



23rd October 2019

Gweithwyr y Tir/ Landworkers' Alliance Cymru Response to: Sustainable Farming and Our Land Consultation

(Llywodraeth Cymru/Welsh Government)

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

1: Structure:

We support the overall approach of benefits outcomes and actions; believe that this is a useful tool and consider it the most appropriate framework. In our response to Brexit & Our Land we advocated focussing on outcomes desired; looking at what actions are likely to achieve them; and moving away from the current prescriptive approach under Glastir. We welcome the fact that the Welsh Government is planning to pursue this.

2: Benefits & Outcomes:

Soil health: we welcome the fact that soil health is included in the list of benefits; however,

we believe it has insufficient attention. Given the UN FAO warnings¹ that soil degradation is so extensive that we have just 60 harvests left; reversing soil degradation is essential for our food security and needs to be front and centre of the WG plans. Farmers, foresters and other land managers are uniquely positioned to be able to reverse the current trend. Improving soil health data will be crucial to this.

Other benefits & outcomes: The benefits and outcomes described are all ones that farmers and foresters can and do contribute to; however, they are incomplete. Insufficient attention is given to the social, economic and health benefits that farms can bring to the local community and customers.

WG does raise some of these, but argues that these benefits will occur anyway, if environmental outcomes are supported. Whilst we agree that there are some social and economic benefits where this is true, others will not necessarily do so. For example, whilst healthier soils do produce healthier food, there will be no public health benefit for the people of Wales if most of this food is either exported or not available to low income households. Furthermore, whilst many sustainable farms play a key role in bringing communities together through on farm events, volunteering etc, this is not an automatic outcome of farming sustainably, but something that requires investment in time and energy in its own right.

Nutritional Health: Affordable, healthy sustainably produced food for all should be a stated aim of policy. Although the Welsh Government lists health benefits in terms of the benefit from public recreation in the countryside; avoiding disease transmission and the health of farmers; however, the production of healthy fresh food is absent.

WG notes that there is a market for food and therefore it does not consider food per se a public good; however, it does acknowledge that the market does not reward adequately reward the sustainable production of food and it rightly seeks to compensate for this. We believe that there is also a market failure with respect to the accessibility of healthy food in Wales and Welsh agricultural policy should address this through both supporting more fruit & vegetable production and through supporting measures that enable access. This includes an increase in Community Supported Agriculture (CSA) and short supply chain infrastructure. We outline how this can be done in response to Questions 4 and 9.

Consumption of fruit & vegetables in Wales is well below the previously recommended “5 a day”, let alone the more recent recommendation of “7 a day”. Of this low consumption, a significant proportion is imported from outside the UK. Whilst we have been unable to find import figures specific to Wales, the UK overall produces just 57% of the vegetables and 16% of the fruit consumed. This means that consumers are dependent on complex supply chains, volatile international markets and trade deals to secure affordable fruit & vegetables. Wales has a smaller proportion of land in horticultural production than other parts of the UK with around 0.1% of agricultural land currently used for fruit & vegetable production². Initial findings show that there are around 400 commercial horticulture businesses within primary production in Wales of which approximately 100 are producing edibles.

This need not be the case. Fruit and vegetable production can be increased and greater access to it enabled. Research by Dr Amber Wheeler³ has found that if just 2% of Welsh

¹ FAO, 2015, international Year of the Soil Conference, <http://www.fao.org/soils-2015/events/detail/en/c/338738/> (accessed 22 October 2019)

² Wheeler, A. 'A New Food Diplomacy: Participatory Action Research Findings of a Food System Approach to Public Health Nutrition', PhD Thesis, Prifysgol De Cymru/University of South Wales, P60-61

³ Ibid

agricultural land were used to produce fruit & vegetables, it would be possible to produce all of the Welsh population's "5 a day" in Wales.

Welsh Government should seek to increase horticultural production by incentivising livestock farmers to diversify into horticulture and landowners/long leaseholders to make land available for new entrants wishing to set up new horticultural businesses. In order to both support the viability of these businesses and ensure that local people are able to directly benefit from their produce Welsh Government should prioritise short supply chain infrastructure. We list a number of suggestions for this in our response to Question 4.

Mental Health: We would also like to raise the substantial role that community-based farms, in particular care farms, can play in providing educational opportunities, physical and mental health benefits and supporting vulnerable people. We welcome the steps that the Welsh Government has taken in this direction through the Enabling Natural Resources and Wellbeing (EnRAW) programme and call for the expansion of the programme and its integration with the Sustainable Farm Scheme.

We also draw your attention to the Children and Nature project in England, supported by Defra, funded by the Department of Education and managed by Natural England. This £10 million project, £1.4 million of which is allocated specifically to Care Farming, shows how different departments can work together to realise the full potential of farms to deliver health and education benefits. This provides a good model of a programme that could also be adopted in Wales.

Social benefits: community resilience and food sovereignty: In addition to nutritional and mental health, social aspects are also neglected. WG refers to its wish to see social benefits realised through both the sustainable land management payments and business support. However, this does not appear to be carried through the consultation. Both of these social outcomes need to be explicitly supported and encouraged.

Employment: We note that figure 3.3. in Chapter Three does not include employment in either the economic or social benefits, despite it having clear benefits to both. Neither is it mentioned in wellbeing benefits listed on page 43. Maintaining and increasing employment is crucial for the economic and social wellbeing in rural communities and for the maintenance of the Welsh language and should therefore be supported. It should be noted that small scale, diverse farms, CSA projects, Care Farms proportionately support more jobs (as measured by FTE per hectare). Research on agroecological farms under 20ha found they employed an average of 3.2 full time equivalent workers per hectare. This is 26 times more employment per hectare than the UK average of 0.026.⁴

3: Sustainable Land Management outcomes

We believe that the system has been described reasonably well and it is easy to understand how this would work for existing farmers, already on the land.

4: Income stream for environmental outcomes:

We strongly support this and welcome the move away from the current approach of only allowing payments to cover costs and income forgone. In order to meet the scale of the

⁴ Loughton, R. 2017. A Matter of Scale: A study of the productivity, financial viability and multifunctional benefits of small farms (20 ha and less). Landworkers' Alliance and Centre for Agroecology, Coventry University, p4.

challenge, payments for environmental benefits should be able to provide a decent income in and of themselves.

However, we believe that the benefits directly rewarded should not be limited to environmental benefits. As noted above, social and health benefits should also be encouraged and there should also be an income stream linked to social and health outcomes.

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:

Proportionate delivery

Welsh Government should make its application process as accessible as possible or it will not be taken up by small scale farms that do not have the resources for dedicated administration staff. Any initial expression of interest should be straightforward and require only the minimum information necessary at that stage. It should not be a requirement of the scheme that applicants attend in person information evenings as is currently required for the Sustainable Production Grant. The limited number of locations and dates of these information evenings makes the requirement to attend particularly restrictive and discriminates against farmers with caring responsibilities.

New entrants: The review stage assumes that applicants already have land. It is not clear how the new system will work for new entrants, who do not appear to have been considered. How, for example, will people who do not yet have land and therefore cannot put together a bespoke Sustainable Land Management plan engage with this process?

It is likely that obtaining capital for land and equipment could depend on a level of assurance that the borrower will qualify for the new scheme. WG should ensure that there is a means for new entrants to show that they would qualify for the scheme if they follow a particular route. This could be through “in principle agreements” or by making sure that the scheme is designed in such a way that lenders can have the necessary confidence to provide capital on the basis of a business plan that would be expected to qualify.

It is not clear in the document whether enrolment in the Sustainable Land management scheme will be ongoing or whether there will be a one off opportunity as was the case with entitlements. We strongly urge Welsh Government to ensure that enrolment is ongoing. A one off process would not just entrench inequality into the new system, but also reduce the potential for the scheme to support innovative ecologically sustainable approaches from future new entrants.

How to reward farmers

Payments should be based on the benefits achieved with respect to environmental, economic and social sustainability. We wish to highlight the work of the Sustainable Food Trust⁵ in developing metrics for all of these and recommend their use by Welsh Government.

The initial and subsequent assessments should include a carbon audit based on emissions produced on the farm as well as embodied carbon. Payments should be linked to the carbon intensity of the food produced so that food with low embodied carbon can be incentivised.

Specific measures

We refer you to The Landworkers' Alliance's recent publication, Food, Farming, and the Climate Crisis: How we can feed people and cool the planet⁶ for details of specific measures that should be pursued. A number of these are listed below.

Reducing emissions: Incentivise good management practice for soil health and manure management.

Enhancing sequestration: Incentives to adopt sustainable sequestration practices, such as planting woodlands, maintaining permanent pasture, enhancing soil quality, and creating wetlands.

Enhancing resilience: Incentives to increase biodiversity in and around agricultural yields, including enhancing wild plant and animal diversity as well as crop diversity over space and time. Development of policy focusing on agroecological techniques for small-scale farmers to build resilience.

Agroforestry: Designing farm systems with agroforestry approaches in mind can efficiently provide production of food and wood products as well as public goods from the same area of land. Trees can be used to provide additional products for sale as well as delivering

⁵ For a summary of discussions raised at SFT's conference on this issues, see <https://sustainablefoodtrust.org/articles/the-future-of-uk-farming-measuring-and-valuing-sustainability/>

⁶ The Landworkers' Alliance, 2019. Food, Farming, and the Climate Crisis: How we can feed people and cool the planet. <https://landworkersalliance.org.uk/wp-content/uploads/2019/07/Food-Farming-and-the-Climate-Crisis.pdf> (accessed 22 October 2019)

public goods, presenting the option of diversifying farm income as well as qualifying for sustainable land management payments.

The Welsh Government should support this through:

- Including agroforestry in the provision of specialist advice and knowledge transfer activity;
- Directly supporting the integration of trees and cropping as well as silvipasture;
- Supporting collaboration between farmers on the same land where multiple crops can be

produced (e.g. orchards with grazing), including with demonstration farms and allowing for this in contracts; and

- Investment in the supply chain to develop markets for secondary products from trees.

Forestry: Policies should be designed to increase opportunities for woodland-based livelihoods and ancillary wood processing facilities, which in turn would support a wider range of rural services and a more vibrant and self-sufficient rural economy. To achieve this Welsh Government should

- Support small scale local forestry enterprises to take on long term contracts on the public forest estate, creating consistent income and an intimate knowledge of sites.

- Support coppice management: it is the highest carbon capture method and can increase biodiversity substantially over unmanaged forest.

- Provide forestry grants focussed on getting small and neglected woodlands back into productive use using local skilled labour.

- Incentivise the planting of high value timber crops (eg hardwoods planted at timber spacings, larch, Douglas fir, western red cedar and productive fuelwood) as these provide a wider range of forestry jobs.

Business Support

In order to reduce waste, keep costs down and encourage a circular economy, WG should allow Business Support money to be used to purchase second hand goods.

Capital grants should be directed at encouraging the uptake of equipment and practices necessary for net-zero carbon farming systems.

We welcome the fact that support for capital investment will be linked to the Sustainable Management Plan and that applicants will not be limited to a specified list of things that they can receive support for. In addition to capital investment, advice and support on planning applications should also be provided.

We welcome the role that Farming Connect has played in Business Support and believe that it should continue. However, we believe that it pays insufficient attention to horticulture in its services and this should be remedied.

Eligibility

Over and above minimum regulatory requirements: We strongly support the requirement that

farmers reach a level substantially above the legal minimum or basic farming good practice.

If payments were made for just basic good practice, then the primary determinant of payment would be land area, essentially returning the policy to area payments. In order to ensure significant improvements in environmental and social benefits from farming and land management, farmers should go beyond this

We welcome the Welsh Government's position that the minimum level of environmental outcomes will not be linked to the size of the farm and the consequential removal of the minimum threshold for inclusion. Many of our members are achieving multiple environmental outcomes in small areas.

Small diverse farms often deliver more environmental benefits per unit area compared to larger farms; they usually have greater crop diversity; employ more (often many more) people per hectare; are more likely to be based on agroecological farming systems; are likely to be operating short, low carbon, supply chains, and in the case of CSA and Care farms, delivering substantial societal benefits. The payment rates for small farms must recognize this 'intensity of delivery' with respect to the desired outcomes. We refer you to Rebecca Laughton's research in *A Matter of Scale*⁷ for more information about this.

Cap on payments

We support the existence of a cap on payments for each holding/business. Such a cap will not only ensure that there is enough money available to support new entrants and small scale farmers that do not currently qualify for support, but it could encourage large landowners to sell off some of their land, which would enable more new entrants.

In order to support increased rural employment, we would also support a system that linked the maximum benefit to the number of additional employees substantially above the Welsh per hectare average.

We would strongly oppose a per hectare cap. If a farmer can create multiple benefits on the same piece of land, then they should receive the full payment for it. A per hectare cap would again make land area the primary determinant of subsidy level, once that limit has been reached.

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**

⁷ Laughton, R. 2017. *A Matter of Scale: A study of the productivity, financial viability and multifunctional benefits of small farms (20 ha and less)*. Landworkers' Alliance and Centre for Agroecology, Coventry University.

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 rather than requiring inflexible box ticking approaches, which was one of the problems with Glastir.

The function: There should be two main functions of the service: 1) training farmers in new techniques and processes needed to benefit from the new scheme; and 2) supporting and guiding farmers in the application process and development of their Sustainable Land Management plans.

a) Training in new techniques

Given that the Welsh Government is proposing a wholesale change in what is expected of farmers, the training aspect of the advisory service must be fully comprehensive and ensure that advisors have sufficient skills to be able to implement the new measures. This should be equivalent to the Organic Conversion Information Service. It is important to recognise that it can take around 2 years for farmers to gain confidence switching to a nature friendly system; therefore, training should be available as soon as possible during the transition period.

The training programme should incorporate farmer to farmer training as a means for farmers that wish to transition to learn from those who are already using the techniques and methods that Welsh Government wants to encourage. On farm training and witnessing successful working examples is an invaluable part of any training programme. Training in direct marketing techniques and other skills needed for short supply chains should also be included.

Many of the Landworkers' Alliance members already use agroecology techniques and we would be interested in working with Welsh Government on how we could share this knowledge and train others. We refer you to Annex A, Agroecology in Action, which includes case studies of our members. In particular we draw your attention to Tamarisk Farm, Woodland Valley Farm, Home Farm and FarmED as examples that highlight different ways of making agroecological farming viable.

There is currently a substantial shortage of experience and training in agroecological farming. This is particularly difficult in horticulture, which depends on a high number of people. Addressing this will take investment.

LWA Cymru is in the early stages of developing a new All Wales Agroecological Traineeship scheme, which will be rooted in practical experience on our members' farms alongside theoretical learning. We believe that this could fill a much-needed gap in training and we would be happy to discuss this in more detail with Welsh Government as the scheme comes together. We will be looking at possible accreditation for this traineeship, but we are keen to avoid any accreditation that would require a high administrative burden. The focus will be on what trainees will need to know to run and work on a successful agroecological farm.

Whilst there is much enthusiasm for the scheme amongst our membership, a key issue that could limit the involvement is lack of funds needed to support a trainee. We encourage Welsh Government to provide funding for new entrants to undertake immersive, on-farm training, with a theoretical component.

With respect to forestry, greater support should be given to institutes teaching sustainable

forestry and alternatives to softwood plantation forestry grown in monocultures. Woodland planted in next few years will not produce any productive businesses for 15- 20 years; however, it is important to ensure that once these forests are established there are enough people skilled at woodland management. Support should also be provided for continued professional development of existing workers in the sector to ensure it thrives as an industry, and that there is incentive to stay within it.

b) Application process

With respect to the second function, we do not think it is necessary for advisors to be involved the whole way through the application process. For example, the initial application should be designed in such a way that it is very straightforward and advisor assistance is not needed for most applications. A helpline should nonetheless be available for those that do still need it.

It is essential to ensure that advisors receive sufficient training to have a high understanding of both agriculture and ecology.

Scale

The training provision for conversion should be substantial and potentially available to all existing farmers.

Relationship between advisors and Welsh Government

In order to maintain impartiality, it is important that the advisors are not the same people as the assessors who determine whether a scheme recipient has met their stated goals.

The proposed system necessarily puts a lot of power in the hands of advisors. It is therefore essential that it be designed so that there are checks in place to ensure that individual advisors give appropriate advice and assessments.

Whilst we support the overall approach of using advisors and believe that this will support a more flexible scheme and lead to improvements on the current highly prescriptive approach, we recognise that this could place a significant amount of power & responsibility in the hands of individual advisers. We believe that one way to combat this could be to have a model based on a network of advisors, with different skills that could all be called upon, rather than individual advisors who would be expected to understand all necessary aspects of a given farm's plans and ecology.

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:

Short supply chain infrastructure support is vital for small farms supplying locally. Many small-scale producers and new entrants in Wales struggle to make businesses work due to the lack of local supply chain infrastructure. Support for this infrastructure, would not only benefit small scale sustainable farms, but also increase access to fresh, local food addressing some of the issues we discussed in our introduction and in response to Question 1.

Key infrastructure that is needed includes:

- Local and appropriately sized packing, cleaning, drying and processing facilities; • Distribution hubs and local low carbon transportation;
- Farmers' markets;
- Local production of animal feeds and pasture / food waste-based systems;
- Small combined slaughter houses and butchers and mobile butchers so that animals can be slaughtered on farms avoiding the need for live transport; and cold storage for both stationary storage and short transportation.

In relation to farmers markets, we believe that much can be learnt from the USA, which has seen a significant growth of vibrant successful farmers markets in many cities and towns. These are often located in under cover high footfall areas and feature entertainment alongside sellers, making them an enjoyable place for consumers to visit. Local authorities could play a significant role in supporting the creation and growth of regular farmers markets through granting access to appropriate locations and the necessary consents.

Community Supported Agriculture (CSA): the establishment of new CSAs should be an explicit target of Welsh Government. Accessing land is a barrier for new CSAs and providing incentives for land owners to make their land available for new CSAs could help tackle this.

Seed saving: Welsh Government should support the development of regional seed banks and training in seed-saving techniques to aid increase ecological and economic resilience.

With respect to timber, the most recent available statistics show that the UK was the second largest net importer of forest products, after China. This reflects the inadequacy of our domestic supply. Wales has the opportunity to provide a significant amount of this, particularly if the new scheme supporting tree planting for carbon sequestration leads to increased forestry cover.

There is a strong potential to develop a vibrant small-scale woodland industry supplying local businesses. Small forestry businesses tend to be more acceptable for local residents with smaller machinery and the ability to supply timber locally. This compares with large scale woodland management where wood is transported out of the area and has less impact on the local economy.

Welsh Government should therefore seek to develop local timber markets; promoting the use of locally grown timber products through effective certification schemes. The use of British hardwoods in particular should be promoted, including through development of new markets for these plentiful but undervalued timber trees.

The creation of local hubs for the storage, processing and retail of local timber products should be facilitated. These could have shared workspaces and machinery, as well as providing places where the public can come to source a wide range of local timber and wood products.

Whilst short supply chain infrastructure can be provided by the market, it is somewhat of a “chicken and egg” situation: such services will only be provided if there are enough small-scale producers to justify them, but small scale producers may struggle to sell their products without such infrastructure. This is why there is a key role for Welsh Government.

Data

We support the updating of Agricultural Land Classification mapping capability and combining this with data on market demand; however, it is important that these tools are used to support farmers in expanding their range of produce rather than restricting agriculture to only the best grade land. There are many examples of successful horticulture businesses on marginal land.

Training

Welsh Government must recognise we need farming skills for national security and cultural continuity and commit to finding ways to keep those with the skills working to pass on skills and insight and increase their number by paying them as educators.

We support the prioritisation of joined up knowledge transfer and innovation. However, as currently proposed it does not have sufficient emphasis on farmer to farmer training and knowledge transfer. See our response to Question 3 for more on this.

Food policy link

We are disappointed in the apparent lack of connection between the proposed Welsh food policy and agricultural policy. The two should be working together to ensure that Welsh farmers are supported in providing healthy and sustainably produced food for the people of Wales. Farmers currently dependent on export markets should be supported to make the transition to local, more sustainable food produc

tion. For example, sheep farmers could be supported transitioning to lower density, higher quality lamb for the Welsh market whilst being paid for the environmental benefits this brings. Such a joined up approach would have the potential to tackle nutrition related health problems; support environmentally sustainable farming and support the rural economy.

Public Procurement: The consultation makes no mention of the role that public procurement could play in supporting Welsh Agriculture. Public procurement could provide a reliable market for Welsh producers and would remove the volatility of currency and price fluctuation for those that currently rely on exporting.

We would strongly support the adoption of the “Preston Model” of local wealth building and in local areas across Wales. Under the Preston Model public sector “Anchor Organisations”, such as hospitals, universities, council offices etc commit to procuring from local businesses whenever possible. The result of this strategy in Preston has been a substantial regeneration of the city over the past few years, with significant job and small business creation. We refer you to the Centre for Economic Studies for more information about this. <https://cles.org.uk/tag/the-preston-model/>. We understand that Welsh Ministers are already

considering this and we urge WG to ensure that local farms, foresters and food businesses are a core part of the strategy.

The impact could be increased if public bodies not only commit to procuring the shortest possible supply chain themselves, but also include supply chain stipulations in grant funding applications.

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:

We welcome the inclusion of a new environmental regulatory framework. Environmentally damaging practices must be cracked down on. Not only do they cause direct harm through pollution etc, but they also put those farmers who do comply with environmental legislation or go beyond it at a competitive disadvantage.

Improvements needed: We agree that the current system is overly complex and would support moves to make it more streamlined and easier for farmers to understand. We welcome moves to bring key legislation together in a single, coherent framework.

The scope of a future regulatory framework: The principles of rectification at source and polluter pays should be incorporated in legislation. We agree that baseline standards should apply to all farmers and land managers regardless of whether they are in receipt on Sustainable Farm Scheme payments. WG should be clear that these payments support the delivery of benefits over and above the basic legal standards, and avoid the perception that farmers are receiving significant public funding simply to comply with the law or to meet minimum standards.

The Future Generations Commissioner for Wales should be directly involved in developing and enforcing environmental regulations.

Specific new regulations

Ultimately, we would like to see an end to the practice of battery farming. We would support restrictions on the number of animals that can be kept in a given space & farmers should be required to show that they have access to enough land to keep the numbers of animals they have humanely.

We support strict regulations on unsustainable agricultural practices, such as limiting over-application of fertilizers and untreated slurry, or requiring buffers between agricultural lands and waterways, and banning removal of peat and draining of bogs.

We would support an end to the ban on feeding surplus food to pigs and chickens provided that this food is safely treated. We believe that this ban is unnecessary and prevents what would otherwise be a sustainable, locally accessible feedstock and low carbon waste food management system.

With respect to forestry, we would support the creation and enforcement of new regulations on habitat destruction resulting from the large scale machine harvesting of timber.

Felling licences: Sustainability should be at the core of all successful felling license applications. In the majority of cases this would exclude clear fell, unless there is a strong justification for it. The felling application process is an important safeguard to protect against poor woodland management practices and over exploitation. However, Natural Resources Wales are currently under-resourced in this area. It is important that there are adequate measures in place to guarantee that this process can be sufficiently robust as an incentive for good management practice.

Monitoring compliance: We agree that the current system of monitoring is clunky and inefficient. The plethora of different inspection bodies and standards (both statutory and various voluntary quality assurance schemes) overlap significantly leading to extensive duplication of effort. We would welcome a more streamlined, integrated system that reduce the number of inspections and efficiency of monitoring systems that would reduce the burden on both farmers and inspectors/ WG officials. There needs to be sufficient resources with the appropriate skills to carry out effective, regular monitoring. There will undoubtedly be different levels of monitoring dependent on the outcomes desired. We would assume that at the lower end there will be options for 'self certification' and highlight the role farmers themselves could play in this process and support their peers.

Enforcement: Penalties should be set at a level which is significantly higher than the cost of compliance to prevent people from deciding not to comply and pay the fine because it costs less.

Business size should be considered when applying the penalty to ensure that the impact is felt, even by the largest agricultural businesses.

Enforcement bodies should be able to help individuals and businesses understand and comply with environmental legislation. If the number of breaches through misunderstandings or mistakes can be minimised, the total number of cases is reduced and resources can be focused on dealing with cases where breaches are wilful and deliberate.

We believe there should be a system that operates at different levels that are appropriate to the severity of the breach, for example:

a) Informal warning/ advice/ opportunity to rectify the situation within a time frame; b) Imposition of sanctions or fines, with right to appeal for more serious cases; c) Recourse to the judicial systems in the case of serious and/or repeated offences.

We agree that a range of civil sanctions, alongside current offences, should be available to increase flexibility, facilitate proportionality and as reduce the burden on the courts.

Competition with imports: In order to prevent Welsh farmers being undercut by imports from countries with lower environmental and animal welfare standards, Welsh Government must fight on behalf of Welsh Farmers in relation to potential trade deals. We appreciate that it is the UK, rather than Welsh Government that will directly negotiate these deals, but whatever influence WG can have on this, should be focussed on stopping food that has been produced with low ecological and animal welfare standards, flooding the market. In relation to competition from other parts of the UK, we urge Welsh Government to work with counterparts in England, Scotland and Northern Ireland to ensure that high standards are required throughout and that there is no “race to the bottom” on environmental and animal welfare regulations.

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 principle of transition: We support strongly a phased transition to ensure minimal financial instability for farmers.

It is important, however, that the length of the transition does not undermine the introduction of the new scheme, which should be available for those that wish to sign up to it as soon as possible. It is likely that much of the cost of the new scheme will be front loaded, particularly with training and equipment purchase. In order to ensure that the funds are made available, we would suggest a phased capping of BPS payments starting with the holdings that receive the most. There should be a clear end point to the BPS, announced far in advance.

As noted in our response to Question 3, comprehensive training in new nature friendly systems should be made available to all farmers during the transition period.

Options: Of the three options proposed, we support Option A: Gradual and Phased. This option would allow those that are already delivering public benefits or are in a position to start doing so to switch, whilst allowing more time for those who need to undertake additional training or make practical/business trainings before they are ready.

Option C, staged enrolment by type, location or sector, would be our second choice. If this is pursued then those that are already modelling the techniques and practices Welsh Government hopes to promote should be enrolled first. These farms could be supported to become “demonstration farms” giving other farmers existing models to learn from.

It would also make sense for those that do not currently qualify for BPS to enrol in the scheme from the start of the transition.

It is essential that, whatever the design of the transition period for existing farmers, enrolment must not be one off, but continue to be available for current and future new entrants.

Alternatives: we have no suggested alternatives as we strongly support option A.

Cap simplification: We do not believe that it makes sense to focus government time on simplification of a scheme that is being phased out. This time would be better spent on the research needed to ensure the new scheme is implemented well.

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:

We welcome this approach to policy making, and broadly agree with it.

Although many of our members do not qualify for BPS, we understand that modelling the impact of a move away from BPS is a crucial element in the Welsh Government's policy making process, and realistically that will, in a large part, will be about mitigating the negative impact that this will have on many Welsh farm businesses. However, equal emphasis should be placed on examining the opportunities for business who hitherto have not enjoyed support from the BPS, and the contribution that this group can make.

Furthermore, the analysis should consider not only the impact of changing trading relationships will have on the market, but also focus on the opportunities in developing a more local, more resilient food systems in Wales.

Methodologies used to value sustainable land management outcomes should be based on True Cost Accounting, and that societal outcomes should also be valued and we refer to the work of the Sustainable Food Trust.

We also argue that evidence base on which policy made should include data and information on small scale diverse system, and the societal benefits accruing from community-based farming and growing. In particular, we draw your attention to:

- Laughton, R. 2017. A Matter of Scale: A study of the productivity, financial viability and multifunctional benefits of small farms (20 ha and less). Landworkers' Alliance and Centre for Agroecology, Coventry University, <http://www.scholacampesina.org/wp-content/uploads/2018/10/A-Matter-of-Scale-Report-LWA-2017.pdf>

- Wheeler, A. A New Food Diplomacy: Participatory Action Research Findings of a Food System Approach to Public Health Nutrition, PhD Thesis, Prifysgol De Cymru/University of South Wales

- Natural England, 2016. A review of nature-based interventions for mental health care <http://publications.naturalengland.org.uk/publication/4513819616346112>

- The Soil Association, 2011. The impact of Community Supported Agriculture, <http://communitysupportedagriculture.org.uk/wp-content/uploads/2015/03/The-impact-of-community-supported-agriculture.pdf>

We welcome the inclusion of broader impacts on the rural economy. We refer you to our earlier comments and evidence on the contribution small scale and community farming make to supporting local economies, including retaining money in the local communities and creating rural jobs.

We agree with the range of impacts considered in the Integrated Impact Assessment, but once again highlight the 'Health' impacts should consider the nutritional benefits of local food, and the therapeutic potential of farming and growing as well as the benefits accruing from a healthier environment.

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 best way to maintain and grow the Welsh language is to ensure that there are employment opportunities in Welsh speaking areas. These are overwhelmingly rural areas where agriculture is a big employer. Reductions in employment in this and other sectors, combined with difficulty accessing housing, over recent years have led to a drain of young Welsh speakers.

Supporting a diverse and vibrant agricultural sector and associated supply chain businesses will encourage young people in rural Welsh speaking communities - whether from farming families or otherwise - to feel that they can build a good career without needing to leave the countryside. Our research has found that work on small, agroecological holdings is often far more interesting and involves more diverse job roles than can be found on larger conventional farms. Therefore, an increase in these farms is likely to generate more attractive employment opportunities.

Supporting small scale value added food processing and infrastructure that enables short supply chains, as outlined in response to Question 4, can stop small and family farms being subsumed by larger farms. This creates a higher number and diversity of employers, increasing the number of Welsh speaking employers.

Question 9 - Other comments

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

Comments:

Co-design process

We welcome the Co-design process that is proposed in Chapter 9. Many of our members are already achieving the outcomes that Welsh Government is seeking to incentivise. We welcome the Welsh Government's Assurances that this will be supported in future. With additional financial support under the new system, we believe that we and other farmers will be able to significantly increase this positive impact.

New entrants & Access to land

The consultation makes no mention of how it will address the difficulties that new entrants have in accessing land; however, we understand that Welsh Government does want to address this and we suggest the following measures to tackle it.

Research amongst our members shows that there is a significant appetite for entering agroecological farming, with even unpaid traineeships being significantly oversubscribed. In addition to the problem of inadequate training referenced in Chapter 3, the key things that are preventing these people entering the sector are:

- 1) High start up costs; and
- 2) Limited access to land.

The costs of starting up agricultural businesses are significantly higher than in other sectors. Estimates for average small business start-up costs range from £12,000 to £27,520, but within agroecological farming, these can range from £25,000 to well over £500,000. Significantly, profit margins are lower than most businesses, whilst annual risk is higher.

Below we list a number of policies that could help tackle these. For more detail on these and other policies please see our publication, Supporting the Next Generation of Farmers, 2019⁸.

1. Welsh Agricultural Land Bank: 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. Qualification for this could be based on the sustainable land management plan.

2. New Entrant Agroecological Start-up Grant & Loan: Through this land bank or in addition to it, Government should provide start up grants of £10,000 to £100,000 to new

⁸ The Landworkers' Alliance, 2019, Supporting the next Generation of Farmers, Proposals for support schemes to assist the establishment and success of New Entrants to Agroecological Farming <https://landworkersalliance.org.uk/wp-content/uploads/2018/10/New-Entrants.pdf> (accessed on 22 October 2019)

entrants to establish agroecological farm businesses. The grant would be available for two to five years depending on the needs of the applicant. This could be matched by a low interest loan. Applicants would need to provide a robust business plan outlining how their business will deliver environmental outcomes and sustainable land management as well as financial viability.

3. Loans to Land Trusts: Welsh Government should provide long term and low interest loans to agroecological land trusts that met certain criteria. These loans would be used by the land trusts to buy land, which would then be subdivided into 'starter farms' and leased to new entrants. The trusts would select new entrants to run the farms based on business plans and experience, and provide the necessary infrastructure, training and support. They would also provide the monitoring necessary to ensure that the farms are being managed agroecologically and are meeting targets.

Organisations such as the Ecological Land Co-operative, which purchases land and makes it available to financially viable farming, forestry and other rural enterprises provide examples of how this can be done and should be supported.

4. Low interest land purchase loans for new entrants: A further approach to the land access problem that would complement the agroecological land trusts model would be low interest loans to support new entrants to buy land, essentially a modified 'help to buy' scheme for new entrants looking to start agroecological businesses.

5. A publicly available land register: Better knowledge of the land available and people interested in purchasing land would go a long way in helping new entrants access land. Therefore, we suggest a publicly available register of land showing use and ownership. This would enable those who wish to purchase or rent land to identify potential owners to approach. Whilst such registers do exist they are incomplete and the fees to access them are prohibitively expensive.

6. Local authorities could play a key role in enabling new entrants to access land. Not only as owners of land that could be made available for new entrants to rent, but in developing or expanding signposting services for those seeking to access to land/or looking to rent out/sell. A cadastral map for each municipality should be made publicly available at council offices, as it is in countries such as France and Spain.

7. 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.

8. Incentivising landowners/long leaseholders: It is likely that for some existing farmers, such as those looking to retire soon, it will not make financial sense for them to invest in training to transition to the new scheme. Those that own land or have long term leases, should be supported and incentivised to make it available to new entrants seeking to farm in ways that deliver the benefits that WG is seeking. Measures to provide this support could include:

- Direct financial support to cover rent;
- Amendments to planning rules to make consent for multiple new dwellings for farm workers easier to obtain, so that both the existing farmer and new entrant are able to live on their land;

- Advice and support on the legal arrangements.

9. Right to buy: We suggest a compulsory purchase process for land is neither in productive use nor in a good ecological condition and that this land be made available for rent or purchase by those that wish to start or expand agroecological farms. We suggest the Scottish Community right to buy model as a good starting point, but suggest that this be expanded to also include individuals and businesses seeking to establish agroecological farms.

County Farms

Welsh Government should use all the power it has to encourage councils to increase their estates and prevent further sell offs. They should also look to what land they have that is not currently in agricultural use, but could be put to it.

We advocate for a requirement for the Council to consult the community before selling county farms and give them the opportunity to turn them into a community farm. Welsh Government should learn from the example of Trecadwgan farm, which the local people have been raising money to secure, shows need for policy to allow communities to have chance to buy publicly owned farms.

Welsh Government should appoint a Land Reform Review Group, similar to that operating in Scotland, with a brief to examine land ownership concentration, the amount of wealth and power this confers on an elite minority, the extent to which lack of access to land may cramp people's aspirations and opportunities, the impacts upon employment and the rural economy, and ways in which access to land, both rural and urban, could and should be improved.

Education

There is no mention of engaging the wider population in farming and education about where food comes from; how to grow it themselves or how to cook it. Schools have a particular role to play in this regard, as do small scale community-based farms. Support should be provided to enable farmers to provide such public education whether with schools, colleges or the wider population. Not only would this provide a valuable education, but increasing the knowledge amongst the general population of how to grow would increase food security, bring health benefits and reduce in carbon emissions.

There should also be more support for opportunities for young people to interact with woodlands through initiatives such as forest school to develop positive relationships with woods and all of the associated benefits and opportunities from an early age. We would also support the inclusion of forestry as a subject in schools from primary education through to college.

One planet development

The One Planet Development (OPD) planning scheme shows the possibility of using the planning system to support sustainable land-based businesses, self-sufficiency and environmentally benign lifestyles. We believe that this world leading planning policy sets a precedent for planning policy that actively promote and prioritise ecological sustainable land management. Welsh Government should enable those that wish to farm in agroecological methods to get planning permission to create dwellings and necessary infrastructure to live and work on their land under a system similar to OPD but with a lower administrative

burden.

We strongly welcome the Welsh Government's recognition of the role of appropriate woodland management for biodiversity and the need for a market for timber produced as a result of such management. We note that woodland producers are already taking advantage of the market that is being generated by One Planet Developments. There is a significant potential for One Planet Development and Welsh Government should ensure that these policies work together

Regardless of whether new OPD style policies develop, there is an opportunity to combine the one planet development (OPD) policy with agricultural policy. For example, OPD could be used to incentivise benefits for the wider community and local economy, which we would define as being within the cycle to work radius of a development.

Planning

A thriving rural economy, based on countryside stewardship with livelihoods resulting from working the land, is impossible without appropriate housing for the labour force needed to make this a reality. Systems must be put in place so it is realistic for land workers to live within the countryside that they manage and are stewards of, with security of tenure where the option to own property is out of the question.

Welsh Government should create a new planning proposal framework for land workers, where an initial temporary permission is granted easily, but where full planning permission is granted when the enterprise is proved to be financially and environmentally sustainable.

Farming: Planning and agricultural policy need to be better aligned. As it currently stands the planning system can create substantial barriers to entry or expansion of sustainable farming businesses.

The current requirement for a farm to be at least 5 hectares before permitted development rights for certain agricultural businesses apply discriminates against small farms. Successful agricultural businesses can be run on less than a hectare, let alone and many of our members are examples of this. We propose that the requirement for permitted development rights should be based on hours worked, not land owned. We believe that using the existing Farming Connect model of at least 550 hours per year would be sensible. The current system particularly difficult for new entrants, that may start with land that has no existing structures.

The functional test for consent for new agricultural holdings places a very high burden of proof on the applicant to prove the need for a given structure. Making this less arduous could go a long way to enabling new farms to get set up.

Appropriate development for new sustainable farms and the infrastructure needed for them to thrive should be permitted in greenbelt areas around cities.

Furthermore, in order to support local food markets and increase resilience, we propose that a new planning class be created for land around settlements, which should be focussed on food production for the settlement and other settlement support. The nature of support needed could be decided in consultative processes that involve local people such as People's Assemblies.

There should be planning protection for Grade 1 & 2 Land to ensure that it does not get

taken out of agricultural use.

Finally, there should be a review of how planning policy could be amended to better facilitate the type of short supply chain infrastructure listed in response to Question 4.

Agricultural Land Classification (ALC) data: It is not clear what is meant by the statement that “for diversification within agriculture, the Agricultural Land Classification (ALC) data will be crucial”

We would strongly support moves to ensure that top grade agricultural land be preserved for agricultural use within the planning system; however, it should be noted that successful horticulture businesses can be developed on land that is classified as poor land. As this is often more affordable, it is often the option that horticulturalists opt for. Therefore, it is important not to make assumptions about what is possible on more marginal land with good management.

Forestry: Planning policy should explicitly allow the low impact, primary processing of timber products within woodlands and the erection of barns to enable these activities.

Forestry tied housing should be reinstated, making it harder to remove land workers and profit from property sales or market rent.

The ability to process and store timber on site is essential for keeping the costs down for sustainable forestry businesses. This is both because it reduces the transportation costs and because the ability to find brownfield sites for timber mills is increasingly challenging. The marginal difference that this makes is especially relevant to small scale foresters and coppice businesses.

It is essential that forestry is recognised as being about more than simply “cutting down trees”. This is particularly relevant when it comes to planning policy and the lack of a clear definition of activities associated with timber. It is often necessary to process timber on site in order to keep costs down and to be able to compete with timber imports. However, due to a lack of definition of activities associated with forestry, there is the potential for individual planning enforcers to shut down sustainable business models. This results in fewer opportunities within the sector, making it harder for small businesses to get established and an increasing dependence on imports.

Research

Major investment is needed into research and development of climate-friendly farming practices including optimal soil management; identification of beneficial crop mixtures for yield, soil restoration, pollinator support, pest management, building fertility, and others; ways to maximise carbon storage capacity in soils; livestock feed mixtures for reduced emissions; optimal manure management; waste food management systems; and so on.

More resources should also be put into research and trials into identifying species and forestry methods that will increase our resilience to climate change as well as research into appropriate hardwoods to reduce our dependence on imports. This should be part of a general increase in funding for forest research, which should also cover potential tree disease outbreaks, to enable preventative measures to be put in place rather than reactionary responses.

Creation of a continually updated guide of best practice based on R&D results, connected to

the network of demonstration farms.

Revenue raising

We understand that WG does not yet know what budget it will have to fund this scheme. Regardless of how much it ultimately gets from the UK Treasury, we believe that it should look at independent means of raising revenue to supplement this. We would support the application of a small land ownership tax on holdings above a certain threshold. Not only would this provide WG with independent means of revenue raising, it also encourages large landowners to sell their land, increasing amount available for new entrants to purchase. To further support this, the fund could be used to directly support new entrants into agroecological farming.

A specific “decarbonisation budget” for Wales should be explored with the potential for this to be in addition to the agricultural budget.

Where farms and forestry enterprises could achieve health and social benefits, we would encourage Welsh Government departments to work together both with respect to policy design and budget.