless opt for a two scheme approach, then care must be taken to ensure that the above risks are minimised.

We believe that public money should only be used to support farming systems that are environmentally sustainable. This is not only crucial in its own right, but is also vital to long

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<sup>3</sup> <http://www.montwt.co.uk/what-we-do/living-landscapes/pumlumon-project>

<sup>4</sup> <https://www.pontcymru.org/conservation-grazing/grazing-case-studies/>

term economic resilience. Unsustainable farming practices ultimately make the land infertile. No payments should be made to support environmentally damaging or exploitative farming methods; however much a farm may meet the other criteria of the Economic Resilience scheme.

Leaving the European Union puts at risk a lot of environmental, animal welfare and workers' rights legislation. Regardless of the decisions made by Westminster in this respect, the Welsh Government should promote an ethical Welsh land management industry that promotes fair labour conditions and high levels of animal welfare. Payments should reflect this and at a minimum the current legal standards must be maintained as a condition of funding.

Applicants who meet the criteria for both positive public goods scheme and economic resilience should be rewarded under both schemes. No one should find themselves penalised or at a competitive disadvantage for combining both aims.

It is also important that payments do not only reward positive change, but also positive existing practice. Many of our members do not currently receive subsidies and have nonetheless managed to farm sustainably and stay afloat. However, they have generally done so on very low incomes, which may be put at even more risk with Brexit. It is therefore vital that these early adopters of positive environmental approaches should be able to qualify for support for what they are already doing.

Finally, the administration of these schemes should be simplified.

## **Question 2 of 20**

From Chapter 4: Land Management Programme

**Does the Welsh Government need to take action to ensure tenants can access new schemes?**

1. Yes ✓
2. No
3. Unsure

**If YES, what action would be best?**

The Welsh Government must ensure that everyone who is managing land has equal access to the schemes regardless of scale or tenancy.

In addition to ensuring access to tenant farmers, the Welsh Government should also ensure that other land managers are included, including those who fall below the 5 hectare threshold or do not have a historic entitlement.

The best way to ensure that both tenant farmers and landowners that did not previously qualify can access the schemes is to link access to activity rather than ownership. There should be an eligibility requirement to meet a definition of "Active Land Management" by the

individual or organisation applying.

We propose a definition of “Active Land Management” with standard criteria and also the option for land managers to demonstrate that despite not meeting the standard criteria, they can still be considered “Active Land Managers”.

For these standard criteria we recommend using the Farming Connect definition of working a minimum of 550 hours per year to qualify as an Active Land Manager. Although there are some problems with this definition (discussed further under Question 8 below) particularly as regards more intensive horticulture projects on small land areas, these could reasonably readily be resolved.

We would caution against using turnover figures to identify Active Land Managers, since this would risk excluding start-up businesses.

We agree that it will also be important to ensure that funds go to active land managers, rather than to land owners. One of the key problems for tenant farmers is that the Basic Payment Scheme payments have often been paid to the landlord whilst agri-environmental schemes went to the tenant. This was addressed previously by not allowing “dual purpose land”. A consequence of this was that farmers were penalised as highlighted in our response to question 1. A better way to avoid this problem would be to adopt the principle that payments should go to the people who are actually managing the land. This highlights the importance of a definition such as that proposed above.

Provided that land managers are pursuing qualifying activities, size or tenure of land should not be relevant.

### **Question 3 of 20**

From Chapter 5: Economic Resilience

#### **From your experience of current programmes, what do you feel would work well for the future?**

We have several recommendations to enable the scheme(s) to work well in the future:

1. The removal of the minimum size for qualification. Small producers often punch well above their weight in terms of public good and economic benefits, with more local jobs, and better development of the local circular economy. Therefore, supporting small scale farmers is the best way to achieve the Welsh Government’s goals. Despite their benefits small farmers have historically been disadvantaged or even excluded from schemes. This needs to change.

2. A focus on environmental outcomes rather than box ticking. Many of the current environmental schemes have been overly prescriptive and expensive to participate in. This includes both certification schemes such as Glastir Organic and payments for environmental management schemes. This has led to many small organic farmers being unable to get certification or giving it up and prevented others from qualifying for support despite meeting the objectives of the schemes.

3. Local scheme managers and a return to 'project officer' roles under Tir Gofal. These project officers need to be senior roles with sufficient expertise to enable them to adequately assess specific applications. This will help bring about Point 2 by enabling project officers to assess outcomes of actions taken or proposed. Individuals with sufficient expertise and time to assess individual proposals or outcomes can take multiple factors into account in a way that simply cannot be done through a prescriptive scheme. Glastir Entry is an example of a scheme with such problems.

4. Upfront rather than retrospective payments. Under the current scheme, initial investment is often required by the land manager before payment is received. This creates a barrier to entry for land managers that do not already have access to finance. Reversing this process by enabling at least some of the payments to be made at the start of a project would significantly improve accessibility.

5. Prompt payment and clear timelines. Under current schemes the timescale for payment and long delays in receiving it can cause significant cash flow problems.

6. Specific support including financial, technical and business advice. To help farm businesses move towards sustainable production systems including organic, agro-ecology and agroforestry based systems, which result in public goods provision.

7. A reappraisal of the priority areas under Glastir (carbon capture, water, and biodiversity) to a system that considers the potential benefits and needs of each region. This furthers the case for project officers identified in Point 3. We have expanded on this issue in our answer to Q8.

#### **Question 4 of 20**

From Chapter 5: Economic Resilience

**Do you agree with the focus of the Economic Resilience scheme being on growing the market opportunities for products from the land throughout the supply chain, rather than restricting support to land management businesses only?**

Yes, we agree that growing market opportunities should be supported and therefore agree that a focus along the supply chain is needed. However, the approach should not be simply to support market growth, the focus needs to be on support that enables markets that are environmentally, socially and economically sustainable.

We urge the Welsh Government to consider the food system as a whole and what is needed to ensure that the people of Wales have access to healthy, sustainably grown, local food. Welsh agricultural policy should ensure that Wales produces a healthy diverse range of foods to enable it to feed its people now and for future generations.

To achieve this, we advocate for a diverse sustainable food system in Wales, which supports vibrant communities, small scale farmers and good jobs. Whilst there are already many small sustainable food businesses, there could be more, and raising the number, impact and economic resilience of these requires changes in the market's infrastructure. Infrastructure that supports short supply chains is needed. Small scale farmers may struggle to sell their produce to local markets due to a lack of outlets that will pay reasonable prices and buy in small volumes. Support for more local shops, Community Supported Agriculture (CSA)

schemes, food assemblies, farmers markets, processing, packaging and storage facilities and small to medium wholesalers (such as Watson and Pratt's and C&M Organics) and more appropriate processing, packaging and storage facilities such as Celtic Pride are essential.

One clear example of infrastructure limitations is the current lack of local abattoirs. This means that livestock needs to be transported long distances, which has both cost, food mile and animal welfare implications. Welsh consumers may be keen to buy Welsh lamb but be unaware that it is often transported to England and back for slaughter. Use of large abattoirs is cheaper per animal when more are slaughtered there at once. Therefore, small livestock farmers suffer a competitive disadvantage because they cannot take advantage of these economies of scale. Support for small local and mobile abattoirs would go a long way to redressing this imbalance. In particular, it is important to ensure that such abattoirs are able to continue to upgrade to keep up with new policies and regulations.

Prioritisation should be given to projects that bring maximum benefit to the local economy. For example, a flour mill that uses local grain and sells to local bakers should be prioritized over one which imports grain and exports flour.

## Question 5 of 20

From Chapter 5: Economic Resilience

**Are the five proposed areas of support the right ones to improve economic resilience?**

1. Yes
2. No
3. Unsure ✓

**Are there any areas which should be included but currently are not?**

The five proposed areas of support already proposed (increasing market potential; improving productivity; diversification; effective risk management and increasing knowledge, skills and innovation) are all very broad and hard to argue against. Assessing their value will depend on the detail of what is supported.

### **Increasing market potential**

The consultation document refers to a principle of fairness in the supply chain and improving routes to domestic markets, both of which we strongly support. We believe that the best way to achieve both these outcomes is through supporting infrastructure and arrangements that enable shorter supply chains, which increase the farmers' share of the food pound. An example of such infrastructure is by supporting small and medium scale packhouses that can be used by multiple businesses. See our response to Question 4 for more examples of such infrastructure.

Another means of increasing market potential that supports fairness, as well as

sustainability along the supply chain, is through doing more with what is produced. For example, we could make full use of a single lamb carcass, rather than only using the parts that produce the meat that is currently most popular. This also supports the aim of increasing the circular economy. Achieving this will require significant education for both land managers and the public.

We do not agree with the Welsh Government's proposal to use this scheme to facilitate increased exports. Not only can subsidising agricultural exports have disastrous consequences for farmers in developing countries, which being unable to compete with foreign subsidised goods go out of business; but it is also an improper use of public funds. Whilst production of food for domestic consumption has the potential to bring benefits to the whole population, the benefits of exported goods go almost entirely to the exporter. Finally, a focus on exports tends to disadvantage small producers and lends itself to a market dominated by a smaller number of large players, and therefore a less resilient market.

### **Improving productivity**

It is essential that attempts to improve productivity should not be at the expense of environmental sustainability. For example, overuse of heavy machinery might significantly increase the unit of production per unit of labour in the short term, but when this leads to soil degradation it is not a viable long-term strategy for either economic resilience or long term food security. This concern backs up our case for why there should be one scheme not two.

We advocate a holistic approach to improving productivity and profitability through use of appropriate technologies that improve the efficiency of human labour whilst fitting within the limitations of their biophysical context which takes account of health, climate, biodiversity and ecology. Enabling this requires flexibility with respect to what tools can be funded, a point we outline further below.

There are many techniques that maximise productivity whilst simultaneously bringing environmental benefits. For example, intensively managed small diverse horticulture and mixed farms can produce very high yield per acre with high biodiversity and soil quality. See Annex A for an example of this from our member at One Planet Salads.

Supporting continuous education of land managers and skilling up the workforce in better techniques through both peer to peer skill shares and more conventional training is another way to improve productivity.

Finally, we note that the definition of productivity in new Agriculture Bill is 'increasing resource efficiency'. We believe that this is an appropriate definition provided that ecological resources such as soil carbon and biodiversity are included in it.

### **Diversification**

Support for niche infrastructure and capital investment for specialised businesses is needed.

Too often at the moment funding is directed towards 'more of the same'. The Farm Business Grant, for example, offers support for capital items on a specific list. By its nature, this excludes niche and specialised businesses. Subsidies directed to capital expenditure should be considered on a case by case basis and aim to support innovative farming practices.

Another problem with the current capital investment support is that it can only be used to purchase new products and requires a significant investment from the farmer. Supporting



the purchase of second-hand products, with lower investment by the land manager would not only ensure that capital support is not limited to those that already have capital, but it would also be in line with the aim of supporting the circular economy.

### **Risk management**

We wish to highlight the role that Community based agriculture can play in helping reduce risk. Under many CSA schemes, for example, customers commit to purchase food from the farm for a set length of time giving farmers a guaranteed market. The shorter supply chains mean that farmers can get fairer prices for their product and the stronger relationship with the local community can lead to support in difficult periods.

### **Increasing knowledge, skills and innovation**

We propose a different approach to knowledge exchange, which would be:

a) Farmer led. The model used by European Innovation Partnerships is a great example: here the agenda is set by farmers, who have direct involvement in collecting data, analysing results, drawing conclusions and disseminating results. Other good examples are Agrisgôp, the Farming Connect mentoring scheme and discussion groups, but these approaches need to become the norm rather than the exception.

b) Practically focussed. The approach to knowledge transfer needs to shift away from open days, conferences and seminars to practical learning where farmers experiment with new ideas and techniques on their own farms and sharing experience with their peers. An example of how this is done well is Llais Y Coedwig's skill sharing days, which are run by and for community groups but receive Welsh Government Funding.

### **Question 6 of 20**

From Chapter 5: Economic Resilience

**Of the five proposed areas for support, which are the priorities, both in terms of funding, and the sequence of delivery? For example, are certain measures needed in advance of others?**

We believe that this is asking the wrong question. Rather than ranking each area and then allocating budget accordingly, each individual funding application should be assessed on the overall purpose of that project in question; how well it supports the overall aims of the economic resilience scheme; and the extent to which it supports the public goods aims.

As a general principle, support should be linked to policy aims, and those projects that go furthest in meeting all these aims should be prioritised. Treating each of these aims individually risks an artificial division of budgets that may well turn out to be unsuitable for the needs of land managers and the environment.

One area that meets multiple aims and should be supported is infrastructure and investment that supports a circular economy. Encouraging use of waste products as inputs can have significant environmental benefits, but also reduces risk and opens up new markets. For example, using waste wood chip from a local tree surgeon to create compost on a farm

simultaneously reduces transportation and landfill; opens up a new market for the tree surgeon; improves the environmental sustainability of the farming practices; and reduces risk to the farmer who might otherwise be at the mercy of global commodity prices that are linked to chemical fertilizer production. This can also be achieved on a single farm through mixed farming and good composting techniques.

### Question 7 of 20

From Chapter 5: Economic Resilience

**Should we be investing in people, for example to bring in new ideas, skills and people into land management and the supply chain in Wales?**

1. Yes ✓
2. No
3. Unsure

**If YES, how should we look to do this?**

We strongly support the principle of investing in people and skills. It is notable that the land management sector has a very high median age with the average age of a farmer in Wales being over 65 and just 3% being under 35<sup>5</sup>.

Addressing this requires support for new entrant schemes that encourage new people into land-based livelihoods.

In order to address this, the key barrier that needs to be addressed is access to land. This will require more substantial intervention from the Government, but is necessary if there is to be any significant increase in new entrants.

Land prices have increased significantly over past years<sup>6</sup> whilst land ownership has become increasingly consolidated making small plots harder to find. Both of these problems have been compounded by the Basic Payment Scheme, which is yet another reason that we

welcome the move to a subsidy mechanism based on activity rather than ownership. However, on its own this is not likely to bring prices down sufficiently for most new entrants.

We propose a national land bank that would provide zero or low interest mortgages to new entrants and struggling farmers; support tenant farmers that wish to purchase the land they farm; and buy up land to rent and cheap rates to small scale sustainable farms.

In addition, agricultural policy should be linked with the One Planet Development (OPD) Policy and provide additional support to those aiming to set up new highly sustainable land based businesses through an OPD. We strongly support the fact that the OPD enables development of residential properties associated with sustainable land based businesses; however, the reality is that such developments are not possible without significant capital to start with. To realise its full potential, OPD must be available to those on low incomes

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<sup>5</sup> <https://www.walesonline.co.uk/business/farming/young-farmers-trying-breathe-new-13383695>

<sup>6</sup> <http://pdf.euro.savills.co.uk/uk/rural---other/uk-agricultural-land-2016-lr.pdf>

without substantial savings.

Other mechanisms that may help to address the problem of limited access to land include:

1. Loans and/or capital grants to support set up costs: agricultural infrastructure costs are very high and pose a significant barrier to entry.
2. Matching Landowners with new entrant farmers or other land entrepreneurs and encouraging the former to parcel up sections of their land and make them available to the latter. This is an approach that is taken by the Fresh Start Land Enterprise Trust in Staffordshire <http://freshstartlandenterprise.org.uk> and a similar scheme could work well in Wales.
3. Supporting organisations such as the Ecological Land Co-op, which purchases land and makes it available to financially viable farming, forestry and other rural enterprises.

Other practical small steps that could help encourage new entrants include:

1. Supporting apprenticeships and making them easier for land managers to offer. Current supported schemes have a high admin burden, which discourages uptake.
2. Increasing agricultural and land management education in schools and through community schemes such as CSAs to increase awareness of land management careers.

Finally, it is notable that small scale and sustainable farms are managed/ owned by a much higher proportion of women and younger people compared to the mainstream, and therefore supporting new entrants in this area will help address this long-standing issue in Welsh and UK farming.

## Question 8 of 20

From Chapter 6: Public Goods

**We have set out our proposed parameters for the public goods scheme. Are they appropriate?**

1. Yes ✓
2. No
3. Unsure

**Would you change anything?**

1. Yes ✓
2. No
3. Unsure

## **If YES, what?**

We support the direction and broad intent of the public goods scheme, but would make a number of amendments. As noted above, we believe that the public goods and economic resilience should be part of a single Whole Farm Management System. However, regardless of whether a two scheme or one scheme approach is taken, we would like to make the following comments.

### **Parameter 1: Scope**

We believe that the following three public goods should be added to the scope:

1. Food sovereignty for Wales.
2. Social cohesion and cultural integrity.
3. Health & Wellbeing.

More detail is provided in our response to question 10.

These three should be in addition to those public goods that are already listed in the consultation, which we strongly support. With recent FAO studies showing that a continuation of the status quo could mean an average of just 60 harvests left worldwide, changing practices to ensure soil conservation could not be more critical. In the face of climate change, carbon farming practices offer some of our best hopes for locking up carbon dioxide. With rapidly declining biodiversity the creation and protection of resilient habitats is also essential.

### **Parameter 2: Open to all**

We strongly support the Welsh Government's position that eligibility for historic schemes should not be a requirement to qualify for the new schemes. In addition, there should be no minimum acreage requirement. All Active Land Managers, regardless of size of holding or historic entitlement should be eligible.

As noted in our response to Question 2, we would support the use of the Farming Connect definition of working a minimum of 550 hours per year to qualify as an Active Land Manager.

For many land managers the size of their holding and type produce should make assessing whether they would meet this criteria straightforward. However, historically, Farming Connect and other schemes have not accurately captured the labour requirements of intensive horticulture and other atypical agricultural businesses. As a result these businesses have been excluded from much needed support.

A recent survey of holdings of <20 ha showed an average of 2.3 FTE workers per holding, with an average of 3.2 per ha. (Laughton: A Matter of Scale, LWA & Centre for Agroecology, Coventry University 2017).

Similarly, a survey and analysis of labour on organic farms in the UK and Republic of Ireland showed the highest labour intensity in the smallest holdings, with 1.82 FTE per farm on those under 2ha (Morison, Hine & Pretty, Centre for Environment and Society and Department of Biological Sciences, University of Essex, 2005)

We would caution against using turnover figures to identify Active Land Managers, since this would risk excluding start-up businesses. At the very least we would propose that businesses that do not fit neatly into standard categories of number of hours per hectare or that do not meet turnover conditions because they are new start-ups should have the opportunity to prove that they are indeed Active Land Managers. Again, this furthers the case for local Project Officers who will be in a position to judge whether or not applicants are genuine businesses.

### **Parameter 3: Opportunities for action**

This could conflict with Parameter 2: Open to All. It will be important to ensure that the success of the scheme is not compromised by excessive reliance on pre-existing mapping for Glastir.

We would propose at the least adding to the public goods opportunities wider dimensions of spatial targeting using postcode level information such as levels of deprivation and access to services indicators.

We would also propose that there should in addition be the opportunity for individual land managers to go to the scheme with their offer and show why they should be supported

### **Parameter 4: Evidence based**

We fully support the principle that all funding from the scheme must be contingent on evidence-based practices. However, the scheme must avoid making decisions on what to support based only on those metrics that are currently used by Rural Payments Wales.

In particular, metrics relating to wellbeing including health, education and social cohesion are widely available, and any public goods scheme should be able to draw on these when valuing outcomes.

The Sustainable Food Trust and Sector Mentor for Soils both provide good data and studies that can assist in providing evidence for effective practices.

### **Parameter 5: Additionality**

We support the principle that payments should be for practices that are above the minimum regulatory requirements and should require active land management; however, it is important that this does not lead to land managers that are already doing best practice being excluded. Any scheme that penalises those who are already exemplars to good practice disadvantages the very group that are likely to deliver the most under the new scheme.

### **Parameter 6: Advisory support for land managers**

We welcome this proposal. It is important that this service is staffed by people with sufficient expertise. This expertise will need to be broad enough both to cover innovative and environmentally sustainable approaches and to take account of social issues.

Within the public goods scheme it will be important that there are measures in place also to avoid 'capture' of advisory teams by particular interest groups.

As noted above, we strongly support the return of area Project Officers. Their on the ground knowledge should enable genuinely innovative approaches to be funded. Both project Officers and advisory staff will need to be sufficiently knowledgeable of agriculture and woodland management and engaged with the local community to be able to assess projects that aim to improve community cohesion and resilience.

We would also note that the advisory support should be linked with the area based Public Service Boards under the Wellbeing of Future Generations Act and draw on local Well-being plans.

### Question 9 of 20

From Chapter 6: Public Goods

**This scheme is meant to offer land managers the opportunity to access a significant new income stream as the BPS comes to an end. How could we improve what is being proposed to attract land managers whilst still achieving our vision and objectives?**

We strongly support the focus on outcomes and the plans to go beyond simply compensating for lost profit and costs as is currently the case under Glastir.

As noted above a key to ensuring that genuine public benefit in the outcomes is to ensure that the schemes are not overly prescriptive and to have project officers to offer advice and assess outcomes (see Annex A for more details).

It is important that the administration associated with the scheme is as limited as possible so that good projects are not prevented due to difficulties with the administration. The only limiting factors with respect to participation in these schemes should be environmental practice and whether the proposed project achieves the public goods outcomes.

### Question 10 of 20

From Chapter 6: Public Goods

**Are there any other Public Goods which you think should be supported?**

1. Yes ✓
2. No
3. Unsure

**If YES, why?**

We believe that the following public goods should be added: food sovereignty; community, cultural integrity & social cohesion; and health & wellbeing.

## **Food Sovereignty**

We believe that access to locally produced, healthy and sustainably produced food should be a public good. Access to clean water is considered a human right and we believe that access to quality food should be seen in the same light.

We would like to distinguish our position from that which argues that food per se is a public good. As noted in the consultation document, food itself has a market, which would exist without public support and it would be hard to argue that, for example, a crisp factory that imported potatoes and exported crisps was a public good for the people of Wales. However, a market for food in general does not necessarily enable people to access local, healthy, sustainably grown food.

Whilst there is a market for healthy, local and sustainably grown food, this is not one that is accessible to all, with those on low income least able to access it<sup>9</sup>. Enabling all people in Wales to access healthy food, regardless of income, should be considered a public good.

Through necessity, farmers often need to target high end, expensive niche markets to earn enough to pay for the costs of their sustainable approaches. Our members do not want to see access to good sustainably produced food limited to those on higher incomes.

Similarly, a new public goods based agricultural support system is well suited to tackle food deserts. These can be found in more remote rural communities as well as deprived urban areas, where poor transport and lack of shops combine to make it hard to access good healthy food.

Education should form part of any strategy to widen access to healthy food and farmers are ideally placed to develop understanding of ways to access, prepare and eat good food. They are also well placed to educate consumers about where food comes from and the relevance of agriculture to everyone's daily lives.

## **Community, cultural integrity and social cohesion**

Farming is integral to the culture of Wales and language of Wales, and an agricultural policy that doesn't recognise this will be a very poor agricultural policy. The health of the farming community is vital to the health of rural Wales and the Welsh language and culture. Given this, it is essential that the move from the BPS to the proposed public goods and economic resilience schemes must support rural farming communities adequately.

We would argue that including social cohesion and Welsh culture within the public goods scheme would demonstrate a genuine desire to ensure the wellbeing of rural Wales and encourage farmers and rural communities to support the new programmes.

A range of land based activities particularly those supporting close links between farmers and consumers could fall within this remit. To give just a few examples, we know that local markets, community supported agriculture projects (livestock or horticulture based), and box-scheme pick-up points provide not just access to food, but a social experience that brings communities together and reduces isolation for farmers and consumers alike.

Similarly, bringing schools, youth clubs, community groups and individuals onto farms and helping them connect and engage with the farming community not only promotes healthy eating but again supports a wider sense of community.

## Health and Wellbeing

We note that “A Healthy Wales” is one of the Wellbeing Goals, and as such health is already acknowledged as a “public good”. However, health is only emphasised in relation to recreation in this consultation, with little mention of the role of good food.

Diet is clearly a major component of a healthy lifestyle and something which the Welsh Government has the power to influence through its agricultural policy. Whilst it does not have the power to impose tax on unhealthy food, it can ensure that healthy food is produced in Wales and made available to its people. Increasing horticulture production to enable greater consumption of local fruit and vegetables would go a long way to achieving this. Please see Annex B for more details on this.

In addition to diet and exercise, the therapeutic benefits of farming and growing to help those with physical and mental health issues are widely recognised, and ‘care farming’ projects are already supported by Welsh Government<sup>7</sup>.

However, these therapeutic benefits should not be reserved for people in crisis. The new public goods scheme provides an opportunity to bring communities together around food production, preparation and consumption, giving opportunities for learning new skills, access to fresh local food, and improved mental and physical health through increased fresh air & exercise. In practice this would provide support for infrastructure and events that enable wider public participation in land management and bring people onto farms.

Overall, these three additional public goods can be achieved through access to local, healthy, sustainably grown food and a vibrant farming community.

## Question 11 of 20

From Chapter 6: Public Goods

**A number of public goods could potentially take several years, sometimes decades, to be fully realised. E.g. carbon sequestration through broad leaf trees. To deliver on these, land managers may need to enter into a long term contract. How do you see such agreements working? What do you see as the benefits or disadvantages to such agreements?**

Land Managers are likely to have two primary concerns with long term arrangements: certainty about receiving payments over the long term for investments made now and locking up parcels of land over the long term.

Long term agreements are needed to give farmers confidence to invest in long term projects.

Many farmers are concerned that they will be required to maintain, for example, habitats created under the scheme in perpetuity potentially long after support payments have ceased (many farmers refer to this as having land ‘locked up’). This should be recognised by Welsh

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<sup>7</sup> We refer you the Social Farms and Gardens website for more information on this and <https://www.farmgarden.org.uk> and to Clynfwy Farm as a case study of Care Farming in action <http://www.clynfyw.co.uk/hort.htm>.



Government.

There will be many situations in which the public goods production does not exclude other use of the land, which is one of the reasons why we proposed the Whole Farm Management Programme. Where a public good is either unaffected or enhanced by another management or production activity, the agreement should not prevent this.

There is also a need to ensure that long term agreements have the flexibility to ensure that the specific measures can change in response to changing environmental conditions or disease outbreaks such as Ash Dieback. Provisions should be made to ensure that the land manager is able to adapt to this without penalty and where possible change the means through which the same public goods outcomes can be pursued.

### **Question 12 of 20**

From Chapter 6: Public Goods

**A collaborative approach to delivering public goods may in some instances provide better value for money than isolated activity. How could the scheme facilitate this approach? How could public and private bodies contribute to such partnerships?**

We support the principle of collaborative approaches to delivering public goods. The most obvious example of this would be catchment areas, and we recognize the good work that has been carried out in this respect to date, and argue for its continuance and expansion.

We also see no reason why water companies should not contribute to the costs of catchment sensitive farming schemes, and acknowledge that this already happen in some cases; let it become the norm rather than the exception.

We see two further approaches to facilitating collaborative approaches. The first would be to use existing local and regional fora for this. One option could be to use Public Service Boards and the Area Statement process and enable landowners to engage in them both through identification of what is needed in their area and in offering delivery of the public goods identified.

The second would be a more bottom up approach in which multiple farmers, environmental and other community organisations, co-operatives and other local businesses could put together their own proposal on how to deliver public goods collaboratively.

### **Question 13 of 20**

From Chapter 6: Public Goods

**Some actions can deliver multiple public goods in the same location. For example, peat bog restoration can have benefits for carbon sequestration and flood risk reduction. However, some locations could be suitable for multiple public goods from different activities. For example, one location may be suitable to either plant trees for carbon sequestration, or to revert to wetland for biodiversity. How could locations for**

## **single, multiple or competing benefits be prioritised?**

There are three key points that should be taken into account when assessing this: the number of public goods that a given measure could accomplish; the specific needs of the area; and the perspective of the land managers.

As a general rule measures that deliver multiple public goods should be prioritised. We suggest that the overall benefit of a project should be assessed using the Sustainable Farming Trust metrics and those that 'score' highest get priority. However, where a specific area requires very specific needs it should be possible to override this. For example, in an area that routinely suffers from serious flooding, a measure only delivers flood defence could be prioritised over one which delivered multiple other benefits.

Land Managers should be involved in the process of deciding which benefit to prioritise and be supported in this. Their knowledge of the land they manage can be drawn upon to maximise the benefit of any measures and spot potential unintended consequences. In addition, they will need to integrate the environmental activities into their farming and goods production.

The role of well trained and supported project officers will be vital. Their input will be needed to strike a balance between land managers views & knowledge of their own land, and the needs of the wider locality.

## **Question 14 of 20**

From Chapter 6: Public Goods

**Given that support for the delivery of public goods will be a new approach in Wales, there will be a requirement for a significant amount of training and advice for the sector. How best could this training and advice be delivered? Which areas of the sector need the most attention?**

This training could best be delivered by supporting on farm learning, peer-to-peer exchange of knowledge and mentoring by experienced land managers.

Too much support and advice in the past has been through meetings and conferences, rather than practical on the ground activity. While meetings do have a useful role, this is likely to be mainly as a feedback mechanism within a wider project.

Project officer training will be at least as important as farmer training. Well trained and supported project officers will have a key role in the success of future schemes. In addition to the ability to assess Public Goods delivery, a good understanding of both sustainable agriculture and sustainable forestry management is important. This could be ensured by having separate agriculture and woodland specialists or by ensuring that all project officers have comprehensive training.

## Question 15 of 20

From Chapter 6: Public Goods

**Private investment in the purchase of public goods is already happening, but at a relatively small scale. How could the new scheme promote greater involvement from the private sector? What are the barriers to this type of investment?**

It is not clear whether this question is referring to private land managers; the private sector outside of land management; or both.

With respect to land managers this can be incentivised by linking of agricultural payments to public goods delivery. Participation and results will be increased by ensuring support, guidance and oversight from skilled project officers.

Planning policy is also relevant in this respect. Many individual farmers and land managers do currently produce huge amounts of environmental and community public goods through the way that they manage their land. While not directly related to the proposed new scheme, making sure that other government policies, such as planning policy - do not hinder this would really help.

With respect to the broader private sector we would urge some caution.

In principle we have no issues with drawing in private sector investment where this is appropriate. In particular, where a private company benefits from a public good, they should contribute to its delivery. For example, insurance companies could be encouraged to contribute to flood defences as whilst this is a public good it also has a financial value for insurance companies, due to the fact that it will reduce their payouts.

However, we are concerned that excessive reliance on private funds has the potential to skew decisions about which activities receive the most support. There is a danger that those public goods that have no obvious role or benefit for the private sector will receive insufficient investment.

In addition, when the delivery of public goods is outsourced to private companies, there is a danger that insufficient oversight and an incentive to cut costs will lead to corner cutting and a failure to deliver real public goods. This is particularly relevant with environmental and social goods that are difficult to measure or test.

## Question 16 of 20

From Chapter 8: Transition, delivery and legislation

**What are your comments on the phased transition period and our ambition to complete the changes by 2025?**

We agree that a phased transition period is essential for the future of Welsh farming. A sudden withdrawal of the existing scheme could result in a mass exodus of farming with a consequential loss of knowledge and attendant environmental, economic and social problems. It is important to recognise that many small and medium scale Welsh farmers are

already in a financially precarious position and should be supported as a matter of urgency. Promoting economic resilience and supporting training for more sustainable techniques and public goods delivery during the transition period will be essential.

We note that the Welsh Government has a good track record of managing transition. For example, their handling of decoupling payments was significantly better than DEFRA's. We acknowledge that the funding that Welsh Government receives post Brexit and the extent to which it retains its devolved powers over agriculture is not certain and we would like to express our support for maximum devolution in these respects.

### **Question 17 of 20**

From Chapter 8: Transition, delivery and legislation

#### **What is the most appropriate way to phase out the Basic Payment Scheme to start implementation of the new schemes?**

With respect to phasing out the Basic Payment Scheme, we would support an initial cap of £120,000 to any individual recipient (whether a company or individual). This would immediately free up money to go towards the new schemes. Payments should then be reduced progressively with the highest percentage reductions applied to those that are currently in higher payment bands. Payments to small farms that receive a very low proportion of the overall BPS budget should be maintained until the end of the transition scheme and they should not lose support until the new scheme is fully implemented.

Prioritising payments to those that receive the least has the following benefits: 1) Those with the least land will likely be the most financially precarious and ensuring that they have enough support to remain solvent and productive is essential to preventing a rural exodus.

2) Payments to farmers on a low income offer better value for money than the same amount to those on higher incomes (Laughton: A Matter of Scale, LWA & Centre for Agroecology, Coventry University 2017).

3) Capping payments at £120,000 and applying the highest reductions to those that receive the most will release the most money whilst affecting the fewest farms. 4) The current system of basing payments on acreage is inherently unjust and discriminates against those with the least land. The proposal above would rectify this as quickly as possible.

With respect to the implementation of the new scheme, those that do not currently qualify for support should be the first to receive payments under the new scheme. This will not only be easier to manage administratively, as they have nothing to transition away from; but will likely maximise value for money. These farms tend to have very low incomes and survive only on account of their ability to do a lot with very little, meaning that they are forced to be innovative. This makes them a good cohort to try out the new scheme on.

### **Question 18 of 20**

From Chapter 8: Transition, delivery and legislation

**How can we simplify the current administration and delivery of the Basic Payment Scheme during the phased transition period?**

We do not have any comments on the specific question of simplifying the Basic Payment Scheme during transition; however, we would like to note that going with a single rather than dual scheme under the new system will likely be administratively simpler. This is because there will only be one budget to manage.

**Question 19 of 20**

Welsh Language standards

**Will the proposed land management programme have any effects (either positive or adverse) on:**

- **opportunities for persons to use the Welsh language;**
- **treating the Welsh language no less favourably than the English language?**

We believe that use of the Welsh language can be protected and enhanced through the inclusion of the proposed public good of Social Cohesion and Cultural Integrity outlined in response to question 10.

If the proposed land management programme fails to take into account social as well as environmental impacts then we believe that this could have a serious negative impact on the Welsh language.

In particular maintaining viable communities in more rural and largely Welsh speaking areas and preventing loss of young and economically active residents is important for the long term health of the language.

As the proposal stands, all of the public goods to be supported relate to the physical environment or tourism. We would strongly encourage the inclusion of social and community based public goods.

As a specific note, it will be important that project officers are Welsh speaking, and have a good understanding of rural and farming communities including upland and small scale farming.

**Question 20 of 20**

**Do you wish to make any further comments?**

Yes:

**Insufficient vision of the food and farming system Wales needs**

The current proposals, whilst offering many improvements on the status quo lack a vision of the food and farming system that the scheme is trying to create.

To achieve such a vision, a more joined up approach to policy making is needed. We are concerned about the divorce between food policy and farming policy. This is a feature of a failing Common Agricultural Policy, which we have the opportunity to leave behind; however, the current approach of developing agricultural and food policy in isolation risks perpetuating this.

A key question that must be addressed is why Welsh produce is not consumed widely in Wales and what can be done about this. We lay out the benefits of reducing food miles and encouraging a local food culture in response to Question 10 (additional public goods) and we provide examples of how this can be supported there and in response to Question 4. Some examples of these in practice are described in Annex A.

However, in addition to these practical steps to encourage more consumption of local food, the bigger question of what Wales produces must be considered. Recent decades have seen a proliferation of highly processed low quality food and diet related health problems. Whilst

the majority of this food is imported into Wales, as things currently stand Welsh food production bears little resemblance to the nutritional requirements of a healthy diet. Even if they were sourced locally, this would not be enough. But this need not be the case and farmers can play a key role in supplying the nation with healthy nutritious food. The Welsh Food Policy is currently focused on exports and 'niche' (expensive) products, when what it should be doing is securing access to quality, nutritious food for ALL our citizens.

### **A joined-up planning and land policy is needed**

There is insufficient linking with other Welsh Government Policy including Planning Policy; the One Planet Development Policy, the Environment Act and the Wellbeing of Future Generations Act.

One of the key barriers to entry for new land managers is the challenge of navigating the planning system and in particular the restrictions on new dwellings in the open countryside. We appreciate the need to protect the countryside from sprawling development; however, a more diversified agricultural sector with more small and medium farms cannot happen without allowing additional dwellings. Current policy combined with low incomes has led many of our members to resort to living in temporary accommodation such as caravans.

We note that this is a problem which the One Planet Development Policy attempts to address and as noted previously we strongly support this policy. However, we recommend that the Welsh Government consider how both OPD and the agricultural policy proposals can be amended so that they support each other and that some of the details of the OPD, such as the Ecological Footprint Accounting, be reviewed and updated where necessary.

The consultation document refers to the Wellbeing Aims; however, we believe that the Welsh Government could go much further in integrating the policy. Eligibility for funding and the amounts available should be dependent on projects meeting one or more of the Wellbeing Aims.

Agricultural policy should also be better linked with environmental policy. For example, the

duty to increase and maintain biodiversity under the Environment (Wales) Act 2016 should be included as a condition of funding.

### **Protecting farmers from cheap imports with lower standards**

As noted in response to Question 1, it is essential that the Welsh Government maintain and enhance the current EU environmental, labour and animal welfare standards. Leaving the EU opens up the possibility of trade deals with countries that have lower standards and there is a danger that this will put Welsh farmers at a competitive disadvantage.

We therefore urge the Welsh Government to lobby the Department for International Trade and the Prime Minister to ensure that any international trade deal is contingent on the counterparty meeting or exceeding these standards. In the event that it is not able to do this, it must do what it can to ensure Welsh farmers can be protected from this competition.

### **Annex A: Examples illustrating responses to questions**

Examples relating to Question 1: Environmentally Beneficial Livestock Farming One example of the positive role that livestock can play in positive environmental management is in peat bog preservation and regeneration. Peat bogs have a huge capacity to hold both carbon and water. Tree growth in peat bogs can cause them to be drained, which reduces their capacity to absorb carbon, and leads to flooding and soil loss downstream. Ruminants are an excellent means of preventing tree growth on peat bogs and are therefore an example of how certain farming practices can improve environmental outcomes. In the Pumlumon Project the Montgomeryshire Wildlife Trust worked with livestock farmers on the Cambrian mountains to lock up carbon and restore peat bogs and improve and restore wildlife habitats. They separated out the areas where there was no peat and fenced these off to promote and protect tree growth and reduce flooding. They noted that overstocking of sheep had previously led to soil compaction and species poor turf. However, by reducing sheep numbers and replacing them with reducing sheep numbers and re-introducing cattle alongside the sheep, these problems were reduced. The different grazing patterns and hooves of sheep and cattle complement each other and encourage greater plant biodiversity in the sward, with consequential increases in general biodiversity. Another example of using livestock to positively support environmental outcomes is the Coity Wallia Commons Biodiversity Project in which Pori Natur a Threftadaeth (PONT) worked with livestock farmers, public bodies and community and conservation organisations to restore and reconnect 1,063 hectares of priority habitats on Cefn Hirgoed and Mynydd y Gaer commons north of Bridgend. Part of this involved a cattle leasing scheme with a new herd of Devon Red Ruby cattle. These and other livestock were shepherded and mineral blocks were distributed to keep livestock in desired areas.

### **Example related to Question 5: Environmentally Beneficial & Highly Productive Horticulture**

LWA Cymru member One Planet Salads is a small market garden providing high quality artisan salad wholesale to restaurants, a local wholefood shop and, in peak season, a local delivery round. They use a no dig system, which prevents soil degradation, and closely cultivate their land creating both high productivity and a healthy ecosystem from their market garden.

2018 is their first year of trading and they have turned a profit since mid-July. They aim to be extending their market garden by half to cater for the demand that they are currently unable to supply, which includes, restaurants, a local organic wholesaler and cottage scale producers. Should they be able to acquire more land, they hope to expand further still.

However, like many small-scale farmers, they have found high land prices and rigidities in the planning system are preventing them from expanding as they would like. Their attempts to secure funding via Welsh Agricultural grants have been rejected on account of their being below five hectares.

Land businesses like these show that food production can be both highly efficient on an acre to output basis, environmentally beneficial and support the local rural economy. Designing an agricultural policy that supports them to grow will go a long way in securing the principles and aims of this consultation.

### **Examples relating to Question 9: Overly prescriptive conditions**

One example of the type of prescription that should be avoided is the requirement under Glastir to use large wooden guards for agroforestry. Implementing this would lead to a somewhat absurd scenario in which it could take around 25 years for the wood that went into the guards to be replaced by the trees they were protected. In addition, the financial and time cost makes planting these trees uneconomic and has we believe, been a major reason for the failure of agroforestry to take off under Glastir. Whilst the requiring that saplings have sufficient protection is a sensible condition of funding, there are far more resource efficient means of doing this. Land managers should be required to show that they can meet the objective of protecting saplings, rather than forced to use unnecessarily expensive and inefficient means of achieving this.

## **Annex B: The Case for Focussing on a Healthy Diet as a Public Good and Expanding Horticulture Production in Wales**

Based on research by Amber Wheeler (University of South Wales, Peas Please Project Board, Fruit and Vegetable Alliance and Defra Edible Horticulture Roundtable)

Despite public health being listed as a public good, the consultation document makes no mention of fruit and vegetable production. The absence of this is notable given the steady reduction in fruit and vegetable consumption amongst the population and the associated health problems.

Just 23% of adults in Wales report eating five or more portions of fruit and vegetables on the previous day (Welsh Government, 2018). This is down from 39% in 2003 when the '5 a day' campaign began. Average purchase of fruit and vegetables is around four portions, leaving likely consumption to be around '3 a day' (Manning, 2016), much less than Welsh and UK Government public health policy advocates, which is now '7 a day' (Public Health England, 2016).

Public goods are defined as the production of outcomes for which there is no market. Although there is a market for healthy food such as fruit and vegetables, the market is not delivering healthy diets and therefore public health, in part a consequence of unhealthy foods being cheaper (Jones et al., 2014). This is particularly a problem for those on low income as the recent Food Foundation (2018) shows. Those on the lowest income in Wales



would have to spend around 66% of their disposable income after housing costs to afford the Government's Eatwell guide making it unaffordable.

Consumption of fruit and vegetables decreases as the relative cost increases. Low income households in the UK, from 2007-2014, decreased their purchases of fresh and processed vegetables by 6.56% and fruit by 11% (Defra, 2016). This is a pattern seen worldwide, with lower income countries as well as lower income groups within countries having lower fruit and vegetable consumption (Miller et al., 2016). Fruit and vegetable consumption seems then to be a particular marker of inequality and potentially a propagator given that low consumption increases morbidity and mortality.

There is a fruit and vegetable deficit in the UK in terms of consumption and availability. Most recent calculations on population requirement put the UK's '7 a day' requirement at 15 million tonnes with 9.3 million tonnes available giving a 5.7 million tonne deficit.

There should be a specific push in Wales for increased fruit and vegetable production and consumption and investment in the supply chain in the interest of and reflecting all three elements of sustainability, particularly the interest of public health improvement.

Based on population data and fruit and vegetable requirements we estimate that Wales is producing around only 1/4 of a portion of fruit and veg per head of population. If this were increased fourfold to provide one portion from Wales, this would involve the percentage of total land growing fruit and vegetables going from 0.1% (1,694 hectares) to 0.4% (7,273 hectares). Despite being a seemingly small percentage land change, this would represent a major change in the trend of fruit and vegetable production in Wales (land allocated to fruit and vegetables having not risen above 2000 hectares in at least 50 years). It would signal a bold new signal that Wales is committed to improving the public health of the nation.

It is also worth noting that average UK financial output for fruit and vegetable production is relatively high at £13,000 per hectare (based on Defra 2017 statistics). Given that fruit and vegetable production would not need to rely on an export market, it could be promoted as a key stable aspect of farm diversification. If Wales were to follow this trend, a quadrupling of production would increase financial output from around £22 million to £95 million. Income from CSAs and Market Gardens might be higher than this and create more jobs per hectare too as Rebecca Laughton's (2017) 'A Matter of Scale' report suggests.

### **Further reading:**

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