



The Landworkers' Alliance (LWA) is a grassroots union of farmers, growers, foresters and land-based workers with a mission to improve the livelihoods of our members and create a better food system for everyone. We have over 1000 small, medium, community, and family farms and prospective new entrants across the UK and LWA Cymru represents around 200 in Wales.

Our members are small business owners and workers, who practice, or are seeking opportunities to work in, agroecological farming and sustainable forestry. Their markets are largely local, using short supply chains, keeping money in local rural communities. The practices they use are already achieving many of the goals that Welsh Government seeks to achieve with its new Sustainable Farming Scheme such as improving biodiversity and sequestering carbon, whilst producing food and generating local employment. As practitioners of sustainable agriculture and forestry our members have a valuable insight into what needs to change if Wales is to meet the challenges of tackling the climate and biodiversity crises, whilst providing food and maintaining resilient rural communities. Many have offered to share their knowledge, experience and challenges with committee members either in a meeting or through hosting farm and woodland visits. Please contact on 07737970229 or [holly.tomlinson@landworkersalliance.org.uk](mailto:holly.tomlinson@landworkersalliance.org.uk) to arrange this.

### Response to Ministers' Letter on Welsh Government Priorities Regarding Climate Change

We are concerned that neither agriculture nor the wider food system is included within the Welsh Government's priorities with respect to Climate Change. Agriculture alone is responsible for 16% of Wales' total greenhouse gas emissions and is a key driver of biodiversity loss. When the broader food system including transportation, refrigeration, processing packaging and retail is accounted for, the proportion is higher still with 30% of global emissions due to the food system. How we produce, process, trade, transport, sell and consume food is of critical importance to the climate and ecological emergencies.

The food system as a whole is not the responsibility of any minister or department, despite how we feed ourselves being perhaps the most fundamental question for any society. Its cross departmental relevance means it should be considered by all departments and Senedd committees, not least Climate Change. We understand that the Minister for Rural Affairs is responsible for agricultural policy; however, given the relevance of agriculture to climate and biodiversity and the crossovers with forestry and flood management, it must also be a priority for both the Climate Change Ministers and this committee. If not, there is a danger of siloed and incoherent policy making from Welsh Government as a whole.

### Wales' resilience & the need to expand edible horticulture

Within Wales there is a deficit in fruit & vegetable production compared to what consumers currently buy, which itself is well below health recommendations. Addressing this is essential for both improving our resilience to climate change, and reducing the impact that our food consumption has on greenhouse gas emissions. The UK overall produces just 57% of the vegetables and 16% of the fruit we consume. In Wales just 0.1% of agricultural land is currently used for fruit & vegetable production. This reliance on imports makes us more vulnerable to supply chain shocks. The current lorry driver shortage is just one example of this, but with many of our fruit & vegetables coming from climate change vulnerable countries, we risk many more. Research by Dr Amber Wheeler has found that if just 2% of Welsh agricultural land were used to produce fruit & vegetables, it would be possible to produce all of Wales' population's "5 a day" needs. Lack of access to land, housing and capital, and planning constraints are all barriers to horticulture farm establishment and expansion. Addressing these barriers should be a priority for both the Ministers and the committee.

### The Sustainable Farming Scheme

The new agricultural support system must be a priority for both the Ministers and the Committee. Whilst LWA Cymru would like more ambition with respect to food production and support for social and health benefits farms can provide, we support plans to move the basis for financial support to environmental benefits and away from land ownership.

However, we are concerned that farms below 5 hectares may be excluded. Research by LWA and Coventry University<sup>ii</sup> found that small diverse farms often deliver more environmental, social and economic benefits per unit area compared to larger farms. They must therefore be included both in their own right and as part of landscape, wildlife corridor or catchment wide projects. As an alternative eligibility threshold, we propose Farming Connect's criteria<sup>iii</sup> of 550 hours worked per year. **We urge the committee to ensure that the new scheme enables participation by small farms (<5ha).** Please see enclosed our response to the Agriculture White Paper for more of our position on Welsh Government's plans.

### A Bold Community Food Strategy

The Programme for Government includes a commitment to developing a Community Food Strategy. This presents a huge opportunity for transformative change to increase our food security, ensure farmers have access to secure local markets; build local community resilience and tackle climate change. However, without sufficient ambition, this will not be realised. **The Committee should prioritise scrutiny of the Community Food Strategy, to ensure that it has ambitious plans such as:**

**Prioritising climate & nature friendly farming:** The Community Food Strategy should include education and financial support to help farmers and community groups produce food in ways that help sequester carbon and enhance biodiversity. We refer you to The LWA's publication, *Food, Farming, and the Climate Crisis: How we can feed people and cool the planet*<sup>iv</sup> for details of specific measures that should be pursued.

**Targeted local public sector procurement:** hospitals, schools and other public bodies could provide a secure market for local Welsh produce at a time when Welsh livestock farmers face threats from new imports produced to lower standards; increased challenges exporting to the EU. The Committee should look to Preston's<sup>v</sup> Community wealth building, Copenhagen's<sup>vi</sup> success with local organic procurement and the findings of the Foundational Economy Carmarthenshire pilot, to see how procurement can achieve public policy aims and support local businesses.

**Supporting Community Supported Agriculture (CSA) schemes:** CSAs are a partnership between farmers and local communities, where risk is shared. They give farmers a guaranteed local market and many customers, who become members also get involved in growing. Several market gardens, such as Cae Tan in the Gower and Caerhys Organic Community Agriculture near St David's, have been set up using the CSA model. However, access to land and capital hold back more CSAs from being established and the Committee should explore how a bold community food strategy could address this.

**Engaging local communities and councils:** the strategy should combine national strategic direction with bottom up community engagement. Community kitchens and food groups, community and town councils and other public bodies should be a part of this process. The Sustainable Food Places network provides a good model for this.

**Includes land allocation:** to be successful, land must be available to meet the demands of food growing for the community food strategy. Where there is public land available that could meet this, it should be allocated to community food growing as a priority and planning policy should facilitate rather than obstruct this.

**Based in agroecology:** agroecology is a wholistic approach to farming and food systems which works with nature, whilst prioritising worker and community empowerment. The FAO's 10 Elements of Agroecology<sup>vii</sup> provide an excellent basis for a community food strategy. These include Diversity; Co-creation and sharing of knowledge; Synergies; Efficiency; Recycling; Resilience; Human and Social Values; Culture and Food Traditions; Responsible Governance; Circular and Solidarity Economy.

## Ensuring forestry benefits local communities

To help tackle the climate crisis, Wales must significantly increase tree cover with diverse well managed woodlands and agroforestry. Just 15% of Wales is currently forested and recent records on planting have been pitiful (just 80 hectares in 2017/18). Getting more trees in the ground is challenging and must be done with care with the right tree in the right place ensuring biodiversity, not monocultures. However, with enough support, working with farmers and land managers, tree cover in Wales could significantly increase. We welcome plans to increase tree planting, but it is essential that local communities can access woodlands and it does not lead to rural unemployment and depopulation.

New forests can create new jobs but only with the right policies. **The Committee should consider the potential impact of tree planting on rural communities and policies** to ensure they benefit. We propose support for new entrants into primary and secondary timber processing; investment in short timber supply chain infrastructure and using public procurement to support local timber processors. As with farming, planning policy should be reviewed to enable better forestry tied housing as well as permission for primary processing and storage on site. Please see our Forestry Manifesto<sup>viii</sup> for more details on how working woodlands can be supported.

## Agroforestry

It is disappointing that, like agriculture more generally, agroforestry is not mentioned in the Ministers' letter as it can play a crucial role in tackling climate change whilst enabling food production. Tree planting is integrated with farming, bringing multiple benefits such as shelter belts and flood management, whilst ensuring farming can continue. Trees can be used to provide additional products for sale as well as delivering public goods. Ways of supporting agroforestry include:

- Directly supporting the integration of trees and cropping as well as silvipasture;
- Supporting collaboration between farmers on the same land where multiple crops can be produced (e.g. orchards with grazing), including with demonstration farms and allowing for this in Sustainable Farming Scheme agreements; and
- Including agroforestry in the provision of specialist advice and knowledge transfer activity;
- Investment in the supply chain to develop markets for secondary products from trees.

## Scrutinising the impact carbon trading & offsets

Tree planting is crucial in tackling climate change and we welcome plans to increase forest cover. However, it should not be used to justify business as usual elsewhere. We are concerned about the impact of hedge funds and other others buying up Welsh land for tree planting to be used in carbon offsetting schemes from both a carbon accounting perspective, the danger of displacing food production and because of the potential impact on communities. We must be clear: where tree planting is simply offsetting

rights to pollute elsewhere, there will be no overall reduction in greenhouse gas emissions. Tree planting funded by offsets must not be counted in Wales' own net-zero targets as to do so would be to double count their carbon impact.

There is also a danger that, left to the free market, the location and types of trees planted will not be ecologically optimal. If they are grown on good agricultural land in a way that displaces food production, this could simply lead to food imports that have a higher carbon foot print.

We urge the committee to investigate offset payments in Welsh forestry and in particular look at:

1. The polluting practices and industries that such offsets justify.
2. The way in which carbon is accounted for and whether there is scope for double counting.
3. Whether and how additionality (that tree planting couldn't have happened without the offset payment) is assured.
4. Whether offset schemes are funding the plantations that have a low ecological value in unsuitable places.
5. The impact of offset schemes on food production and impact of it being displaced by imports.
6. The impact that offset schemes have on local communities.

## References

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<sup>i</sup> Wheeler, A. (2018) 'A New Food Diplomacy: Participatory Action Research Findings of a Food System Approach to Public Health Nutrition', PhD Thesis, Prifysgol De Cymru/University of South Wales, available at: [https://pure.southwales.ac.uk/files/5479834/Amber Wheeler PhD 1 .pdf](https://pure.southwales.ac.uk/files/5479834/Amber_Wheeler_PhD_1_.pdf)

<sup>ii</sup> Laughton, R. (2017) *A Matter of Scale: A study of the productivity, financial viability and multifunctional benefits of small farms (20 ha and less)*. Landworkers' Alliance and Centre for Agroecology, Coventry University available at: <https://landworkersalliance.org.uk/wp-content/uploads/2018/10/matterofscale.pdf>

<sup>iii</sup> Farming Connect *Eligibility Criteria* [https://businesswales.gov.wales/farmingconnect/sites/farmingconnect/files/documents/eligibility %20%281%29.pdf](https://businesswales.gov.wales/farmingconnect/sites/farmingconnect/files/documents/eligibility_%20%281%29.pdf)

<sup>iv</sup> The Landworkers' Alliance, 2019. *Food, Farming, and the Climate Crisis: How we can feed people and cool the planet*. <https://landworkersalliance.org.uk/wp-content/uploads/2019/07/Food-Farming-and-the-Climate-Crisis.pdf>

<sup>v</sup> Preston City Council (2021) *Community Wealth Building* <https://www.preston.gov.uk/article/1334/Community-Wealth-Building>

<sup>vi</sup> FAO (2018) *Copenhagen: Organic Conversion In Public Kitchens* <https://www.milanurbanfoodpolicypact.org/wp-content/uploads/2020/12/Brief-15-Copenhagen-2017.pdf>

<sup>vii</sup> Food & Agriculture Association of the United Nations (2018) *The 10 Elements of Agroecology Guiding The Transition To Sustainable Food And Agricultural Systems* <http://www.fao.org/3/I9037EN/i9037en.pdf>

<sup>viii</sup> The Landworkers' Alliance Woody Branch (2020) *Forestry Manifesto* <https://landworkersalliance.org.uk/wp-content/uploads/2020/07/Forestry-Manifesto-LWA-final.pdf>

## Agriculture (Wales) Bill

### Regulatory reform

1. What are your views on: (a) The proposed approach to the creation of the National Minimum Standards?(b) The need for flexibility to amend the National Minimum Standards where necessary? Are there any further considerations which are needed? Please provide comments to support your view e.g. potential benefits and impacts.

We support the consolidation of multiple different regulations into a single coherent piece of legislation. Having one place to look at for all regulations covering agriculture and the environment will make it much easier for farmers to know everything they need to comply with and reduce the risk of being unknowingly non-compliant.

NMS should improve enforcement by increasing clarity of rules and breaches for both regulators and neighbouring farms that might be negatively affected by a breach. We hope it will also enable better prioritisation of enforcement by the former and increase wider public knowledge of the standards farmers are held to.

However, the National Minimum Standards (NMS) need to go beyond a bureaucratic tidying up exercise. Many Welsh farmers are already demonstrating best practice, showing that it is possible to raise standards above current levels and still leave room for Sustainable Farming Scheme payments. We believe that over the next few years there must be a steady ratcheting up of standards, with the overall direction of travel set out clearly in advance.

There must be an inexorable drive towards farming that tackles rather than compounds the climate and ecological emergencies, whilst proactively supporting farmers to make the changes necessary. Welsh Government should take the opportunity to develop a rigorous sustainability criterion based on agroecology and progressively raise the bar. Some of the current standards date back over a decade, long before the climate emergency declaration. They should be reviewed in light of this and the 2020 State of Natural Resources Report.

Poor standards aren't just bad for the environment, they are also bad for neighbouring farms that are trying to do the right thing but suffer pollution on their land due to their neighbour's bad practice; are more vulnerable to livestock disease outbreaks because of conditions that others keep their animals in; or are out competed by those cutting corners.

Areas that are currently weak and need particular attention include:

- Soil health: Organic Matter (OM) levels are at the very heart of soil health, ecology and structure. Increasing OM in soils not only contributes to improving all these aspects, but has high potential to sequester carbon and therefore contribute to climate change mitigation. The NMS should therefore include an element of adding OM to the soil, for example minimum areas of fertility building leys in cropping systems, or a proportion of nutrients supplied from organic sources (manures/ composts).
- Tackling slurry and other pollution from intensive agriculture. Excess nitrogen leading to pollution is a serious problem in Wales, and it is clear that NRW have not had the resource to monitor or enforce compliance. The extension of the NVZ regulations present an opportunity to address the problems; however, they will be not be sufficient if there is not the capacity to ensure they are followed. While we acknowledge that the NVZ rules present significant challenges to some farmers in Wales, a situation where the nutrients imported as feed for permanently housed livestock, far outstrips the capacity of the farm to utilise those nutrients for production is unsustainable. It presents a serious risk to the environment, it is grossly inefficient in terms of nutrient usage and strips fertility from the systems from which the feed is sourced. A move towards short supply chains, more mixed farming and local food systems, as proposed in this bill will go a long way to redressing the balance, and urge the Welsh Government to focus its support for farmers needing to address this issue accordingly.

At the same time, it is important to recognise that many unsustainable practices such as intensive livestock farming was based on advice that is no longer consistent with the intentions of Welsh Government. Those that are locked into substantial investments based on such advice should receive dedicated financial, legal and other support for developing exit strategies.

We support the proposal that funding under the Sustainable Farming Scheme and Sustainable Land Management Scheme should be contingent on going above and beyond legal requirements.

We recognise the need for flexibility to amend the NMS in order to respond to new problems in the future.

The planning framework is not discussed in the White Paper; despite the relevance of this both to farmers' ability to diversify in ways that support sustainability, and as another means of preventing environmentally harmful new developments.

#### Intensive agriculture

We are very concerned about the increasing numbers of intensive housed livestock farms, particularly intensive poultry units and dairy farms. Such a high ratio of animals to space not only has serious animal welfare and disease implications, but also, significantly increases the risk of serious environmental accidents and ongoing cumulative pollution problems.

We would support maximum stock to land ratios as one means of tackling this problem.

We believe that the current planning regime which has allowed this many intensive poultry units to be developed and shown itself unfit for purpose, as evidenced by the high levels of eutrophication in Wales' rivers. Farmers, community groups and others have recently won judicial reviews on the consents for these, demonstrating there are reasons to be concerned about the processes that led to their approval. Wales is at a watershed moment in relation to IPU's and we are concerned about the potential for similar problems with pig and cattle units.

2. What are your views on: (a) How advice and guidance can effectively support farmers to understand the National Minimum Standards; and (b) The further considerations needed for advice and guidance? For example, what form guidance should take, who should provide it, the scope of guidance and how farm advisory services may support farmers. Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

Guidance should be bilingual and in straightforward language avoiding legal jargon and include examples of practical steps that can be taken to ensure compliance (making it clear where something is an example rather than a requirement).

Guidance should be available both in written form and verbally, when farmers need clarification. It should be provided by support services such as Farming Connect. If it is provided by NRW or other regulators, the advice function should be separate from the regulatory function so that farmers do not avoid seeking advice for fear of being found non-compliant.

Changes in standards should be widely advertised with as much advance notice as possible with advice on practical ways to comply.

It is often farmers themselves who are best placed to support each other in understanding and complying with regulations. Those that are already doing best practice should be supported to share their practices with others.

3. What are your views on the proposals for civil sanctions to enable proportionate enforcement of regulations? Are there any further considerations which are needed? Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

We support the use of civil sanctions. We believe that this will be more efficient and effective than relying solely on criminal sanctions and withholding payment. As civil courts are in principle focussed on remedying harm rather than punishment, we believe they are more appropriate for lower level agricultural and environmental non-compliance.

Both fixed and variable monetary penalties should be based on the cost of remedying the problem, but higher than the cost of compliance in the first place.

We particularly support the use of Enforcement Undertaking. Ensuring the problem has been remedied and making the person that caused the problem responsible for remedying it will be more relevant to the overall state of the environment or animal welfare than simply punishing the offender.

However, we would oppose a situation in which those who cause severe irreversible environmental damage, can respond by simply donating to an environmental cause. The exact circumstances of when prosecution would be warranted will need to be worked up; however, we believe that intentional action that leads to severe irreversible damage should result in criminal prosecution.

#### Prioritisation & funding

Good regulations and appropriate penalties will not be effective if enforcement is not properly funded or prioritised. Experience amongst our members is that currently many pollution events are ignored. For example, one member reported a neighbour causing severe river pollution incidents, resulting in many fish dying, 8 times. Most reports only led to letters and the worst the neighbour got was a £1,000 fine.

Regulators should take a risk-based approach to enforcement and focus on farms that are at particularly high levels of risk of highly damaging incidents based on history of pollution incidents, type of farming (eg. highly intensive livestock being particularly damaging and certified organic being lower risk) and size of farm.

There should also be provisions for safe reporting or whistle blowing by farm workers and members of the public.

## SLM - future support

4. What are your views on the proposed purposes for funding in support of the delivery of SLM? Are there other purposes which you feel should be considered? Please provide comments to support your view e.g. potential benefits and impacts.

#### OVERALL VIEW

We support the move to a system that rewards delivery of public goods and away from the current one that rewards land ownership and does little to encourage more sustainable practices. We strongly support funding being available for actions that lead to improved soils, clean air, clean water, improved biodiversity, carbon sequestration and emissions reduction.

We welcome the fact that Welsh Government is pursuing a payment on the basis of anticipated benefits rather than an on income foregone, which has been one of the problems with Glastir.

#### TRANSITION SUPPORT

These are challenging times for farmers and, whilst change is necessary, it is essential that Welsh Government work with farmers to ensure that they are supported to make the transition and that the scheme enables any farmer delivering the relevant public goods to benefit.

Eligibility should not be dependent on having a specific type of land in the first place: good soil health, biodiversity and carbon sequestration is possible on all types of farmland. It is also essential that the money should go to the people working on the land and delivering the benefits, rather than simply becoming a subsidy for passive land ownership by the back door.

## EXISTING GOOD PRACTICE

In addition to supporting those that need to transition, those that are already exhibiting good practice should also be supported.

## TRAINING

To ensure all current and future farmers can benefit, funding needs to be available for training in agroecological farming. This should include training for existing farmers that will need to change their practices; traineeships and apprenticeships for new entrants; a focus on agroecological farming at agricultural colleges and work with schools and colleges to engage young people and encourage more to consider pursuing a career in agroecological farming.

Farmers themselves are often the best placed people to teach other farmers and those already delivering best practice should be supported in training others.

For traineeships and apprenticeships, provision should be made so that these can be fully funded. On farm traineeships can be a hugely valuable learning experience for trainees and are an essential part of building the next generation of farmers; however, many small agroecological farms do not have the funds to pay decent salaries to trainees out of their own income. This means that traineeships may not be accessible for people with high financial commitments. Including funds for traineeships within the Agriculture Bill, would help ensure improved access.

## SMALL FARMS

Many of the most diverse and nature friendly farms in Wales are small scale. Indeed, Wales has only 204 commercial horticultural growers, but over 120 of these operate on holdings less than 5ha. It is essential that small farms are not left out of the scheme and the current 5ha minimum land area entry level should be abandoned. Indeed, there are good reasons to specifically target small farms:

Research with Coventry University found that small diverse farms often deliver more environmental, social and economic benefits per unit area compared to larger farms and many Landworkers' Alliance Cymru members across Wales are achieving multiple social and environmental outcomes in small areas. See <https://www.scholacampesina.org/wp-content/uploads/2018/10/A-Matter-of-Scale-Report-LWA-2017.pdf> for details.

A survey of holdings of <20 ha showed an average of 2.3 FTE workers per holding, with an average of 3.2 per ha. This recent article, written in relation to Defra summarises these points well and would also apply to Welsh Government: <https://foodresearch.org.uk/foodvoices/small-farmers-must-be-included-in-new-land-use-schemes/>

We recognise that Welsh Government will need some metric for determining who qualifies for the scheme and who does not; however, we believe that this should be based on work done rather than land area. There is no need to invent a new system: Farming Connect already uses the criteria of 550 hours per year worked (based on estimates of by stock and type of farming) to determine whether someone qualifies for their advice and support. We believe that this same model should be adopted by Welsh Government in determining who is eligible for the Sustainable Farming Scheme. However, we would advise that Farming Connect review its assumptions about the relationship between area and hours worked, particularly in relation to intensive horticulture.

We also recognise that there is currently a limited pot of money available and Welsh Government may be reluctant to open up the scheme to those that do not qualify for existing schemes due to size. However, size is an arbitrary measure and the fact that some farms have historically been discriminated against is no reason to continue that discrimination under the new scheme. If there is insufficient money to support all those that could deliver ecological benefits, then either more must be made available; or if there must be limits, it should be a maximum level of support per holding. A maximum could have the additional benefit of discouraging further land ownership concentration. However, in order to support rural employment, we would support an arrangement whereby any maximum is increased for every FTE employee on PAYE above the Welsh per hectare average.

## SUCCESSION AND NEW ENTRANTS

In addition to support for the public goods listed, Welsh Government should have the power to raise finance to support new entrants and young farmers to access the land and capital needed to start farming. Agriculture is an industry with significant barriers to entry. With many farmers reaching retirement age, without clear successors at the same time as young farmers and would-be new entrants are unable to access the land and/or capital needed to start, there must be provisions in the bill to support both succession arrangements and new entrants. We list some of the ways in which Welsh government could help these in response to Question 21.

## HEALTH

The Agriculture Bill should provide power to fund physical and mental health benefits that farms can provide.

We welcome the fact that access to the countryside is included as a benefit that should be supported; however, we are concerned that no other physical or mental health benefits associated with farms are mentioned. For example, more support should be made available for care farms, which provide significant mental health benefits. Indeed this is recognised by Defra, who recently provided over £1m of direct support to Care Farms in England. Whilst Wales has just six care farms, each of these is doing much of what Welsh Government is hoping to achieve, England now has 200. We see no reason Wales could not match or exceed England in this regard.

Farms that not only provide access to the general public for walking, but also enable volunteering, farm visits provide the benefits of social cohesion, better connection with food and mental health benefits from working with nature.

Nutritional health is also relevant. Whilst we understand that Welsh Government does not consider food in and of itself to be a public good, in the context of significant diet related physical and mental health problems, access to healthy, nutrient dense fresh, local, sustainably produced food should be supported, particularly for those on low incomes. This can be achieved by supporting partnerships between food aid organisations and farms to enable direct supply, along with infrastructure to increase edible horticulture, as detailed below.

The fact that nutritional and mental health are the responsibility of the health department is not a reason to leave it out of agriculture, where there are clear links. Indeed, this is just one example of the need for more cross departmental thinking and a justification for a food commission, as detailed in response to Question 21.

## Industry and supply chain

5. What are your views on the proposed priorities for industry and supply chain support? Please provide comments to support your view e.g. potential benefits and impacts.

### SHORT SUPPLY CHAINS

We welcome the focus of the bill on supporting short supply chains and local food systems. These systems deliver a wide range of benefits for the rural economy, the environment, waste reduction, food justice and human and animal health. We refer you to the document Vocal for Local ([https://docs.google.com/document/d/1mzGpwuDw3ZBRPjWYTn\\_ghMuKHO-a\\_7mQBSLq8EP5ARM/edit?usp=sharing](https://docs.google.com/document/d/1mzGpwuDw3ZBRPjWYTn_ghMuKHO-a_7mQBSLq8EP5ARM/edit?usp=sharing)) for detailed evidence. These outcomes are entirely consistent with the direction of Wales' post Brexit Agriculture policy and deliver directly all the goals of the Wellbeing of Future Generations Act (2015).

On the basis of this we argue that the Welsh Government uses the powers proposed to make significant investment in local and short supply chain systems, prioritising support for those businesses either already operating. or wishing to switch to these systems.

Key infrastructure that is needed to support short supply chains includes:

- Local and appropriately sized packing, cleaning, drying and processing facilities;
- Distribution hubs and local low carbon transportation;
- Farmers' markets;
- Local production of animal feeds and pasture / food waste-based systems;
- Small combined slaughter houses and butchers and mobile butchers so that animals can be slaughtered on farms avoiding the need for live transport; and
- Cold storage for both stationary storage and short transportation.

### FRUIT & VEGETABLE PRODUCTION

Welsh Government states that it wants to help farmers identify and produce, "what consumers and the supply chain want to buy", or how they propose to go about identifying this. However, short supply chains are one way to balance supply and demand.

Within Wales there is clearly a deficit in fruit & vegetable production compared to what consumers currently buy, which itself is well below health recommendations. Of this low consumption, a significant

proportion is imported. The UK overall produces just 57% of the vegetables and 16% of the fruit consumed meaning that consumers are dependent on volatile international markets to secure affordable fruit & vegetables. Wales has a smaller proportion of land in horticultural production than other parts of the UK with around 0.1% of agricultural land currently used for fruit & vegetable production. Initial findings show that there are around 400 commercial horticulture businesses within primary production in Wales of which approximately 100 are producing edibles. This need not be the case. Research by Dr Amber Wheeler has found that if just 2% of Welsh agricultural land were used to produce fruit & vegetables, it would be possible to produce all of Wales' population's "5 a day" needs.

#### COMMUNITY SUPPORTED AGRICULTURE

An effective way to increase edible horticulture, whilst supporting livestock farmers is to fund the set-up of Community Supported Agriculture (CSA) veg schemes on larger livestock farms. Under such schemes, community members commit to buying their vegetables regularly from the farm (eg. via a box scheme) giving farmers a secure market, keeping a higher proportion of final price paid; whilst local people have a direct relationship with how their food is produced. CSAs often bring consumers onto the farm for open days, volunteering opportunities and workshops. This brings multiple benefits in terms of improved nutrition, health, wellbeing and community cohesion as research from Cardiff University has shown .

Financial support for the initial infrastructure set up costs, grower's salary and land rent, combined with the type of legal and matching support from the Farming Connect Venture Programme could help significantly increase.

#### SUPERMARKET CONTRACTS

We strongly support the proposal for more transparency and greater fairness in relation to super market contracts. The domination of food markets in the supply has led to downward pressure on prices and increased pressure on farmers to cut environmental and animal welfare standards in order to make this possible. This is an area that has had inadequate attention in the past and tackling it has the potential to achieve greater economic resilience and environmental practices from farmers.

#### SUSTAINABLE BRAND VALUES

We agree with proposals to help farmers evidence sustainable brand values; however, we are concerned that this has not been defined. It is important that Sustainable Brand Values should reflect genuine sustainability and not undermine the concept.

We believe that Welsh Government should also explore certification for health metrics both with respect to the type of food and nutrient density.

#### PUBLIC PROCUREMENT

Public procurement has the potential to significantly increase the value received by farmers providing secure markets without reliance on exports. If well targeted, it can create additional incentives to increase environmental and other standards. However, it receives no mention in the White Paper, despite the very encouraging initial results from pilot studies. Initial results from the Foundational Economy Challenge Fund project focussing on procurement in Carmarthenshire highlighted the importance of:

1. A target driven approach with short and medium term objectives for local food, sustainable production and nutritional value.
2. Defining the meaning of words such as "local", "sustainable" and "nutritional value" for procurement frameworks
3. Strong partnerships with farmers, growers and secondary food processors.
4. Parallel development of routes to market in the wider economy.

It is important that the Agriculture Bill learns the lessons from such projects. Agriculture is part of the Foundational Economy and here is another example of where more joined up thinking is needed.

## Collection and sharing of data

**6. What are your views on the proposed purposes for collecting, sharing and linking data? Please provide comments to support your view e.g. potential benefits and impacts.**

We support proposals to minimise the admin burden that monitoring and data collection creates and believe that, provided appropriate data collection procedures are followed, the proposals are broadly sensible.

It is important that farmers should own the data kept about them and have access to it when requested.

De-personalised and aggregate data that can support progress in refining sustainable farming techniques, identifying problems and increasing farmers' understanding of their animals, plants, land and wider ecosystem should be made available for free or at cost.

Innovations based on this data should not become the property of private monitoring companies and the intellectual property behind them should be open source.

**7. What are your views on the establishment of a national database for farms and livestock? Please provide comments to support your view e.g. potential benefits and impacts.**

We support the principle that all land and its ownership should be registered as a means of increasing awareness and transparency about land ownership and the extent to which it is concentrated. Such a register would also help new entrants seeking to buy or rent land to identify the right people to approach.

However, there are important security implications of publishing names & addresses of farmers on a national database, therefore care should be taken.

**Thinking about the SFS: 8. In terms of the future scheme, what are your views on the proposals to enable the data we collect on a farm to be used by farmers to track progress and demonstrate their sustainability credentials? Please provide comments to support your view e.g. potential benefits and impacts.**

We would support enabling farmers to access data to track and prove their sustainability credentials.

**Thinking about regulatory compliance: 9. What are your views on the proposals for improving the monitoring of regulatory compliance? Please provide comments to support your view e.g. potential benefits and impacts.**

We support proposals to harmonise the form in which data is provided and enable data sharing between regulators so as to minimise the admin burden on farmers.

## 10. What do you think needs to be considered in future to enable regulators to effectively monitor regulations?

A risk-based approach to monitoring and enforcement should be used in which certain farms are prioritised according to various factors including:

- History of non-compliance.
- Size of farm.
- Number of animals.
- Ratio between animals and space available.
- Type of farming practices used. For example, farms that are certified organic will be at lower risk of non-compliance because:

a) They will already be monitored under their certification schemes; and

b) They will not be using synthetic fertilizers or pesticides and therefore pose a much lower risk.

- Evidence shows that there has been insufficient monitoring of regulatory compliance on farms, particularly in relation to agricultural pollution, with NRW reporting 3 pollution incidents per week in recent years.

At present there is insufficient capacity to investigate and build credible cases in any but the most serious cases of pollution.

If a new delivery system is to be put in place to involve more advice and engagement than has previously been the case, it is essential marshal sufficient resources to operate a system that is capable of delivering results, both in the short term and for the next 25 years.

Sufficient resources should be made available to allow enough skilled staff to be recruited and retained. Over time costs can be expected to fall with increasing compliance and higher productivity within regulatory teams

## Forestry and woodland

11. What are your views on the proposed amendments to forestry legislation? Please provide comments to support your view e.g. potential benefits and impacts.

We support the proposals to include woodland creation on and off farms under the Sustainable Farming Scheme, but significantly more ambition is needed. The focus needs to be on supporting managed woodland and supporting the development of the small-scale local timber markets.

#### FINANCIAL SUPPORT

We strongly support proposal to include woodland creation both on and off farms under the new Sustainable Farming Scheme.

#### INSUFFICIENT AMBITION

- The proposal to increase woodland cover by 2000 hectares per year rising to 4000 hectares is not ambitious enough. We believe 30,000 hectares per year is necessary to meet the challenge of the climate crisis.
- 15% of Wales currently forested 300,000 hectares – we should double in 10 years – including on publicly owned land. To do this over 10 years would require planting 30,000 hectares per year, which should be done in collaboration with farmers.
- Across the UK, it is really challenging to get trees in the ground. Support current trend of mapping land types and putting the right tree in the right place
- The recent record (80 hectares) in 2017/18 is pitiful.

AGROFORESTRY: Debate often puts farming and forestry as alternative uses of land; however, if we use trees intelligently on farmland, then they can support food production by providing shelter belts etc. Using agroforestry means increase in woodland cover does not need to mean abandonment of livestock and there is scope for developing wood pasture with sporadic planting with livestock.

MANAGEMENT: We agree that we need to increase the amount of managed woodland in Wales and that that well managed diverse woodland with different ages have improved carbon sequestrations. This increase in managed woodland can be supported by:

- Improving the grants system for access and infrastructure.
- Providing loans for small local woodland companies.

Please see our Forestry Manifesto: <https://landworkersalliance.org.uk/wp-content/uploads/2020/07/Forestry-Manifesto-LWA-final.pdf> for more details on policies that could create sustainable, working woodlands and revitalise the small scale timber sector in the UK.

#### TREE NURSERIES

To ensure availability of a diverse range of native species suitable for the current and changing Welsh climate, there needs to be a significant increase in the number of tree nurseries in Wales.

If the lack of Welsh tree nurseries is not addressed, we will be relying on international imports.

#### REGULATIONS

- We agree that the current regulatory and incentive scheme is overly complicated and this creates barriers for foresters.
- We agree with proposals to increase NRW's powers to clamp down on illegal felling and support the specific proposal that felling licences be granted with conditions and amended, suspended or revoked.
- However, the key issue is one of resources. Policing is currently really lax and powers are meaningless unless NRW has the resources needed to enforce
- Support the proposal for exemptions that allow the felling of ash trees due to potential danger from ash die back. Clearer more up to date guidelines are needed. There are currently not enough people working in the forestry industry to tackle the problem ash die back.

#### MAPPING

- We support the proposal to update and improve the woodlands opportunity map. Note that currently it is not very interactive.

**12. What are your views on how the Welsh Government can support landowners in Wales to benefit from carbon markets for planting trees?**

We have significant concerns about the operation of carbon markets and do not think it is prudent for Welsh Government to rely on them as a means of funding the increase in forestry needed. Key issues that we are concerned about include:

**THE DANGER OF DOUBLE COUNTING:**

If trees planted as carbon offsets for pollution outside of Wales are counted towards Wales' own targets, then the carbon sequestered will be counted twice. For this reason, any planting programme that relies on public funding should be prohibited from participating in carbon markets for the same plantation.

**THE IMPOSSIBILITY OF ENSURING ADDITIONALITY:**

If carbon markets can only work in reducing emissions if they fund work that would not otherwise have happened. There is no way of ensuring this is the case, indeed currently many schemes simply ask those doing the work whether they would have done it without the money from carbon credits.

**JUSTIFYING BUSINESS AS USUAL:**

In order to tackle the climate emergency, Wales and the rest of the world must rapidly reduce emissions and move away from fossil fuels. Much of this will require significant investment and systemic change. Carbon markets and offsets can provide justifications for Governments and highly polluting industries such as energy and transport to delay making the necessary investments and systemic changes. Therefore, whilst they could lead to more trees being planted in Wales, the overall impact on decarbonisation could be counterproductive.

## Tenancies

**13. Do you think the dispute resolution procedures described in the proposals should be extended to FBTs? Please provide additional evidence to support your view e.g. the extent to which this is a problem currently, the likely benefits and impacts.**

Tenancies make up a large proportion of the way farms are operated in Wales and it is essential that tenant farmers are not prevented from being able to access these schemes due to their tenancy agreements. Therefore, providing a means to resolve this for all tenant farmers is sensible.

**15. Do you think it would be appropriate to allow joint landlord/tenant SLM scheme agreements? Please provide evidence to support your views e.g. the extent of the need, the likely benefits, drawbacks and impacts.**

Yes, support from Farming Connect should be provided to facilitate this.

## Animal health and welfare

16. What are your views on the proposals for additional powers for Welsh Ministers to: a) Establish Movement Control Zones to control the movement of animals, semen, embryos, animal products, animal by-products and/or other things that can spread infection e.g. equipment and utensils, in the event of a significant, new animal disease threat, where there is currently no or limited power to do this? b) Specify 'animal', 'farmed animal', 'livestock', 'pet animal' and 'animals intended for agricultural purposes', beyond the current rigid traditional definitions to ensure animal disease control measures can be applied appropriately and flexibly to any species of kept animal where there is a potential disease risk? Please provide comments to support your view e.g. potential benefits and impacts.

As noted in response to Question 3, we are very concerned about the increasing number of intensive poultry units, pig farms and dairy units. These have no place in a sustainable farming system and present environmental degradation due to nitrogen pollution, animal welfare problems and disease risks.

## Welsh language

19. We would like to know your views on the effects that the White Paper proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The impact of these proposals on the Welsh Language will depend on the detail of how they are implemented.

20. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

One of the biggest risks to the Welsh language is rural depopulation from areas where Welsh is dominant. Welsh Government needs to take this seriously and ensure that they examine the current trends and set out a strategy to address rural depopulation.

The resilience of the Welsh language depends among other things on employment in rural communities where Welsh is the dominant language and the opportunities for young people who grow up there. A focus on payment for delivery of environmental benefits on farms and in woodlands has the potential to increase rural employment, but only if it is paid to those who actively work and manage the land in the communities, rather than absent landowners.

Ensuring that new woodlands supported under the scheme are managed working woodlands that develop and contribute to local timber markets, is crucial. Tree planting without ongoing management on the other hand will not have a long-term positive impact on jobs.

As noted in response to Question 4, small farms typically have more employees per hectare adding yet another reason to not leave out small farms.

Opportunities for new entrants, access to land and well managed farm succession also has the potential to increase rural business and job opportunities for young people.

## Any other comments

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

#### A FOOD COMMISSION

Whilst we welcome many of the proposals here, we are concerned that there is insufficient focus on the food system as a whole. In line with the Food Policy Alliance Cymru manifesto (<https://foodpolicyalliance.cymru/>) we believe that an independent food system Commission should be set up to re-invigorate, prioritise and re-direct energy into connecting what are currently separated policy spheres: Agriculture, nutrition, health, environment, education, and the economy.

The Commission would harness and build integrated policies that transcend political cycles to generate and promote capacities to create a sustainable food system fit for all. Current departmental approaches to food system-related policies miss opportunities to generate synergies with other policies; these synergies are necessary in order to generate the transformation of the food system required to deliver equitable food access - including Children's right to food, healthy diets and biodiversity and carbon emission targets.

An example of the cross departmental nature of food policy is how COVID19 and Brexit have combined to increase vulnerability and diet related inequalities and financial uncertainty for those that make their livelihoods from food and farming. In this context of uncertainty and reduced resources a Commission could be tasked with:

- o Supporting integrated policy making, with benefits across the sector.
- o Scaling up and out from successful pilot projects that are shown to deliver multiple benefits, such as the Foundational Economy Challenge Fund Projects.
- o Holding the policy makers and other key food system players to account.
- o Building capacity, evidence and knowledge both within Government and outside it.

The Commission should proactively seek input from citizens farmers, food sector workers, food aid organisations and other stakeholders to tackle some of the challenges. This should include working closely with the Future Generations Commissioner and enabling public engagement through forums such as citizens' assemblies.

#### NEW ENTRANTS

For a vibrant, thriving agriculture sector it is essential that new entrants are supported.

Access to land is a major barrier, but there are a number of measures that could improve access to land for new entrant farmers, we suggest the following:

##### 1. LAND REGISTRATION

Better knowledge of the land available and people interested in purchasing land would go a long way in helping new entrants access land. Therefore, efforts should be made to get all land in Wales registered and access to the SFS and SLM should not be available for unregistered land.

##### 2. ENSURING COUNTY FARMS REMAIN COMMUNITY ASSETS:

Historically, county farms have provided an entry route for new farmers, but they are now being rapidly sold off. Welsh Government should use all the power it has to encourage councils to increase their estates and prevent further sell offs. They should also look to what land they own that could be used for community gardens and urban farming.

We advocate for a requirement for the Council to consult the community before selling county farms and give them the opportunity to turn them into a community farm. Welsh Government and councils must learn from the example of Trecadwgan Farm. Here local people raised money to purchase a county farm, with plans to turn it into an agroecological farm, training centre and community food hub, but were met with hostility from Pembrokeshire County Council and despite winning auctions, were ultimately unable to secure the farm. This case shows need for policy to allow communities to have chance to buy publicly owned farms where they do go on sale. Please see attached our briefing paper on policy recommendations arising from this <https://landworkersalliance.org.uk/wp-content/uploads/2020/02/Trecadwgan-Policies-Updated.pdf>

##### 3. LOANS TO LAND TRUSTS FOR "STARTER OR INCUBATOR FARMS":

These loans would be used by the land trusts to buy land, which would then be subdivided into 'starter farms' with some shared infrastructure and leased to new entrants, enabling them to develop their businesses in a more sheltered situation. The trusts would select new entrants to run the farms based on business plans, experience, and provide the necessary infrastructure, training and support. They would also provide the monitoring necessary to ensure that the farms are being managed agroecologically and are meeting targets. After 5 or more years tenants could be given the opportunity for lifetime leases or purchase.

Much can be learnt from the French organisation 'Terre de Liens' which has pioneered a comparable model with great success. Between 2003 and 2018 they acquired 177 farms and 4253 hectares of land under the agroecological management. The Ecological Land Co-operative, which purchases land and makes it available to financially viable farming, forestry and other rural enterprises, provides another example of how this can be done.

4. **LOW INTEREST LAND PURCHASE LOANS FOR NEW ENTRANTS:** A further approach to the land access problem that would complement the agroecological land trusts model would be low interest loans to support new entrants to buy land, essentially a modified 'help to buy' scheme for new entrants looking to start agroecological businesses.

5. **INCENTIVISING LANDOWNERS:** It is likely that for some existing farmers, such as those looking to retire soon, it will not make financial sense for them to invest in training to transition to the new Sustainable Farming scheme. Those that own land or have long term leases, should be supported and incentivised to make it available to new entrants seeking to farm in ways that deliver the benefits that WG is seeking. Measures to provide this support could include:

- Direct financial support to cover rent.
- Amendments to planning rules to make consent for multiple new dwellings for farm workers easier to obtain, so that both the existing farmer and new entrant are able to live on their land.
- Advice and support on the legal arrangements.

#### START-UP COSTS

New Entrant Agroecological Start-up Grant & Loan: To address the high start-up costs, Welsh Government, potentially in partnership with the Welsh Development Bank, should provide start up grants of £10,000 to £100,000 to new entrants to establish agroecological farm businesses. This could be matched by a low interest loan. Applicants would need to provide a robust business plan outlining how their business will deliver environmental outcomes and sustainable land management as well as financial viability. Funding should be tied to mentoring on business planning and land management. The Loans for Enlightened Agriculture Programme, run by the Real Farming Trust provide a good model for this combining loans, grants and mentoring.

## Demographic questions

### About you

<b>Name</b>	The Landworkers' Alliance Cymru
<b>Are you responding as an individual or as an organisation?</b>	As an Organisation
<b>Are you or your organisation based in Wales?</b>	Yes
<b>Email address</b>	holly.tomlinson@landworkersalliance.org.uk

### First half of postcode (4 digits)

LL55 3PS

Please indicate which of these best represent you or your organisation (please select only one)

Trade Union/Representative

## Submitting your response

If you want to receive a receipt of your response, please provide an email address. Email address

holly.tomlinson@landworkersalliance.org.uk