

1.

Q Is the structure of benefits, outcomes, and actions useful?

A Yes we agree with the general principle, and the description is useful. although the pyramidal diagram suggests a lot of actions required at the base to achieve a few benefits at the top. The opposite could be true that with a small number of actions a large number of benefits could be delivered.

Q Do the benefits and outcomes reflect the broad contribution that farming delivers?

A Only in part. We also believe there is justification to include the socio economic benefits regularly provided by farming. Farming, even more so in more remote regions, provides the foundation for many other businesses including agricultural suppliers and contractors, tourism, local transport, pubs and hotels, shops, garages and much more. Often farming communities form the bedrock of school pupils, keeping local businesses in business 365 days of the year and keeps rural communities, culture and Welsh language alive. We also believe there should be recognition of the value to the public of a level of food security and also of local and artisanal food culture. We believe this could and should be built on further in order to add value and retain value within a more localised supply chain. For this to happen we believe there should be incentives for new and small infrastructure eg low throughput abattoirs where necessary, butchery skills and high quality products.

Relating to sheep farming specifically we can envisage a desire to maintain and create 'traditional approaches' to sheep farming particularly in the hills and uplands, using native breeds and more intensive shepherding. We support this approach but are convinced that investment is needed to ensure it works in the marketplace through the greater differentiation of products and knowledge and understanding of producers regarding which markets are options and which are being targeted. It is important to note that most farmers want to farm and not be 'conservation graziers'. In addition effort needs to be made to create market demand and profitable businesses that are using very traditional approaches. Success needs to come from both the market and reward for public goods delivery recognising the general public good of very traditional farming particularly in more sensitive areas.

Q Is the description of SLM outcomes reasonable?

A Yes although see above

Q Is it right to focus on the delivery of environmental outcomes to create and income stream?

A Yes we agree with environmental outcomes (including climate change measures, resource use, and the protection of natural capital) forming a key part of an income stream but we also support the

view that income related outcomes be broader to represent a wider range of public goods, including socio economic and well being, enhanced animal welfare, and agricultural diversity and native breeds being considered as part of biodiversity.

We believe it important to recognise the often long term nature of environmental investment. For instance planting trees is a long term commitment and related payments should include both reward for the public good delivered as well as a compensatory value based on any loss of grazing etc. We would advise that making land available for trees should attract capital support for establishment as well as compensatory and reward payments for periods of at least 25 years. We also believe it necessary to evaluate and document the purpose of tree planting, whether it is for timber production or environmental benefit (or a balance of both). This should be included in the farm sustainability review and the following sustainable farm plan.

Q Would a different policy framework be more appropriate – if so what?

No, we agree with this framework.

2. Q How the Farm Sustainability Review and Farm Sustainability Plan could be delivered in a proportionate manner?
3. A It is crucial to consider the importance of the current Basic Payment Scheme and the relatively long term business security it offers. While we agree with the principle of farms becoming more profitable and financially sustainable it is a fact that many farm businesses rely on the relative permanence of the BPS to underpin loans and credit. We strongly feel that future sustainable farming scheme structure should offer long term commitments to avoid fluctuations and volatility.
4. We agree with the principle and the value of every farm business undergoing a farm sustainability review and the development of a farm sustainability plan. However, the success of this approach will be entirely dependant on the structure, practicality, and cost. The review and the plan will only succeed if it is fully developed and owned by the farm business itself, and in addition we believe such ownership must be by multiple partners or family members on family farms. We believe that both the review and the plan should be a facilitated process where the farmers take the lead. This could be supported by 'smart' on line processes which could auto populate both the review and the plan and minimise any time spent by specialist personnel. We accept the potential need for 'expert input' across a range of disciplines at certain points but this should only be used where necessary.
5. We would like to see significant opportunities created for farmers themselves to be trained and work as part time facilitators and experts in their field in order to get a higher level of ownership of the review and planning approach. This would create new business opportunities within the farm business community as well as broaden the skills and knowledge base, and get more 'ownership of the vision' from the farming community. Such an approach should not be seen as the industry 'policing itself' (although this is not necessarily a bad thing) and accreditation schemes could protect against any risks.
6. We would recommend simplicity in approach, possibly with provision of a template that the majority of farmers can do, followed by advice depending on areas needing improvements. We can see this being done by the use of a 'public goods tool' to assess performance across a range of criteria, and having been involved in approximately 50 sheep farm sustainability assessments via the EU funded iSAGE

research project, the NSA have submitted a proposal to the Defra ELMS Test and Trials project to test farm plan approaches.

7. While we support the principle of sustainability reviews and farm planning we are concerned about the manpower and resources needs to facilitate these reviews and plans as well as the cost of this work and its impact on the overall agriculture and environment budget. Considerable training and upskilling would be needed and this would take time and require close management and assessment.
8. We are confident and encouraged by thinking that this could be an opportunity for farmers to be trained to deliver some of this work and we have spoken to farmers who are favourable of this thinking.
- 9.
10. Q How best to reward farmers for outcomes derived from actions?
11. A Actions and outcomes should be paid for with, additional reward for higher outcomes. There needs to be both actions and outcomes directly involving the farming activities (nesting and feeding habitats for farmland birds, or conditions for pollinators, or protection of soils), and also actions and outcomes relating to non farming land management (tree planting, wetting of areas, fencing of hedges, maintenance of walls etc)
12. We would like to see clarity over any legal restrictions or land designations gained during the scheme and would expect that generally when the scheme ends any restrictions end as well. The primary aim for most farmers is to farm and produce. We accept that this needs to be within acceptable sustainability boundaries but access to schemes must be voluntary with those choosing not to join being free to produce within the limits set by regulation. We encourage the WG to develop schemes that integrate productive sustainable farming and environmental management (and wider public goods delivery).
- 13.
14. Q How a sustainable farming payment should operate?
15. A Largely to move away from income foregone principle towards a reward based approach (although we do believe there are cases where payment rates should consider compensatory allowances based on the loss of ability to farm). There are increasing examples where habitat degradation is occurring due to an absence or lack of grazing - and grazing management is not supported or encouraged, in fact we believe current policies have encouraged ranching that has not been beneficial for farming or environmental conditions. We are strongly of the opinion that much of the science behind what appears to be a general aim of reducing livestock production (global warming and methane, diet related illness and red meat consumption, and the loss of species and grazing animals) is flawed in that the science done is not adequately holistic, performed on a global basis rather than considering local conditions, nor considerate of any gaps in science completed. For example the recent findings that methane from grazed animals is not the cause of climate warming that it was assumed to be due to its short life cycle.
16. There is concern amongst some farmers over entering schemes and not being allowed to go back to where you were prior to scheme commencement. Any post scheme restrictions need to be made clear and it needs to be recognised that many farmers will be cautious about entering a scheme that affects future post scheme decisions or potentially affects land and farm values.
17. We get good reports from farmers involved in some advanced level Glastir schemes with individual bespoke contracts and agreements. These appear to pay for example for double fencing which has the dual benefit of protecting hedges and also improving biosecurity and aiding animal health and disease control. We hear reports

of half day meetings to agree a plan with Glastir staff then working up a plan to be discussed and agreed with the farmer. We have had examples where scheme participants had to put in wooden gates (that were paid for) but now they have flexibility to use metal gates where they choose to and simply be ineligible to claim for it. This gives farmers and land managers choice.

18. We would like to see more mention of animal health and biosecurity measures built into this scheme design. For sheep we believe that significant improvements could be made in productivity without challenging the farming system, by improving nutrition and health management with incentives for the use of analytics, monitoring, and basic bench marking. While this may well be supported via other funding approaches (such as RDPW currently) the planning and whole far approach should be as integrated and inclusive as possible.
19. There needs to be accepted approaches for both graziers and land owners delivering and benefitting from ecosystem services based on equitable share (eg carbon storage or water management).
- 20.
21. Q What type of business support should be offered?
22. A Support should be offered through; advice and facilitation, training, facilitation for greater levels of farmer collaboration and partnership working, capital grants for farm and public goods improvements, and incentives for efficiency measures (such as soil pH and aeration, and farm animal health planning and management). We believe there needs to be investment available for small capital projects. Finally businesses should be supported by reward for delivery of public goods.
- 23.
24. Q What eligibility criteria should apply?
25. A The principle should apply that funding and rewards should go to the active farmer - those making the investment, doing the work, and taking the risk. There should be no size cap for smaller farmers wishing to enter the scheme - small farmers are important and will collectively contribute to bigger goals. We accept this is not always straightforward - it is relatively simple with owner operators, should steer funding towards tenant farmers involved in tenancy agreements and should be reflected in short term lets via lower cost grazing rentals. For common land we are strongly of the opinion that those using their grazing rights (not necessarily just holding rights) should be recipients of public goods payments on the basis of a sustainable farming scheme being based on the actual farming activity. The recipient is likely to be involved and stated in the farm sustainability review and the farm plan - for commons this may well need to be done via a partnership model that includes both the landowner and the grazier.
26. We do not believe that land used for non farming activity (ie crops for AD, or biofuels) should be eligible via this scheme if the enterprise is already supported by feed in tariffs for example. Double funding in this way distorts the market and presents unfair competition that disadvantages and disrupts established farming activity.
- 27.
- 28.
29. Q Whether there is a case for capped or diminished payments?
30. A We do not generally believe that there should be a minimum size cap set and believe that small farmers should be eligible. We believe that diminished payments over a certain threshold would be preferable but only on the basis that the bulking up of payments on very large holdings could take a large proportion of the budget and once any holding gets beyond a certain threshold significant efficiencies of scale

come into play. There is a strong view that there should be a capping of payments or scheme availability per holding.

31.

32. Q How to design scheme to lever down additional private finance?

33. A Clear payments for ecosystem services that larger corporate companies could purchase to offset their emissions. Co-ordinated and facilitated schemes on behalf of clusters of farmers/ catchment or ecological areas are likely to be the best approach to access private money. Scaling up management will deliver enhanced benefits and it is crucial that any private funding is made available to small farmers (through massing up via collaborative approaches).

34.

35. Q Are there any alternative ideas to reward farmers for sustainable land management?

36. A Yes – we would like to see start up or/and small farmer top ups on the first say 20 hectares of land under sustainable land management based on incentivising small farm holdings and their benefit for an agrarian culture in Wales and a likely benefit to the use of the Welsh language through strong local communities.

37. It is important that all structural development, policy, and support pulls in the same direction without contradiction. In particular we would urge the WG to facilitate its own direct funding streams and the use of red meat levy money to be co-ordinated - ie if Govt policy is encouraging sustainability based in part around more traditional livestock and grazing approaches, potentially relying more on traditional native breeds then levy money should be spent on developing markets and products that support this approach, with breed improvements targeted towards efficiency improvements alongside hardiness and ability to thrive on lower grade forage. We also believe that the development of new sheepmeat products and the promotion of later season lamb (hogget) and mutton is necessary in order for the market to support the land management objectives proposed. We believe WG could do far more in this area for example by steering public procurement markets in a co-ordinated direction - schools, armed forces, hospitals etc.

3. Q Should an advisory service be established?

A We accept the need for an advisory service although the approach described suggests more the need for a facilitation service that is underpinned by an advisory service covering a range of disciplines. We would suggest that even those advisory services should be as multi discipline focussed as possible.

The demand placed on such a support service should not be underestimated and we suggest that efficiencies are sought in any way possible. We suggest more of an advisory network rather than a formal service, with advisers with specialist advice integrating well with other disciplines.

With the aim of making this scheme work for farmers and keeping the maximum amount of money within the primary farming sector we would like to see proactive efforts to get farmers involved in delivering facilitation and advisory services.

We recognise the need for high quality and trusted advice and support. It is essential that the sustainable farming review and the plan are owned by the farmer and this will be best achieved if the farmer takes an active role in its development.

Q What should the functions be?

A The functions of the facilitation process should be to support the farmer (if needed) in completing a sustainability assessment and a sustainable farm plan; to identify the farmers aims and objectives; to understand the opportunities and needs; to assess investment required; to budget and set agreed targets; to provide an entry to funding streams. Advisory support may follow depending on the needs identified in the plan. Advisory functions should be specific and related to (for example) enterprise efficiency, livestock health planning, habitat works, water management, energy production. We recommend that even specialist advisors have a level of multi discipline knowledge and would like to see farmers given the opportunity to develop skills and expertise in this area.

Q What is an appropriate relationship between an advisory service and the WG?

A This must be arms length and advisors should be working primarily for the farm and not for the WG. There must be full confidentiality provided with agreements reached for any data or information shared.

The advisors should be working for farmers who are collectively delivering to and benefitting from WG

policies.

Q What is the appropriate scale of delivery?

A Extreme care will be needed to ensure that facilitation and advisory provision is as lightweight and efficiently delivered and that the farmer can do as much as he/she is able and willing to do. Advisory support must not use up too much of the funding available and we absolutely do not want armies of consultants and advisers creating a new industry with farmers working ever harder to stand still.

We like the idea of a web based template/ support/ application process but this needs to be designed with poor broadband service in mind.

There is still inadequate broadband connection across much of Wales.

4. Q Is it right for support to be subject to sustainable land management?

A We believe it is important for support to be provided in order to secure efficiencies and high quality at all stages of the supply chain, enabling productive and profitable farm businesses. We also believe it is important that farmers and land managers receive financial reward for environmental and public good delivery. We agree with the urgency to ensure multiple outcome and holistic sustainability but we are concerned that research knowledge is still not yet adequately inclusive or multi functional.

We agree with the general principle that support should be linked to sustainable land management and that farmers and land managers should be involved in sustainable land management practices in order to receive support. However we are aware that there may need to be exceptions, for instance where areas of the supply chain and its support network are landless. One example may be where young people are entering the sheep industry as small scale producers but also contracting work for other farmers (shearing, mobile dipping etc). These people provide a valuable service and can raise standards of welfare and

productivity - they are worthy of support to help start their businesses but may not have an opportunity to demonstrate sustainable land management. Another may be small scale processing, shortening supply chains and adding value. These facilities support local businesses and are likely to contribute to sustainable land management but may not be in a position to be able to demonstrate this. Such examples could be involved in what are agreed to be sustainable livestock management and farming practices and we suggest these businesses have another way to demonstrate their contribution to sustainable farming.

Q Do the proposed priorities reflect the right areas of focus?

A We broadly agree with these priorities and we would like to see the industry supported further with adequate broadband and mobile connectivity. This has been promised before yet significant parts of rural Wales are still not properly serviced. We believe that inspection and bureaucracy throughout the supply chain could be streamlined by use of technology – abattoir inspections via blue tooth 3D imaging is an opportunity as is reducing the need for on farm inspections through use of technology.

We assume that promoting brand values, and the use of innovation and KT includes a desire (with incentives for encouragement) to improve livestock health in Wales and make more of maintaining and

improving a foundation of high quality and resilient traditional genetics.

Incentives and support needs to encourage the improved feedback of research to all participants in the industry, and to encourage contributions from farmers to data gathering (ie health and disease surveillance).

5. Q How can the current regulatory framework be improved?

A Tighten up on animal health requirements –eg enforcement of sheep scab order. Do more to control domestic dogs and prevent livestock attacks; to be open about allowing licensed control of protected species when causing problems for animal welfare.

To protect Wales's farmers from lower standard imports.

Systems of self reporting/open record keeping to allow on line inspections, and the use of data sharing from

existing schemes and inspection results.

Q What should be the scope of the future regulatory framework?

A Food safety; environmental protection, animal health and welfare – things that affect society. The regulatory framework should also legally bind the WG to providing secure and long term support for farmers and land managers.

Q How should a regulatory framework champion Welsh standards?

A This depends on whether farmers and land managers can be supported financially for meeting regulatory standards. If not then regulations should underpin to a base line

acceptable standard – but allow for brand development based on assurance and able to attract financial support.

While we support Wales' aspiration for being a leader in high environmental and welfare standards we are not confident that the market supports yet such an approach.

Q How should regulatory compliance be monitored?

A Existing farm assurance inspections should be accepted as defining regulatory compliance. We accept the role of risk based inspections and spot inspections in order to incentivise compliance.

Q How can breaches be fairly and proportionately managed?

A There must be a principle of innocent breaches receiving warnings before any financial penalty is applied. Cross compliance penalties relating to minor tagging and movements reporting breaches are a good example of what needs to be avoided.

6. Q What are the principles of transition?

A We absolutely agree with the need for transition support and stress that this should be a clear and well communicated period of 7 - 10 years. At the same time transition must ensure that adaptation and change takes place. We note that the BPS is only guaranteed up to and including 2020. This is only one year away and while we understand the political situation we are seriously concerned that without funding there will be no transition and many businesses would suffer with knock on impacts for animal welfare and environmental management. There are broad commitments until 2022 but the uncertainty of the political situation means this is not guaranteed. If it is the right place to do it then we would like to see the Agriculture Bill making provisions for long term funding for devolved nations and we would like to see those long term commitments followed by WG to farmers. We note the commitment that 'once funding is returned we will ensure funds are directed towards farming, forestry, and land management'. We would like to see stronger commitments relating to funding being used to support, incentivise and reward farm businesses in relation to productive and sustainable farming and the delivery of public goods. We value some funds being used for training and consultancy/advice but this needs to be kept in proportion, justified, and continually re-evaluated.

We would like to see all the elements that have been funded via RPDW be eligible for similar levels of support into the future, including industry wide initiatives such as national disease control programmes. We stress though that we expect to see at least the same budgets available as are currently.

We agree that training and consultancy via Farming Connect, should be available for land managers and food businesses irrespective of their involvement in any proposed new scheme.

Q What are the merits of the 3 transition options?



A We prefer Option B or C in terms of transition arrangements on the basis that it allows closer and more controlled management of the process. We can see that Option C could be more targeted, something that could be useful although we would want to see anyone disadvantaged by this - keen to join new schemes but ineligible.

The principle to maintain income opportunities and investment is essential.

Q How could the CAP be improved prior to being phased out?

A We support the options outlined in 8.36 - in particular the options that appeal include; Cross border single application rule; ESPG rule; a review of cross compliance penalties.

7. Q Are there views on the analytics used

A The stages proposed appear thorough and logical

We agree with the range of impacts listed in the integrated impact assessment although we would like to see an impact assessment to include food culture, health relating to diet and connections between production and consumption in Wales. We would also like to see an impact assessment on agricultural diversity within Wales, including native breeds and other breeds of livestock, crops, and grass/ forage crops.

8. Q Are there proposals included that would affect the Welsh language

A A sudden increase in facilitation and advisory personnel could result in inadequate numbers of welsh speakers and this may reduce opportunities for welsh speaking farmers and land managers. This adds weight to the argument for training programmes to get more practicing farmers into these roles. Similarly any serious disruption to the farming community, with farmers choosing to get out of the industry, would be likely to result in new comers coming in, many of whom may not speak welsh. This could have a negative impact on the use of the welsh language.

Q How could positive impacts on the Welsh language be grown?

A Create opportunities for indigenous welsh people. Offer welsh language training for facilitators and advisors.

9. Overall we understand the title of this consultation 'Sustainable Farming and Our Land', and we understand the context of the words used. However it is right to inform that we have received a number of comments that are critical of the statement, 'Our Land'. These comments have been made on the basis that 'its not our land, its my land'. In a small number of cases these words have been interpreted as challenging the ownership rights of landowners. The small number of comments we have received suggest there is deep distrust in some quarters, albeit small in number. We are relaying these comments in the hope they help strengthen future communications and trust between WG and farmers.