



RSPB Cymru comments on the Wales Audit Office report and the Welsh Government Response.

November 2014

Recommendation 1.

1.1. Recommendation 1 is broadly similar to that put forward in the 2007 Auditor General Report on Tir Gofal and calls for landholders to make significant changes to their land management in order to receive grant funding. To date we feel this has not been addressed and Glastir continues to focus on rewarding landholders for maintaining current practices regardless to whether they contribute to environmental scheme objectives. This is reflected in the continuing declines in farmland wildlife, as reported in last years State of Nature report, and the ongoing declines in the farmland bird index. The large number of water bodies failing to meet the Water Framework Directive, with diffuse pollution from agriculture a significant factor, further illustrates the fact that to date Glastir has not led to significant improvements in the Welsh countryside.

1.2. As acknowledged in The Welsh Government response to the recent Wales Audit Office report only 32% of Tir Gofal participants were required to make a change to pre-existing farm practices, which led to Tir Gofal failing to make a significant contribution to meeting The Welsh Governments environmental objectives. Whilst Glastir may have learnt lessons from the failures of Tir Gofal there is no evidence to suggest Glastir will lead to the sea change in land management required to meet The Welsh Governments environmental objectives including those relating to biodiversity.

1.3. Caution must also be taken on using change of land management practices as a measure of success. Success must be measured in the ability of Glastir to deliver The Welsh Governments environmental objectives, current scheme implementation will fail to meet those objectives relating to biodiversity as the scheme often fails to deliver the full requirements of priority species and habitats, within farms and/or at a landscape scale.

1.4. We agree with The Welsh Government suggestion that a combination of capital and management payments will be required to deliver scheme objectives, but again the focus should be on delivering against environmental objectives.

Recommendation 2.

2.1. Whilst considering the possible range of interventions required to address water quality problems, where poor agricultural practices are to blame, there must be recognition of the limited resources available to the Welsh Government and the requirement to deliver the best value for money on public investment. We agree with The Welsh Government that it would be wrong to target agri-environment support at farms where poor agricultural practices are causing environmental damage, instead regulatory action must be used to reinforce the polluter pays principle. Glastir must not pay for damaging operations or those operations that should be addressed through cross compliance.

2.2. Agri-environment support should be targeted at those farms that can provide the widest benefit to society, for example appropriate management and restoration of upland habitats can meet objectives relating to water quality, carbon storage and biodiversity. If targeted and implemented appropriately this could provide the greatest value for the use of public money as well as supporting some of the most financially vulnerable farm business.

2.3. Pillar 1 greening could have achieved broad brush environmental enhancements throughout Wales, including improvements to water quality. This would have signalled a move to ensure the best possible use of public money, instead the opportunity has been missed and more than 80% of farmers in Wales will receive greening payments for continuing existing practices. These include practices responsible for The Welsh Governments failure to meet the Water Framework Directive and the continuing decline in the Farmland Bird Index. We feel this strengthens the argument for ensuring RDP funding achieves additionality.

Recommendation 3.

No comments on this recommendation

Recommendation 4.

4.1. Whilst ensuring Glastir provides value for money is an important consideration, due to the technical nature of certain aspects of the scheme there is also a need for appropriate advice and guidance to be available to scheme participants. This should not be limited by financial constraints as it is key to successful delivery. Providing funding for management without the corresponding advice and guidance required to ensure success is equally poor value for money. And whilst reducing the cost of running the scheme may be seen as positive in certain terms, cheap does not mean success, and care must be taken to ensure the ability of the scheme to deliver is not hampered.

4.2. Whilst comparisons with similar schemes is welcome to monitor the efficiency of scheme administration and value for money, the efficiency of the scheme and its ability to deliver against The Welsh Governments environmental objectives must be a key consideration.

4.3. Previous research work by ADAS estimated the scale of intervention needed to meet The Welsh Government's objectives for biodiversity, cultural landscapes, climate change mitigation, flood risk management, soil health, and water quality at £165m per annum¹. Glastir is The Welsh Governments main tool for delivering these objectives but this requires twice as much as the amount likely to be allocated under the new agri-environment-climate programme for 2014-2020.

Recommendation 5.

5.1. It was recently acknowledged by The Welsh Government, in the review of the Glastir scheme that the data underlying the scheme is of varying quality. One of the recommendations of the 2007 Auditor General Report on Tir Gofal was to improve data quality and reliability, in order to allow adequate monitoring and evaluation. We feel this is still a major concern The Welsh Government is yet to address, and this limits both the effectiveness of Glastir in delivering its objectives and the ability of The Welsh Government to report on the implementation of the scheme. Ensuring the

¹ "Estimating the Scale of Future Environmental land Management Requirements for the UK". Cao, Y., Elliott, J., McCracken, D., Rowe, K., Whitehead, J. and Wilson L. Report to Land Use Policy Group by ADAS & Scottish Agricultural College. December 2009.

scheme is based on good quality data enables The Welsh Government to: a) target positive action effectively, and, b) avoid negative (expensive) action.

5.2. Targeting of the scheme needs to be improved and become more effective in order to deliver the schemes objectives. Currently the scheme fails to deliver the right management in the right places to be effective, the Welsh Government should look to improve the underlying data and work with relevant organisations to develop packages of options that could be used to target a range of species and habitats thereby maximising the value for money and minimising the administration.

5.3. The review of the data sets underlying Glastir, proposed by The Welsh Government, in order to address those data sets deemed inadequate, must ensure measures are put in place to improve those data sets. Without these measures in place The Welsh Government risks failing to carry out management to benefit priority species and habitats.

5.4. The Welsh Government response to the Wales Audit Office report only addresses targets in relation to scheme uptake, and fails to address the issues of targeting interventions within the scheme at delivering objectives. Whilst increased uptake of Glastir could be a positive development this is only true if the scheme maximises the ability of agreements to deliver against environmental objectives including those for priority species and habitats. Increasing uptake at present will simply deliver high numbers of agreements that fail to contribute to meeting The Welsh Governments environmental objectives particularly those relating to priority species. The upcoming review of the Advanced element of the scheme must strive to address the issues preventing agreements from delivering for priority species and habitats, by ensuring agreements provide for the full requirements of species (see text box below) rather than the current approach of delivering a single action per species.

5.5. The 2007 Auditor General report on Tir Gofal pointed to deficiencies in information relating to targets and performance, this is an area the latest report makes clear is still an issue. In response to the various reviews of Glastir RSPB Cymru has consistently called for The Welsh Government to set clear measurable targets and objectives for Glastir, and to make clear exactly what proportion Glastir is expected to contribute to meeting environmental objectives. Without setting clear targets for what Glastir is expected to deliver The Welsh Government will be unable to assess the performance of Glastir.

The Full Species Package

In order to provide genuine environmental benefit and value for money, Glastir agreements targeted at delivering species objectives, must deliver for all the species requirements. For priority bird species, such as yellowhammer, this involves providing:

1. A winter seed source,
2. Insect food for adults and chicks in spring and summer,
3. Safe nesting habitat.

Failing to ensure Glastir provides all of the above at an appropriate scale, within or across farms, risks providing little or no benefit for species. Additionally, paying a landholder to deliver just one of the above, without delivering the other requirements, risks wasting public money. The current approach within Glastir, to provide only one action per objective, fails to deliver this full species package and therefore fails to benefit species or provide value for money.

Recommendation 6.

6.1. We agree with The Welsh Government statement that the evidence base underlying the scheme is unsatisfactory and must be updated. Steps must be taken to ensure objective data is robust and at an appropriate scale, and that environmental data on the current situation is sufficient to provide a suitable baseline for future monitoring and monitoring must be suitable to assess all scheme objectives.

6.2. The protocols adopted to monitor Glastir, as part of the Glastir Monitoring and Evaluation Programme, are based on Ecosystem Assessment and the current design is unlikely to provide evidence of the impact of Glastir on priority species, or assist in determining value for money. This will impact on the ability of Welsh Government to assess the successful delivery of the scheme. And the ability to adapt if Glastir fails to benefit priority species, one of the fundamental reasons behind development of agri-environment schemes is to halt and reverse declines in our wildlife, however the current monitoring system is unlikely to prove an effective means of monitoring the impact on wildlife.

6.3. As mentioned previously The Welsh Government must clarify exactly what Glastir is expected to contribute to its suite of environmental objectives and commitments, including those targeted at halting biodiversity loss by 2020. We agree with The Welsh Government that the failure of previous agri-environment schemes to set quantitative targets for environmental change has limited the ability to assess the success of the scheme. This has also limited the ability to gain buy in from scheme participants and engender a sense of striving to achieve a goal. Setting clear appropriate targets could allow success to be measured and also give participants in the scheme a clear.

6.4. We welcome The Welsh Government commitment to work with stakeholders to identify targets for the Rural Development Programme, and hope these targets reflect the full suite of objectives the scheme is designed to address including halting and reversing biodiversity loss by 2020.

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