

Sustainable Farming and our Land - Consultation Response Form:

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

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

LandManagementReformUnit@gov.wales

Data Protection

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

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

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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published.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

Confidentiality

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

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

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

Date:	
Name	Game & Wildlife Conservation Trust Wales
Are you responding as an individual or as an organisation?	Individual <input type="checkbox"/> Organisation X
Are you or your organisation based in Wales?	Yes X No <input type="checkbox"/>
If you are answering as an individual, do you identify as Welsh speaking?	Yes <input checked="" type="checkbox"/>
	No <input type="checkbox"/>
Address	The Maltings, East Tyndall St, Cardiff CF24 5EA
E-mail address	sevans@gwct.org.uk

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

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

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

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

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

Responses should be returned by **30th October** to

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

Responses completed electronically to be sent to:

FfermioCynaliadwy.SustainableFarming@gov.wales

FfermioCynaliadwy.SustainableFarming@llyw.cymru

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

Farmers own and manage most of the land in Wales. If biodiversity decline is to be turned around, they are the only people who can make a real difference. Through our work with farmers we know that they are keen to pursue opportunities in delivering biodiversity and learn more about how they can deliver real outcomes. Other land managers can play an important part in working to deliver these outcomes, but farmers are in the majority.

3.4 GWCT support these principles.

3.6 GWCT led research science and demonstration farms can show how production of food and other economic goods can be mutually reinforcing of environmental goods.

3.12 GWCT can demonstrate sustainable farms producing both economic and environmental goods in a holistic system which delivers on the Future Generations Act.

3.20 We fully support the delivery of multiple benefits but would also highlight the conflict that exists sometimes between benefits such as between carbon capture and biodiversity. Some have suggested that upland moorlands would provide the most carbon capture by planting trees, but this would decimate the delicate biodiversity for which many are listed as SSSI's. Through the work we have done with communities through the Sustainable Management Scheme and our Farmer Cluster work we find that local communities are the best people in most cases to decide on the priorities that should be delivered. The lack of success of the Summit to Sea project event though they had been granted millions of pounds made available to them was due to their disregard for the local community's priorities for their area.

3.28 We agree and have found from our own work that by focusing the outcomes on the environment other public benefits will be delivered. We can demonstrate this by the work done under the Powys Moorland Project and others in Wales.

We are happy to support this policy framework in principle. The detail of the schemes will dictate its success.

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

GWCT welcome the intention that the SFP can make a long term and sustainable contribution through a multi-year agreement to farm profitability going beyond merely paying for income foregone and costs incurred.

We support the intention to pay farmers for their actions in order to deliver intended outcomes with the risk being borne by Welsh Government rather than the farmers. When developing this approach, it is important to allow flexibility as we know each farm is different and what works in one place may not be as effective in another. Therefore, we would ask for the scheme to allow the farmer to choose which approach he/she will adopt to deliver the desired outcome. For example, a woodland with an array of wild flowers such as bluebells may be managed better by maintaining existing balanced livestock grazing rather than fencing off from livestock which would result in the loss of the wild flowers as bramble etc. would take over.

We welcome the intention to support maintenance as well as creation. Many farmers have already done a significant amount of habitat creation and it is important to support those farmers who have done the most beneficial work for the environment as well as to continue to support the creation of new habitat.

We support the intention that any farmers should be able to produce the outcomes and apply for SFP. We would like to see flexibility in the scheme so that farmers can suggest and negotiate alternative methods in order to better deliver the intended outcomes from the prescribed list. This may need to be done with the support of a specialist advisor.

GWCT support the approach of having an EOI leading to a Farm Sustainability Review and Farm Sustainability Plan. Many farmers already have their own advisers that they work with and we would hope that WG will enable those advisers to be able to continue to work with farmers to create their Farm Sustainability Plan. Utilising existing advisers on farm and potentially training them to deliver these plans will make it easier for WG to resource the service that will be required to deliver all the new farm plans. From the work that we do with

farmers we find that they work best with someone that they trust and who understands the farmer and his land. If existing advisors are not experts in all necessary areas, there should be scope for signposting the farmer to others who can assist in the next stage of that element. For example, say the farm has a trusted agronomist who knows little about delivering additional environmental benefit they could signpost the need for that expertise and bring a specialist advisor in to coach that element of development of the business.

4.27 Farmers have many frustrations with existing accreditation schemes ranging from the cost to small farmers being prohibitive to the power that the individual accreditors have to decide on a farms success when they spend such a short time on farm understanding that business. It is important that there is extensive farmer co-production and buy in on this element if it is to work successfully.

GWCT would like to highlight again the potential for increasing biodiversity on farm which is not really mentioned in the consultation document. Many farmers who have improved their habitat through Glastir are now looking for ways to increase biodiversity. In order to deliver on the governments objectives to reverse biodiversity decline a different approach is required as continuing to do the same this will only produce the same outcomes. Adopting GWCT's three-legged stool approach highlighting the importance of not just habitat but also winter feeding and predation control would increase biodiversity on farms.

We would ask that you also consider another driver for woodland planting on farm which can produce a return on the woods being shooting. Our 80 years of science and active work on the ground shows how shooting can provide a great benefit to biodiversity. We can show you how farms with shoots have more areas of woodland as well as feeding birds over winter and carrying out predation control. Please see GWCT book "The Knowledge" available to read online.

An easy win for more trees on farms are boundaries where farmers are willing for their boundary hedge to encroach further into the field than internal field boundaries and potentially could include larger trees. This delivers multiple benefits from biosecurity where animals are not able to touch noses to an unbroken continual corridor along which biodiversity can travel.

Farmers can be further encouraged to allow space for trees by measuring and rewarding farmers on a cubic meter basis for their hedges. A three-meter cubed hedge which is flailed every or even every other autumn could provide three times its current benefit when allowed to grow into a 9-meter cubic meter hedge.

We agree that farmer carrying out an annual self-assessment would be the most cost-effective method of delivery and GWCT have been working with Nestle and others in developing this approach. We would be very happy to share this approach with Welsh Government which has been effective at getting dairy farmers who supply milk to Nestle's engaged in delivery of environment benefits where they had not been involved in any agri-environment scheme previously. Key to the success of this scheme, which has 100% sign-up from producers is that the reward makes it worthwhile being in the scheme and that reporting and checking is done by an on-line platform. The farmer records on a spreadsheet the actions he's planning to take and dependent upon the specific activity and the extent the spreadsheet calculates the reward. For example, if a farmer commits to plant 100m of a multi species hedge, he enters that intention into the spreadsheet and can see what reward he will get. To verify he has done the

work he simply uploads 3 pictures – the scene before the planting, one of the work being done and one of the completed planting.

We would like to see WG, when carrying out their inspections, being able to target farms where there has been some indication of problems rather than it just being a completely random selection of farms.

GWCT have shown on its demonstration farms that productive farms can deliver high levels of habitat and biodiversity. However, the support mentioned in 4.72 should not judge farmers by improved productivity so much as on overall profitability and sustainability of the farm.

We welcome the flexibility expressed in 4.75 for the farmer to use an existing advisor.

In 4.79 we support the view to work closely with academic institutions but would ask that you widen that to organisations such as the GWCT who have over 60 scientists working for us not only working on peer reviewed science but developing methodology for application on the ground and sharing that knowledge through practical implementation on our own Welsh demonstration farms.

In 4.82 we welcome the option for farmers to find support for their innovation from a wider group of advisers and experts. This will enable the possibility for continued advancement of ideas to be adopted by farmers on the ground.

Collaboration from our experiences. We agree that collaboration between farmers and other land managers has the potential to deliver greater outcomes on a landscape scale. We agree that each farmer should potentially have a baseline individual scheme to create habitat and other public benefits but then should have the opportunity to work within a wider group to deliver greater benefits. The Sustainable Management Scheme has demonstrated the potential benefits to working collaboratively and how this can not only deliver more habitat but also provide social and other benefits to the wider community. We would welcome an approach whereby farmers and potentially others could form an association through which a management agreement would work in delivering additional benefits and payments could be distributed.

Innovation and continuous improvement We would like to see an amount of funding made available for farmers to continue to innovate not just on production elements but also on delivering more for the environment on actively farmed land. We would very much welcome the opportunity to work with farmers to develop improved management methods on farms and have demonstration farms to inspire and encourage others to follow suit.

Remote monitoring GWCT use Apps as well as water quality sensors etc. in the work that we do on farm. We would be very happy to share some of our work on this type of approach.

Private Finance Sustainable Management Schemes already work with external funding being promoted and we believe that this is a good model for future payments.

Question 3 - Advisory service (refer to chapter 5)

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

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

Comments

One of the most important elements is that farmers have one person they contact with whom they have developed a trusting relationship. It would be preferable for that to be a long-term relationship and farmers can be directed to others/experts for additional assistance. It is important that farmers are able to establish a relationship and trust with one person who can then work in the long term to interact with Government and address any questions.

GWCT have first-hand experience of the benefits of demonstration farms and farmers working collaboratively and we would support a range of approaches to advisory support. In developing a future suit of advisory support, it is important that it is adaptable and can develop as farmers progress their ideas. It is also important that the farmers get the choice of their preferred advisers.

5.26 We agree that advisory service should be separate from any enforcement.

5.27 We agree that the advisory service should be evidence-based and would expand that to enabling farmers to work in collaboration with others in developing further evidence where none currently exists.

5.28 GWCT are open to the possibility of a service whereby the principle contact for each farmer is a Welsh Government member of staff or that they are from an independent accreditation scheme.

The advantages of them being a WG employee is that the previous ESA officers are still considered by most farmers to have worked well and they would most likely support that type of approach. However, there are many accreditation schemes already established with assessors already visiting farms and there is absolutely no point in having two separate assessments carried out on the farm it would be far better to incorporate the two.

The officers should be able to signpost farmers to further independent/contract-based specialist advice. In that way the farmers can build a long and trusting relationship with one person while the system provides the flexibility to continually develop their ideas. Welsh Government then benefits from the commercial (and other) sectors investment in research for knowledge transfer to farmers and will enable farmers to pursue innovation to the cutting edge should they so wish. We would like to see the ability for farmers to choose from an unlimited source of advisers whether individually or in groups or onto demonstration farms and not be restricted to a narrow choice of accredited agents.

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

As a conservation-based charity our answers to this section will focus mainly on how farmers decisions may be influenced with regards to delivering more biodiversity.

61.4 We very much support finding more high value markets driven by the delivery of high environmental benefit and livestock welfare as these will be another driver to Welsh farmers to deliver more environmental benefits.

61.8 We welcome the incentive to support farmers to better understand what can be produced on their ground. For biodiversity to thrive diversity is key. The loss of mixed farms in the last forty years has had a negative impact on biodiversity and by farmers expanding their enterprises this should have a positive effect on biodiversity. For example, introducing top fruit onto a farm could provide potential food and shelter for birds not only from the elements but from predators, producing a more diverse landscape. However, these changes should only be encouraged if they can be done sustainably.

6.2 The Sustainable Management Scheme has brought farmers together in farmer clusters to deliver mainly environmental benefit and from this all kinds of additional benefits can arise including strength working together and the potential for developing producer groups.

6.21 We would ask that you also consider another driver for woodland planting on farm which can produce a return on the woods is shooting. Our 80 years of science and active work on the ground shows how shooting can provide a great benefit to biodiversity. We can show you how farms with shoots have more areas of woodland as well as feeding birds over winter and carrying out predation control. Please see GWCT book "The Knowledge" available to read online.

6.22 & 6.29 We would like you to expand your intention to work with academia and industry to science based charities such as the GWCT who have 80years worth of research and expertise available for example farmers in Wales are keen for us to continue our work on reducing tick burden in the uplands through development of tick collars for sheep but as yet no funding stream has been identified to take this research to the next stage. This type of research that we carry out can also deliver multiple benefits for farmers, biodiversity as ticks kill ground nesting bird chicks and on public health by reducing the risk of Limes disease.

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 intention to make regulation and enforcement relevant and appropriate to the industry and particularly the intention for it to be reviewed with a view to enhancing to embrace innovation and failures within the system.

7.21 We very much welcome your approach to see what does and doesn't work well within the current BPS and Cross Compliance requirements.

7.36 Many farmers have told us how frustrated they are by the current system of inspection which results in a spot inspection being undertaken because their name has been drawn at random. They feel that and inspectors seem to go out of their way to find minor faults over which to penalise them in what they believe is a disproportionate manner rather than WG pursuing and fining those who do continual damage and openly flout regulation. We would therefore welcome a risk-based inspection program.

7.37 Within our GWCT assisted collaborative projects we are utilising technology with apps recording activities undertaken, plotted on site along with photos which provides proof of the action having been completed. The farmers and others working with this have been very happy with the outcome and it provides additional benefits of incentivising better outcomes.

7.38 We would welcome a new approach to farm inspections which is risk-based, effective and proportionate.

7.39 GWCT can share self-assessment and self-reporting approaches which have been designed within a Nestle commissioned project.

7.40 We also support the approach of earned recognition.

7.45 With our scientific work on fish and rivers (see current Interreg SAMARCH project <https://samarch.org/>) we are very concerned about the pollution of waterways by slurry. We agree that the development of new regulations surrounding slurry must be done in conjunction with farmers. Farmers tell me that overly prescriptive current regulation for the dates on which they can spread slurry alongside the need to employ contractors due to the expense of equipment puts pressure on the system with the result that spreading of slurry still takes place during wet days of the spreading season. A more sophisticated and holistic approach is needed to deal with this problem.

We have been working with groups of farmers as well as fishermen on getting together to tackle dairy slurry pollution problems but as yet we have not been successful in finding any funding and the SMS funding bid was not successful.

7.47 GWCT greatly support this paragraph and the need for enforcement and fines to be proportionate so that serial offenders have an increasing and significant fine.

We look forward to engaging in further consultation on this matter in future and will continue to work with farmers, fishermen and communities in tackling the problems.

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

We support the proposals outlined in option A and in Wales can see the merit of a higher percentage reduction being applied to higher payment bands thus reducing the pressure on the lowest payment recipients. There seems to be public support for maintaining smaller family farms in Wales to maintain the local communities and this should be reflected in payments made. This could be done by front loading payments for the first 50 acres (or other such as first £5,000) which could also be used to cover the cost of an independent assessment if farmers were then to choose and pay for their own assessors.

GWCT would urge WG not to miss the opportunity in the next three years to achieve net biodiversity gain and reverse biodiversity decline in Wales. As the Minister has declared a climate emergency, The State of Nature report continues to demonstrate a lack of real progress in biodiversity decline and the Climate Change, Environment and Rural Affairs Committee continuing to do the same or even worse do nothing within this timeframe will not help to tackle this problem and would be an opportunity missed.

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

GWCT fully support the proposal for co-design approach. We are working with groups of farmers and other working and living in the rural community all over Wales and we can get groups together to meet and discuss further with Welsh Government.

We also particularly welcome the intention to pilot the practical aspects of scheme delivery and GWCT with our expertise in this area are keen to work with WG in developing and running pilot projects. We look forward to assisting Welsh Government in the design of the future funding program.

Spatial opportunities maps – GWCT would hope that these maps will not be used in a way that restrict those farmers who are able to deliver a higher level of biodiversity gain from doing so because the area that they sit within indicated on an area map is not specifically highlighted for that purpose. Each farm is different, and maps used for generalisation are fine on a macro scale but should not be a final decider on the ability of a farm to produce outcomes. The enthusiasm of the farmer to deliver outcomes for nature is more important than whereabouts on a map the farm is.

Many farmers are approaching us having created a great deal of habitat through Glastir and Tir Gofal and they want to know what to do next. GWCT would like to see WG delivering a scheme where those that have delivered most in the past and want to continue to increase their commitment to delivering a biodiversity net gain are able to do so and can lead the way in demonstrating the potential for Wales to increase its environmental credentials. In order to do this we envisage a layered scheme whereby people can keep opting to deliver more on their farm. That they are able to potentially deliver high level outcomes as well as simple basic benefits at any point and that collaborative landscape scale collaboration would be the highest tier of delivery.

The reference to environmental outcomes seems to be missing any attempt to deliver a biodiversity net gain on farms. I understand that reversing the loss of biodiversity is one of the First Ministers priorities yet there is no reference made to this in the document.

GWCT science and work on the ground demonstrates that more is needed to enable net biodiversity gain than purely habitat creation. Without winter feeding and in some cases predation control for species such as ground nesting birds there will be no increase possible in species numbers. As the State of Nature Reports have demonstrated generalist species are doing exceedingly well but we are losing the more vulnerable specialist species. We need to take further action to bring about more balance in nature to enable these species to increase in numbers again. This is possible in a relatively short timescale as our 80 years of science and

application other than the ground demonstrates net biodiversity gain on farms, but the right levers and advice will be necessary to achieve this.

Further to this we believe that in order to demonstrate the scale of opportunities for farmers across Wales pilot projects should be run. These will also ensure that the approaches and real costings on farm to deliver the outcomes desired are established before any new scheme gets rolled out. We would like to see the new scheme being adaptable and therefore able to enable farmers to continue to improve methods of delivery on farm. In order to do this we believe that farmers should be required to deliver outcomes without being restricted in their methodology by overly prescriptive requirements within the scheme.

A.22. Drawing on existing data – Another source of data for working to deliver outcomes is held within the Sustainable Management Scheme projects. Many have been delivering outcomes on farms in a collaborative way and would be a good source of information to inform development of future schemes.

A.23 GWCT have run projects with Nestle and Kellogg's and have developed payment methods

Proof of concept of how a simple yet effective scheme can work with up to 100% of farmers involved in the supply scheme taking up the offer. We believe there is a real opportunity to harness the desire of consumers, through the supply chain, that their food be locally sourced and produced to high welfare and environmental standards. We believe an effective partnership through Government and Farmers can help to achieve this, and many other objectives.

GWCT very much welcome the intention to pay an amount above and beyond the "income foregone cost incurred". Once improving the environment becomes an intrinsic part of the business model for the farm, contributing to the bottom line, then it will be treated as importantly as economic food production.

A.27 Building a set of representative farms – GWCT would like to take this one step further in demonstrating the opportunities on a representative group of demonstration farms in Wales as above.

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 rural communities have a larger percentage of Welsh speakers than urban dwellers in Wales and therefore maintaining small family farms is as important to the Welsh Language as it is to maintaining rural communities and their infrastructure such as schools. As suggested above this is reason to consider a front loading of payments for the first sum or acreage to support small family farms.

Question 9 - Other comments

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

Comments

Some of the first Sustainable Management Schemes projects are coming to an end in the spring of 2020. There is no current potential for continuity of the collaborative work that has been developed over the first three years. Many, like the Beacon Hill farmers who have grown in their involvement with the Powys Moorland Project are looking for succession funding to be able to continue and further develop the good work begun by the SMS. We would urge WG to continue to financially support the worthwhile outcomes that are being delivered through the SMS's and to provide funding for the next phase of developing the work to deliver yet more positive outcomes for community and the environment through this existing outcomes-based process.

GWCT would like to put forward a number of pilot projects which we believe need to take place immediately in order to provide further demonstration of the best way to deliver outcomes based public benefits on farms.

GWCT have the tried and tested science and methods to reverse biodiversity decline on farms in Wales and we would like to be given further opportunity beyond the existing Sustainable Management Schemes we are working with to help farmers to achieve these outcomes.

With the Minister having declared a Climate Emergency & biodiversity decline continuing and again becoming a focus of Welsh Assembly we would like to see work being put into place to deliver a net biodiversity gain within the next 3 years and not have to wait for a further 3 or 5 years before we can truly start to make a difference.