

# Sustainable Farming and our Land - Consultation Response Form:

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

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

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

## Data Protection

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

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

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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published.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

## Confidentiality

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

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

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

<b>Date:</b>		
<b>Name</b>		
<b>Are you responding as an individual or as an organisation?</b>	Individual Organisation	
<b>Are you or your organisation based in Wales?</b>	Yes No	
<b>If you are answering as an individual, do you identify as Welsh speaking?</b>	Yes	
	No	
<b>Address</b>		
<b>E-mail address</b>		

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

<b>If you have indicated that you are a farmer, please identify your main farm activity (please select only one)</b>	Sheep	
	Beef	
	Dairy	
	Arable	
	Horticulture	
	Mixed	
	Other	
<b>Do you currently claim BPS?</b>	Yes	
	No	

<b>Do you currently have rights to graze stock on a common?</b>	Yes	
	No	

<b>Are you a tenant farmer?</b>	Yes	
	No	

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

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

Responses completed electronically to be sent to:  
[FfermioCynaliadwy.SustainableFarming@gov.wales](mailto:FfermioCynaliadwy.SustainableFarming@gov.wales)  
[FfermioCynaliadwy.SustainableFarming@llyw.cymru](mailto:FfermioCynaliadwy.SustainableFarming@llyw.cymru)

### 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

We broadly welcome the framework which sets out a clear and logical sequencing of *Benefits, Outcomes* and *Actions*, connects food production and environmental outcomes and makes reference to the importance of soil health for achieving both throughout.

Despite this, we were disappointed to see that soil – and specifically healthy soils and peatlands - was not included as a distinct environmental Benefit in its own right alongside clean atmosphere, high water quality and biodiversity. Indeed, it is not even listed specifically among the proposed environmental Outcomes as currently framed (p25).

This oversight ignores the headline importance of soil health which should be considered - as the Consultation document describes it - as a '*high-level concept*'. Page 13 of the document even refers to: *some of the large problems Welsh society faces, in relation to things such as clean air, water quality and soil health*. If a decline in soil health can be understood as a critical, societal 'problem' in this context – by the same logic, why can't its remediation be described as a headline *Benefit* – and therefore a central pillar of the strategy?

This inconsistency is a typical example of the way in which soils continue to be understood (UK-wide), as a problem but marginalised when it comes to addressing – and investing in – a genuine, ambitious solution.

This inconsistency is particularly disheartening given the genuinely world-leading position that the Welsh government and people hold as champions of soil health, expressed through the inclusion of *Concentration of carbon and organic matter in soil* among the national indicators in the 2015 *Well-being of Future Generations Act*. If this commitment is to mean anything, it needs to be converted into concrete policy commitments as an example to the other three nations of the UK and internationally – and this strategy is the logical place to start.

With that in mind, we would recommend that *Healthy, carbon-rich soils and peatlands*' be added as a new (fourth) Benefit to the proposed Framework. The rationale is as follows:

- '*Healthy, carbon-rich soils and peatlands*' meets the criteria laid out for Environmental benefits in that they *arise from the sustainable management of natural resources, are connected to the maintenance and improved condition of ecosystems as assets and they indirectly support the delivery of wider social benefits and underpin the delivery of economic benefits*.
- Soil carbon provides the foundation for the three Benefits as currently proposed: Soil organic matter (carbon) improves soil structure and reduces erosion, which leads to

improved water quality in groundwater and surface waters, and ultimately to increased food security and decreased negative impacts to ecosystems. Since these Benefits already overlap, there would be no contradiction in adding soil – indeed the addition of ‘earth’ to air, water and life would only strengthen the underlying vision and narrative.

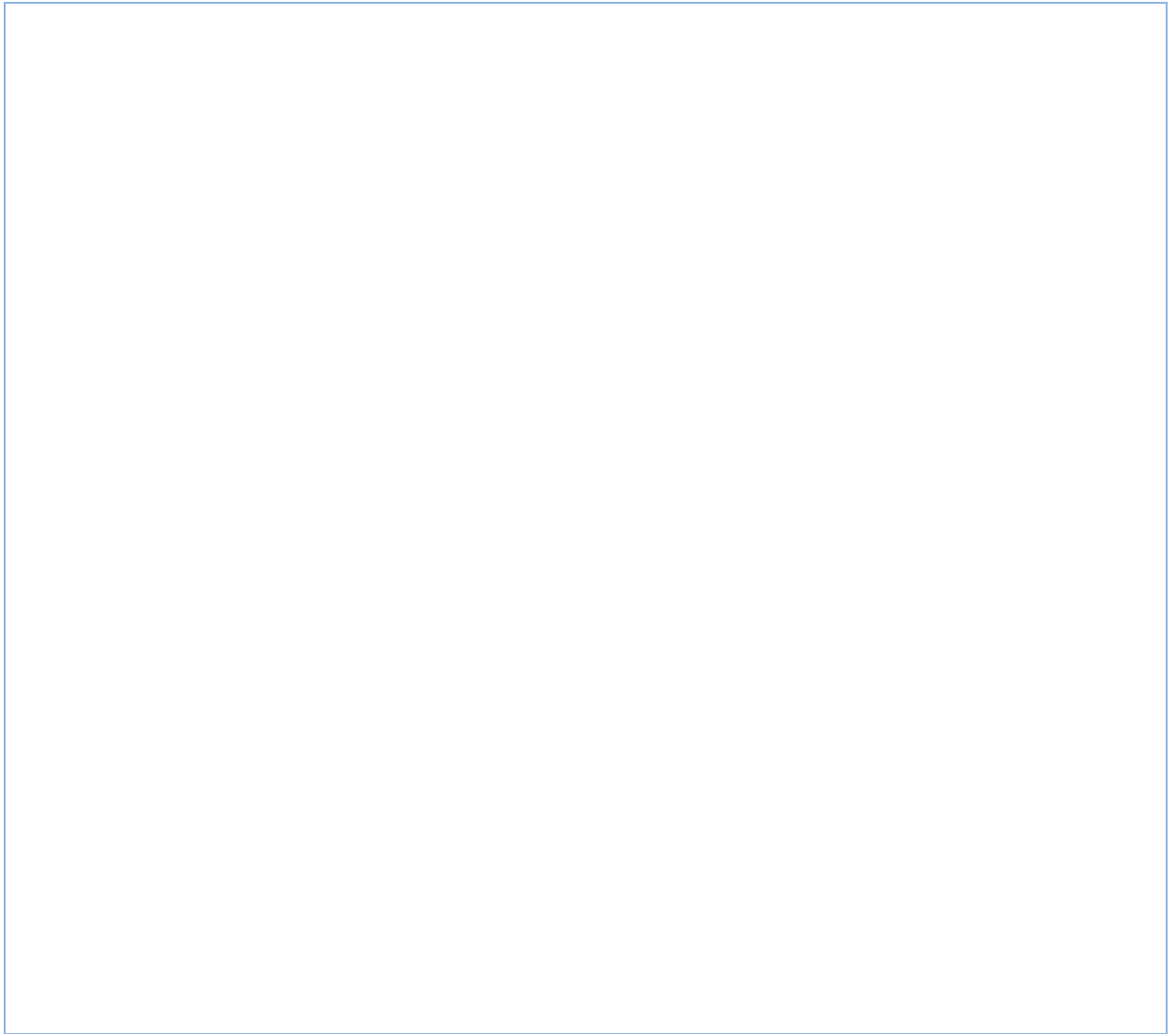
- In addition to the Environmental benefits, carbon-rich soil is also critical to many of the economic and social categories too. Such is its importance that, as currently framed, there would be an argument to include it among the outcomes for all nine Benefits proposed!
- Peatlands need to be name-checked specifically as part of the *Benefit* because of their unique environmental significance and the need for targeted action, separate to that for soils more generally. We would remind the government of its commitment to ensure that all peatlands supporting semi-natural habitats are under active management by 2030
- We have concerns about the current framing of ‘carbon sequestration’. Some of this relates to semantics, others to a misunderstanding of the role, status and mechanics of soil carbon, specifically.
  - Carbon-rich soil underpins many of the defined Environmental Outcomes – water quality, flood risk mitigation, resilient ecosystems etc. Placing ‘carbon sequestration’ alongside these contradicts both the scientific evidence and the document’s own internal logic.
  - It is not enough simply to refer to carbon sequestration – since halting ongoing carbon loss in soils that are already subject to degradation is equally important.
  - ‘Carbon sequestration’ is an Action – not an Outcome. Similarly soil husbandry and nutrient management are defined as ‘actions’ - but these might be considered ‘Outcomes’ in themselves that need to be underpinned by a raft of distinct practices.
  - Pursuing soil carbon sequestration in isolation from other soil health functions and at the expense of more integrated thinking can be counter-productive, e.g. if it leads to increased compaction through machinery use or displacement of food production to other parts of the country or world. Instead it needs to be seen in the context of the other measures to improve land stewardship.
- The Framework will be critical for the subsequent policies of monitoring, regulation and incentivisation that follow. Again we are concerned that as currently designed, it will not motivate the carrot/stick behaviour change required, nor the generation of a coherent picture of change over time.
- Instead, there is a risk that, as currently framed, the benefits of healthy soils will be spread too thinly across different outcomes.
  - Incentives will be diluted since it will be impossible to weight the numerous environmental benefits from healthy soil – e.g. if carbon sequestration achieves flood risk mitigation, will it be doubly rewarded?
  - The required regulatory scheme will be disjointed (pursuing potentially contradictory outcomes in isolation)
  - The impacts of the various contributing actions (e.g. underlying subsequent farm management practices) won’t be clearly monitored, analysed or understood.
- Only a soil-specific *Benefit* can bring the necessary strategic oversight here, and drive the development of a long-term, strategic vision.

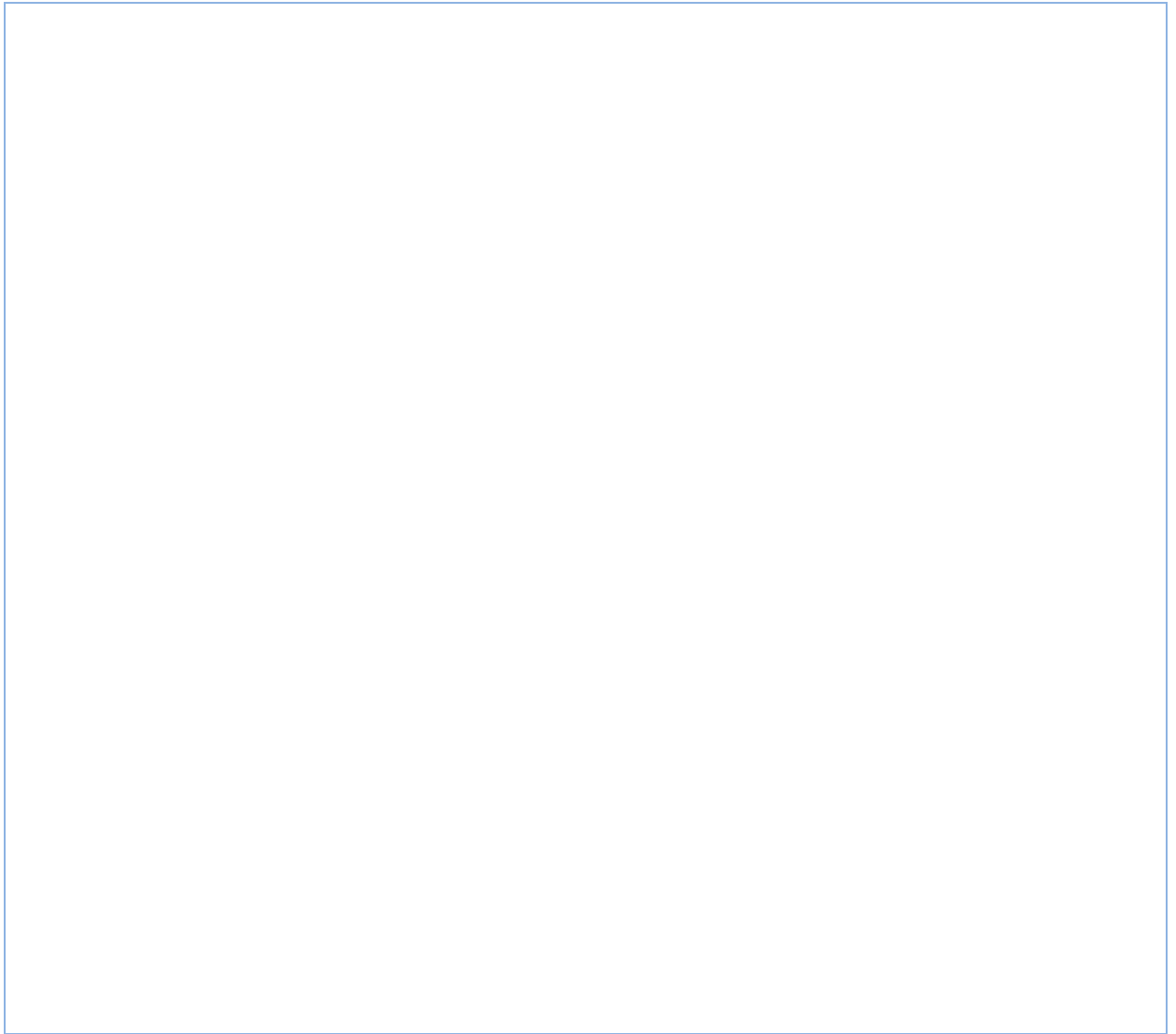
Finally, If *Healthy, carbon-rich soils and peatlands*’ were to be added, it would be straightforward to break it down into the outcomes needed to achieve it. These might include carbon sequestration and maintenance, improved soil structure, peatland protection and restoration. Actions could then be developed that support these.

In the 2016 House of Commons Environmental Audit Committee Inquiry into Soil Health, the Welsh authorities were praised for making efforts to 'join-up' soils policy between Government departments, for investing in a rolling soil monitoring programme and for its targeted approach to regulations and incentives.

At this critical juncture of post Brexit agri-environmental policy making, the other nations will be looking to Wales to set the example here – to finally break soil out of the neglected policy silo it has existed in and set the precedent for genuinely ambitious approach.

Currently, we see this strategy as a step in the opposite direction, and urge the government to reconsider.







**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****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**

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**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**

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**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**

**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****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**

**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**

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<b>Question 9 - Other comments</b>
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| <ul style="list-style-type: none"><li>• If you have any related issues that we have not specifically addressed, please let us know.</li></ul> |
|---|

<b>Comments</b>
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