Cyswllt Amgylchedd Cymru | Wales Environment Link

WEL response: Sustainable Land Management Indicators & Targets, under the Agriculture (Wales) Act 2023

3rd March 2026

Overview

The Sustainable Land Management (SLM) Indicators and Targets were finally published by Welsh Ministers on 19th December 2025. These are a crucial mechanism of monitoring, ensuring accountability and measurement of how Welsh Government delivers agricultural support and regulation under the Agriculture (Wales) Act 2023, including the new Sustainable Farming Scheme (the SFS or 'the Scheme'). WEL members were invited to be part of a stakeholder group in summer 2025 to help determine measurements and targets, and how they'd fit under the four Sustainable Land Management objectives of the Agriculture Act:

1) Produce food and other goods in a sustainable manner.
2) Mitigate and adapt to climate change.
3) Maintain and enhance the resilience of ecosystems and the benefits they provide.
4) Conserve and enhance the countryside and cultural resources and promote public access to and engagement with them, and to sustain the Welsh language and promote and facilitate its use.

In addition to feeding into the stakeholder group, WEL wrote to the Minister outlining our priorities and concerns and have put this statement together by way of responding to the overall outcome and outstanding targets, still to be determined.

Whilst these are technical and lesser-known aspects of the Scheme, they are crucial for the Welsh Government and Senedd to assess how the Scheme is working; how it is actually contributing to tackling the climate and nature crisis; and whether it is effectively fulfilling its goals, whilst meeting – as the Act explicitly sets out under each

objective – “the needs of the present without compromising the ability of future generations to meet their own needs”.

Below we outline our thoughts on each objective’s indicators and some key targets. Overall, we are particularly concerned about most ecosystem-related targets being deferred to the Environment (Principles, Governance and Biodiversity Targets) Bill – only just passed by the Senedd – as the nature targets sitting underneath it will not be set until 2028, since the Bill sets a deadline of 24 months to make those under regulations. The first Section 6 evaluation report on progress towards the biodiversity targets (after they have been set) will be published in 2031. If we postpone establishing relevant SLM indicators, we will not have a clear idea of whether actions under the SFS have achieved their 2030 goals until 2031 at the earliest. For a Welsh Government and Senedd that has declared a nature emergency, this is not being done with the urgency that is necessary.

Farming covers 90% of Welsh land; there is no Wales that achieves its 30 x 30 targets without a Sustainable Farming Scheme that delivers better ecosystem resilience and more abundant species and healthy habitats. The SFS is a key driver for agriculture to enable nature restoration and carbon adaptation, with much of the UK Committee on Climate Change’s key recommendations related to agricultural practice and land management. These are not areas that should be in silos. Farming and nature should go hand in hand.

The statement published last month shows the below numbers of indicators and targets, and those still to be developed. We comment on those most related to our subject areas per objective below.

	Indicators	Targets	Indicator/targets in development
1. Sustainable production of food	15	2	4
2. Climate Change	8	2	2
3. Ecosystem resilience	11	2	6
4. Access, culture and Welsh language	6	2	2

Produce food and other goods in a sustainable manner

1.1A. Average agricultural output by farm (£)

WEL does not think this indicator matches the 'purpose of support' it is allocated against (produce food and other goods in a sustainable manner), since there is no assessment of sustainability as part of this metric. Therefore, a risk is created that a high level of output is misinterpreted as a sustainable output. This is especially problematic given that agricultural pollution is often associated with more intensive, high-output farming in the dairy and poultry sectors. Incentivising overproduction for the sake of it was also an inherent environmental problem of the previous Common Agricultural Policy, so we should be trying to avoid repeating the same mistakes.

We would also support a recommendation from ERAMMP scientists in their evaluation, where they propose for an aggregated measurement of 'Total Factor Productivity' to be brought together from several measurements. As they set out: "The production of food in an environmentally sustainable manner (PoS 1.1) is indicated by Average Agriculture Output (all farms (£)) (1.1A) when considered alongside, and relative to, indicators relating to maximising resource use efficiency (PoS 1.5) where it is proposed the following indicators are included: Utilised Agricultural Area (1.5A), Total Agricultural Workforce (1.3D), Total Inputs of Inorganic Fertiliser and Feed (1.5B), Organic Manures (1.5C) and Plant Protection Product Use in Agriculture (1.5D). Ideally, these indicators should be brought together to calculate and report on Total Factor Productivity for Agriculture in Wales going forward as this is only available at the UK level currently."

It'd also be helpful to see an indicator in future that tracks the diversity of food products produced by Welsh farms, as it would better reflect climate resilience than a simple measure of total output. According to the latest 2025 data, less than 6% of Welsh farmland (110,100 hectares) were used for arable crops. Some estimates are as low as 2.7% making up all cereal and horticulture in the last decade, with the NFU Cymru agreeing that at most, only 3% of Welsh farmland is used for arable farming (compared to 30% in England).

Mitigate and adapt to climate change

2.2B. Farm level carbon and/or greenhouse gas reporting tool (target/indicator in development)

It's important that farms have the means to understand their carbon baseline, and we'd support a universal tool being developed to help with this. But we should ensure we do not create something which suggests emissions can be wholly offset by sequestration at a farm level, as it could hamper efforts to decarbonise – especially when combined with the push from industry for Welsh Government to adopt the GWP* accounting metric that has become closely linked with greenwashing and avoiding climate action. Furthermore, and more dangerously, this would undermine the existing GHG inventory approach, where land use sequestration remains separate from agricultural emissions. If this principle of separation is broken, Welsh Government risk creating a precedent where land use sequestration can be used by any sector to offset their industrial emissions. For example, such an approach risks encouraging other sectors to purchase Welsh land, take it out of food production and focus on 'carbon farming'. Whilst we do not think this is the intention, we want to make sure emissions reduction is incentivised beyond solely balancing it out with sequestering. This can also remove land from other production purposes, like timber and holding space for water, and it may limit our ability to plan for different purposes and different forms of production for land use.

Maintain and enhance the resilience of ecosystems and the benefits they provide

3.1A. / 4.2B. Ecosystem Health and Resilience

Several WEL members have identified the significant possibilities presented by the proposal to include '3.1A Integrated Ecosystem Indicator'. There is clearly a need for biodiversity to be included in some form. Yet the evidence supporting the proposals highlights the need for significant further research and development to deliver something fit-for-purpose. While we welcome this R&D and are keen to support Welsh Government in doing so, we must also highlight (as we have done on other proposals) that the lack of a ready indicator now may jeopardise reporting of SLM in the early years. As such we would urge for proceeding with additional indicators, such as '3.1b Abundance of all species', which is underpinned by the well respected

and independently produced State of Nature report, to ensure this important data is considered in the immediate future. However, we would like to emphasise that the use of this indicator in the SLM framework must not preclude its use in future statutory targets, such as those set under the Environment (Principles, Governance and Biodiversity Targets) Bill. As the ERAMMP report stresses, several of these indicators will help us achieve our commitments to our international '30 by 30' targets, and we see these indicators as filling in a key part of the accountability gap that will remain until those targets are set and the necessary monitoring across the whole of the country is fit for purpose.

We also need to see what the ecosystem health is like across places in Wales, not just in protected sites or particular designations of interest. For example, how well a particular catchment is performing, for benefits to both nature and people.

We also note that, despite Section 5 of the Agriculture Act requiring it, the Statement has no regard to the 50 national well-being indicators or the latest State of Natural Resources Report (SoNaRR), which we'd hope to see in the next version and certainly in the setting of this Indicator's targets.

3.1B. Abundance of species

As this indicator/target is still marked as 'in development', we presume this is relying on the Environment (Principles, Governance and Biodiversity Targets) Bill's legislation, to be rolled out over the next 24 months after Royal Assent. As outlined above, these targets will take up to two years to be set. We seek for this to be done as quickly as possible and in partnership with NRW to ensure species measurements and the habitat/ecosystem improvements that should be supported as part of the SFS (especially in the Optional and Collaborative Layers, still to be completed) can be assessed, evaluated and watched closely as soon as is feasible.

3.3A. All freshwater bodies in good overall status in Wales

3.3B. Pathogens from agriculture in fresh and coastal waters

3.3C. Percentage of soils under arable and improved grassland land uses that exceed threshold levels for phosphorus leaching risk

All these indicators are related to freshwater pollution. In terms of agricultural attribution, we note that there is some concern over the extent river pollution can be

linked directly to agriculture. Yet there are multiple other indicators which also lack agricultural attribution (notably '1.2b number of / proportion of rural households beneath medium income' and '1.2c number / proportion of rural community reporting mental health issues') where this is not raised as a concern.

We would argue that while the precise attribution of river pollution does vary and is hard to fully attribute, especially in diffuse instances, there is significant agreement across the evidence base (i.e. the RePhoKus study and Natural Resources Wales' identification) that the agricultural sector is a primary cause in many catchments across rural Wales. Given this, and the wider imperative to address freshwater pollution in response to both public demand, and to meet the Global Biodiversity Framework (GBF) commitments, these are important indicators and we're pleased to see them included.

3.3A has a target of 'Good Overall Status for all Waters' but 3.3B and 3.3C are still in development, and we'll be interested to see how this develops and are happy to be involved, in conjunction with refinement of the Agricultural Pollution Regulations (with Susannah Bolton's recommendations currently being worked through in a T&F group, at time of writing). We'd also be keen to know if this will help inform natural flood management strategies by Welsh Government and local authorities, to ensure the most holistic view possible is taken towards flood risk.

Conserve and enhance the countryside and cultural resources and promote public access to and engagement with them, and to sustain the Welsh language and promote and facilitate its use.

4.2A. / 3.1A. Ecosystem Health and Resilience: Condition of designated landscapes
We are pleased to see the inclusion of this target as we recognise how the condition of designated landscapes in Wales (25% of land cover) has a significant impact on '30 by 30' targets and the wider ecosystem health and resilience of Wales. The importance of designated landscapes is not limited to the public's ability to access and engage with the countryside, and the crossover in targets is therefore vital for recognising their statutory purposes and duties.

However, we also note that improving the condition of our designated landscapes cannot be achieved without wider reform to the purposes, duties and governance arrangements of National Parks and Landscapes. The existing climate and nature emergencies need to be urgently recognised in updated purposes and subsequently prioritised in ambitious management plans underpinned by these SLM targets. The Protected Landscapes Outcomes and Targets framework in England could be used to inform how SLM targets and indicators may be best set and integrated with those set under the Environment (Principles, Governance and Biodiversity Targets) Bill.

Any indicators under this SLM target need to be carefully designed if they are to deliver dual benefits across the two linked targets, and they must align with the management plans whilst also embracing emerging new mechanisms such as OECMs as legitimate ways to drive an improvement in landscape condition within designated landscapes. In WEL's manifesto, we propose broader reform when it comes to landscape improvements, suggesting that we update National Parks' and designated land's statutory purposes, duties and governance arrangements, to ensure they actually drive ecosystem restoration. This would include a new nature recovery and climate purpose for National Parks to drive their plans and implementation.

Finally, we want to highlight the challenges laid out in the supporting ERAMMP report, which demonstrated a clear and obvious issue in effectively baselining the state of biodiversity in designated landscapes, whilst using the currently limited available data sets and the poor quality of existing State of the Park reports. A concerted effort is needed to implement the recommendations from the Biodiversity Deep Dive's Designated Landscape Working Group report to improve data capture in designated landscapes. This should include more monitoring of sites in designated landscapes and more data sets cut to National Park boundaries, with an increase in GIS capability within the landscapes. Without improved baseline data sets, ambitious indicators and targets will remain disjointed and hard to achieve.

4.3A. Public Rights of Way open and signed

WEL is content with the indicator chosen on access and rights of way. It's consistent as it builds on years of ERRAMP field-based monitoring; the last National Trends report (published in March 2025) noted that "50% of Public Rights of Way remain

blocked and/or not signed", so a 10% improvement over the next 4 years is a good start.

Ramblers Cymru are pleased that access has been included in the SFS via Scheme eligibility, as well as including potential in the optional layer for progressive change and expansion to access to the countryside. We welcome public access being part of the Scheme's rules and would suggest continued further engagement with user groups on how the indicator is developed and monitored.

Again, in WEL's manifesto, we suggest that the next Welsh Government could finally propose a 'made in Wales' Countryside and Rights of Way Act for Wales, to deliver enhanced access to nature and giving people a better experience of open countryside where they live. Perhaps through a vehicle like this, Welsh Ministers will be able to create better cross-working between land managers, local authorities and Local Access Fora.

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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