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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/0269/25

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

23 June 2025

Dear Andrew,

Thank you for the opportunity to discuss this important topic with the Committee. Soils are the foundation of our agricultural systems and the natural environment.

Additional information is included in the Annex to this letter. I hope the Committee finds it useful.

- 1. We note the first objective listed in the Glastir General Guidance was “Managing soils to help conserve our carbon stocks and reduce soil erosion.” To inform our understanding and recommendations to you, we would welcome further explanation of why you believe Glastir was a “success story”, while the ERAMMP results show a seemingly different picture against this objective?*

Our view that Glastir was a success is based on the scheme and evaluation documents and we do not believe the ERAMMP [Report-105: Wales National Trends and Glastir Evaluation](#) shows a different picture against the objective stated in the Committee’s question above.

In the Committee’s letter, it highlights a summary of the national trends identified by the analysis of the ERAMMP National Field Survey. There is a distinction to be made between national trends and Glastir evaluation outcomes, i.e. not all farms in the national survey would be in Glastir and therefore not all issues would be the same. The headline results should be read in the context of the accompanying technical annexes.

In [Report-105](#) Figure 8 indicates the impact of Glastir management options for soil was mostly stability (grey), had modest improvement (blue) for some indicators and some decline. This is more positive than the National Trend (2013-16 to 2021-23) for soil shown in Figure 2 of the report.

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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.

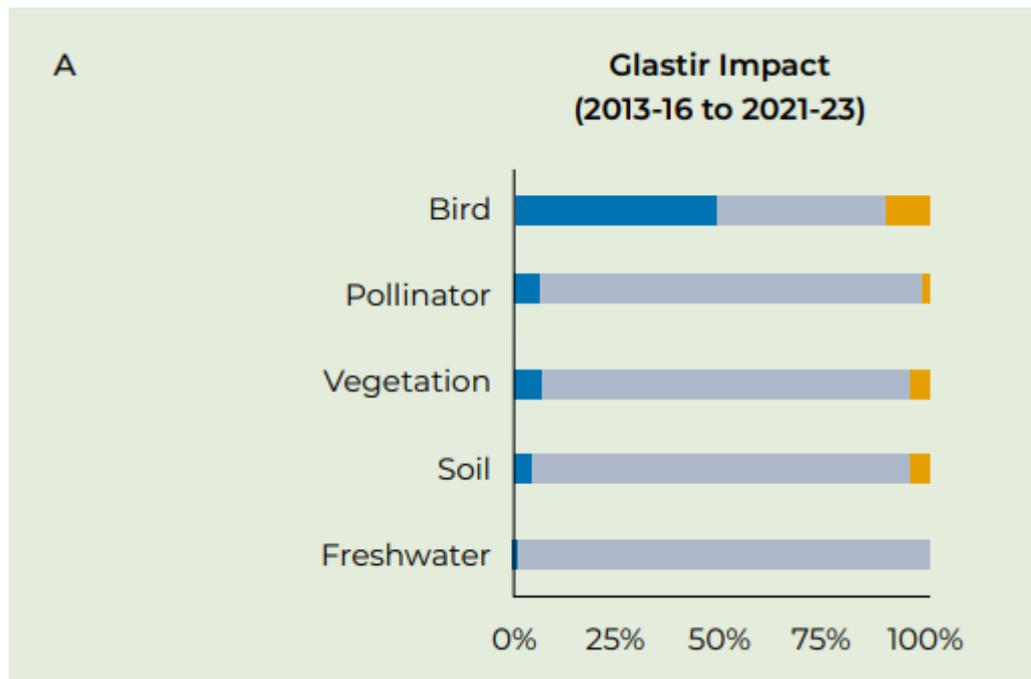


Figure 8. The percentage of total counts of indicators which had improved (blue), were stable (grey) or had declined (orange) at the national scale for land within the Glastir scheme for: A) five Natural Resources, and B) four Asset Classes over the short term (2013-16 to 2021-23). Indicators are the enhanced ERAMMP suite of indicators.

Table 3 of the ERAMMP [Report-105: Wales National Trends and Glastir Evaluation](#) demonstrates that the expert summary assessment of the effect of Glastir management options show some improvement for blanket bogs and a “modest and variable response of the individual indicators” for other peatland habitats within the scheme.

Page 68 of the ERAMMP [Report-105: Wales National Trends and Glastir Evaluation](#) identifies the following limitation, “The initial condition of a site can also greatly impact on the magnitude of improvement detected as identified by previous analysis of GMEP¹ data (Alison, et al., 2022). GMEP results clearly identified management options had in general been targeted on the better environmental quality land, which could affect the impact the magnitude of benefits realised”.

2. *You told the Committee on 15 May 2025 that “The GAEC 4 and 5 are expected to be included within the SFS scheme requirements.” While the Committee welcomes the inclusion of GAEC 4 and 5 in cross-compliance rules for those participating in the SFS, we would like clarification about whether these rules would not apply to farmers outside of the SFS or not?*

GAEC 4 & 5 will apply to both BPS and SFS claimants.

The [Control of Agricultural Pollution Regulations review](#) published on 31 March 2025 considered the role of soil and soil management for all agricultural land in Wales.

The review identified that there was a lack of legislative protection for soils in Wales, where they were a feature in other parts of the UK and recommended measures to reduce the risk of soil loss to the environment. The recommendations will be taken forward in full.

¹ GMEP - Glastir Monitoring and Evaluation Programme

- Recommendation 6 (short term): Include requirements within the Control of Agricultural Pollution regulations to protect against soil loss to the environment, potentially replicating the Good Agricultural and Environmental Condition (GAEC) requirements of Cross Compliance.
 - Recommendation 7 (medium term): Consider the role of higher risk cropping on potential losses of soil to the environment and effective mitigation techniques such as buffer strips.
3. *We would also like to understand the Welsh Government's change of approach from the Agriculture (Wales) Bill White Paper where it was proposed that NMS would be introduced to create a clear regulatory baseline for all farmers in Wales, including GAEC 4 and 5. Please could you provide some detail on the thinking behind this?*

The regulatory baseline for agriculture, previously referred to as National Minimum Standards, already exists and establishes the minimum requirements every farmer and landowner must comply with, and the associated criminal offences for any serious contraventions.

The [Sustainable Farming Scheme \(SFS\) outline proposals](#) published in November 2024, proposed that maintaining compliance with the Scheme eligibility criteria, scheme requirements, regulatory baseline, and all applicable Scheme Actions will be a condition of payment.

As part of efforts to make the agricultural regulatory baseline more accessible, the Welsh Government has invited the Law Commission to report to simplify and modernise agricultural law in Wales. The project was formally launched on 16 April 2024, the Law Commission has met with stakeholders and policy officials to conduct their analysis of agricultural related law, which is expected to be published before the end of 2025. Further information can be found on the Law Commission website: [Agricultural Law in Wales - Law Commission](#).

I hope the Committee find this information helpful as part of your important Inquiry.

Yours sincerely,



Huw Irranca-Davies AS/MS

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a Materion Gwledig

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

Annex 1 - Additional Information:

Chapter 7 of the [Review of Welsh soil evidence | GOV.WALES](#) provides all references used, including ERAMMP.

The evidence base for the [Welsh Soil Evidence Review](#) incorporates evidence from ERAMMP and GMEP as well as other sources (p. 23).

The Agricultural Soil Policy Statement [Farmers Engagement Report](#) provides the evidence, engagement and sectors represented.

The Agricultural Soil Policy Statement [Stakeholder Engagement Findings and Response](#) chapter 2 provides the organisations consulted.

[Agricultural Land Classification Technical Review: scoping study | GOV.WALES](#) Table 25 sets out the scope of the England and Wales project to update the ALC system.

[Agricultural land classification: predictive map guidance | GOV.WALES](#) sets out how to use the predictive ALC Map.

[Agricultural land classification: frequently asked questions | GOV.WALES](#)

[Soil function maps resource review | GOV.WALES](#) scopes the data sets and systems available to balance land use decisions where trade-offs between soil functions and land use demands compete. The map may 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.

[Assessment of soil, climate and habitats across designated sites | GOV.WALES](#) This report summarises the key soil, habitat and climate characteristics of sites with designations to understand their unique character, the contribution that soil plays to the importance of the designation and the additional functions that soil provides given these unique characteristics.

ERAMMP [Report-105TA1S2: Wales National Trends and Glastir Evaluation, Technical Annex-1, Supplement-2: Broad Habitat Results](#) details the methods used to analyse data collected from the ERAMMP National Field Survey to create the results The report covers:

- Survey square selection
- Calculation of Glastir bundle predictors
- Calculation of other covariates
- National trend models
- Glastir models

ERAMMP [Report-105TA1S8: Wales National Trends and Glastir Evaluation, Technical Annex-1, Supplement-8: Peatland Emissions](#) provides an assessment of peatlands emissions reduction resulting from restoration activities.

ERAMMP [Report-105TA1S9: Wales National Trends and Glastir Evaluation, Technical Annex-1, Supplement-9: Soil Erosion](#) provides an overview of an approach to assessing the state of soil erosion and disturbance in Wales.

Further Information in Relation to Question 1:

The [Glastir General Guidance](#) is Rules Booklet 1 with the general objective of, “managing soils to help conserve our carbon stocks and reduce soil erosion”. The objective refers to both mineral and peat soils.

The ERAMMP [Report-105: Wales National Trends and Glastir Evaluation](#) measured “soil quality and management” in Table 1 as the Glastir Objective. This included an expanded range of indicators: carbon, pH, nitrogen, phosphorous and bulk density. It did not include “soil erosion”. Soil erosion is part of the national trends reporting.

The ERAMMP [Report-105TA1S7: Wales National Trends and Glastir Evaluation, Technical Annex-1, Supplement-7: Soil Health](#) provides the assessment methodology and conclusions for each of the Glastir management action bundles referred to in our evidence to the committee.

Table 1 of the ERAMMP [Report-105: Wales National Trends and Glastir Evaluation](#) summarises the impact for land in the Glastir scheme as “low” under the objective. The limitations and conclusions of the report do not indicate “low” as being either negative or positive. “Low” must be viewed in the context of the scheme and evaluation data.

Figure 21 A of the ERAMMP [Report-105: Wales National Trends and Glastir Evaluation](#) demonstrates the indicators for soils within the scheme are stable.

Glastir [Technical guidance 2015](#) Rules Booklet 2 provides the list of management actions available. [Glastir Advanced 2019](#) Rules Booklet 1 provides the Management and Capital Works payment rates.