

**P-06-1388 Remove the requirement for farmers to have at least 10% tree cover to access the new Sustainable Farming Scheme – Correspondence from the Petitioner to the Committee, 22.01.24**

Alex Higgs MA BA Cantab

I farm in the uplands of Mid Wales, with my husband, producing Farm Assured Beef and Lamb for 2 prestigious producer groups. The farm has won environmental awards and been undertaking enhanced biodiversity projects for 35 years.

I also farm in South Wales, with my son, on the coast producing annually 80 to 90 of tonnes of beef for a producer group, and 100s of tonnes of wheat, barley and oats for home use and sale to merchants. On the farm is a Pick your Own enterprise selling tonnes of strawberries and raspberries direct to the public. The farm has a large area of cliff land in an Area of Outstanding Natural Beauty (ANOB) over which thousands of people walk monthly. This is managed for habitat and wildlife.

Both farms employ labour and contractors and put thousands of pounds into the rural economy.

**My Reply To Lesley Griffiths' Letter:**

Thank you for giving me the opportunity to give my thoughts on the response to my petition from Lesley Griffiths.

It is positive that existing trees and woodland would be counted towards the minimum requirement for farmers to have 10% trees as one of the 17 Universal Actions proposed to be able to access the Sustainable Farming Scheme. I believe that most farmers are aware that this will be the case.

It is also positive that trees and woodland will generate payment within the new scheme after the many years they have not been valued within the subsidy system.

As suggested trees are beneficial as shelter, shade and as biosecurity boundaries and many farms have miles of hedges which have this affect but do not count towards 10% trees in the present SFS consultation.

It is also positive that tenant farmers will have a derogation if their tenancy agreement precludes tree planting and it would be ecologically inappropriate to plant trees on valuable habitat land.

It is still proposed that 10% trees will be required on remaining land, which will be 'productive land'. Lesley Griffiths states 'that the tree cover should not be considered in isolation'. The problem is that a farmer would not be able to access the scheme as described in the present consultation if he/she did not have 10% trees or was intending to plant trees on productive land in the next 6 years.

## **My reasons for establishing the Petition:**

Farmers and land owners have replied to the previous consultations and also stated in numerous co-design meetings that the idea of 10% trees will prohibit a lot of farmers from being able to join the Sustainable Farming Scheme, as Welsh Government continually propose. As you can observe from the number of farmers who signed the petition many of them will find it impossible to achieve 10% trees and therefore will not be able to access the SFS. These tend to be the highly productive farmers who use their land efficiently to produce food. Of course other farmers will have 10% of their land as trees or may be happy to plant trees to attain the level.

Why is Welsh Government not listening to the consultation replies? It appears that Welsh Government is determined to solve a lot of the Carbon balance problems of Wales by making farmers plant their land with trees to capture Carbon.

When the UK was part of the EEC farmers received money from the Common Agricultural Policy (CAP). The CAP was a partnership between society and agriculture that ensured a stable food supply, safeguarded farmers' incomes, protected the environment and kept rural areas vibrant.

It would be hoped that the new Welsh Sustainable Farming Scheme would have the same aims. (Indeed, in the Welsh Government's own words, 'The Welsh Government re-stated its commitment to affect a **Just Transition** away from the fossil-fuelled economy of the past to a new low carbon future. Delivering a just transition will mean, as we move to a cleaner, fairer Wales **we will leave no-one behind**' It should be possible for all farmers to join the scheme, but if thousands of farmers are barred from joining the scheme because of the 10% tree requirement, we in Wales will have failed to design a scheme accessible to all, and it will be in direct conflict with the Welsh Government's commitment to 'leave no-one behind'. It will be very disappointing but also mean that the vision of Welsh farming as 'progressive and environmental' will be very much diluted as these farmers will not engage with the other 16 universal actions, the majority of which will benefit the industry and environment.

## **Why are some farmers resistant to the requirement for 10% trees as a Universal Action (UA)?**

**-Planting trees is almost irreversible.** It has a risk of unintended long term or irreversible damage to farms, agricultural business and local Welsh economies -i.e. a threat to **Just Transition**. In the early 1960s Beeching's report on the railways of Great Britain on how to stem the large losses of the nationalised railway resulted in the closure of 4500 miles of railway which included 2500 stations with the loss of over 65,000 jobs. By 1968 the railways had not been restored to profitability and miles of railway had sadly been lost for all intents and purposes irreversibly. Wouldn't it have been positive for Climate change if some of these lines were still running now? It is important to be mindful and careful before losing thousands of acres for food production.

**-Fixed overheads and Interest on loans.** Farming has high general fixed farm costs (insurance, accountancy, paperwork) machinery costs and in many cases labour costs. These costs are divided by the area of production. If a 100-hectare farm is reduced to 80 hectares, 10 hectares to habitat and 10 hectares to trees, the burden of fixed costs per hectare will increase dramatically. I hear Welsh Government saying 'we will encourage farmers to be more efficient and increase productivity'. Many of the farms who are resistant to 10% trees are already the efficient highly productive farms. Planting trees on farm land (change of land use) will immediately reduce the value of the land by thousands of pounds per acre. Many farmers borrow from lenders using land as collateral. Lenders will not be happy if land is planted and devalued and may want more land as collateral. This may restrict the extent of future capital available and hence reduce capacity to invest in these farming businesses and as such in Wales.

**Food Production and food security** Farmers primarily produce food. The definition of a farmer is a person who works on a farm growing vegetables, grains, fruit and/or raising animals for milk, eggs or meat. Food is a basic requirement and not since the second world war has there been greater threat to national and international food supplies.

-Taking 20% of land out of production (10% habitat plus 10% trees) in Wales will threaten supply. Farmers have contracts to supply product i.e. milk, lamb beef. Losing area to trees will compromise these contracts. A decrease in product will affect processors who will have to buy in stock from England or Scotland to maintain capacity and viability, and might even move out of Wales.

-This decrease in Welsh stock, and hence production, will have an effect on the Welsh balance of payments.

**The basic feasibility of growing trees.** -Growing trees like growing anything is not easy:

- Weather affects young plantations. A long dry spell in the summer after planting leads to high mortality of saplings.

-Diseases have become more prevalent in the past years e.g. ash die back, acute oak die back, dutch elm disease, eight toothed spruce bark beetle, great spruce bark beetle, oak processionary moth, pine processionary moth, sweet chestnut blight and many more. (see Woodland Trust key tree pests and diseases)

-Conifers are often the easiest and fastest growing species to plant, but do not provide a very diverse habitat and are not reflective of the native habitat in Wales. The pasture land of Wales captures Carbon. It is full of earthworms essential for a healthy soil. Planting trees changes the ph (acidity) of the soil. Conifers particularly acidify the soil which kills earthworms leading to degradation of the soil and loss of Carbon and also leads to increased acidity in the water. Trees also use large volumes of water which affects the water table.

-Rabbits, hares, voles, mice and in some cases deer are prevalent and can destroy young saplings in days. Tree guards are expensive and usually made of single use plastic.

-Fencing is expensive and not long lasting (15-20 years)

-Planting near the coast in the teeth of the wind is nearly impossible. It has been suggested that farmers should plant in sheltered areas of land on these farms. This land is invaluable for shelter for stock and for arable crops. Salt wind can destroy an arable crop, such as barley, after planting in a weekend. Wind close to harvest can cause cereals to lodge, shed grain and be very difficult to harvest leading to significant decrease in yield.

-The payment available at present is realistic for flat easy plantings but the 12-year payment although initially reasonable is not inflation linked. After 12 years there will be no income until the wood is ready to harvest.( this will be a long time for hardwood plantations) The trees will still need managing until mature. At this point there may be a glut of timber if everyone plants in the next 6 years. Will there be enough demand and will there be labour to harvest? Have these key considerations been contemplated?

**Positive suggestions:**

-Decrease the percentage of trees required as a Universal Action so that most farmers are not restricted from joining the scheme by this action.

- At the same time make the payment for riparian strips around water courses attractive to also protect water courses from soil contamination. In these situations, advise shrubs which enhance the biodiversity as well as trees in these areas.

- Some farmers may be interested in significantly increasing the area of trees, well above 10%, on their land if they are incentivized by significant payments. This could be in the Optional Actions.

- Instead of just thinking the blunt tool of trees is the answer to Carbon capture in Wales farmers should be helped financially to assess the baseline emissions and capture on farms.

-Perhaps Wales should look into the Arc Zero project in Northern Ireland chaired by Prof John Gilliland which has pioneered a more precise Carbon measurement system for farms than just a basic carbon audit. It has looked into Carbon sequestration using new technologies: Aerial LiDAR showing 3D images of the farm from above which can be used to create a carbon asset register for your farm and they have pioneered a machine which can easily measure carbon stocks to 1 meter depth. Farmers could then be encouraged to increase Carbon sequestration in crops such as trees, willow, miscanthus and soil.

As all patients using the NHS are not prescribed the same prescription, possibly the prescription for our unique farming situations: geographies, habitats, livelihoods and the local communities within which they sit, should not be prescribed such a blunt remedy.

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