Cyswllt Amgylchedd Cymru | Wales Environment Link

Sustainable Farming and our Land: simplifying agricultural support

October 2020

Introduction

Wales Environment Link (WEL) broadly agrees with many of the simplification proposals contained in this consultation. Below we outline specifically those areas where there is consensus on the concerns. The policy reform signaled by the Sustainable Farming and Our Land consultation represents a radical and necessary overhaul of the status quo. We do not underestimate the scale of the change this policy reform represents for farming. Given this, and given some of the structural challenges that the farming sector faces, there is a need for Government to be proactive in helping to manage the change that this represents. To help manage this, the Welsh Government could provide support through a **Transition Fund** to help farmers adapt, to include support for succession planning, business management advice and new entrants. We believe the current proposals miss this opportunity.

Our concerns with specific proposals are:

- Missed opportunity in relation to the proposal to retain the environmental benefits of Greening practices through Cross-Compliance – this could be approached in a way that helps farmers to transition;
- Concern that expanding the national reserve categories to include additional land acquired could drive short-term intensification through amalgamation, with consequent environmental risk;
- Concern about signalling fewer inspections at a time when EU oversight mechanisms are not yet replaced with domestic governance;
- Some of the new measures are not tightly enough defined in relation to the direction that a new scheme should be heading in; and
- Missed opportunity to rectify the BPS eligibility rule that creates a perverse incentive for farmers to fell trees, which we believe is counter to current Welsh Government woodland policy.

Q5. Do you agree with the proposal to maintain greening practices through cross compliance?

We acknowledge that Greening has been ineffective in halting and reversing wildlife and environmental declines and tackling climate change. However, this is more to do with the unambitious measures that sit under the Greening requirement, rather than the concept itself. We believe that future schemes should include more ambitious standards that help reverse wildlife declines.

For the purposes of simplification, we agree with the proposal to maintain the limited number of beneficial greening practices through cross compliance. However, there is insufficient detail in the consultation on compliance management. Given the current levels of agricultural pollution (impacting both air and water) that Wales is experiencing, for example, this does not give us confidence in current compliance management processes.

Another cause for concern is that this proposal sends wrong signals to the agriculture sector in advance of a new policy focused on restoring nature, tackling climate change and securing environmental public goods. Messaging and language will be critical in this respect, so that farmers are both aware and prepared for the changes ahead. We advocate redistributing Greening funds towards a Transition Fund to support farmers in transitioning to a new sustainable farming scheme.

Q11. Do you agree with expanding the national reserve categories to include additional land acquired?

We do not support this proposal. We have concerns that the availability of entitlements for additional land acquired could help drive farming intensification through amalgamation, with consequent environmental risk. We also fail to see how the continuation of even more "no strings attached" direct payments will help farmers and government transition towards a new sustainable farming scheme.

Q13. Do you agree with this proposed reduction in BPS inspection rates?

As a direct consequence of our experience of both agricultural pollution levels and declining biodiversity, we do not agree with the idea of a reduction in inspection rates. Effective inspection and enforcement regimes are essential to ensure compliance with regulatory standards. We believe that Government should seek to retain and simplify cross compliance rules and their enforcement without amending minimum requirements. Whilst there is a lot of room for improvement with cross-compliance, it does provide an important set of environmental safeguards, especially in the context of a general lack of enforcement activities. We believe that frequent transgressors should continue to be inspected and monitored closely, with appropriate enforcement taking place relative to the breach.

Inspections and monitoring will be important element of a future sustainable farming scheme and will be essential in order to report against outcomes. A Transition Fund could be useful in supporting farmers and land managers to gain the necessary skills and expertise to self-monitor and self-assess against defined standards. Furthermore, this could lead to an 'earned recognition' approach to inspections, reducing the need for future inspections.

Q19. Do you agree with the proposed amendments of the Measures?

Whilst we agree that retaining the full range of measures is necessary to provide Welsh Ministers with a complete framework to provide support, we reiterate that support should be closely linked to

the objectives of the Environment (Wales) Act 2016. Some of the proposed measures, particularly those associated with more economic benefits, must contribute, and not hinder those objectives.

Q28. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We ask whether there is an opportunity to modify the Welsh Government's unique, and in our view over-literal interpretation of CAP rules that reduce BPS eligible areas by requiring the mapping out of groups of 3 or more trees on grazing land. This is not the approach used by DEFRA or Scottish Government.

As a result of this interpretation, hundreds or even thousands of farmers will lose money simply for having trees on their land, and many could be tempted to fell these trees simply to avoid losing Government grant. This creates an incentive for the removal of trees and natural regeneration that is wholly counter to the intentions of Welsh Government policy and contrary to the delivery of public goods. Farmers with traditional wood-pasture systems have lost payments not only on grazed land under the canopy of trees, but also on land shown as shaded by trees on aerial 'photos.

The Welsh Government could avoid doing this by protecting clusters of trees as features within cross compliance, under GAEC 7. This would be a move in the direction we advocate for a post CAP public goods focused support framework including a "Hedges and Edges" scheme.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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