

# Agenda – Economy, Trade, and Rural Affairs Committee

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Meeting Venue:

Committee room 5 – Tŷ Hywel  
and video conference via Zoom

Meeting date: 30 April 2025

Meeting time: 09.30

For further information contact:

**Robert Donovan**

Committee Clerk

0300 200 6565

[SeneddEconomy@senedd.wales](mailto:SeneddEconomy@senedd.wales)

## Hybrid

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### Private pre-meeting

09.15 – 09.30

### Public session

09.30 – 11.00

#### 1 Introductions, apologies, substitutions, and declarations of interest

09.30

#### 2 Soil Health in Agriculture: Panel 1

09.30 – 11.00

(Pages 1 – 58)

Professor Bridget Emmett, Principal Scientist, UK Centre for Ecology and  
Hydrology

Dr William Stiles, Lecturer in Soil Science – Department of Life Sciences,  
Aberystwyth University

Professor Prysor Williams, Chair of Agriculture and Environment, School of  
Environmental and Natural Sciences, Bangor University



Attached Documents:

Research brief

Written evidence – Professor Bridget Emmett

Written evidence – Aberystwyth University

Additional evidence – Farmers' Union of Wales (FUW)

Additional evidence – Soil Association Cymru

### **3 Papers to note**

11.00

#### **3.1 P-06-1507 We call on UWTSD and the Welsh Government to create a viable, sustainable plan for the long-term future of Lampeter campus**

(Pages 59 – 63)

Attached Documents:

Letter from the Chair of the Petitions Committee – 24 March 2025

#### **3.2 Official Controls (Extension of Transitional Periods) (Amendment) Regulations 2025**

(Pages 64 – 65)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs – 25 March 2025

#### **3.3 Meeting of the Inter-Ministerial Group for Environment, Food and Rural Affairs**

(Pages 66 – 67)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair of the Legislation, Justice and

Constitution Committee – 25 March 2025

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair of the Legislation, Justice and Constitution Committee – 31 March 2025

### **3.4 Petitions regarding animal health and welfare**

(Pages 68 – 70)

Attached Documents:

Letter from the Chair of the Petitions Committee – 27 March 2025

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair of the Petitions Committee – 2 April 2025

### **3.5 Follow-up to the committee meeting held on 14 November 2024 – The Foundational Economy**

(Pages 71 – 73)

Attached Documents:

Letter from the Minister for Culture, Skills and Social Partnership – 27 March 2025

### **3.6 Follow-up to the committee meeting held on 5 February 2025 – Sustainable Farming Scheme (SFS)**

(Pages 74 – 75)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs – 31 March 2025

### **3.7 Lord of the Manor titles**

(Pages 76 – 77)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs – 2 April 2025

### **3.8 The Ivory Prohibitions (Exemptions) (Process and Procedure) (Amendment) Regulations 2025**

(Pages 78 – 80)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs – 2 April 2025

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs – 24 April 2025

### **3.9 Apprenticeship pathways inquiry**

(Pages 81 – 85)

Attached Documents:

Letter from the Chair to the Minister for Further and Higher Education – 3 April 2025

Letter from the Minister for Further and Higher Education – 24 April 2025

### **3.10 Request for economic impact assessment of proposed closures in languages and cultures at Cardiff University**

(Pages 86 – 87)

Attached Documents:

Letter from the Chair of the All-Party Parliamentary Group on Modern Languages – 3 April 2025

### **3.11 Meeting of the Tourism Inter-Ministerial Group (IMG)**

(Page 88)

Attached Documents:

Letter from the Cabinet Secretary for Economy, Energy and Planning to the Chair of the Legislation, Justice and Constitution Committee – 9 April 2025

### **3.12 UK's agri-food and drink attachés**

(Pages 89 – 90)

Attached Documents:

Letter from the Chair to the Secretary of State for Environment, Food and Rural Affairs – 10 April 2025

### **3.13 Follow-up to the Committee meeting held on 6 March 2025 – Freight and logistics, and regulation of ports**

(Pages 91 – 100)

Attached Documents:

Letter from the Cabinet Secretary for Transport and North Wales – 11 April 2025

Letter from the Cabinet Secretary for Transport and North Wales – 22 April 2025

### **3.14 Meeting of the Inter-Ministerial Standing Committee (IMSC)**

(Page 101)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair Legislation, Justice and Constitution Committee – 22 April 2025

**4 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting**

11.00

**Private session**

11.00 – 12.20

**5 Consideration of evidence following the meeting**

11.00 – 11.10

**6 AI and the Welsh Economy: consideration of draft report**

11.10 – 11.30

(Pages 102 – 133)

Attached Documents:

Draft report

**7 City Deals: Scope and approach**

11.30 – 11.45

(Pages 134 – 144)

Attached Documents:

Scoping paper

**8 Food Processing: Scope and approach**

11.45 – 12.00

(Pages 145 – 150)

Attached Documents:

Scoping paper

**9 Supplementary Legislative Consent Memorandum: Data (Use and Access) Bill: consideration of draft report**

12.00 – 12.10

(Pages 151 – 174)

Attached Documents:

Draft report

Legal advice note

**10 Scrutiny of the Draft Budget 2025–26: Evidence provided by the Welsh Government**

12.10 – 12.20

(Pages 175 – 176)

Attached Documents:

Letter from the Chair of the Finance Committee to Committee Chairs – 1  
April 2025

# Agenda Item 2

Document is Restricted

**Senedd's Economy, Trade and Rural Affairs Committee**  
**Inquiry on Soil Health in Agriculture**

Written evidence by Prof Bridget Emmett OBE, UK Centre for Ecology and Hydrology;  
Scientific Lead of ERAMMP and member of the EU Mission Board for Soil.

11<sup>th</sup> April 2025

**Headline messages regarding:**

- **The role of soils in agricultural systems**

Soil is the main natural capital all agricultural systems rely on. It underpins all agricultural production and supports all land-based wildlife embedded in and around our agricultural systems. This includes (although is often missed) the bacteria, fungi and animals living in soils and which are thought to represent 60% of global biodiversity.

Soil is a precious resource which renews only very slowly (around 0.5cm every 100 years). All current soil in Wales has developed since the last glaciation around 11,000 years ago.

Soil (and peatlands) are the dominant land-based carbon store representing 94% of biosphere carbon in the UK and it has the potential to help us decarbonise the agriculture sector if we change current land use and management practices. However when we captured the full range of evidence from many studies this may be limited to a reduction of 5-10% of the net greenhouse gas emissions from the agricultural sector (Emmett et al. 2023).

Soil carbon is the Well-Being of Future Generations (Wales) Act 2015 National Indicator No. 13. We believe Wales is one of the few countries globally to have soil as an indicator of national well-being.

Concern that soil health has slipped through the protection and regulatory net is already well established in Europe with one of the 5 EU Missions dedicated to improving soil health <https://mission-soil-platform.ec.europa.eu/>. This followed an analysis of all current soil monitoring data available which revealed 60-70% of EU soils were unhealthy. Issues of concern identified by the Mission and that are relevant for agricultural soils in Wales are; loss of organic matter and carbon, nutrient enrichment, compaction and erosion, levels of control chemicals and contaminants and loss of land/soil to urban development. With the exception of the last issue, all of these are related to current agricultural management practices.

- **Monitoring of soil health to assess state and change in soil health in agricultural soils**

A monitoring programme in Wales (ERAMMP) has just recently (April 2025) published the status and trends of soil health in Wales for the last 10 years linking to legacy monitoring programmes started in the 1970s (<https://erammp.wales/en/nationaltrends>). The report also evaluates the impact of the Glastir agri-environment scheme on soil health and the extent and benefits of restoration of agricultural land on peatland on greenhouse gas emissions. This provides a timely and statistically robust insight into current trends in soil health in agriculture which we hope will be of interest to the Committee.

Key ERAMMP findings relating to soil health in agriculture over the last 10 years include:

1. 8% decrease in topsoil carbon concentration in Arable soils
2. 6% in Arable increase in soil bulk density (which is indicative of increased compaction), a 10% increase in Improved Grassland and 12% increase in Semi-Improved Grassland. Overall there was a 8% increase across Wales.
3. a) 15% increase in topsoil phosphorus level in Improved Grassland with a 3 fold increase in number of sites exceeding leaching threshold (19% now exceed recommended levels which risk leaching to rivers)  
b) 18% increase in topsoil phosphorus in Arable and 2 fold increase in number of sites exceeding recommended levels (11% of sites now exceed recommended levels.)  
c) 10% reduction in nitrogen levels in Arable soils but remaining within recommended guidance levels for production
4. 72% of Improved Grassland sites fall below the minimum soil acidity levels when productivity may be reduced. This statistic has not changed over the last 10 years
5. 5% loss (-49,000ha) of Arable and Improved Grassland land between 2010 and 2021 primarily to increased Urban (+28,200ha) and Woodland (+23,600 ha)
6. The agri-environment scheme Glastir has had minimal benefit effect on soil health in agriculture over the last 10 years.
7. 3% (526ha) of agricultural peatland has been restored (rewetted, scrub removal etc)
8. A new baseline assessment suggests 4% of Wales experiences some form of soil erosion and disturbance
9. Baseline data is also available for soil biodiversity. Dried and frozen soil samples have been archived for future needs such as assessing soil biodiversity change and levels of contaminants and control chemicals.

Overall, these results suggest one of concern for soil health in agriculture as all of these indicators (except 3c) indicate a decline in soil health. Below these findings are put into

context and described in greater detail. I look forward to discussing this evidence and their implication with the Committee on the 30<sup>th</sup> April 2025.

### **Personal experience**

I have over 35 years as an environment research scientist as a Soil and Ecosystem Science specialist. I am providing this evidence as the independent Scientific Lead for a major Welsh Government funded programme of work called ERAMMP (<https://erammp.wales/en>; <https://erammp.wales/cy>) which brings together over 20 organisations to deliver evidence, modelling and review to support policy development and evaluation which underpins Sustainable Land Management of the Welsh landscape. Welsh Government has supported the work since 2012 which is led by the UK Centre for Ecology and Hydrology. As I am also one of the 15 members of the EU Mission Board for Soil, I can provide some insight as to the direction of travel on this topic in Europe.

### **Monitoring Soil Health in Wales: Evidence from ERAMMP**

On the 4<sup>th</sup> April 2025 ERAMMP published an independent evaluation of the current national trends of Wales' natural resources and the outcomes of the Glastir agri-environment scheme (AES) (<https://erammp.wales/en/nationaltrends>; <https://erammp.wales/cy/tueddiadaucenedlaethol>). Wales is unique amongst the four UK Nations in having and maintaining a long-term, integrated national monitoring programme across its rural environment. The quality and breadth of the evidence base presented in the report is unmatched. The design of the programme enables us to compare the results from the last 10 years with those from the historic UKCEH Countryside Survey stretching back to the 1970's. In addition, the same design and methodologies used for national trend reporting have been used for Glastir evaluation enabling the contribution of Glastir to be assessed both for land where management options were applied but also how they aggregate up to contribute to the national trends reported.

As part of this evidence we have specific data relating to the status of, and change in, topsoil health in agricultural systems which is outlined below (Emmett et al. 2025). Note that results cover the top 0-15cm of the soil as this is the part of the soil most actively managed and most exposed to climate change. Going forward it is hoped the resources will be made available by Welsh Government to extend soil monitoring to deeper soil.

## **Headline messages with context**

1. 8% decrease in topsoil carbon concentration in Arable soils

*Context: Carbon in soil is considered one of the most most helpful indicators of overall soil health as it is linked to soil moisture retention, effective nutrient cycling and overall good soil structure which benefits root growth. It also contributes to carbon sequestration and thus helps meet the Net Zero target. Soil carbon loss is usually attributed to intensive management practices such as tillage and a lack of organic matter inputs. The decrease in Wales reported by ERAMMP compares to an increase in Arable soils across Great Britain (driven primarily by trends in England) reported by UKCEH's Countryside Survey which reversed a longstanding trend of decline of 11% since 1978 (Bentley et al. In review). The reason for the different signals in England and Wales is being explored but could include a lower rotational diversity in Wales (Upcott et al, 2023 which uses UKCEH's annual crop map) and / or lower uptake of actions often described as regenerative agriculture which we believe may now be reversing the longstanding decline of soil carbon in arable soils in England.*

2. 6% increase in soil bulk density in Arable soils (which is indicative of increased compaction), 10% increase in Improved Grassland and 12% increase in Semi-Improved Grassland. Overall there was a 8% increase across Wales.

*Context: An increase in bulk density / compaction is of concern as it is linked to a more dense soil structure (more soil per volume of soil) which leads to less favourable root growth and poor infiltration and rapid runoff of rainfall into rivers. The increase varies across habitats and currently the levels remain below recommended thresholds and in-depth analysis is needed to understand the drivers of change. However, the ERAMMP results provide an early warning of a possible lack of adaptation of management practices in response to wetter winters and drier summers associated with climate change.*

3. a) 15% increase in topsoil phosphorus level in Improved Grassland with a 3 fold increase in number of sites exceeding leaching threshold (19% now exceed recommended levels which risk leaching to rivers).  
b) 18% increase in topsoil phosphorus in Arable and 2 fold increase for Arable (11% now exceed recommended levels.)  
c) Topsoil nitrogen concentrations have reduced but remain with productivity guidelines in Arable soils (**note is a positive outcome**)

*Context:*

*3a&b Phosphorus fertiliser is used to maintain production in both Improved Grassland and Arable systems. The general increase in soil P levels reported by ERAMMP is at first*

*difficult to reconcile with the reported reduction in the use of manufactured fertiliser between 2010 and 2023 of 55% in England and Wales (British Survey of Fertiliser Practice 2023 (BSFP 2023)). However, manure use trends between 2014 to 2023 suggests a 14% increase in dressing cover of organic manures for the whole of Great Britain (data for England and Wales from 2010 and separate to GB are not available) (BSFP 2023). Therefore the mismatch between the BSFP survey and the ERAMMP results may be related to the use of sustained, and possible increased, use of organic manures, in particular the use of poultry manures as poultry litter and manure is very phosphorus rich compared to other animal slurries and farmyard manures.*

*The ERAMMP results of increased number of sites exceeding soil P recommended thresholds also highlights the issue of local use versus national averages. It is the use of high levels by just some farmers near to sensitive river systems which can result in nutrient enrichment (called eutrophication) of soils, freshwaters and coastal systems recently highlighted in the media. As we develop future indicators for Sustainable Land Management we need to consider indicators which can identify extremes which can cause local issues such as river pollution as well as national averages.*

*(Note: It is worth noting the design of the British Survey of Fertiliser Practices is targeted towards reporting change in use of manufactured fertiliser not manures and therefore the data for use of organic manures is not as robust but it is the only data available.)*

*Context 3c: A decline in soil nitrogen levels reduces the risk of nitrogen entering rivers and other water bodies and the risk of emissions of nitrous oxide from the soil (a potent greenhouse gas). It also reduces the potential transfer of nitrogen from field to field margins which are important refugia for wildlife and are damaged by raised nutrient levels. It is possible this is an early signal of an environmental benefit of The Water Resources (Control of Agricultural pollution) (Wales) Regulations 2021 which came into force April 2921. No change was reported for improved Grassland.*

4. 72% of Improved Grassland sites fall below the minimum soil acidity levels when productivity may be reduced.

*Context: The majority of Improved Grassland sites have soil acidity levels which fall below the recommended threshold. This number has not improved over the last 10 years. Below the threshold, lower fertiliser use efficiency particularly of phosphorus can occur. This low acidity is most likely due to the use of manufactured fertiliser (particularly ammonia-based fertiliser) without the use of lime to offset its acidifying effect. Low pH also increases the risk of nitrous oxide emissions from soil – a powerful greenhouse gas.*

5. 5% loss (-49,000ha) of Arable and Improved Grassland land between 2010 and 2021 primarily to increased Urban (+28,200ha) and Woodland (+23,600 ha)

*Context: These results are obtained from the use of satellite data by UKCEH for ERAMMP. It demonstrates the multiple demands on our land resource as building new houses and new woodland are priorities as is a resilient and sustainable food system. Currently these results suggest these priorities are directly competing for the same land.*

### **Impact of Glastir**

6. The agri-environment scheme Glastir has had minimal benefit for agriculture soils over the last 10 years.

One of the six environmental objectives of the Glastir agri-environment scheme which ran from 2012 to 2023 was “Improving soil quality and management”. The ERAMMP National Field Survey found minimal evidence soil quality had been improved on land in the Glastir scheme which had taken up management options intended to improve environmental outcomes. However 11% farmers in scheme self-reported they were more likely to have carried out soil nutrient testing and 10% had undertaken more manure actions. Management options taken up appear not to have been sufficiently widespread or transformative in nature to protect or restore soil health in agriculture.

### **Peatland restoration in agriculture**

7. Limited peatland restoration on agriculture land representing (526ha / 3% of agriculture land on peat).

Peat soils represent 4% of Wales but contribute 10% of the combined Agriculture and Land Use Land Use Change and Forestry GHG inventories due to their water logged nature. Their restoration is often suggested as a priority to help meet Net Zero by 2050.

Agriculture (arable, intensive and extensive grassland) represents 19% of this peatland (0.8% of all agricultural land in Wales) but is responsible for 54% of GHG emissions from all peatlands.

Whilst an estimated 5,000ha of peatland restoration has been carried out (most since 2010), only 526ha has been carried out on agricultural land representing 3% of land area and 3% reduction in GHG emissions from agriculture on peatland. Most peatland restoration 5,000ha has been on bogs.

### **New baseline for future broader assessments of soil health**

8. Soil erosion and disturbance features

The ERAMMP report provides a first estimate of the area of Wales where there is soil erosion and disturbance present. This is estimated as 4% of Wales using a combined approach of aerial photography and the ERAMMP National Field

Survey. Linking this data to erosion modelling indicated the majority of this eroding soil contributes to soil in rivers but is re-distributed within the fields and landscape.

## 9. Soil Biodiversity

Welsh Government paid for one of the most comprehensive national assessments to date of soil biodiversity ever undertaken using eDNA. The data provides a fascinating insight into the current distribution of bacteria, fungi and animals in soil across the different habitats of Wales and describe the inherent properties of soils and climate which drives the observed distributions. This provides a robust baseline for future assessments using soil samples frozen from ERAMMP or future surveys should this be prioritised by Welsh Government. (Emmett et al. 2017; George et al. 2019). This builds on Countryside Survey soil biodiversity assessments (Griffiths et al. 2011)

## 10. Contaminants

Baseline assessments for metal concentrations have been made with dried samples archived should change data be requested (Emmett et al. 2010). Frozen samples are also available for assessment of Persistent Organic Pollutants should this be requested (GMEP and ERAMMP samples).

### Sources:

*Bentley et al. (2025) Soil. In Emmett, B.A., et al. (2025). ERAMMP Technical Annex-105TA1: Wales National Trends and Glastir Evaluation. Report to Welsh Government (C208/2021/2022) (UKCEH 08435)*

[https://erammp.wales/sites/default/files/2025-04/ERAMMP%20Technical%20Annex-105%20Wales%20National%20Trends%20and%20Glastir%20Evaluation\\_0.pdf](https://erammp.wales/sites/default/files/2025-04/ERAMMP%20Technical%20Annex-105%20Wales%20National%20Trends%20and%20Glastir%20Evaluation_0.pdf)

*Emmett, B., Evans, C., Matthews, R., Smith, P., Thompson, A. (2023). Environment and Rural Affairs Monitoring & Modelling Programme (ERAMMP). ERAMMP Report-101: The opportunities and limitations of carbon capture in soil and peatlands. Report to Welsh Government (Contract C208/2021/2022)(UK Centre for Ecology & Hydrology Project 08435) [https://erammp.wales/sites/default/files/2025-01/101%20Report101\\_ERAMMPShortReport\\_Carboninsoil\\_EN\\_v1.2%20%281%29.pdf](https://erammp.wales/sites/default/files/2025-01/101%20Report101_ERAMMPShortReport_Carboninsoil_EN_v1.2%20%281%29.pdf)*

*Emmett, B.A. & the ERAMMP team (2025). ERAMMP Report-105: Wales National Trends and Glastir Evaluation. Report to Welsh Government (C208/2021/2022) (UKCEH 08435)*

<https://erammp.wales/sites/default/files/2025-03/Report%20105.%20Wales%20National%20Trends%20and%20Glastir%20Evaluation.pdf>

*Emmett, B.A., Reynolds, B., Chamberlain, P.M., Rowe, E., Spurgeon, D., Brittain, S.A., Frogbrook, Z., Hughes, S., Lawlor, A.J., Poskitt, J., Potter, E., Robinson, D.A., Scott, A., Wood, C., Woods, C. (2010). Countryside Survey: Soils Report from 2007. Technical Report No. 9/07 NERC/Centre for Ecology & Hydrology 192pp. (CEH Project Number: C03259). <https://www.ceh.ac.uk/our-science/projects/cs-soils>*

*Emmett, B. A., & the GMEP team (2017). Glastir Monitoring & Evaluation Programme. Final Report to Welsh Government. <https://gmep.wales/sites/default/files/GMEP-Final-Report-2017.pdf>*

George, P. B., Lallias, D., Creer, S., Seaton, F., Kenny, J. G., Eccles, R. M., . . . Jones, D. L. (2019). *Divergent national-scale trends of microbial and animal biodiversity revealed across diverse temperate soil ecosystems. Nature Communications 10.*

Griffiths et al. (2011) *The bacterial biogeography of British Soils. Environ. Micro. 13: 1642-1654.*

Upcott et al (2023) *A new approach to characterising and predicting crop rotations using national-scale annual crop maps. Science of the total Environment 860: 160471*

## **Economy, Trade and Rural Affairs Committee meeting: Soil Health in Agriculture**

**Dr William Stiles and Dr John Scullion**

This report offers a brief overview of the areas of interest specified. Where appropriate summary bullet points are provided at the end of a section.

### **The role and state of soils in agricultural systems**

Soils offer a range of ecosystem services (e.g. carbon storage, water regulation) and are the foundation of food production. Soils are complex ecosystems being governed by a dynamic interplay between biological, chemical, and physical properties. These properties interact to give a soil its characteristics. Soils are subject to change, particularly in relation to biological and chemical characteristics. Across Wales there is a significant variability in agricultural soils with differing suitability for agri-systems. Quantifying the 'state' of a soil requires a clear target condition and related assessment factors.

#### Production:

Soil is fundamental to agricultural production. Soil offers a rooting medium and supplies of water and nutrients for growing plants. Parikh and James (2012) note that soils best suited for agricultural production possess a balanced soil texture (without extreme proportions of sand, silt, and clay), SOM, and air/water filled pore space. This allows for adequate water retention and drainage, root aeration, and nutrient availability. As such, factors that control soil texture will to a degree determine the potential of a soil to support agricultural and different crop productivities (Silver *et al.*, 2021).

Inappropriate management can degrade a soil significantly and rapidly. For instance, the loss of organic matter or excessive trafficking would drive physical degradation. Growth of plants in soils where SOM has dropped to below 2% will be suppressed even when fertilisers are applied (Johnson *et al.*, 2009). Reduced liming applications may constrain productivity in the medium term. Crops such as fodder maize, when grown without the use of understorey or cover crops, have the potential to lead to significant erosion of bare soils in winter (Jaafar & Walling, 2010), leading to the loss of the nutrient rich surface soil layer.

- Failure to maintain optimum pH a medium term risk
- Precision techniques have potential to better match inputs to demand

#### Organic matter and carbon:

Soil organic matter (SOM) includes material of biological origin, both as living and dead material. This can be taken as a proxy for soil health as it directly relates to several key soil functions, including fertility. To some extent the amount of more labile SOM in soil will vary seasonally (Leinweber *et al.*, 1994) due to factors altering the balance of addition/decomposition (management, climate, topography, and others) (UKSO, 2025). But in

the medium term stocks are in equilibrium unless external factors change. The level of SOM, and soil organic carbon (SOC), is relatively high in Welsh soils (EEA, 2024). This is mainly due to the large stock of organo-mineral and peat soil in Welsh upland systems, and to the large proportion of grassland-livestock systems across Wales (Mahmood *et al.*, 2024). It should be emphasised that these findings relate to C stocks not dynamics and the relatively high C contents are vulnerable to decline due to climatic and management changes.

Grasslands are typically subject to less disturbance than arable or other high-intensity management system soils and have higher SOM consequently. For instance, according to the Countryside Survey, there has been no change to SOC in grassland systems since 1978, whereas soils in arable and horticulture systems have lost 11% of SOC over this period (Emmett *et al.*, 2010). Climate change and agricultural economics are likely to promote a switch to cropping of grassland soils.

However, the levels of organic matter will still vary within Welsh grassland systems subject to the intensity of management. High levels of disturbance (ploughing and reseeding), high stocking densities, and high rates of nitrogen/nutrient input will have a broadly negative effect. Additionally, management which favours monocultural grassland will have lower overall soil carbon (Cong *et al.*, 2014; Yang *et al.*, 2019). This may represent a loss of opportunity where SOC could be higher under alternative management with a focus on increased biodiversity.

- Need to distinguish stocks from fluxes
- Potential land use changes may lead to a loss of soil C
- Limited potential for C sequestration in most Welsh soils

#### Water regulation:

Soil has an important role in hydrological cycles capturing, storing and gradually releasing incident rainfall into rivers or groundwater. During passage through soils microbial activity and physical filtering ameliorate influents such as applied animal slurries. Macropore space dominates the movement of water through soils where these pores are interconnected as is the case with earthworm burrows and former root channels. However, these pore systems are however heterogenous and vulnerable to loss by compaction or declines in earthworm numbers. Where surface infiltration is limited surface runoff predominates during heavy rain increasing local surface flooding risk.

Much of upland Wales has been subject to pasture improvement, where acid grasslands have been limed, cultivated and reseeded to more productive species. Cultivation of these soils destroys surface organic layers and their high rainfall acceptance. However, the resulting circumneutral pH allows colonisation by earthworms whose burrows promote infiltration. There has however been a decline in lime applications in the UK over recent decades (Goulding, 2016), particularly in less accessible upland soils. As a result, these soils have become more acidic, earthworm abundance has declined and water infiltration has decreased (Scullion *et al.*, 2023). The implications of this for reduced water storage for catchment scale hydrology will depend on factors such as topography and proportions of affected pastures on steeper slopes.

Productive grassland swards in Wales are often dominated by perennial ryegrasses due to their high productive potential. However, many of these grasses have profuse surface rooting traits which militate against ingress of excess rainfall. Surface infiltration rates under pure ryegrass swards have been found to be up to 5 times lower compared with those under clovers (Marley *et al.*, 2024). Ryegrass/clover mixtures have rates close to the mean of individual components. Over reliance on ryegrasses and reduced rainfall capture presents an enhanced local risk factor.

In addition to the flooding risks associated with increased surface runoff, bypassing the soil reduces plant uptake of nutrients and the extent to which added influent is ameliorated by soil processes. This has particular relevance to issues surrounding slurry applications.

- Agriculture management practices affect water infiltration and flood risk
- Reduced infiltration can limit nutrient uptake and exacerbate pollution risk

### **Monitoring of soil health**

The objectives of a monitoring system need to be clear and can vary from soil protection to providing evidence of medium term trends in conditions. Historically, the focus has been on the suitability of soil for crop production, whereas, more recently, the focus has shifted towards multi-functionality assessment, considering the provision of ecosystem services and the resistance/resilience of the soil ecosystem to perturbation (Hanley *et al.*, 2018; Toor *et al.*, 2021).

A range of tools exist for monitoring variability in the health of soil. Whilst soil properties are dynamic and heterogenous, certain predictions can be made based on factors including land-use type, soil type/texture, and climate. The tools available range from scorecard-style systems (e.g. AHDB, 2025) to online calculator tools (e.g. UKCEH, 2025).

The scorecard approach from AHDB (2025) offers a system to interpret soil health for farmers and land managers that considers values for SOM, pH, fertility (phosphorus, potassium, magnesium), structure, and earthworms against expected ranges for given UK soil types. These present a colour-coded 'traffic light' hierarchy to represent quality and where action is required. This approach is focussed on optimum conditions for crop production, which is not necessarily the same as optimal soil health, and requires sampling and analysis of a range of soil variables to be undertaken.

The SOD (SOil funDamentals) is a tool from CEH based on Countryside survey data. This uses the robust dataset to offer insight on the quality of soil across a range of indicators, including SOM, pH, bulk density, and earthworm abundance (UKCEH, 2025). However, this tool still requires a reasonable understanding of the environment in question (i.e. soil textural type, annual rainfall rate), and measurements to be taken of the main characteristics in order to be applicable, which may lead to challenges. Nevertheless, where the required input data is known, the SOD tool can help contextualise the quality of a soil relative to expectations. The factors considered by this tool to determine soil health are by virtue interrelated. For instance,

SOM can act as a buffer against soil pH change and soils with high organic matter would be expected to have greater porosity and general physical structure.

The above approaches require input derived from on-site analysis of the soil under consideration. The future of large-scale soil health assessments must utilise remote sensing technologies, offering a rapid approach to health status quantification (Aqdam *et al.*, 2023). This is an active area for research but to date no one consistently accurate approach has emerged. Studies vary from single issue assessments as a proxy for health (i.e. soil carbon), (Endsley *et al.*, 2020), to multi-factor assessments of remote sensed information (Wang *et al.*, 2023) and are expected to improve rapidly with the application of machine learning and artificial intelligence.

- Various systems exist for assessing soil quality suitable at farm and broader scales
- Developments in remote sensing offer the prospect of landscape scale assessments

### **Classification of soils for land use**

The soils of Wales have been mapped as part of the Soil Survey of England and Wales. These maps have been digitised as part of the Land Information System (LandIS) project and are available through the Soilscales Viewer (LandIS, 2025). According to Cranfield University (2025) there are 298 distinct soil types (or soil associations). These broad classifications can be simplified by aggregating broadly similar groups together, which results in 27 distinct soil units (Haygarth & Ritz, 2009), but this still represents a significant diversity of soils across the Welsh landscape.

The Agricultural Land Classification (ALC) is a system of categorisation which can show the suitability of a given soil to produce food (MAFF 1988). Whilst this system considers more than simply soil, it offers a broad framework for considering the potential of a landscape in the context of agricultural productivity. However, current factors which would be considered essential, such as the delivery of ecosystem services from soils, would not be adequately considered by this approach and classifications tend to be static.

Understanding the different soil types present in a given location can indicate likely vegetation landcover, and *vice versa* (through plant-soil interactions), at least for 'natural' or unmodified landscapes. The existing spatially-explicit soil data could allow the quantification of land use capability subject to underlying soil type, where the requirements of land use and the limitations of a soil type are adequately quantified. However land use change can modify soil through alterations to SOM, soil biodiversity, and pH. Quantifying the influence of land use on soil types is necessary to understand the influence on soil health and ecosystem service provision for each soil type under differing management.

- Ongoing developments in classification promise digital, high resolution mapping with the option of varying factors and outcomes

**The policy and legislative mechanisms to protect soils and productive land (including the Sustainable Farming Scheme, National Minimum Standards and planning policy (amongst others))**

Soil protection in the Wales is governed through devolved and UK-wide policies. Wales has developed distinct mechanisms compared to the wider UK, tailored to its unique environmental and agricultural context.

*The Sustainable Farming Scheme:*

The proposed Sustainable Farming Scheme (SFS) in Wales is central to future agricultural land and soil protection. The scheme encourages farmers to adopt sustainable land management practices that enhance soil health, reduce erosion, and increase carbon sequestration. The SFS is framed within the Agriculture (Wales) Act 2023, which mandates support for sustainable land management (Welsh Government, 2023a).

*National Minimum Standards:*

Alongside the SFS, National Minimum Standards (NMS) for environmental protection are intended to ensure all land managers meet baseline regulatory requirements. These standards need to be enforceable and include requirements relating to soil health, such as minimising compaction, maintaining ground cover, and preventing pollution from run-off. The NMS are intended to replace the cross-compliance mechanisms.

*Planning policy and land use:*

Land use planning plays a key role in protecting productive land from harmful development. Planning Policy Wales (PPW) emphasises the protection of the best and most versatile (BMV) agricultural land (grades 1, 2, and 3a) from development unless there is an overriding need. The policy mandates local planning authorities to consider soil quality and sustainable land use in development decisions (Welsh Government, 2021).

The above initiatives in Wales are delivered in line with national legislation: the Environment (Wales) Act 2016, the Agriculture (Wales) Act 2023, and the Well-being of Future Generations (Wales) Act 2015.

The legislative landscape surrounding the protection of soils remains complex and transitional. Continued coordination between government, enforcement of minimum standards, and robust data collection are essential to improving long-term soil health and protection of productive land.

**The potential for legal frameworks and targets for soils.**

Soils in the UK and Wales lack dedicated legal protection. Soil degradation continues due to compaction, erosion, organic matter loss, and sealing through development (Graves *et al.*, 2015). Existing legal instruments, such as the Environment (Wales) Act 2016, acknowledge soil as a natural resource but do not set enforceable standards or monitoring obligations.

The Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 provide foundational legal tools that could support the development of soil health objectives. These Acts obligate public bodies to pursue long-term environmental sustainability and sustainable natural resource management. Soils could be more explicitly incorporated into the

Natural Resources Policy and the associated Area Statements under the oversight of Natural Resources Wales (NRW).

The Agriculture (Wales) Act 2023 and the upcoming SFS present promising opportunities for embedding soil health principles into law through conditional support payments, baseline standards, and incentivised practices. While not legally binding in a regulatory sense, these frameworks have the potential to set *de facto* standards for soil management, especially if linked to measurable indicators.

Scientific consensus supports using indicators such as SOM, erosion rates, and compaction measures to assess the health and quality of soil (Kibblewhite *et al.*, 2008; Hanley *et al.*, 2018; Toor *et al.*, 2021). Incorporating this into statutory targets, alongside monitoring obligations, would align Wales with best practices in natural capital accounting and environmental governance.

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# Farmers' Union of Wales response to a Senedd Economy, Trade and Rural Affairs Committee inquiry on soil health in agriculture

11th April 2025

## About the FUW

The Farmers' Union of Wales (FUW) was established in 1955 to exclusively represent the interests of farmers in Wales. Since 1978 the union has been formally recognised by UK Governments, and subsequently by Welsh Governments, as independently representing those interests.

The FUW's Vision is *thriving, sustainable, family farms in Wales*, while the Mission of the Union is *To advance and protect Wales' family farms, both nationally and individually*, in order to fulfil the Union's vision.

In addition to its Head Office, which has thirty full-time members of staff, the FUW Group has around 80 members of staff based in twelve regional offices around Wales providing a broad range of services for members.

The FUW is a democratic organisation, with policies being formulated following consultation with its twelve County Executive Committees and eleven Standing Committees.

## General comments

The majority of the themes covered by this inquiry are addressed by the FUW's response to a Welsh Government consultation on its Draft Soil Policy Statement in 2022 (Appendix 1). Therefore, in addition to the further comments below, we would refer members of the Committee to Appendix 1 as well as the Soil Carbon and Baseline recommendations of the Sustainable Farming Scheme Carbon Sequestration Panel summary.<sup>1</sup> The full report is expected to be published on the Welsh Government website ahead of the committee's oral evidence sessions.

## The role and state of soils in agricultural systems

Farmers in Wales manage a range of different soil types, even within their own farming systems. Soils themselves are influenced to varying degrees by previous and current management practices, underlying geology, soil structure, microbiota, weather, and increasingly, climate change. Furthermore, different soils can react differently to management practices, making

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<sup>1</sup> [Sustainable Farming Scheme: Carbon Sequestration Evidence Review Panel: summary report | GOV.WALES](https://gov.wales/sustainable-farming-scheme-carbon-sequestration-evidence-review-panel-summary-report)

standardised policies, measuring and management techniques difficult (for example, the impact of tree planting on organo-mineral soils and sandy soils' soil carbon content).

**Figure 1: An overview of Wales by a) land cover [1], b) agricultural land classification land quality (Predictive ALC Version 2) [2], c) elevation [1] and d) major soil groups [3].**

MMH is 'mountain, moorland and heath'; BMV stands for 'Best and Most Versatile' land; SW is 'surface water' and GW is 'ground water'.



Figure 1 (taken from the Welsh Government's review of evidence on Welsh soils).<sup>2</sup>

There is an estimated 410 Megatonnes of carbon stored in Welsh soils<sup>3</sup>. Whilst farmers in Wales manage soils ranging from arable land to peatland, the vast majority of farmland use is permanent pasture or upland rough grazing. This often-undervalued habitat acts as a huge soil organic carbon store in Wales (SOC)<sup>4</sup>, subject to very little disturbance in comparison to land used for arable, horticulture, forestry or development purposes. Yet, current private carbon sales only value 'new and additional' sequestration<sup>5,6</sup>, and payments are often higher for creating new

<sup>2</sup> [Welsh Soil Evidence Review](#)

<sup>3</sup> Russell, S., Blackstock, T., Christie, M., Clarke, M., Davies, K., Duigan, C., Durance, I., Elliot, R., Evans, H., Falzon, C., Frost, R., Ginley, S., Hockley, N., Hourahane, S., Jones, B., Jones, L., Korn, J, Ogden, P., Pagella, S., Pagella, T., Pawson, B., Reynolds, B., Robinson, D., Sanderson, B., Sherry, J., Skates, J., Small, E., Spence, B. and Thomas, C. (2011). Chapter 20: Status and Changes in the UK's Ecosystems and their Services to Society: Wales. UK National Ecosystem Assessment: Technical Report. [Assessment of Welsh Soil Issues in Context](#)

<sup>4</sup> [Welsh Soil Evidence Review](#)

<sup>5</sup> [Regenerate Outcomes](#)

<sup>6</sup> [Getting paid for carbon](#)

habitat through Government schemes, as opposed to valuing existing carbon stocks, their protection and enhancement. This means farming practices which have protected and maintained their soil carbon stores (and habitat value) are often at a disadvantage for obtaining further funding.

This lack of disturbance and sustainable management through livestock is reflected in recent research compiled by the Welsh Government's Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP), which demonstrated no changes in national topsoil carbon<sup>7</sup>, in contrast to England. However there was a loss within Arable soils (-7.7%). Arable farmland in England is now seeking the re-integration of livestock to restore their soil organic matter levels<sup>8</sup>.

The importance of soil health (particularly soil organic matter- SOM) for providing multiple benefits cannot be understated. It impacts our ability to produce food, recycle nutrients, filtrate water, store carbon, and support biodiversity. However, there is a shift underway within agricultural practices, as the science and understanding around the biological element of soils is developing, alongside how management techniques can directly and indirectly influence these factors. Historic policies and agricultural businesses have focused on dramatically increasing production via chemical means (artificial fertilisers). However, both the scientific and practical implications of the role of mycorrhizal fungi, SOM, root exudates, the sustainable use of inputs and the impact of grazing management and rest on soil health, soil carbon and achieving optimum productivity is now increasingly understood.

The high costs and market volatility of manufactured fertilisers, the direction of agricultural support policies, and an uplift in farmer to farmer knowledge exchange<sup>9,10,11</sup>, alongside biological soil consultants is enabling this shift.

This means the adoption of both new and old management techniques such as no or minimum tillage, ensuring diversity of species and deep rooting plants, mob/cell/holistic planned grazing, consideration of anthelmintic use, and outwintering or bale grazing.

The vast majority of Welsh farmland inadvertently follow the five rules of 'regenerative agriculture'<sup>12</sup> - don't disturb the soil, keep the soil surface covered, keep living roots in the soil (depending on the grazing implemented), grow a diverse range of crops (unimproved or semi-natural grasslands have the highest diversity, unless abandoned<sup>13</sup>) and integrate livestock. However, the supply chain and Government-led schemes still lack recognition and reward for ensuring the long term viability and good health of soils. Soil health is a long term investment, however, short tenures, annual Government funding cycles and pressure on tight profit margins makes this long term vision, and implementation, challenging to balance against annual

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<https://erammp.wales/sites/default/files/2025-03/Report%20105.%20Wales%20National%20Trends%20and%20Glastir%20Evaluation.pdf>

<sup>8</sup> [https://www.soilassociation.org/media/25271/sa\\_ex-livestock\\_3\\_web.pdf](https://www.soilassociation.org/media/25271/sa_ex-livestock_3_web.pdf)

<sup>9</sup> [Pasture for Life](#)

<sup>10</sup> [Regenerative agriculture training, webinars and course in the UK — Regenerate Outcomes](#)

<sup>11</sup> [Da Byw](#)

<sup>12</sup> [Principles of Regenerative Agriculture - Groundswell](#)

<sup>13</sup> [Species-rich grasslands management - Farming for Nature](#)

profitability, in addition to understanding the complexities of soil carbon.

## **Monitoring of soil health**

There is a huge array of soil modelling, research and papers written on Welsh soils via the ERAMMP and Soil Policy Evidence Programme.<sup>14,15,16</sup>

Yet, the vast majority of this data and detail is not communicated back to the farmers managing these soils, representing a missed opportunity for engagement, knowledge sharing and monitoring. However, accurate and cost-effective monitoring of soil carbon through comparable and repeatable measurements is challenging at the farm-level.

The engagement potential is illustrated well in Northern Ireland's Soil nutrient Health Scheme. The largest baseline soil sampling programme ever undertaken has had a 92% farmer uptake, in part due to the delivery of farm-level, and field-level soil data on fertility and carbon stocks, with accompanying LIDAR run-off risk maps and above-ground biomass maps.<sup>17</sup>

The Carbon Panel recommended that Welsh Government makes improvements to its soils monitoring programme to ensure it meets United Nations Framework Convention on Climate Change (UNFCCC) compliant standards to assess soil carbon to a minimum of 30cm, (as opposed to 15cm) recognising that good practice involves sampling to 1m or the bedrock.

Farming Connect currently have an ongoing Welsh Soil project, seeking to understand the carbon content of soils under different management intensity across Wales<sup>18</sup>, using a selection of the demonstration network farms. However, comparing averages can be challenging as was reflected in a First Milk and University of Leeds study. The study showed carbon stocks in permanent pastures varying from 35-350 tonnes of Carbon per hectare<sup>19</sup>.

Soil sampling has been supported via various Government-led schemes, including Farming Connect. Farmers also pay for their own soil sampling to ensure lime, slurry and fertiliser applications are optimal, or to identify mineral deficiencies which may impact on livestock health. However, the results collected through Government-funded schemes are not noted against fields or farms<sup>20</sup> (such as on RPW Online) due to data sharing technicalities, but rather compiled according to geographical area. They have historically included nutrient indices tests only (P, K & Mg, and also pH), but are now being expanded to incorporate biological factors such as soil organic matter and structure.

The soil testing of field parcels that receive inputs is proposed as a Universal Action within the upcoming Sustainable Farming Scheme (SFS).

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<sup>14</sup> [Soil & Peat | ERAMMP](#)

<sup>15</sup> [Soil function maps resource review](#)

<sup>16</sup> [Soils | Sub-topic | GOV.WALES](#)

<sup>17</sup> [Soil Nutrient Health Scheme | Agri-Food and Biosciences Institute](#)

<sup>18</sup> [Farming Connect Demonstration Network - Welsh Soil Project](#)

<sup>19</sup> [On farm carbon capture - Knowledge Transfer Partnerships](#)

<sup>20</sup> [Summary of Farming Connect Soil Results 2023/2024](#)

New markets and companies are taking advantage of this appetite from farmers to understand their soils, particularly carbon levels and the ability to increase (or decrease) their levels, via sales from soil carbon credits. Examples include Agreeena, Soil Capital, Trinity AgTech and Regenerate Outcomes - but many will take a significant cut of any credits generated, both in order to pay for the soil carbon baselining and monitoring, in addition to profit.

Applications (paid for) are also available to guide farmers through soil sampling and monitoring, such as Soil mentor<sup>21</sup>, which allow you to plot results, observations and photos against GPS field locations, and to benchmark them against other farms. However, at current prices, they are not widespread or widely used.

Soil structure can also be assessed by farmers via the 'Visual Evaluation of Soil Structure'<sup>22</sup> steps, simply using a spade out in the field. Worm count tests can also be done in the field, which give a good indication of organic matter<sup>23</sup>.

## **Classification of soils for land use**

*(Please see the Soils Policy Statement response)*

The FUW endorses the need to protect agricultural soils classified as the Best and Most Versatile (BMV) for sustainable food production, given the challenge of conflicting profitability of different land uses, long term food security, and the increase in population predicted over the next decades, amid increasingly unstable geo-political trade.

However, other grades of land should not be disregarded or left unprotected for food production. Climate change is adding increasing stress to soil health on all types of land, particularly arable land which is generally classified as BMV. This is due to challenging growing conditions and extreme weather, which causes increased compaction or the loss of microbial activity due to drought, or increased levels of pests and pathogens from warmer, wetter weather. This will increase the need for other grades of land to 'fill the gap', whilst delivering on various other land use demands such as biodiversity, energy generation, carbon sequestration and development.

It should also be recognised that using land classifications can often be a blunt tool for determining the appropriateness of certain land areas for other uses such as tree planting or development. The FUW has previously questioned the Welsh Government's intentions to plant 'less productive areas' of Wales with trees given that the areas of Wales categorised as Less Favoured Areas (LFA) and Severely Disadvantaged Areas (SDA) are 79% and 56% respectively, and therefore for many farming business the entire farming system will consist of land classified as Grade 3 or lower. When determining the appropriateness of different land

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<sup>21</sup> [Soilmentor](#)

<sup>22</sup> <https://ahdb.org.uk/knowledge-library/how-to-assess-soil-structure>

<sup>23</sup> <https://soils.vidacycle.com/soil-tests/1-1-earthworms/>

areas for other agricultural or non-agricultural purposes, the FUW maintains that socio-economic and wider environmental factors must also be considered on an equal basis.

**The policy and legislative mechanisms to protect soils and productive land (including the Sustainable Farming Scheme, National Minimum Standards and planning policy (amongst others))**

**The potential for legal frameworks and targets for soils**

*(Please see the Soils Policy Statement response for an outline of existing policy and legislative mechanisms farmers work within)*

A singular Soil Carbon Code<sup>24</sup> is desperately needed, to standardise measuring, modelling, permanence requirements and provide governance around selling Carbon credits from soils. The soil carbon credit market is still considered somewhat of a 'Wild West', whereas there are established codes for Woodlands and Peatlands. Yet, it offers a unique opportunity for farmers to increase carbon sequestration, implement soil and grazing management practices which benefit biodiversity, water quality and soil health, alongside earning a potential new income and helping to reduce GHG emissions.

The challenge with setting targets for soils is their variability and establishing current (and varying) baselines. However, in general, increasing Soil Organic Matter is a good ambition due to the multiple benefits it provides, although some areas will have high existing levels already (such as permanent pastures or habitats in good condition). A farm scale study at 'North Wyke' showed how interrelated Soil Organic Carbon stocks were with various other environmental and productivity indicators, correlating positively with water discharge quality, botanical diversity, liveweight gain and stocking densities.<sup>25,26</sup>

As outlined in our response to the Welsh Government consultation on its Draft Soil Policy Statement, any additions to the current legal framework around soils must consider all types of land management and impacts on soil.

Whilst previous Cross Compliance requirements regarding the management and protection of agricultural soils were in 'return' for the Basic Payment Scheme payment, it is possible that these requirements are introduced as part of a regulatory baseline for all farmers..

The Control of Agricultural Pollution review has also recommended that these (Cross Compliance) requirements are replicated within the regulations. Any steps to bring such measures into regulation would benefit from industry consultation, to ensure they are practical and implementable. The Environmental (Principles, Governance and Biodiversity Targets) Bill will also seek to further strengthen environmental governance, compliance and targets. Soil

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<sup>24</sup> <https://sustainablesoils.org/soil-carbon-code/about-the-code>

<sup>25</sup> <https://www.sciencedirect.com/science/article/pii/S1751731118000502?via%3Dihub>

<sup>26</sup> [Key Research Findings](#)

health also crosses over into the Sustainable Land Management objectives and the Agriculture (Wales) Act 2023 objectives, therefore any targets or legal frameworks for soils should be incorporated into these existing pieces of work.

It is important to emphasise the challenge for farmers having to comply with these regulations and expectations, whilst competing against other agri-food imports produced to far lower environmental standards.



# Farmers Union of Wales' feedback on the draft soil policy statement

4th October 2022

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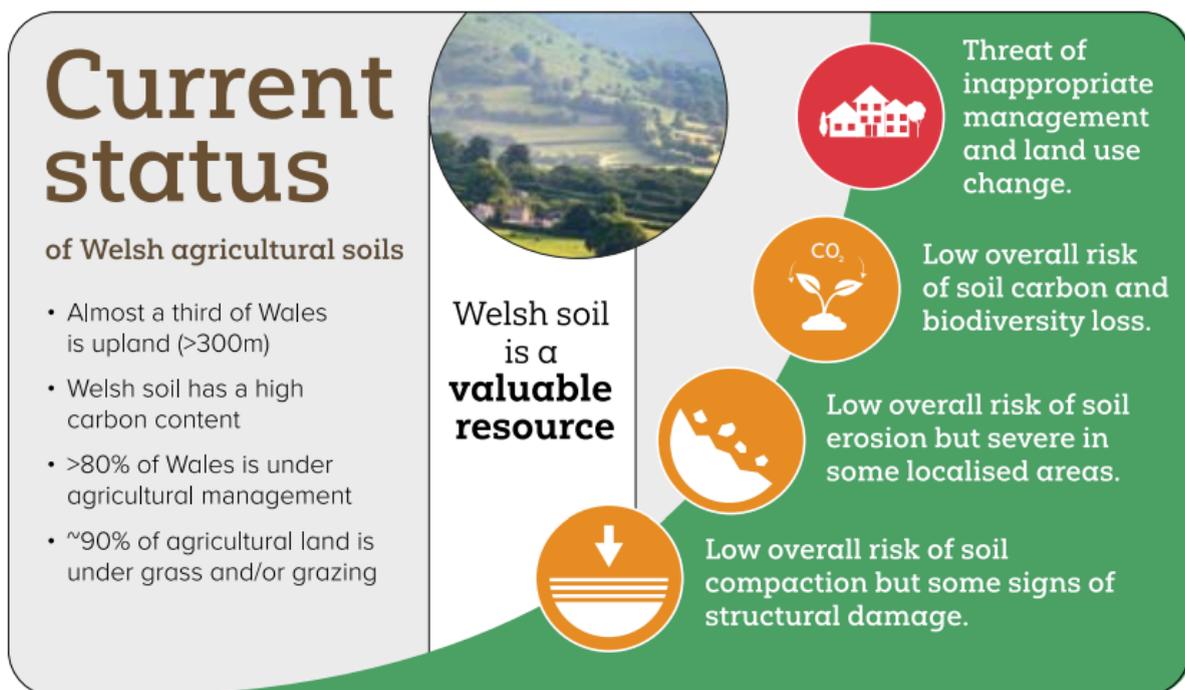
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## Farming the Welsh Way

The Welsh Soil Evidence Review<sup>1</sup> is a welcome, useful review and a generally positive document which highlights the soil health benefits arising from the “Welsh Way”<sup>2</sup> of farming. Farming permanent grasslands (>80% of agricultural land in Wales), with mixed (cattle and sheep grazing together) and rotational/seasonal grazing (graze and rest systems, or summer/winter only hill grazing systems) on soils with a ‘higher greater carbon content than most soils in England and Europe’ all contribute towards;

- keeping soils covered
- a consequently low risk of soil erosion
- high soil organic matter content which contributes towards better water infiltration rates, higher carbon sequestration, and healthier soil microbiology and soil fertility

However, the review recognises the risks to soil health associated with land use change (such as afforestation, development or conversion to arable), inappropriate management (such as compaction) and climate change.



## Insufficient consultation period to create a shared vision

The Welsh Government has aimed to gather feedback from farmers on the draft soil policy statement in order to ‘ensure it is fit for purpose and represents a shared vision for soil policy

<sup>1</sup> [Welsh Soil Evidence Review & https://gov.wales/sites/default/files/publications/2022-08/review-welsh-soil-evidence-executive-summary\\_0.pdf](https://gov.wales/sites/default/files/publications/2022-08/review-welsh-soil-evidence-executive-summary_0.pdf)

<sup>2</sup> [The Welsh Way](#)

*in Wales*'. However, the FUW would argue that despite the importance of this work, the consultation period has not been transparent enough to ensure this is a genuinely shared vision.

For example, the draft statement was shared only three weeks before the deadline for comment, which has not given the FUW sufficient time to consult fully with its members in respect of its democratic structure. In addition, the small workshops held in September consisted of farmers who had noticed the sign up call during the week prior to the Royal Welsh Agricultural Show makes it difficult to ensure that a wide cross section of farmers were consulted, especially given the soil policy needs to be fit for all farmers.

The key objectives were therefore arguably not shaped by those farmers or land managers who are managing soils every day, and who are most directly influenced by either support or regulations relevant to soils.

However, the FUW appreciates that the Sustainable Farming Scheme co-design has taken priority during this period. The FUW would therefore appreciate the opportunity to share the Welsh Government's response to this feedback with its county branches. Nevertheless, the comments provided below have been compiled from longstanding policies of the FUW.

## A soil policy should be holistic

In addition, it is appreciated that the focus of the soil policy statement is on agricultural soils due to 80% of the land in Wales being managed for agriculture. However, that does not necessarily mean that agricultural soils are those with the highest risk of soil degradation. On the contrary, the review recognises the low risks that most of this management poses to soil degradation, therefore, a holistic soil policy should incorporate all land uses, especially those which result in more soil disturbance than permanent pastures - such as forestry (*“Activities associated with afforestation such as planting, management and harvesting disturb soil and can cause soil carbon loss during first rotation forestry”*<sup>3</sup> [108]), housing, road building, and renewable energy plants.

## Existing soil protection, regulation and the impact of competition on farming standards

The FUW welcomes the development of a soil policy and an increased focus on soil health, however, the statement claims 'there is no soil protection policy in Wales'. Conversely, farmers have to comply with a number of rules relating to soils in order to access financial support via the Basic Payment Scheme. For example,

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<sup>3</sup> D. Berdeni, J. Williams, and J. Dowers, "Assessment of the impact of tree planting on Welsh organo-mineral soils," Soil Policy Evid. Program. Rep., 2020.

- Cross compliance: rough surface soil guidance<sup>4</sup>
- GAEC 4: Minimum soil cover<sup>5</sup>
- GAEC 5: Managing land to limit soil erosion<sup>6</sup>
- GAEC 6: Maintenance of soil and organic matter<sup>7</sup>

Currently, managing soils in this way in addition to producing food is supported via the Basic Payment Scheme (which makes up around 80% of Welsh farmers' income). However, the Agriculture (Wales) White Paper<sup>8</sup> proposed to make these rules 'National Minimum Standards'. Therefore, all farmers, regardless of whether they are in receipt of any subsidies, will have to comply with these regulations or risk civil sanctions against them.

Whilst Welsh farmers are proud of the high environmental and animal welfare standards Welsh food is produced to, there is a risk, particularly with liberalised trade deals being struck with large agri-exporters<sup>9</sup> that UK agriculture will be undercut, or undermined by the produce being imported. The costs incurred with complying to these higher standards, or the production reduction means that raising the regulatory baseline for Welsh farmers may simply serve to make them uncompetitive at their current level of production, and consequently offshore the UK's environmental footprint to other countries, whilst becoming more dependent on imported food.

Therefore, if the liberalisation of free trade agreements and unfair competition continues, the Welsh Government will need to provide additional support for farmers to ensure environmental standards are upheld and farmers are able to stay competitive. Therefore, the FUW proposes the following changes to the objectives.

## Rewarding farmer-led soil health enhancement - alternative objectives

The current objectives proposed are:

### **Maintain and enhance the soil resource, soil functions and services by:**

#### **1. Reducing soil degradation**

- Maintain and enhance soil organic matter
- Minimise soil erosion
- Minimise soil compaction
- Foster soil biodiversity

#### **2. Exchange knowledge on the value and vulnerability of soil**

- Enhance effective enhance of knowledge between farmers, decision makers and

<sup>4</sup> [Cross compliance: rough surface soil guidance](#)

<sup>5</sup> [Cross compliance: minimum soil cover \(GAEC 4\) \(2020\)](#)

<sup>6</sup> [Cross compliance: managing land to limit soil erosion \(GAEC 5\) \(2015\)](#)

<sup>7</sup> [Cross compliance: maintenance of soil and organic matter \(GAEC 6\) \(2022\)](#)

<sup>8</sup> [Agriculture \(Wales\) White Paper](#)

<sup>9</sup> [Farmers' Union of Wales \(FUW\) submission to a Senedd Economy, Trade and Rural Affairs inquiry into the UK-Australia Free Trade Agreement](#)

scientists

**3. Maintain and develop soil monitoring and modelling**

Additional monitoring of soil at local scales

Feedback outcomes to land managers to support farming decisions

The FUW proposes amending these objectives to enable more direct support to farmers for management actions they can take, or are currently undertaking, to enhance soil health.

For instance, the title of the first objective '*reduce soil degradation*' is at odds with the current low evidence of soil degradation on agricultural soils across Wales as a whole. 'No direct evidence for measured erosion rates'... 'grassland is generally considered to be at a low risk to soil degradation'. This gives an unjustified negative impression of agricultural soil management in Wales.

Furthermore, whilst administering and coordinating knowledge exchange, and undertaking additional monitoring are important and valuable objectives, they do not provide direct financial support for on-farm actions to enhance soil health enhancement or cover soil protection measures (as outlined is needed in Section 4.)

Therefore, the FUW would argue for the key objectives to be amended to:

Protect soil organic matter levels

- a) It is important to place an emphasis on protecting and maintaining soil organic matter (SOM) content in Wales, particularly due to its value as a large carbon store. Whilst in some instances, soil organic carbon (SOC) is at an equilibrium of emissions/sequestration in soils with existing high SOM levels (and therefore does not represent an active carbon sink) it is still a highly valuable and large carbon store in Wales (the total soil carbon stock in Wales is 410 Mt, with grasslands storing a large proportion of this). As the review emphasises, '*it is of national and global importance that this carbon is retained*'.
- b) Therefore, maintenance and protection measures supported by the Government are essential, particularly as any carbon market payments in the future will only value and pay for **new and additional** carbon sequestration.
- c) Placing an emphasis on the protection and maintenance of permanent pastures would also value the current agricultural management outlined in Section 1, whilst putting in place measures to avoid compaction (such as track infrastructure and water trough placement as practised on many dairy farms) or erosion, protection of peatlands, and preventing the soil carbon loss from afforestation onto organo-mineral soils.

## Enhance soil organic matter levels

- a) SOM is the best indicator of carbon storage and sequestration, water retention and ease of infiltration, population and diversity of soil biota and accessibility of plant micro and macronutrients. Whilst SOM levels are typically high in Wales, there are multiple (and public) advantages to increasing these levels<sup>10</sup>, many of which would reflect the Sustainable Land Management outcomes the new Sustainable Farming Scheme is aiming to achieve<sup>11</sup> (see graphic below).

### 2.2 Sustainable Land Management Outcomes

The Scheme sets out a range of actions farmers can undertake. However, it is important we make a clear connection between these actions and the outcomes they are seeking to deliver. These are:



#### Clean air

Air which has limited pollution (human made particles and harmful gases) including fine particulate matter, ammonia and non-methane volatile organic compounds.



#### Mitigate flood and drought risk

Farms prepare for periods of low or high rainfall, reducing the risks to the farm and communities from flooding, drought and coastal erosion.



#### Clean water

The water environment (including inland water) is sustainably managed to support healthy communities, flourishing businesses and biodiversity.



#### Protected natural landscapes and historic environment

Conserve and enhance natural beauty, cultural heritage and the historic environment.



#### Enhanced access and engagement

People are more easily able to enjoy the countryside for health and wellbeing benefits.



#### Reduced greenhouse gas emissions

Farms reduce their greenhouse gas emissions, through making efficient use of fuel and energy, minimising external inputs and having productive livestock and crops.



#### High animal health and welfare

Animals are healthy, productive and have a good quality of life.



#### Resilient ecosystems

Maintaining and enhancing the resilience of ecosystems delivering benefits for biodiversity, species and habitats.



#### Maximise carbon storage

Creating new and enhancing existing carbon stocks on farms.



#### Resource efficient

Taking a circular approach by keeping resources and materials in use for as long as possible and avoiding waste.

- b) This could include supporting the management actions outlined in the Welsh Soil Evidence review which increases SOM such as; rotational grazing/seasonal grazing/graze and trample and rest management, deeper

<sup>10</sup> [Rotational grazing shown to increase soil organic matter on Welsh farm](#)

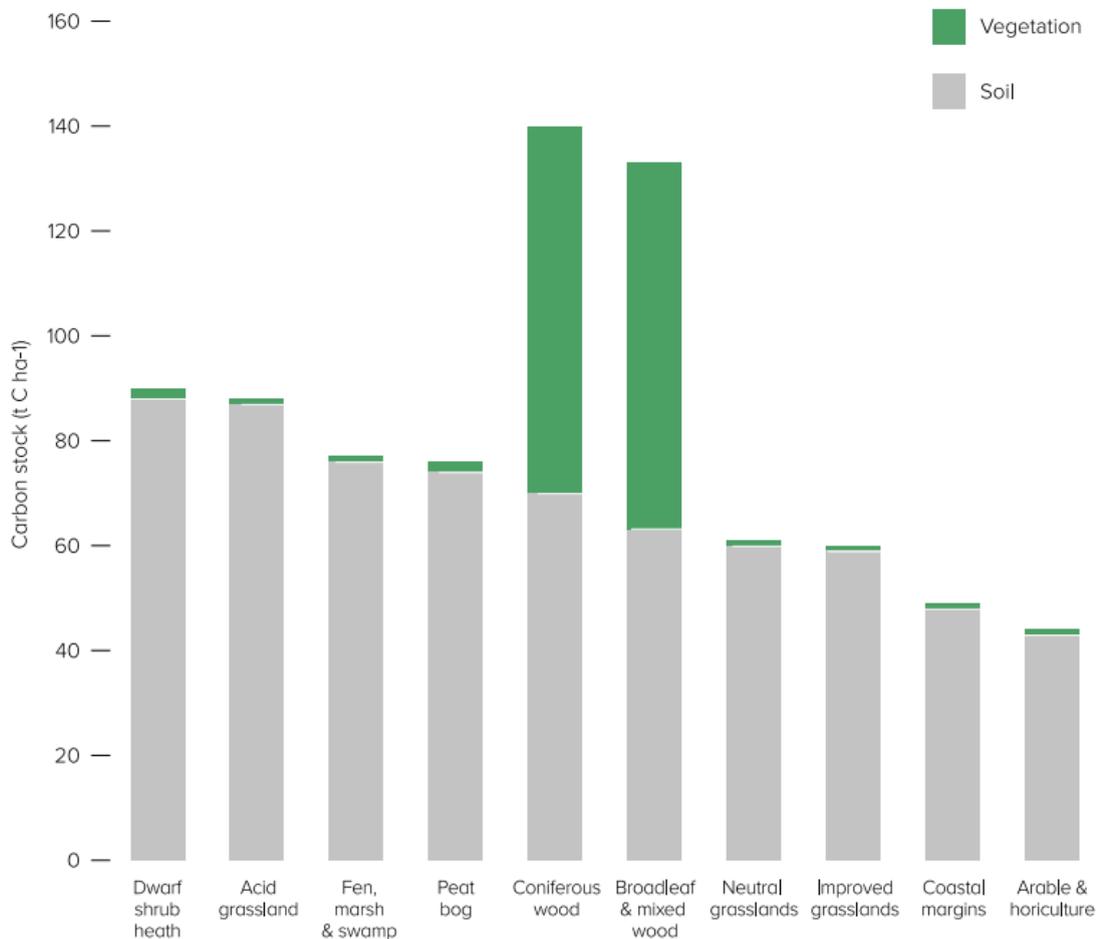
<sup>11</sup> [Sustainable Farming Scheme Outline Proposals for 2025](#)

rooting and more diverse grass species (whether through allowing native species to grow taller and set seed, or reseeded deeper rooting and mixed species leys into improved grasslands), increasing nitrogen fixing species, ensuring an efficient use of nutrients/inputs, minimum tillage etc.

- c) Increasing tree/woody cover has also been identified as a way to increase SOM when including trees on arable land due to the extensive litter, rooting and carbon inputs, however there is a risk of carbon **loss** when planting on high carbon soils, such as peat and organo-mineral soils. Therefore care must be taken not to apply this as a blanket policy to increase SOM/SOC. For example, whilst net carbon sequestration may increase due to the additional biomass within the tree/hedgerow cover (Figure 11), the Welsh Soil Evidence Review states that it can **decrease** the SOC levels (*Other studies have shown a decrease in topsoil carbon 14 years after planting trees in pasture in England [119] or no change in SOC or soil N 26 years after converting permanent grassland to silvopasture or woodland in Northern Ireland [120].) & 'adjacent grassland had a total SOC stock comparable to ancient woodland, which indicated that, for these sites, woodland creation on pasture had little benefit for soil carbon sequestration compared to woodland creation on former arable land [116].)* However, it is recognised that different benefits will arise such as increased crop yields due to reduced wind stress, livestock shelter, improved soil structure from rooting depth, and moderation of temperature extremes.

**Figure 11: The soil and vegetation carbon stock in different habitats**

Data <sup>[57]</sup> is from 15 cm deep soil samples in England. Woodland vegetation data is from 50-year-old average rotations.



- d) Furthermore, the FUW believes there should be more of an emphasis within the soils policy statement on the **management of grasses and livestock to improve soil health and soil biodiversity**. The agricultural industry in Wales is already a leader in developing grass species<sup>12</sup>, grassland management and in sustainable livestock management<sup>13</sup>, and therefore there is great potential in harnessing the existing experience and knowledge to further improve SOM and its associated benefits. Yet, the Welsh Soil Evidence review makes limited, or purely negative references to this potential - they state '*a major threat to soil biodiversity is the intensification and extensification of agricultural management*' (which seems contradictory as extensive livestock systems are generally seen as the opposite of intensive management), whilst then admitting that '*Limited evidence currently exists on trends in soil biodiversity in Wales*'.
- e) For example, **plant/grassland diversity is a key driver of SOC formation and storage**. '*High plant diversity enhances SOC storage by elevating*

<sup>12</sup> [Aberystwyth celebrates 100 years of grass breeding at IBERS](#)

<sup>13</sup> [Perfecting the Welsh Way](#)

*belowground carbon (i.e., root biomass and root exudates) inputs (13, 14) and promoting microbial growth, turnover, and entombment of necromass (15). Maintaining consistently high levels of biodiversity and root carbon inputs is essential for enhancing SOC storage and persistence in grasslands (Fig. 1)*<sup>14</sup> The actions outlined in 2b could help encourage greater diversity into our grasslands, and value those which are already diverse.

- f) Furthermore, **‘grazing management and biodiversity restoration can provide low-cost and/or high-carbon-gain options for natural climate solutions in global grasslands. The achievable SOC sequestration potential in global grasslands is 2.3 to 7.3 billion tons of carbon dioxide equivalents per year (CO<sub>2</sub>e year<sup>-1</sup>) for biodiversity restoration, 148 to 699 megatons of CO<sub>2</sub>e year<sup>-1</sup> for improved grazing management, and 147 megatons of CO<sub>2</sub>e year<sup>-1</sup> for sown legumes in pasturelands.**<sup>1516</sup> The FUW would argue these potential gains for Wales should not be dismissed, particularly due to their potential to create multiple benefits, nor impact negatively on food production.
- g) There is inconsistency and a lack of clarity in the review about the impact of stocking densities on soil health. Whilst it is understood that, like machinery, livestock can create compaction issues under certain conditions, however, grazing management can also be used to improve soil health and biodiversity. ‘Light grazing’ is referred to within the review in one section (6.3) as a reduction of stocking rates, and stated to be the most beneficial for soil carbon in grasslands. However, within the global analysis referenced, light grazing is used in the context of seasonal or rotational grazing, with other studies recommending high stocking densities in some instances to trample organic matter into the soil, and encourage growth to increase photosynthesis<sup>17</sup>. This implies that the rest period was more crucial than the stocking rate.
- h) Reductions in grazing, and the resultant loss of vegetation structure – for example through the dominance of species such as purple moor grass (molinia) - has had adverse impacts for species such as golden plover and other waders, including curlew<sup>18</sup> - now considered the most pressing bird conservation priority in the UK. Moreover, a more recent study found that trebling sheep numbers led to the largest increase in species diversity on mountain land compared with either the removal of sheep or the introduction of cattle.<sup>19</sup> Similarly, analysis by Plantlife has shown that more than half of all wild plants need regular management or disturbance to thrive, and that 39.6%

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<sup>14</sup> [Grassland soil carbon sequestration: Current understanding, challenges, and solutions | Science](#)

<sup>15</sup> [Grassland soil carbon sequestration: Current understanding, challenges, and solutions | Science](#)

<sup>16</sup> [Pasture for Life: A solution to global warming](#)

<sup>17</sup> [Managing Grazing to Restore Soil Health, Ecosystem Function, and Ecosystem Services](#)

<sup>18</sup> Changing livestock numbers in the UK Less Favoured Areas – an analysis of likely biodiversity implications, RSPB, December 2012

<sup>19</sup> Long-term impacts of changed grazing regimes on the vegetation of heterogeneous upland grasslands, Pakeman, R. J. et al., Journal of Applied Ecology (2019)

of species would decline within a decade if the land on which they grow is abandoned, while 16.4% would decline within 1-3 years under such circumstances.<sup>20</sup>

- i) The review also reveals that in the past 30 years, whilst topsoil carbon was stable in improved land, it **decreased in habitat land** (and increased in woodland). Potentially the lack of livestock dynamics and disturbance has stalled this increase. Whilst the soils review is a comprehensive and detailed review, this area needs far more attention and research.

Increase farmer knowledge of soil management (including through gathering iterative data)

- a) As recognised in the draft soil policy statement, knowledge exchange between farmers, and knowledge transfer between experts and farmers is a powerful tool for improving the management of soils. Many farmers are already part of grazing groups, discussion groups and organisations which drive forward their performance.
- b) The FUW believes there is a great opportunity within the new Sustainable Farming Scheme and the proposed Sustainability Review to **pay farmers for the on-farm data they provide**, particularly as the Soils Review identifies many areas where more detailed and localised data is required. However, the data should then inform farmers as to what management support/capital costs/advice is needed from the Sustainable Farming Scheme payments based on the data, therefore, providing more **targeted support** and ensuring the data results in direct action/maintenance. Farmers already provide detailed data by completing the Single Application Form on an annual basis via RPW Online, and much more could be done to provide this data **back** to farmers, enabling benchmarking between farms in order to ensure there is an annual, iterative and useful process of data provision.
- c) Many farmers are undertaking carbon audits, however, the lack of consistency between calculators, particularly regarding carbon sequestration rates such as from soil, is a barrier to engagement. If the Welsh Government provided consistent, comparable and simple KPIs/proxies for carbon as part of the Sustainability Review, it would provide a large amount of useful data for both farmers and the Government, and begin the process of carbon auditing for many farmers.
- d) In addition, demonstrating the business value of soils is an important aspect of knowledge transfer, particularly as soils under agricultural management are not managed in isolation to the business (see objective 4). For instance nutrient management cost savings/optimisation, value of dung beetles/earthworms, the impact of soil compaction on productivity, value of

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<sup>20</sup> [Rewilding, July 2019](#)

liming etc. Many soil health indicators (such as compaction, earth worm counts) could also be incentivised and tested by farmers themselves, as opposed to being presented in a report, which would also increase knowledge and engagement in soils.

### **Sustainable Farming Scheme proposals relevant to soils:**

(U) Carry out professional and farmer soil testing at Scheme entry and in time for contract renewal to include a combination of:

- Nitrogen (N), Potassium (P), Phosphorous (K), Carbon and pH
- a biological measure e.g. eDNA, respiration counting 'proxy' species (earthworms)
- a physical assessment e.g. infiltration rate, bulk density or Visual Evaluation of Soil Structure (VESS).

(U) Submit nutrient accounts and evidence covering N, P, K, C and pH.

(O) Optional Actions which impact a farm's nutrient use and soil condition can be found throughout this document, including actions to:

- supplement applied nitrogen with nitrogen fixing plants (establishing mixed swards, planning rotations, cover cropping)
- establish leys and crops with varied rooting profiles (establishing mixed swards, crop rotations, cover cropping)
- improve soil biology (diverse planting, graze and rest practices, minimum or no till, use of anthelmintic plants to reduce wormer usage, habitat management)

(C) Support for farmers to work together in a catchment to improve water quality.

(FC) Farming Connect will provide support for:

- soil sampling
- technical advice to interpret results and use it to benefit their farm and the environment
- farmer-led learning on soil health.

Ensure soil policy, regulation and support enhances, and does not damage, the economic sustainability of family farms

- a. 80% of the land in Wales is managed by farmers. Therefore, the management of soils is inextricably linked with the farming businesses and their economic viability and business decisions. They are dependent on each other. The potential negative impacts of market competition, pressure on standards and a higher regulatory baseline to both farming businesses and the health of soil are outlined above, therefore, including this objective would ensure that policies are not designed in isolation to these important considerations.
- b. Any policies which influence farming businesses must also consider the significant contributions such families make to Wales' economy, culture,

language and jobs - factors which are all underpinned by ensuring that farming enterprises remain financially sustainable.

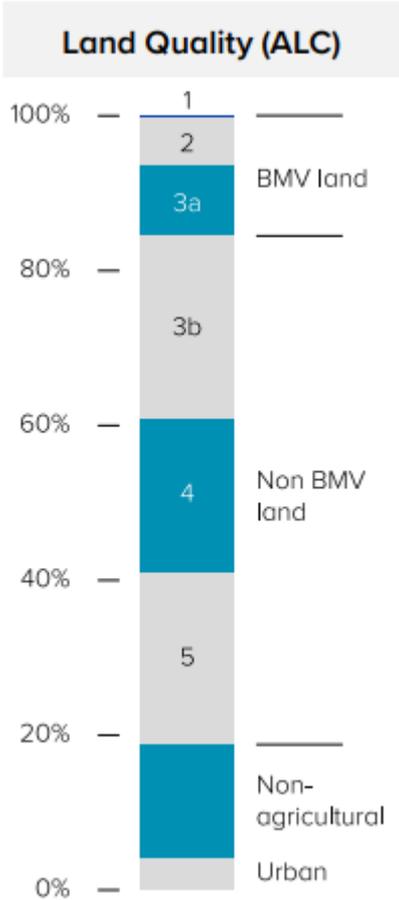
## Additional considerations

The impacts of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 on soils in Wales must be taken into consideration.

The FUW has, on a number of occasions, raised concerns regarding the impact these regulations will have on grazing management and stocking densities. It is evident that the loss of upland and hill reared suckler herds would result in the decline in species diversity and therefore the regulations in their current form go against a longstanding policy of the Welsh government to support farmers through environmental schemes such as Glastir to graze cattle in recognition of the benefit it provides for biodiversity.

Furthermore, these regulations in particular will place significant pressure on cattle farmers to empty their stores before the closed period and spread as much as possible within the limits after the closed period to ensure that storage capacity limits are not exceeded, rather than spreading at the optimal time in regard to weather conditions, soil and crop requirements.

Consideration should also be given to protecting the Best and Most Versatile land for agriculture (10-15% of land in Wales), particularly as there will be more challenging growing conditions in the future. There will undoubtedly be pressure on BMV land from urban, mineral and land-based renewables, development and afforestation, however, the FUW would argue that food security in the future must be safeguarded.





## **Soil Association Cymru**

### **Written Evidence Submission to the Economy, Trade and Rural Affairs Committee inquiry: “Soil Health in Agriculture”**

Andrew Tuddenham, Head of Policy Cymru  
atuddenham@soilassociation.org

April 2025

## **About the Soil Association**

The Soil Association is a membership charity founded in 1946 by farmers, scientists, doctors, and nutritionists with a vision for good food produced with care for the natural world. Today, it develops and scales solutions for sustainable food and farming. Its Food for Life programme supports schools, hospitals, and caterers in shifting to healthy, sustainable diets. About 30% of primary schools in England are accredited. In Scotland, funded by the government, the programme now works with 18 of 32 local authorities to increase local and organic ingredients in school meals. In Wales, the Sustainable Food Places partnership, delivered by Food Sense Wales, promotes healthy, sustainable food in seven local authority areas. Soil Association Certification, our trading arm, works with over 6,000 businesses—farmers, growers, retailers, and manufacturers—in more than 50 countries, certifying over 14 million hectares of forest globally. A third of Wales’ organic farms are certified by Soil Association Certification.

## **Introduction**

Soil Association Cymru welcomes this inquiry and we are grateful for the opportunity to submit evidence. Soil health is central to resilient, productive farming and to tackling the climate, nature and health emergencies, but for far too long soil has been in the shadows of environmental policy when compared to air, water, and biodiversity. As such this crucial natural resource has been left relatively unprotected and undermeasured.

Welsh Government has made progress in building the knowledge base on Welsh soils, and there may be opportunities for soil protection, restoration and research through the Sustainable Farming Scheme. However, Wales lacks a legally binding soil health target and national soil strategy and action plan.

### **1. The role of soils in agricultural systems**

- 1.1** Healthy soils are essential to our ability to produce food, to control flooding and droughts and to limit the impacts of climate change.

- 1.2** The Food and Agriculture Organisation of the UN defines soil health as “the capacity of soil to function as a living system, with ecosystem and land use boundaries, to sustain plant and animal productivity, maintain or enhance water and air quality, and promote plant and animal health...”<sup>1</sup> The FAO also suggests that “a healthy soil does not pollute its environment and does contribute to mitigating climate change by maintaining or increasing its carbon content”.
- 1.3** Knowledge about soils and soil health remains incomplete, notably about the variety of soil life and its role in sustaining soils.
- 1.4** Arbuscular mycorrhizal fungi and soil bacteria support plant growth by improving soil structure and recycling nutrients. The fungi act as root extensions, boosting nutrient uptake and helping to bind soil.

## **2. The state of soils in agricultural systems**

- 2.1** In the last century, conversion of natural to agricultural ecosystems combined with detrimental practices such as deep and repetitive tillage, lack of organic amendments, overgrazing, monoculture and long bare-fallowing periods have caused the depletion of the Soil Organic Matter pool by 25%–75% across the globe<sup>2 3</sup>. This is the biggest issue for soils because organic matter is critical to soil health, biodiversity, productivity and carbon storage.
- 2.2** Particular risks to soil organisms and organic matter arising from farming practices that prevailed since the latter half of the 20th century include:
- 2.3** Over-application of synthetic fertilisers, which can reduce soil organic matter levels and increase soil acidity, reducing the habitat quality for soil organisms and the diversity of soil microorganisms. Reduced soil life and function affects crop growth, development and disease incidence. By reducing soil life synthetic fertilisers can create dependency as the soil loses its natural ability to supply nitrogen and other elements and nutrients to plants, whilst the excessive application of chemicals leach from soils, polluting environments near and far. The latest Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) National Trends and Glastir Scheme evaluation Report (2025)<sup>4</sup> notes that the majority of improved grassland sites surveyed (72%) have “soil acidity levels which remain below the production threshold which is most likely linked to the continued use of synthetic fertiliser without the accompanying use of lime”.

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<sup>1</sup> [Plant Production and Protection Division: What is a healthy soil?](#)

<sup>2</sup> Lal, R., 2011. "Sequestering carbon in soils of agro-ecosystems," Food Policy, Elsevier, vol. 36 (Supplement), pages 33-39, January.

<sup>3</sup> Sanderman et al., (2017) [Soil carbon debt of 12,000 years of human land use](#), Proc. Natl. Acad. Sci. U. S. A., 114 (2017), pp. 9575-9580

<sup>4</sup> [Report 105. Wales National Trends and Glastir Evaluation.pdf](#)

**2.4** Repeated cultivations, physically disrupting the habitat for soil organisms and, by aerating the topsoil, accelerating the microbial breakdown of soil organic matter. One major cause for concern is the reduction in arbuscular mycorrhizal fungal diversity and biomass in UK soils. These are fungal networks associated with most crops that provide key benefits and are keystones within healthy soil communities.

**2.5** The prevalence of monoculture crops, which fail to provide the variety of conditions necessary for a diverse range of soil organisms to thrive.

**2.6** Pesticides that can kill not only the intended target, but also other beneficial organisms. Some pesticides are known to persist in soils, long after their intended use. This chemical contamination leads to a decrease in soil biodiversity.

**2.7** The latest ERAMMP National Trends and Glastir Scheme evaluation Report (2025)<sup>2</sup> data for soils indicates:

- stability in the national topsoil carbon concentration albeit an 8% loss in topsoil carbon concentration in arable and horticulture habitats
- 6-32% increase in soil compaction
- 4% of soils in Wales eroded or disturbed
- a 15% increase in phosphorus levels in improved grassland soils and three-fold increase in the number of improved grassland sites exceeding the leaching threshold for water quality
- a two-fold increase in the number of sites exceeding the leaching threshold for phosphorus in arable soils and a 7.7% loss of topsoil carbon
- 72% of improved grassland sites retain soil acidity levels below production thresholds

**2.8** The underlying driver of soil degradation in the UK has arguably been the specialisation and separation of arable and livestock production, in pursuit of ever cheaper commodity crops, but at great cost to the environment, health and animal welfare.

**2.9** Around 3.9 million hectares of farmland in England and Wales are at risk of compaction, largely due to late harvesting of crops (eg maize) and over-cultivation, which have disrupted traditional soil-regenerating practices.

**2.10** In eastern England, arable soils degrade as synthetic inputs replace organic matter and diverse crop rotations. Heavy machinery worsens compaction, affecting productivity, carbon storage, and flood resilience.

**2.11** In Wales and the west of England, intensive livestock farming produces more manure and slurry than soils can absorb. The Wye catchment sees over 6,000 tonnes of phosphorus annually, mainly from the rapidly growing poultry sector<sup>5</sup>.

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<sup>5</sup> [Re-focusing Phosphorus use in the Wye Catchment](#)

- 2.12** Manure phosphorus in the Wye catchment exceeds land needs by 45%, with the surplus polluting rivers and causing serious ecological harm.
- 2.13** In contrast to the risks to soil health associated with these farm types, organic farms have healthier soils. When compared to non-organic farms, organic farm soils perform significantly better against a range of soil health indicator. Long term studies have shown higher levels of soil microorganisms on organic farms compared with non-organic farmland<sup>6</sup> and organic farms have higher levels of soil organic matter<sup>7</sup>. They are also found to show better resilience against drought<sup>8</sup>.

### **3. Monitoring of soil health**

- 3.1** Despite an increasing interest in recent years, the existing data on soil health remains limited. Without data it is difficult to know where to start in order to protect and restore soils.
- 3.2** The data that does exist is fragmented and disjointed, as it is recorded by a variety of businesses and institutions, with different methods of soil sampling and analysis. Gaps in the publicly available data sets on Wales' varying soil types, functions and condition makes it difficult to measure progress or to establish a baseline for farmers to work with.
- 3.3** Much of the UK has been stuck for far too long in a circular bind, in which there are no agreed legally binding soil health improvement targets, due to insufficient data to establish a national baseline, and national soil monitoring schemes lack investment because soil health isn't prioritised relative to other focus areas like water, air and biodiversity with legally binding targets.
- 3.4** The European Union Soil Strategy for 2030 identified the lack of legislation as a key cause of soil decline in the EU. A 2023 directive will introduce mandatory soil health monitoring across all land types, covering chemical, physical, and biological properties. We discuss the need for legally binding soil targets to drive action in Wales in Section 6.
- 3.5** The Soil Association believes farmers have a key role to play in gathering data to help monitor soil health. Many are already doing so – as explored by various field labs within

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<sup>6</sup> Henneron, L et al. (2015) '[Fourteen years of evidence for positive effects of conservation agriculture and organic farming on soil life](#)', Agronomy for Sustainable Development, 2015, 35:1 169 – 181 doi:10.1007/s13593-014-0215-8.

<sup>7</sup> Tuomisto et al. (2012) Does organic farming reduce environmental impacts? A meta analysis of European research. Journal of Environmental Management, 112, December 2012, 309-320

<sup>8</sup> Muller et al. (2016) Organic farming, climate change and beyond. IFOAM EU and Fibl, p12: "organic farming systems are more resilient to changing weather conditions, such as extreme droughts and extreme rainfall."

the Innovative Farmers Programme (eg “Collective approach to improving soil health in the Orton Fells”<sup>9</sup>), which supports farmer-led research and innovation.

- 3.6** We believe that all farmers should know their soil health and how it compares to similar farms. With proper support, farmers can monitor and improve soil health, helping to fill gaps in our understanding of soils and uncover opportunities for funding and innovation. We provide views on the Sustainable Farming Scheme in section 5.
- 3.7** The Sustainable Soils Alliance recently identified<sup>10</sup> 26 soil metrics in use within 34 schemes or initiatives in widespread use by organisations and governments looking to influence or prescribe how farmers measure and assess their soil. For on-farm soil health monitoring to be most effective we urgently need a cohesive, standardised approach that will help join the dots between the various sectors involved – from farmers, to businesses, researchers, and policymakers.
- 3.8** The Global Farm Metric<sup>11</sup> developed by the Sustainable Food Trust provides a common framework for farm sustainability. The Soil Association partnered with the Global Farm Metric as official delivery partner in the UK, launching Soil Association Exchange<sup>12</sup> in 2022. The service helps farmers collect data on sustainability metrics like biodiversity, water, and soil health, to improve farm sustainability and access to new finance opportunities.
- 3.9** For soil health, Soil Association Exchange gathers data across nine metrics (soil organic matter, soil organic carbon stocks, bulk density, Visual Evaluation of Soil Structure, total Nitrogen and C:N balance, earthworms, soil cover %, pH, and contextual soil information)<sup>13</sup>
- 3.10** Remote sensing technology is emerging to help target areas for in-field assessment, and for in-field assessment to help refine remote sensing data<sup>14</sup>. Soil Association is a delivery partner in a Horizon Europe Framework Programme project to validate and develop soil health indicators. The project is creating an open access European-wide digital infrastructure, termed “AI4SoilHealth” . This infrastructure will be used for assessing and continuously monitoring soil health metrics by land use and/or management. A soil health measurement app is due to launch in 2026, and the UK pilot site is the UK Centre for Ecology & Hydrology’s (UKCEH) Plynlimon research catchment.

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<sup>9</sup> [Soil health in Westmorland Dales](#)

<sup>10</sup> [UK Soil Health Measurement Research.pdf](#)

<sup>11</sup> <https://www.globalfarmmetric.org/>

<sup>12</sup> [Profitable and sustainable farming | Soil Association Exchange](#)

<sup>13</sup> [21f3ea\\_5acb58c9b5724003bcb16c563fa808c6.pdf](#)

<sup>14</sup> [Soil mapping for precise land management | Farming Connect](#)

## 4. Classification of soils for land use

- 4.1** To date, 747 soil types have been identified in England and Wales, each with distinct properties shaped over geological time. These soils determine land productivity, influencing suitability for crops, livestock, and forestry, and play a key role in erosion, flood risk, and carbon storage.
- 4.2** We need a strategic approach to delivering the types of nature and climate friendly farming and the habitats that we need to avert the nature and climate crises and ensure food resilience.
- 4.3** We believe a land use framework informed by soil classification mapping is a key tool for shaping the policy needed to deliver this new approach to land. Soil Association has been calling for land use frameworks for years to give the clarity and confidence that nature-friendly farmers, land-users and progressive businesses need to invest in the future of the countryside.
- 4.4** It is therefore encouraging that Welsh Government Soils and Land Use Policy Team are considering the development of a soil functions and services map of Wales<sup>15</sup>.
- 4.5** Welsh Government’s “Soil function maps resource review” report of July 2024 states that “the aim of the map will be to provide best available information to support and balance land use decisions where trade-offs between soil functions and land use demands compete....The map will allow specialists and non-specialists to understand and quantify the impact of land use and policy decisions on a range of soil functions and services.”
- 4.6** Given that not all land is equally productive for food and that the way that land is farmed will determine whether Welsh Government can avoid unnecessary trade-offs between food, nature and climate we would also add that a soil function and services map must do more than merely guide land use change decisions, as a refinement of planning policy regarding the ‘best and most versatile land’ of ALC Grades 1-3a. A strategic approach to land use is needed to help target government support and regulation to encourage the farming *practices* or farm *types* that best match the carrying capacity or environmental vulnerabilities of the land.
- 4.7** On high yielding land, for example, regenerative practices and the use of ‘eco-infrastructure’ such as wildflower habitats, shelter belts and hedges can boost pollinators and pest control services to help sustainably optimise yields. Less productive land suits more extensive farming practices, including those which create and maintain semi-natural habitats, including meadows, heath, and wood pasture, which are critical for carbon sequestration and nature recovery. To tackle the nature and

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<sup>15</sup> [Soil function maps resource review](#), Welsh Government Soil Policy Evidence Programme 2023-24 report (July 2024)

climate crises, it is also critical to protect, restore and create woodlands, wetlands, and peatlands.

## **5. The policy and legislative mechanisms to protect soils and productive land (including the Sustainable Farming Scheme, National Minimum Standards and planning policy (amongst others))**

**5.1** To achieve healthy soils we need to focus on restoring multiple soil functions. This requires changes across the whole agricultural system. The Soil Association report, “Saving our Soils: healthy soils for climate, nature and health”<sup>16</sup> (2021) offers a suite of policy actions to support this:

**5.6** Provide clear incentives for farmers to monitor their soil health and improve it above their soil type baseline. Commit to a legally binding soil health target underpinned by properly funded national soil monitoring scheme.

**5.7** Support farmers to increase plant and animal matter being returned to soil through an increase in cover crops/green manures and a reintegration of grass-fed livestock. This then needs to connect with policies around nutrient pollution reduction.

**5.8** Increase incentives for farmers to increase use of minimum or no-till systems, along with support for drastically reduced pesticide use and conversion and maintenance of organic farming.

**5.9** Covering up bare soil – farmers should be supported to increase use of fertility-building green manures/cover crops, or the of the area under permanent grassland and longer leys, particularly on vulnerable soils. A strict regulatory baseline needs to be developed to keep vulnerable soils better covered. Monitoring should include a minimum percentage of bare soils at any time of year.

**5.10** Bring more trees into the farmed landscape – agroforestry systems protect soils from erosion by wind and water

**5.11** Reducing compaction - awareness of this issue should be raised amongst farmers via advisory services and written guidance, and baseline regulations should have compaction prevention as a clear standard.

**5.12** Designing crop rotations to improve soil health – longer and better rotations and intercropping should be incentivised alongside better support for farmers to move to niche and protein crops. New baseline regulations should help the transition away from basic rotations.

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<sup>16</sup> <https://www.soilassociation.org/media/24941/saving-our-soils-report-dec21.pdf>

### *Sustainable Farming Scheme*

- 5.13** Elements of many of the Soil Association's 'Saving our Soils' policy actions are contained in the Sustainable Farming Scheme: proposed scheme outline (2024).
- 5.14** With proper guidance and data safeguards, UA3: Soil Health Planning could create a valuable national soil dataset, benefiting the SFS and enhancing soil regulation. Farmers' concerns about data privacy must be addressed to encourage uptake of the SFS.
- 5.15** Soil test results will also require interpretation to ensure that appropriate management responses and potential SFS actions are identified. The SFS should provide guidance to help all farmers in the scheme understand soil structure and soil biology if these are assessed, and to signpost to further sources of advice and SFS Optional and Collaborative actions.
- 5.16** There is a clear need and opportunity to turn Universal layer plans and reports into actions, such as through the Optional and Collaborative layer. Without this, the level of ambition of a number of Universal actions will remain similar to regulatory baselines in Wales or elsewhere in the UK.
- 5.17** As such, alongside the need to 'ratchet up' their requirements over time, such as to include requirements to assess other indicators of soil health (eg earthworm numbers and a Visual Evaluation of Soil Structure), the overall effectiveness of the soil standards will rely on the ambition of other SFS requirements, and how the scheme is delivered as a whole. Payment rates and advisory support for practices like nutrient and pest management and support for organic farming will be crucial for promoting soil-focused farm practice.
- 5.18** Similarly, opportunities to reduce risks to vulnerable soils could be delivered by Universal Action 13: Tree Planting and Hedgerow Creation Opportunity Plan if guidance and mapping involves soil types and vulnerabilities, plus topography and potential nutrient and soil runoff pathways, to suggest parts of the farm where tree planting or hedgerow expansion could deliver benefits for soil health.
- 5.19** SFS support for organic farmers (and conversion to organic) will be crucial, particularly to provide support for farmers to transition to sustainable farming practices in catchments where soils and water are at risk from the cumulative impacts of agricultural intensification. We welcome the rollover of Organic Support Payment in 2025, but the sector needs clarity around what support will be available in the SFS in 2026.
- 5.20** Current soil health regulations mainly target individual issues in a fragmented manner. A 2020 study by the University of Sheffield and ADAS found that while farmers recognised the importance of sustainable soil management, few applied a wide range of practices

holistically. Since farms are complex systems, future soil regulations and SFS support will be more effective if delivered using a whole farm system approach.

**5.21** We suggest that further protection of soils in Wales could be achieved through SFS requirements towards maize growing, a high risk crop for soil erosion. The Agriculture and Horticulture Development Board (AHDB) notes that much of Wales is regarded as marginal for maize growing, being wetter and more exposed than much of England.

#### *National Minimum Standards*

**5.22** We believe the current regulatory framework across Wales is too fragmented and we supported the Agriculture White Paper (2020) proposals to consolidate existing legislation under a set of National Minimum Standards (NMS), applicable to all farmers and land managers in Wales regardless of whether they choose to enter the SFS. This will provide a level playing field across Wales and will ensure that the SFS is not undermined by farming businesses that are not participating.

**5.23** We wish to see a commitment to develop an NMS framework. There are potential risks to soils, water, and biodiversity arising from further intensification of agriculture if farmers choose not to participate in the SFS. Furthermore, value for public money is reduced if SLM gains secured through scheme payments are offset by regulatory failure to control damaging practices or pollution on the same farm or elsewhere.

**5.24** Within the Basic Payment Scheme's Cross Compliance framework a regulatory baseline for soil is provided by Good Agricultural and Environmental Conditions (GAEC). GAECs 4 (minimum soil cover), GAEC 5 (managing land to limit soil erosion) and GAEC 6 (maintenance of soil organic matter) represent the minimum standards of protection against soil loss and damage to soil health. We support recommendation 6 of the recently published statutory review of the Control of Agricultural Pollution Regulations: 2025 to bring GAEC 5 (managing land to limit soil erosion) into regulation within 18 months. However, GAEC 4 (minimum soil cover) is a non-statutory standard and gains function from Cross Compliance. GAEC 4 should be brought into the SFS and subsequently into NMS (alongside other soil-related regulation) to maintain protection against soil loss across Wales.

## **6. The potential for legal frameworks and targets for soils**

**6.1** Welsh Government's support for the Global Biodiversity Framework requires cutting nutrient losses to the environment by half and pesticide losses by two-thirds by 2030. While the SFS may help, Wales lacks a binding soil health target and national soil strategy to drive lasting progress.

**6.2** It is welcome that Welsh Government have invested in soil monitoring in the last 10 years through the Environment and Rural Affairs Monitoring and Modelling Programme

and have established a Soil policy evidence programme to review evidence of the condition of Welsh soil and how agricultural practice is affecting it.

- 6.3 Wales does not yet have a dedicated soil strategy and soil action plan. The publication timeline for Welsh Government’s Soil Policy Statement is currently unclear. The statement will set out Welsh Government’s “vision for the sustainable management of agricultural soils for future generations”<sup>17</sup>.
- 6.4 We suggest an overarching vision should refer to all soil, acknowledging the importance of soil in urban and non-agricultural locations. These soils are often overlooked by policy, and due to lack of knowledge and understanding by managers are at risk of degradation.
- 6.5 The Well-being of Future Generations Act national indicator for 'Concentration of carbon and organic matter in soil,' is a key metric, as it reflects soil health, fertility, and its ability to sequester carbon, thus contributing to climate change mitigation.
- 6.6 However, Well-being indicators and a Soil Policy Statement alone are not enough. A comprehensive soil strategy and action plan that includes the policy, monitoring and investment is required to ensure that all soils in Wales are managed in a way that improves their health and productivity, supports biodiversity, and contributes to climate change mitigation.
- 6.7 Section 4 of the Agriculture (Wales) Act 2023 requires the Welsh Ministers to prepare and publish indicators and targets to measure progress towards achieving the SLM objectives. We would like to see a soil health target and indicators included in this suite.

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<sup>17</sup> [Soil management | GOV.WALES](https://gov.wales/soil-management)

Andrew RT Davies MS,  
Chair,  
Economy, Trade and Rural Affairs Committee

Buffy Williams MS,  
Chair,  
Children, Young People and Education Committee

24 March 2025

Dear Andrew and Buffy,

**Petition P-06-1507 We call on UWTSD and the Welsh Government to create a viable, sustainable plan for the long-term future of Lampeter campus**

The Petitions Committee met on 10 March and considered the above petition, submitted by Esther Weller.

The Committee agreed that I would write to you both, to highlight the petition and the petitioner's alternative proposals included in the attached correspondence, for consideration in your ongoing scrutiny work.

It was also agreed that I would seek to raise the petition in future debates on the higher education sector, and in light of these actions there was a majority decision by Members to close the petition.

The full details of the Committee's consideration of the petition, including the correspondence and the actions agreed by the Committee can be found here: [P-06-1507 We call on UWTSD and the Welsh Government to create a viable, sustainable plan for the long-term future of Lampeter campus](#)

I would be grateful if you could send any response by e-mail to the clerking team at [petitions@senedd.wales](mailto:petitions@senedd.wales).

Yours sincerely



Carolyn Thomas MS

Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.



**P-06-1507 We call on UWTSD and the Welsh Government to create a viable, sustainable plan for the long-term future of Lampeter campus - Correspondence from the Petitioner to the Committee, 04 March 2025**

Background information for Petitions Committee meeting 10/3/25

The university at Lampeter is Wales's oldest university; the 3<sup>rd</sup> oldest in England and Wales after Oxford and Cambridge. It is a globally significant institution of higher education. The decision to end undergraduate teaching at Lampeter marks a devastating blow not only to the Lampeter campus but to the cultural, historical, and educational heritage of Wales. UWTSD have allowed the closure of an institution that has shaped Wales's intellectual and cultural identity for nearly 200 years.

The decision has been framed as a financial necessity. We, the Lampeter Society, do not accept that narrative. The decline of Lampeter was not inevitable but engineered through successive cuts, neglect, and strategic missteps that reduced a once-vibrant institution to its current state. For decades, Lampeter has been deliberately and systematically stripped of its resources and identity. Fewer courses led to fewer students, which in turn justified further reductions - a clear and calculated process of managed decline.

The decision completely disregards the devastating economic and social impact on Lampeter and south Ceredigion. The 2008 HEFCW report explicitly warned that the closure of Lampeter would have a severe economic impact on the town and surrounding area. For a rural community like Lampeter, the university is not just an employer but a cultural and social lifeline.

Lampeter is more than a campus. It is an institution of global renown, a vital thread in the cultural fabric of Wales, and a symbol of resilience and intellectual excellence. Its closure represents a national scandal, and history will not look kindly on those who allowed this to happen.

The Lampeter Society calls upon UWTSD and the Welsh Government to develop a robust way forward that honours the institution's past while securing its future. Despite the current narrative, we believe it is certainly a matter for the Welsh Government. Not stepping in when the nation's Higher Education sector is struggling, and in some cases failing, is shortsighted and indeed contravening a precedent which has already been set.

The following are alternative proposals drawn up by the Lampeter Society for the Lampeter campus.

## ALTERNATIVE PROPOSALS FOR THE LAMPETER CAMPUS

**A strategic review of higher education in Wales is ultimately needed as the sector grapples with a nation-wide financial crisis with falling student demand; rising costs; tuition fee-value erosion; research being undertaken at a net loss; and an over-reliance on international student income. The solution to this crisis so far has been to cut costs by reducing or closing down departments and faculties – as is the case with UWTSD, Bangor University, University of South Wales and Cardiff University. However, education should not be seen as a cost burden but rather as an investment in the nation's future. What is ultimately needed is a global and integrated vision of the future and a planned approach to reform and consolidation of HE institutions in Wales. A world-class University of Wales with member branches and campuses would rationalise course distribution, encourage world class departments, attract globally recognised academics and would reduce competition between campuses/universities across Wales.**

There are four **local business options** for Lampeter on the table. These are:

I - Positioning Lampeter as a leading institution in heritage-driven education and research excellence, developing interdisciplinary degree programmes combining humanities with practical and emerging fields, such as digital studies and sustainability

II – Offering a mainstream humanities degree teaching programme that focusses on popular subjects that the Lampeter Campus is noted for globally, and allied with the **Centre for Advanced Celtic Studies**, the **Welsh National College** and the prospective **National Welsh Language Learning Institute**. The Lampeter portfolio would include Celtic studies & the Welsh language; archaeology; geography; creative writing & English; religious studies & theology; ancient/medieval history & classics; philosophy; and Chinese studies. Programme delivery would be low-cost, with a small core academic and support staff and the use of visiting 'star' alumni lecturers to add pulling power and admin volunteers

III – Turning the Lampeter Campus into an enterprise hub for Mid-Wales, offering entrepreneurship undergraduate and postgraduate degree programmes that promote sustainable economic development and the concept of the green campus

NB – We believe the above options work alongside and support the Welsh Government's ***Wellbeing of Future Generations (Wales) Act 2015***; widening access to participation and developing a cohesive and strengthened local community and economy.

IV – Leasing out part of the Lampeter campus to an international or Russell Group university, that is looking for a rural campus and an alternative approach

**Lampeter's rural and community-oriented environment holds great advantages to non-traditional and neurodivergent students. Welsh universities are experiencing a quiet epidemic of student suicides; the University of South Wales alone had more than 10 suicides last year alone. The large university metropolis does not suit many young people; the mental health benefit of being able to study in a close knit friendly environment which Lampeter is uniquely able to offer cannot be underestimated.**



Ein cyf/Our ref: MA/HIDCC0636/25

Andrew RT Davies MS  
Chair  
Economy, Trade and Rural Affairs Committee  
Welsh Government  
Cardiff Bay  
Cardiff  
CF99 1SN

25 March 2025

Dear Andrew,

I am writing to inform the Committee of my intention to consent to the UK Government making and laying the Official Controls (Extension of Transitional Periods) (Amendment) Regulations 2025 ("the 2025 Regulations").

We have received a letter from Baroness Hayman the Minister for Biosecurity, Animal Health, and Welfare, asking for consent to these Regulations. The Regulations intersect with devolved policy and will apply to Wales. The Regulations will extend to England, Scotland, and Wales and a similar request for consent has been sent to Scottish Ministers.

The Regulations will be made in exercise of the powers conferred under:

- Article 144(6) of, and paragraph 2 of Annex 6 to, Regulation (EU) 2017/625 of the European Parliament and of the Council ('the OCR').

The purpose of 2025 Regulation is to extend the implementation period of import checks on certain sanitary and phytosanitary ('SPS') goods entering Great Britain ('GB') from certain countries, until 31 January 2027.

The 2025 Regulations will extend the transitional staging period from 1<sup>st</sup> July 2025 to 31 January 2027. This extension will delay the imposition of checks on Sanitary and Phytosanitary (SPS) goods imported from the EU to GB. This instrument also extends an easement which delays the requirement for import checks (that applies to rest of the world countries) in respect of plants, plant products, or other objects (such as machinery and vehicles which have been used for agricultural or forestry purposes) entering GB from the EU, Liechtenstein or Switzerland through a West Coast Port (as listed in the definition of 'relevant port' in regulation 3 of the Official Controls (Plant Health) (Frequency of Checks) Regulations 2022) before 31 January 2027, in line with the end of the TSP. The rationale for this extension is to prevent any disruption in trade and to allow sufficient time to transition to a permanent legislative basis for the Border Target Operating Model.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The 2025 Regulations do not commit Welsh Ministers to adopting any future UK Government position on biosecurity. The Regulations do not diminish or undermine the powers of Welsh Ministers in any way.

Although the Welsh Government's general principle is that the law relating to devolved matters should be made and amended in Wales, on this occasion, it is considered appropriate for this instrument to apply to Wales as there is no policy divergence between the Welsh and UK Government in this matter. I consider that legislating separately for Wales would be neither the most appropriate way to give effect to the necessary changes nor a prudent use of Welsh Government resources given other important priorities.

I have written similarly to Mike Hedges MS, the Chair of the Legislation, Justice and Constitution Committee.

Yours sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping loops and strokes, characteristic of a cursive signature.

**Huw Irranca-Davies AS/MS**

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

# Agenda Item 3.3

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros  
Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: PO/HIDCC/0126/25

Mike Hedges MS  
Chair  
Legislation, Justice and Constitution Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

25 March 2025

Dear Mike,

I am writing in accordance with the inter-institutional relations agreement to let you know that the postponed Inter-Ministerial Group for Environment, Food and Rural Affairs which was originally be held on 10 March will now be held on 31 March. I will be representing the Welsh Government.

The meeting is expected to focus on the circular economy, animal diseases, discussion on a potential UK-EU sanitary and phytosanitary agreement, "Not for EU" labelling, and the impact of the Internal Market Act on the EFRA sector. I will update you on discussions, and a communique will be issued, after the meeting.

We are also holding a quadrilateral meeting on borders with Baroness Hayman on the same day.

I have also copied this letter to the Climate Change, Environment and Infrastructure Committee and the Economy, Trade and Rural Affairs committee.

Yours sincerely,

**Huw Irranca-Davies AS/MS**

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

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Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Huw Irranca-Davies AS/MS  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros  
Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: PO/HIDCC/0135/25

Mike Hedges MS  
Chair  
Legislation, Justice and Constitution Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

31 March 2025

Dear Mike,

I am writing in accordance with the inter-institutional relations agreement to let you know that the Inter-Ministerial Group for Environment, Food and Rural Affairs meeting scheduled for 31 March has been postponed. The next scheduled meeting is due to take place on 12 May.

I have also copied this letter to the Climate Change, Environment and Infrastructure Committee and the Economy, Trade and Rural Affairs committee.

Yours sincerely,

**Huw Irranca-Davies AS/MS**  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

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0300 0604400

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Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Andrew RT Davies MS,  
Chair,  
Economy, Trade and Rural Affairs Committee

27 March 2025

Dear Andrew,

Petitions P-06-1253 Ban greyhound racing in Wales and P-06-1354 The Welsh Government should support greyhound racing in Wales; and Petition P-06-1391 Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners

The Petitions Committee met on the 10 March and considered the above two petitions on greyhound racing, the first submitted by Hope Rescue and the second by David Tams, before going on to consider a petition on regulating the dog grooming sector, submitted by Brian Howell.

The Committee noted that the Welsh Government's intention to introduce a ban on greyhound racing was clear. It was agreed to write to you as Chair of the Economy, Trade and Rural Affairs Committee, the lead committee for scrutiny of these legislative plans, to make you aware of the two greyhound racing petitions. The Committee has agreed to close both of these petitions.

While a majority of Members supported the ban, Joel James MS does not support a ban as the way forward to address the animal welfare issues, and his views on Petition P-06-1253 are noted in paragraph 27 of the Committee's 2022 report 'The Final Bend?'

In discussing the three petitions it was noted that there had been a wider consultation on the Licensing of Animal Welfare Establishments, Activities and Exhibits, which included licensing of the dog grooming sector, and detailed scrutiny of Welsh Government's plans for the animal welfare issues in that wider consultation was needed.

With regard to **Petition P-06-1391 Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners**, it was agreed that I will write to the Cabinet Secretary for Climate Change and Rural Affairs to seek more information on the timeline for delivery of Welsh Government's national model for the regulation of animal welfare, to deal with licensing of the dog grooming sector.

The full details of the Committee's consideration of all three petitions, including the correspondence and actions agreed by the Committee can be found here:

[P-06-1253 Ban greyhound racing in Wales](#)

[P-06-1354 The Welsh Government should support greyhound racing in Wales](#)

[P-06-1391 Introduce regulation of the dog grooming sector, to protect the welfare of dogs and rights of owners](#)

Yours sincerely



Carolyn Thomas MS

Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Huw Irranca-Davies AS/MS  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros  
Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Eich cyf/Your ref P-06-1391  
Ein cyf/Our ref HIDCC/00617/25

Carolyn Thomas MS  
Chair - Petitions committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN

02 April 2025

Dear Carolyn,

Thank you for your letter of 25 March regarding the petition to introduce regulation of the dog grooming sector.

The regulation of pet groomers was included as part of our public consultation on [the Licensing of Animal Welfare Establishments, Activities and Exhibits](#). The consultation [summary of responses](#) was published on 18 December, alongside a [written statement](#). I intend to issue a further statement detailing next steps in the Spring.

As set out in the consultation, this forms the first stage in the commitment to develop a National Model and I cannot pre-empt the outcome at this time.

Yours sincerely,

**Huw Irranca-Davies AS/MS**  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Andrew RT Davies MS  
Chair, Economy, Trade, and  
Rural Affairs Committee

27 March 2025

Dear Chair,

During the general scrutiny session on the Foundational Economy on 14 November 2024, the following questions were identified as areas that I would follow-up with the Committee.

**In relation to the railway engineering degree apprenticeship run by the University of South Wales and Coleg y Cymoedd, please can we be provided with the current recruitment figures, as well as the projected recruitment figures in the years ahead.**

Medr, which is the new post 16 tertiary authority, has advised that the January 2025 end of year registration estimates from providers showed that there were two new entrants estimated to complete the USW BSc Railway Engineering degree at the end of 2024/25, and 10 continuing students (from 2023/24) that were estimated to complete at the end of 2024/25.

As Medr have not asked USW to submit their estimated bids for Degree apprentice starts for 2025/2026, they are unable to predict any recruitment figures in the years ahead.

**Please can we be provided with further detail on steps being taken to support skills apprenticeships in the housing sector, particularly in regard to housing decarbonisation.**

We are prioritising investment to meet our current and future skills needs through developing apprenticeships in growth sectors and emerging occupations in line with priorities determined by Regional Skills Partnerships (RSPs), labour market information and sector reviews carried out by Qualifications Wales.

We are working closely with Medr who are reviewing the content of apprenticeship frameworks and pathways with a focus on developing and adapting those apprenticeships that support our net zero and sustainability goals. Medr currently has a Housing framework at level 2 and Level 3 and have just developed a level 4 framework. The newly developed Level 4 Housing framework is expected to be published by the end of February 2025 and will contain modules on sustainability.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Jack.Sargeant@llyw.cymru](mailto:Gohebiaeth.Jack.Sargeant@llyw.cymru)  
[Correspondence.Jack.Sargeant@gov.wales](mailto:Correspondence.Jack.Sargeant@gov.wales)

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

A review by Qualification Wales, in 2018, found that employers believed construction apprenticeships in Wales did not meet their needs. Following this review, Qualification Wales, working with the sector, developed new arrangements where most learners complete a Foundation qualification in college in the first year and then progress to an apprenticeship at level 3. Under these arrangements, only a minority of learners are expected to directly start an apprenticeship at level 3 after leaving school.

We are currently working with the Construction Industry Training Board (CITB), training providers and Qualifications Wales to review the impact of these new arrangements, with a particular focus on entry requirements, the effect on construction apprenticeship starts, progression and completion.

We have a Programme for Government commitment to expand shared apprenticeships for new employers, sectors and regions. To achieve this expansion, we introduced a new funding and delivery model in 2022. Providers in the construction sector are continuing to offer non-Welsh Government funded, shared apprenticeship provision to employers allowing them to continue to access CITB funding. For example, Melin Homes works with Monmouthshire County Council and Y Prentis on construction-based apprenticeships.

Colleges are also boosting their Green Skills offer in the Construction Sector, by providing a range of courses aimed at upskilling in relation to energy efficiency measures as well as delivering courses aimed at demystifying the retrofit agenda.

In line with the Programme for Government commitment to increase degree apprenticeships, CITB, working closely with the Welsh Government and stakeholders including employers, universities and professional bodies, was the lead developer progressing a new construction pathway and developing new pathways in civil engineering, quantity surveying, surveying and construction management. Following this work, pathways of the construction degree apprenticeship framework have been offered from September 2024 by the University of South Wales, the University of Wrexham and the University of Wales Trinity Saint David.

**In reference to the social partnership duty, can the Minister please confirm if all the trade unions within Transport for Wales are now signed up to that social partnership duty and way of working. Furthermore, and more broadly across other public bodies, is there confidence that they're going to be supported with facility time as well?**

Public bodies which are subject to the well-being duty in Well-being of Future Generations (Wales) Act 2015 must set and publish objectives designed to maximise their contribution to achieving each of the well-being goals; and take all reasonable steps in meeting their objectives.

Since 1 April 2024, those public bodies now have a social partnership duty to seek consensus or compromise with their recognised trade unions, or where there is no recognised trade union other representatives of their staff, when setting or reviewing and delivering their well-being objectives. The duty is therefore placed on the public bodies rather than the trade unions. I can confirm that Transport for Wales is captured by the social partnership duty and therefore is required to seek consensus or compromise with all its recognised trade unions.

Decisions on facility time are determined locally and Welsh Government does not have levers to intervene in local decision making on this issue. Welsh Government does however recognise the value of facility time and views facility time as an investment rather than a cost. It is key for ensuring workers have the opportunity to be represented collectively,

ensuring workers are informed about proposed decisions that may affect them, and providing workers with the means to participate in and influence those decisions. Welsh Government has reiterated to public bodies the importance of facility time and the expectation for Trade Unions to have the appropriate time to be able to fully engage in the implementation of the Social Partnership Duty.

During the session the Welsh Government also committed to provide the Committee with updates on the following, once progress has been made in their respective areas:

**The outcome of the first meeting of the task and finish group established by the Social Partnership Council, once it has taken place.**

The planned inception meeting for the group on 25 February has been postponed following apologies and a new date is being sought.

**Details around investments in the semiconductor industry, following the completion of consideration by the Cabinet Secretary of two current development cases.**

The Welsh Government has supported a £51m investment into Vishay Intertechnologies. This included investment into new equipment at their Newport plant, supported by a £5m grant from Welsh Government. This investment will help safeguard 200 jobs at the plant. This has been announced and is in the public domain.

The second investment is currently being finalised and is at the legal documentation stage. We expect to make an announcement in early March subject to successful completion of the legal documentation and due diligence and will update the committee following completion.

I trust this information covers all the questions that were asked during the general scrutiny session.

Yours sincerely,

A handwritten signature in black ink that reads "JACK SARGEANT". The signature is written in a cursive style with a long horizontal line underneath it.

**Jack Sargeant AS/MS**

Minister for Culture, Skills and Social Partnership

Y Gweinidog Diwylliant, Sgiliau a Phartneriaeth Gymdeithasol

# Agenda Item 3.6

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros  
Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref PO/HIDCC/0089/25

Andrew RT Davies MS  
Chair  
Economy, Trade and Rural Affairs Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

31 March 2025

Dear Andrew,

Thank you for your letter of 24 February as a follow up to the ETRA session on 5 February, regarding the Sustainable Farming Scheme (SFS).

We have made significant changes to the proposed actions and requirements to make the Scheme more accessible and manageable as set out in the Scheme Outline published on 25 November 2024. It is still my intention to publish the final Scheme as early as possible this summer once the current phase of work with the Ministerial Roundtable and Officials Groups has concluded, and we have the outcomes of the economic analysis and impact assessment.

The analysis is currently underway, and we will have the outputs later in the spring. Ministers will not be making any final decisions until we have this evidence, and it has been discussed with the Roundtable, ahead of the Scheme being introduced in 2026.

Once the final Scheme decisions are taken and the final Scheme design has been made public, we will confirm our engagement plans with farmers. This will provide further information and support to farmers on the Scheme content and the opportunities from Optional and Collaborative Actions available to them. We intend for this to include in person events held across Wales.

I share your views on the importance of providing sufficient multi-year funding to deliver a successful Scheme. We want to get this right with the view to delivering generational change for the future.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

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Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

We are working with the recently formed Trees and Hedgerows Stakeholder Delivery Group on the SFS scheme level targets for tree planting and hedgerow creation as well as the development of the tree planting and hedgerow creation opportunity plan which will form part of the Universal Layer of the SFS. The information shared with the Group includes the area of land in the low sensitivity area for the Small Grants Woodland Creation scheme: 995,243 ha which represents 48% of land in Wales. The group is considering how the tree planting and hedgerow creation opportunity plan can be designed in a way that enables farmers to take these positive actions in areas which will benefit both their farm business and the wider environment.

In addition to the [Summary Report](#) of the Carbon Sequestration Evidence Review Panel published last November, the full technical report is now being prepared for publication. This includes information on the process of gathering the evidence and subsequent analysis. The full report is expected to be published toward the end of April, once translation and design work are complete.

The Sustainable Farming Scheme is being designed to provide significant and long-term support to create a resilient and sustainable Welsh agricultural industry with high quality food production at its heart. This is a vision that I am sure we all recognise and would agree with.

Yours sincerely,



**Huw Irranca-Davies AS/MS**

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs



Ein cyf/Our ref: PO/HIDCC/0090/25

Andrew R.T Davies MS  
Chair  
Economy, Trade and Rural Affairs Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

2 April 2025

Dear Andrew,

Thank you for your letter regarding Lord of the Manor titles and the impact on common land. I will address each of your questions in turn.

### **Question 1: What is the current Welsh Government position on the issue of people using Lord of the Manor titles to take over common land?**

It is important to highlight that common land and the rights of graziers are protected by various act of Parliament, notably the Commons Act 2006. This legal framework includes provision for seeking remedies through court for unauthorised works on common land and unauthorised agricultural activities. It also abolishes approvement, a medieval law which allowed Lords of the Manor to enclose a common.

Lord of the Manor titles might be considered in the context of land ownership more generally, and if a landowner is acting outside of their rights, there may be legal protection available, depending on the circumstances. For example, criminal behaviour of threats or violence could be reported to the police. Any restricted works without permission could be the subject of an application to the County Court (see sections 38 and 41 of the Commons Act 2006).

As manorial rights can vary there currently is no overarching Welsh Government position on the matter. If the actions of a Lord of the Manor, or indeed a landowner, were acting outside their legal right, it would likely be considered a private matter and will likely require independent legal advice sought by those affected. Farmers Unions may be able to assist if legal fees for private law firms are too much of a burden.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

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Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

**Question 2: Is there any policy work the Welsh Government could undertake to make buying these titles less attractive?**

As highlighted above, common land and associated graziers rights are already protected by law. Currently the Welsh Government's primary focus when it comes to common land is to implement the remaining parts of the Commons Act 2006, primarily Part 1, section 25 which will introduce electronic registers of common land and village greens. This will help to ensure their longevity and provide commoners and members of the public easily accessible records.

**Question 3: Which organisation(s) has responsibility for this issue and who should be supporting people affected?**

It is difficult to provide a full response to this question without further detail. As highlighted, the common land and graziers rights are protected in law. If criminal behaviour is suspected by any landowner or Lord of the Manor, then the police should be involved. If the issue is a breach of commons legislation, for example s.38 Commons Act 2006 where restricted works that require consent are carried out on common land, the Act enables any person to make an application to the County Court to rectify the situation. Farmers' unions may also be able to assist.

**Question 4: Have the Government given any consideration to how it might be able to safeguard graziers' rights over common land when Lord of the Manor titles are purchased on the open market?**

Common land and graziers rights are already protected in law. If a Lord of the Manor is not acting within their legal rights and is preventing the commoners from exercising their rights, the way in which they are breaching them would determine the next steps. For example, incidents of criminal behaviour are a police matter. If it is a civil matter, they could take the case to court. Again, a farmers' union could support them with this.

**Question 5: Has this issue been considered as part of the development of the SFS?**

How landowners and those with commons rights can access funding has been fully considered during the development of the SFS and the revised Scheme Outline published last November provides the latest update on the development of the Scheme. If a Lord of the Manor or landowner are operating outside the law, this is a matter for legal action or, in the case of criminal behaviour, the police.

Yours sincerely,



**Huw Irranca-Davies AS/MS**

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: MA/HIDCC/0183/25

Andrew RT Davies MS  
Economy, Trade and Rural Affairs Committee Senedd  
Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN  
[SeneddEconomy@senedd.wales](mailto:SeneddEconomy@senedd.wales)

2 April 2025

Dear Andrew,

## **The Ivory Prohibitions (Exemptions) (Process and Procedure) (Amendment) Regulations 2025**

I wish to inform the Committee of my intention to give consent to the Defra Minister for Animal Welfare and Biosecurity, Baroness Hayman of Ullock to make the 'Ivory Prohibitions (Exemptions) (Process and Procedure) (Amendment) Regulations 2025' ("the 2025 SI"). Please be aware that, at the time of writing, my officials had not received a final version of the instrument.

The 2025 SI is being made to amend Schedule 1 (Prescribed Institutions) to the 'Ivory Prohibitions (Exemptions) (Process and Procedure) Regulations 2022' (S.I. 2022/94) ("the 2022 SI").

The 2025 SI will add three additional names to the list of institutions which possess the necessary knowledge and expertise to provide the Secretary of State with advice on applications for exemption certificates under Section 2 to the Ivory Act 2018 ("the Act"). These are:

- National Museums and Galleries on Merseyside;
- National Museums and Galleries of Northern Ireland; and
- National Museum of Wales.

The overarching purpose of the Act is to prohibit commercial activities concerning ivory in the UK, and the import and re-export of ivory for commercial purposes to and from the UK.

The Act prohibits dealing in items made of, or containing, ivory, with limited exemptions for dealing in ivory items that do not contribute directly or indirectly to the ongoing poaching of ivory species. Section 2 of the Act provides for an exemption for "pre-1918 ivory items of outstandingly high artistic, cultural or historical value".

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

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CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I am pleased that a Welsh museum is being added to the list of 'Prescribed Institutions'. Wales has a rich cultural heritage and by recognising the expertise within the National Museum of Wales, the SI affords improved access to assessors for the people of Wales.

I would like to reassure this Committee it is normally the policy of the Welsh Government to legislate for Wales in matters of devolved competence. However, in certain circumstances there are benefits in working collaboratively with the UK Government where there is a clear rationale for doing so. The UK has had a uniform approach to this policy for many years and continued alignment will result in a Welsh institution being added to the 'Prescribed Institutions' list. This will ensure owners and traders of ivory items that reside in Wales will be afforded the opportunity to have their items assessed in Wales, and potentially in the Welsh language. It is unclear whether this could happen without Welsh Ministers' consent.

Whilst a Welsh SI could achieve the same outcome, I am strongly of the view that the benefits of consenting to a UK SI significantly outweigh the risks. It is the most pragmatic approach to achieve consistent implementation of the agreed policy with no risk of deviation, both from a policy and timings perspective.

The Regulations will be laid before the UK Parliament on 23 April 2025 using the negative procedure.

I have also written to the Chairs of the Legislation, Justice and Constitution Committee, and the Culture, Communications, Welsh Language, Sport and International Relations Committee.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Huw Irranca-Davies', written in a cursive style.

**Huw Irranca-Davies AS/MS**

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Huw Irranca-Davies AS/MS  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros  
Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: MA/HIDCC/0183/25

Andrew RT Davies MS  
Economy, Trade and Rural Affairs Committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN  
[SeneddEconomy@senedd.wales](mailto:SeneddEconomy@senedd.wales)

24 April 2025

Dear Andrew,

Further to my letter of 2 April, I write to inform you that I have now given consent to the Secretary of State for Environment, Food and Rural Affairs to make the Ivory Prohibitions (Exemptions) (Process and Procedure) (Amendment) Regulations 2025.

The Regulations were laid before the UK Parliament on 23 April 2025 using the 'made negative' procedure. I have laid a Written Statement to update the Senedd which can be accessed here: [WS-LD17131 - Written Statement by the Welsh Government The Ivory Prohibitions \(Exemptions\) \(Process and Procedure\) \(Amendment\) Regulations 2025](#).

I have also written to the Chairs of the Legislation, Justice and Constitution Committee, and the Culture, Communications, Welsh Language, Sport and International Relations Committee.

Yours sincerely,

**Huw Irranca-Davies AS/MS**

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

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CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Vikki Howells MS

Minister for Further and Higher Education

3 April 2025

Dear Vikki,

### **Apprenticeship pathways inquiry**

You will be aware that the Committee is currently undertaking an inquiry into Apprenticeship pathways, with the Committee in particular considering:

- Pathways between apprenticeship levels: The extent to which there are challenges in mapping out career routes through the different apprenticeship levels, such as from a junior apprenticeship to a degree apprenticeship. Whether this is more difficult in some careers/sectors than others.
- Economy: The extent to which apprenticeship pathways support the needs of Welsh businesses and contribute to filling skills gaps in the Welsh economy.
- Employers: The engagement of employers in facilitating these pathways and attracting apprentices. Is specific support needed for micro, and small and medium enterprises (SMEs) to engage with the apprenticeship programme.
- Information about apprenticeships: Good practice between careers services, schools, colleges and employers in terms of promoting apprenticeships and the provision of meaningful work experience.
- Equity of support and access for learners: The extent to which apprenticeship pathways are made open to all young people in Wales and any barriers facing specific demographic groups or geographical areas.

- The Welsh Government's role: How policies support apprenticeship pathways and any barriers that need addressing in that regard. The role of the Welsh Government, Regional Skills Partnerships and other stakeholders in identifying and communicating economic and skills needs to inform apprenticeship frameworks and the delivery of qualifications.

As part of this inquiry, the Committee heard oral evidence from the Cabinet Secretary for Economy, Energy and Planning, and in written correspondence in follow up to this session requested, amongst other queries, an update on what progress has been made in developing a national strategy for vocational education and training. In a letter of 13 March 2025, the Minister for Culture, Skills and Social Partnership confirmed this was a matter for yourself, and had requested you write to update the Committee on this.

The Committee would therefore like to take the opportunity to welcome this update, and request this please be with us by 24 April 2025, in order for the Committee to consider your response at its next meeting. Members would also be interested to note any views you may have on any other area of the terms of reference for the inquiry, as detailed above, as you see fit.

I look forward to receiving your response.

Kind regards,

A handwritten signature in black ink that reads "Andrew RT Davies". The signature is written in a cursive style with some capital letters.

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English



Andrew RT Davies MS,  
Chair of Economy, Trade and Rural Affairs Committee

24 April 2025

Dear Andrew

Thank you for your letter dated 3 April outlining the scope of the ETRA Committee's inquiry into apprenticeship pathways.

I have had sight of the previous response that my colleague, Jack Sargeant the Minister for Culture, Skills and Social Partnership, sent to you on the 13 of March asking me to reply to one of the Committee's questions, and I am pleased to offer an update as detailed below.

**ETRA committee question:**

What progress has been made in developing a national strategy for vocational education and training?

**Progress update (April 2025):**

Taking forward the recommendations of both the Review of Vocational Qualifications and the Report on Transitions into Employment remains a key priority for Welsh Government. It is important to note that there are many co-dependencies associated with delivery of the recommendations and that the strategic relationship between Welsh Government, Qualifications Wales and Medr is of significant importance in this context.

Our aim in implementing the recommendations is to align with the wider participation agenda, including in relation to the 16-19 local curricula and work with Medr, Careers Wales, the UK Government and other stakeholders on skills priorities. Working with these partners, our ambition is to create clearer and more accessible pathways for all learners, whilst supporting them to access appropriate guidance and the learning that is the best fit for them.

A focus for us in 2025 is to identify the short, medium, and long-term actions required of Welsh Government and our partners to enable collaborative delivery of the recommendations – some of which have fairly significant lead times for example the introduction of VCSE's, which will be available for first teaching from September 2027.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

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CF99 1SN

[Gohebiaeth.Vikki.Howells@llyw.cymru](mailto:Gohebiaeth.Vikki.Howells@llyw.cymru)  
[Correspondence.Vikki.Howells@gov.wales](mailto:Correspondence.Vikki.Howells@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

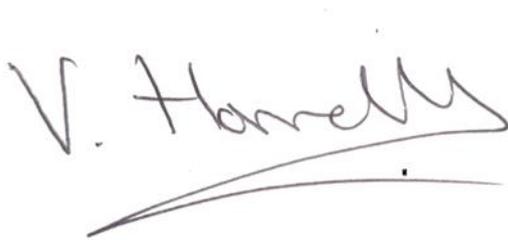
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Action is already underway on many of the qualification-specific recommendations in the Vocational Qualifications Review, being progressed by Qualifications Wales and Medr, in partnership with Welsh Government. Examples include the expansion of sector review stakeholder group membership (recommendation 6), the scrutiny of sector review findings at Board level (recommendation 7), and the development of VCSE's (recommendation 22). Qualifications Wales has also published a [progress report](#) (Sept 2024) on their targeted approach for increasing the number of Welsh medium qualifications available to learners (recommendations 19 and 20).

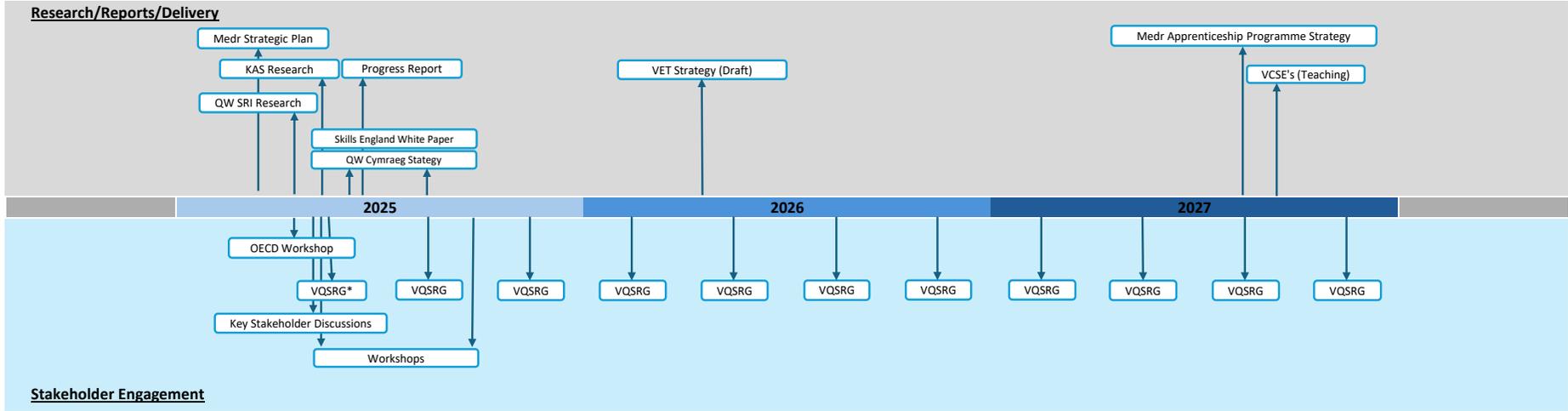
I am attaching a draft delivery plan for the implementation of the recommendations to give the Committee a sense of the scope and scale of the programme, as well as a sense of timeframe for delivery. You will see in the plan there are indicative timings for the development of a Vocational Education and Training (VET) Strategy. My officials are exploring with key partners (including Medr, Colegau Cymru, Qualifications Wales, and Universities Wales) the scope to co-produce the strategy within this indicative timeframe. Wider stakeholder engagement will follow, and it should be noted that these discussions might impact the indicative timeframe described above. I will keep the Committee informed of any changes.

As you will be aware, many of the recommendations link to the wider skills agenda, and I will continue to work closely with my Ministerial colleagues, and across Welsh Government, Wales and the UK, to align our policy aims where appropriate.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'V. Howells', with a long, sweeping underline stroke.

**Vikki Howells AS/MS**  
**Y Gweinidog Addysg Bellach ac Uwch**  
**Minister for Further and Higher Education**



\*Vocational Qualifications Stakeholder Reference Group

# Agenda Item 3.10

## ALL-PARTY PARLIAMENTARY GROUP on MODERN LANGUAGES



Chair: Tonia Antoniazzi MP (Lab); Co-Chair: Baroness Coussins (CB);  
Vice-Chairs: Darren Paffey MP (Lab); Lord Dykes (CB); Lord Sherbourne of Didsbury (Con).

3 April 2025

To:  
Andrew RT Davies, Chair, Economy, Trade, and Rural Affairs Committee

CC:  
Wendy Larnar, Vice Chancellor, Cardiff University  
Damian Walford-Davies, Deputy Vice Chancellor, Cardiff University  
Pat Younge, Chair of Council, Cardiff University  
Vikki Howells, Minister for Further and Higher Education, Welsh Government  
Baroness Smith of Malvern, Minister of State (Minister for Skills) and Government spokesperson for Equalities, Department for Education  
Heledd Fychan, Chair, Wales International Cross-Party Group  
Alex Barros-Curtis, MP for Cardiff West  
Stephen Doughty, MP for Cardiff South and Penarth  
Anna McMorris, MP for Cardiff North  
Jo Stevens, MP for Cardiff East

Dear Mr Davies,

### **Request for economic impact assessment of proposed closures in languages and cultures at Cardiff University**

**The All-Party Parliamentary Group on Languages is alarmed that Cardiff University is proposing to close degrees in languages and cultures at Cardiff University.**

**We wish to bring your attention to this matter (7 February letter attached).**

**What impact assessment has been made of the economic effects in Cardiff and across Wales of closing such significant provision of languages study?**

For example, Cardiff University is the largest provider of modern languages degrees in Wales, accounting for over 60 per cent of all undergraduate intake. This would make access to languages within Wales difficult for many – forcing linguists to leave Wales for their degree; reducing the number of trainee languages teachers available to Welsh schools; and risking the loss of Wales-based graduates who decide not to return as a result.

Cardiff University is a regular recipient of funds from the Turing Scheme and the Welsh Government's Taith Scheme, both of which fund international mobilities and (in the case of Taith) reciprocal international exchanges, which brings overseas students and others to Wales.

We note for example that Taith has funded five 'planned projects'<sup>1</sup> at Cardiff University from 2022-2024, funding 1,311 individuals to a total of £2,829,518. How many of these mobilities would be affected by these closures and what would be the financial impact?

The closures could furthermore complicate regional inequalities in economic opportunity.

We would be grateful if you could provide reassurance that full economic impact assessment has been made of the proposals, across a full range of criteria, including those above, and provide details of any such impact assessment.

Best wishes,

Tonia Antoniazzi MP, Chair

Baroness Jean Coussins, Co-Chair

All-Party Parliamentary Group on Modern Languages  
APPG Secretariat: [APPGML@ciol.org.uk](mailto:APPGML@ciol.org.uk)

<sup>1</sup> <https://www.taith.wales/impact/planned-projects/>

## ALL-PARTY PARLIAMENTARY GROUP on MODERN LANGUAGES

Chair: Tonia Antoniazzi MP (Lab); Co-Chair: Baroness Coussins (CB);  
Vice-Chairs: Darren Paffey MP (Lab); Lord Dykes (CB); Lord Sherbourne of Didsbury (Con).



7 February 2025

To:

Wendy Lerner, Vice Chancellor, Cardiff University  
Damian Walford-Davies, Deputy Vice Chancellor, Cardiff University  
Pat Younge, Chair of Council, Cardiff University

CC:

Vikki Howells, Minister for Further and Higher Education, Welsh Government  
Baroness Smith of Malvern, Minister of State (Minister for Skills) and Government spokesperson for Equalities,  
Department for Education

Dear Wendy, Damian and Pat,

### **Call to secure the future provision of languages and cultures at Cardiff University**

**The All-Party Parliamentary Group on Languages urges Cardiff University to declare an immediate pause in the current proposals for the closure of degrees in languages and cultures at Cardiff University.**

**Proposals have caused great concern across the UK.**

**It is clear that the closure of honours degrees in languages, cultures and societies cannot be seen as a strictly internal matter, but will have strategic consequences affecting language provision and leadership in Wales and indeed the UK.**

**We urge decision makers to pause, take a wider view and commit to maintaining provision, working with staff and stakeholders to find ways forward.**

The APPG is concerned that proposals will harm the reputation of Cardiff University and reflect badly on Wales and the UK more widely.

Colleagues at Cardiff University have led, and continue to lead on, nationally important work for languages, resulting in Cardiff University's enjoying a well-deserved reputation for leadership on language policy in Wales, influence on national policy, and pioneering student mentoring programmes which are influencing the whole country.

Cardiff University is the largest provider of modern languages degrees in Wales, accounting for over 60 per cent of all undergraduate intake. The impact of cuts would therefore be of national and strategic importance. It would make access to languages within Wales difficult for many – forcing linguists to leave Wales for their degree; and reduce the number of trainee languages teachers available to Welsh schools.

We note that the proposed cuts were raised in the Senedd as a matter of national urgency on February 5<sup>th</sup>, and urge all relevant parties to respond and find solutions.

It is short-sighted to lose linguistic and cultural expertise as the country's future requirements for diplomacy, security, diversified trade and exports will become more complex.

Post-Brexit, as the UK navigates new relationships and trade with the European Union and the rest of the world, including international university partnerships and preparing young people for the agile, skilled careers of the future, we will need universities to lead in providing the necessary skills and opportunities.

We urge Cardiff University to commit to be part of that future.

Tonia Antoniazzi MP  
Chair

Baroness Jean Coussins  
Co-Chair

All-Party Parliamentary Group on Modern Languages  
APPG Secretariat: [APPGML@ciol.org.uk](mailto:APPGML@ciol.org.uk)



Llywodraeth Cymru  
Welsh Government

Our ref: RE/PO/160/2025

Mike Hedges MS  
Chair  
Legislation, Justice and Constitution Committee  
Welsh Parliament  
Cardiff Bay  
CF99 1SN  
[SeneddLJC@senedd.wales](mailto:SeneddLJC@senedd.wales)

09 April 2025

Dear Mike,

I am writing in accordance with the inter-institutional relations agreement to notify you that the Tourism Inter-Ministerial Group (IMG) will meet on 7 May 2025.

This will be the first meeting of the IMG since the publication of the Review of Intergovernmental Relations in January 2022 and will be chaired by the UK Government Minister of State for Creative Industries, Arts and Tourism, Chris Bryant MP. I will represent Welsh Government at this virtual meeting.

I anticipate the meeting will provide an opportunity to discuss the UK Government's plan to increase international tourism, and updates from all four governments in relation to activity and issues in their respective areas.

I have copied this letter to the Chairs of the Finance Committee, the Economy, Trade and Rural Affairs Committee, and the Culture, Communications, Welsh Language, Sport, and International Relations Committee.

Yours sincerely,

**Rebecca Evans AS/MS**  
Cabinet Secretary for Economy, Energy and Planning  
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

[Correspondence.Rebecca.Evans@gov.wales](mailto:Correspondence.Rebecca.Evans@gov.wales)  
[Gohebiaeth.Rebecca.Evans@llyw.cymru](mailto:Gohebiaeth.Rebecca.Evans@llyw.cymru)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

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The Rt Hon Steve Reed OBE MP  
Secretary of State for Environment, Food and Rural  
Affairs  
Department for Environment, Food and Rural Affairs

10 April 2025

Dear Secretary of State,

### **UK's agri-food and drink attachés**

As part of its remit, the Economy, Trade and Rural Affairs Committee takes a great interest in work taking place affecting the Welsh agricultural and food sectors. With this in mind, the Committee is keen to understand the work undertaken by the UK Government's agri-food and drink attachés working in UK Embassies, and how they support the Welsh agri-food sector.

We understand the role of the attachés is, in part, to identify emerging international markets and access demand worldwide for goods from UK farmers and producers. Please could you provide an update on their work in relation to Wales including information on how Welsh agriculture and produce is being promoted, if any specific actions or initiatives can be identified. We would also be interested to hear about how the attachés work with Welsh Government officials in countries where they are co-located.

I appreciate your attention to this matter and look forward to your response.

Kind regards,



Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English



Andrew RT Davies MS,  
Chair of the Economy, Trade and Rural Affairs Committee

11 April 2025

Dear Andrew,

Please find below additional information on what's been done over the past three to four years in terms of progress made on freight and logistics that was requested following the ETRA Committee on 06 March.

The Covid pandemic, rising inflation, energy, fuel and labour costs highlighted more than ever the role that freight and the logistics industry plays in supporting the Welsh economy and in peoples' everyday lives. The Welsh Government has made positive strides in focussing more strategically on freight and logistics within this Government term.

The North Wales Transport Commission ensured that freight was central to the work and examined origin and destination data to understand freight movement patterns in the region. The report has clear recommendations on freight and logistics.

Following the publication of the Roads Review Panel's 'The future of road investment in Wales's on February 14th, 2023, the remit of the North Wales Transport Commission was extended to consider how the connections to and from Ynys Môn could be made more resilient. Considerations were made in the context of the Menai Suspension Bridge commenced in 2023, and recurrent incidents and bad weather events that affect the crossings.

In July 2021 the Holyhead Road King Truckstop (third party operated) closed and the land was sold to HMRC to house their Inland Border Facility. Holyhead Port is the 2<sup>nd</sup> largest roll-on/roll-off ferry port in the U.K. and facilitates the movement of a large volume of HGV's every day. Consequently, a parking facility was still required, and the Welsh Government opened a temporary HGV parking facility on a non-prejudice basis. Since opening the facility has been used extensively and is full most nights. This facility is a secure area which reduces theft in the region, it is also equipped with basic welfare facilities (toilet and showers).

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0300 0604400

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[Gohebiaeth.Ken.Skates@llyw.cymru](mailto:Gohebiaeth.Ken.Skates@llyw.cymru)  
[Correspondence.Ken.Skates@gov.wales](mailto:Correspondence.Ken.Skates@gov.wales)

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We completed the £30m A55 Aber to Tai'r Meibion Improvement in April 2023 which improved safety and resilience against flooding along a stretch of 1.2km on the A55. We also completed the £46m A487 New Dyfi Bridge in February 2024 which also improved resilience against flooding and safety. Both schemes improve journey reliability for freight along these key east - west route in north Wales and north - south route in mid Wales. In south west Wales, we'll be opening the £60m A40 Llanddewi Velfrey to Redstone Cross Improvements in early May which will improve safety, journey times and access to the Haven Enterprise Zone, ports at Fishguard, Milford Haven and Pembroke Dock, and the county town of Haverfordwest.

We're also in the final stages of completing the 28-mile upgrade to the A465 heads of the valleys road designed to bring prosperity to one of the UK's most deprived areas. The £590m final section from Dowlais to Hirwaun is due to open this summer and will make it easier for local people and businesses to get around and create a resilient alternative route between the Midlands and south-west Wales, easing pressure on the often-congested M4 at Newport.

This upgrade isn't just about moving people and goods, but it also about generating jobs, prosperity, opportunities and better connecting and benefiting communities across the region supporting inward investment to areas like the Ebbw Vale Enterprise Zone. We are continuing to improve the resilience of the strategic road network including the replacement of the River Dee Bridge in North East Wales and developing options to improve the resilience of the bridges across the Menai Strait in North West Wales.

We have also developed a Major Asset Renewals programme to address key structures that require significant repairs or replacement – this will ensure the strategic road network remains resilient and open for the movement of goods and services. Regional Transport Plans are now out to consultation and freight and logistics will play a prominent role within those.

Policy officials meet with industry on a regular basis via Logistics UK and Road Haulage Association. These include roundtable events with Cabinet Secretaries and formal Senedd receptions. We also ensure we are aware of others who represent the industry and publish articles such as Chartered Institute of Logistics and Transport. There is a commitment within Llwybr Newydd to develop a freight and logistics plan and we are looking at what actions are realistically deliverable by the end of this government term setting a pathway for any new incoming government to refresh the plan in 2026, with five further years of deliverables.

Zemo Partnership was commissioned by the Welsh Government to assess the policy options to decarbonise the commercial vehicle (CV) sector in Wales utilising the main technology pathways. The report was launched on 21 March. The long-term primary pathway to decarbonising the commercial vehicle sector will be electrification. However, this will take time and there are types of operation where electrification may not currently be a viable option. Therefore, to maximise the decarbonisation of commercial vehicles in Wales, all pathways must be adopted in parallel. Welsh Government will now consider the report and respond.

The Welsh Government's ReAct+ programme is designed to help people who have been impacted by redundancy to acquire the skills that recruiting employers are looking for. The programme can provide a vocational training grant of up to £1500 and can support people to gain LGV licences, the driver CPC qualification and complementary qualifications such as HIAB and ADR. The programme can also fund refresher training for lorry drivers who wish to re-enter the sector. ReAct+ can also support ex-offenders or offenders who are serving community sentences, and we are planning pilot programmes to help serving prisoners who are due for release to complete the LGV theory test so that they can undertake the practical training and test soon after they are released from custody. ReAct+ and its predecessor programmes have funded well over 1,000 people to gain HGV/LGV licences.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ken Skates', with a large, stylized flourish at the end.

**Ken Skates AS/MS**

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru  
Cabinet Secretary for Transport and North Wales



22 April 2025

Dear Chair of the Economy, Trade and Rural Affairs Committee

Please find below detailed an explanation of the regulatory regimes for ports that are in place including an outline of how the different regulatory regimes in the UK Government operate that was requested following the ETRA Committee on 06 March.

### **Reserved to UK Government**

Most of the regulatory regimes for Ports are reserved to UK Government. Under the Health and Safety at Work etc Act 1974 (HSW Act), employers, people in control of premises, the self-employed and employees must ensure the health and safety of others and themselves. There are also regulations that apply to all industries because many of the hazards will be the same. But some industries do have specific pieces of legislation. In the port industry, these include:

- the Docks Regulations 1988; 2 of 11 pages Health and Safety Executive A quick guide to health and safety in ports
- the Dangerous Substances in Harbour Areas Regulations 1987; and
- the Loading and Unloading of Fishing Vessels Regulations 1988.

The Approved Code of Practice Safety in Docks (COP25) covers the Docks Regulations 1988 but much of that material has been repealed and replaced by more recent legislation. The HSW Act and associated regulations do not apply to seamen working onboard ship under the control of the ship's master. Comparable Merchant Shipping Health and Safety Regulations do apply to ships' crew and are enforced by the Maritime and Coastguard Agency (MCA).

There are also regulations that apply to all industries because many of the hazards will be the same regardless of the industry involved. But some industries do have specific pieces of legislation. In the port industry, these include:

- [Duties under the Dangerous Goods in Harbour Areas Regulations 2016 \(DGHAR\)](#)

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[Correspondence.Ken.Skates@gov.wales](mailto:Correspondence.Ken.Skates@gov.wales)

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- [The Loading and Unloading of Fishing Vessels Regulations 1988](#).

The Docks Regulations 1988 were in force until 6th April 2014. The old ACOP 'Safety in Docks' (COP25) was withdrawn at the same time and replaced by a new [Safety in Docks ACOP \(L148\)](#)

Marine Accident Investigation Branch (MAIB) is a UK Government organisation, specifically an independent unit within the Department for Transport. They are responsible for:

- carrying out investigations to determine the causes of accidents at sea
- publishing reports that include MAIB recommendations on improving safety at sea and the actions we've taken
- increasing awareness of how marine accidents happen
- improving national and international co-operation in marine accident investigations
- The British Ports Association has mapped some of the most important pieces of legislation and regulation that affect ports, but this does emphasise the complex nature of regulations that face the operation of Ports. [Mapping Port Regulation - British Ports Association](#).

## **Port Health Authorities**

Port Health Authorities (PHAs) are constituted with the primary objective of preventing the introduction into the country of dangerous epidemic, contagious and infectious diseases and ensuring the wholesomeness of imported food.

A PHA is a specially created local authority specific to an air or sea port, which cuts across existing council boundaries which have a common purpose in dealing with a port – i.e. duties under the International Health Regulations. The PHA will absorb delegated statutory functions from each Local Authority which it cuts across in relation to these activities. In many areas across Wales, the Local Authority discharges port health border functions without setting up a PHA. This is common in Scotland. It is also worth noting that Ynys Mon hasn't set up a PHA.

The Association of Port Health Authorities is the only UK wide organisation representing the interests of Local Authorities and Port Health Authorities with responsibilities for health controls at sea and airports. It is a formally constituted company which represents almost all employers of port health teams. It sits outside the Welsh Local Government Association but liaises with central government on behalf of ports of entry.

Further details of their roles can be found here; [The Association of Port Health Authorities |](#)

## **Home Office / Border Force**

Border Force is the part of the Home Office responsible for securing the UK border 24 hours a day, 365 days a year by enforcing immigration and customs regulations.

[Border Force - GOV.UK](#)

## **Borders Control Posts**

New processes for safety and security controls (applying to all imports), and sanitary and phytosanitary controls (applying to imports of live animals, animal products, plants and plants products and high-risk food and feed not of animal origin) were published in the UK

Government's Border Target Operating Model in August 2023. These changes are now being phased in.

31 January 2024 saw the introduction of import pre-notification for Products of Animal Origin (POAO) and Export Health Certificates on imports of medium-risk animal products, plants, plant products and high-risk food and feed of non-animal origin from the EU, other than Qualifying Northern Ireland Goods. Further details can be found [here](#).

[Post EU-exit border controls and infrastructure | GOV.WALES](#)

## **The Employment Rights Bill / the Seafarers' Wages Act 2023**

The Employment Right Bill amends the Seafarers' Wages Act 2023 to give the Secretary of State power to make regulations specifying the wages and working conditions of seafarers working on ships providing services currently covered by that Act. Those conditions are enforceable in the same way as existing provisions of that Act.

### **Devolved**

#### **Harbour Revision Orders HROs**

The Harbours Act 1964 ("HA 1964") gives powers to the Welsh Ministers to extend and/or amend the powers and duties of a SHA, close a harbour or create a new harbour along with the SHA which will assume responsibility for it. These powers are exercised via harbour orders ("HO"), a form of subordinate legislation which can take various forms. HOs may be made upon application by a SHA, a petitioner seeking an empowerment order, or in some cases the appropriate Minister acting on their own initiative.

HOs can broadly be categorised into two types, 'works' orders are those which seek to build or develop a part, or whole, of a harbour. Applications which do not include such projects are for 'non-works' orders. The application process for the two types varies.

#### **Harbour Dues**

The Wales Act 2017 provides that in Wales, the controlling authority for most ports and harbours is the Welsh Ministers (the exception being reserved trust ports). Under the Harbours Act 1964 ("HA 1964"), statutory harbour authorities ("SHAs"), have the power to impose "harbour dues on users of the harbour". The term "harbour dues" encompasses, "ship, passenger and goods dues". These harbour dues are charges, which section 57 of the HA 1964 defines as including "fares, rates, tolls and dues of every description".

Namely those charges are associated with:

- ships entering, using, or leaving the harbour.
- passengers embarking or disembarking at the harbour; and
- goods.

but not charges levied for the use of ancillary facilities at the harbour or port in question provided for passengers or goods.

#### **Right of objection**

Section 31 (1) provides a right of objection to "ship, passenger and goods dues". Section 31 (2)(a) allows a person or representative body with substantial interest, to object to charges by putting the objection in writing to the Secretary of State ("SoS"). Written objection to a charge can be made on various grounds.

Further information can be found the Welsh Government website; [Ports and harbours | Sub-topic | GOV.WALES](#)

## **Planning and Consenting**

Wales currently has three tiers of consenting processes for most infrastructure projects (there are some exceptions):

Smaller projects are decided by local planning authorities.

Larger projects, where consenting is devolved, are decided by the Welsh Government through the Developments of National Significance (DNS) process; and

Larger projects, where consenting is not devolved, are decided by the UK Government through the Nationally Significant Infrastructure Projects (NSIP) process.

The Infrastructure (Wales) Act will establish a new consenting process for major infrastructure projects in Wales, including significant energy, waste, water and transport, projects. This bill will streamline the decision-making process, helping to support port investment and development, to ensure that our ports are ready to take advantage of opportunities such as offshore wind projects.

Further information on planning can be found here.

[Building and planning | Topic | GOV.WALES](#)

## **Marine Licences**

Many activities that take place in and around the sea need a marine licence. Natural Resources Wales is responsible for marine licensing in Welsh waters. Further background can be found here.

[Natural Resources Wales / Marine licensing](#)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ken', enclosed in a thin black rectangular border.

## **Ken Skates AS/MS**

Ysgrifennydd y Cabinet dros Drafnidiaeth a Gogledd Cymru  
Cabinet Secretary for Transport and North Wales

Huw Irranca-Davies AS/MS  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros  
Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs

Ein cyf/Our ref: PO/HIDCC/0188/25

Mike Hedges MS  
Chair  
Legislation, Justice and Constitution Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

22 April 2025

Dear Mike,

I am writing in accordance with the inter-institutional relations agreement, and further to my letter of 26 March, to draw to your attention a [Written Ministerial Statement](#) summarising discussions at the most recent meeting of the Inter-Ministerial Standing Committee ('IMSC').

I have copied this letter to the Chairs of the Finance Committee, the Economy, Trade and Rural Affairs Committee, the Culture, Communications, Welsh Language, Sport, and International Relations Committee and the Health and Social Care Committee.

Yours sincerely,



**Huw Irranca-Davies AS/MS**  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd  
a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

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# Agenda Item 6

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# Agenda Item 7

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# Agenda Item 8

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# Agenda Item 9

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Chair, Children, Young People, and Education Committee  
Chair, Climate Change, Environment, and Infrastructure Committee  
Chair, Culture, Communications, Welsh Language, Sport, and International Relations Committee  
Chair, Economy, Trade, and Rural Affairs Committee  
Chair, Equality and Social Justice Committee  
Chair, Health and Social Care Committee  
Chair, Legislation, Justice and Constitution Committee  
Chair, Local Government and Housing Committee  
Chair, Chair's Forum

1 April 2025

Dear Committee Chairs,

### Scrutiny of the Draft Budget 2025-26: Evidence provided by the Welsh Government

In our [report](#) on the scrutiny of the [Welsh Government Draft Budget 2025-26](#), we made several recommendations relating to budget presentation improvements. We also agreed to consult Committees on the documentation provided by the Welsh Government alongside its Draft Budget proposals, concluding that:

*"Conclusion 1. The Committee will consult Senedd committees involved in budget scrutiny ahead of the Welsh Spending Review and the 2026-27 budget round to explore ways to maximise budgetary scrutiny in the Senedd, in order to mitigate the impact of a curtailed scrutiny window."*

As a result, in reflecting on this year's budget scrutiny experience and in seeking improvements to the budget documentation provided by the Welsh Government at the 2026-27 Draft Budget and beyond, I would be grateful for the views of your committee in response to the following questions:

- What improvements would you like to see in the Welsh Government's Draft Budget documentation and subsequent ministerial written evidence? Please make reference to the

timeliness, quality and usefulness of any documentation and/or evidence received in your response.

- Given the UK Spending Review, which is due to be published on 11 June 2025, will provide indicative funding for the Welsh Government future years, do you have any views on information you would require regarding a subsequent Welsh Spending Review, either along with budget documentation or as a separate exercise?

We would appreciate responses by **Friday 23 May 2025**. Your views will then be collated and fed back to the Cabinet Secretary for Finance and Welsh Language, for his consideration in advance of the Budget Priorities 2026-27 Plenary debate that will be led by the Finance Committee and take place before summer recess.

Yours sincerely,



Peredur Owen Griffiths MS  
Chair, Finance Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

