



**To: The Environment and Sustainability Committee, Welsh
Assembly – Common Agricultural Policy Task and Finish
Group**

**From: Farming & Wildlife Advisory Group (FWAG) Wales
(Cymru)**

Topic: Proposed Reform of Common Agricultural Policy

The Farming & Wildlife Advisory Group (FWAG) Cymru are pleased to respond to the European Commission's proposals for the reform of the Common Agricultural Policy (CAP)' commenting on how the organisation perceives they may affect Wales and Welsh agriculture. We are aware, of course, that the proposals are intended to be universally adopted across Member States and will be determined by co-decision.

FWAG Cymru works with farmers and landowners to deliver best farm practices and to enhance the wildlife opportunities on farms and estates. The

organisations encourages, supports, guides and inspires farmers as they combine commercial agricultural production with sound environmental management. It has a membership of over 700 farmers including over 80 within its premier membership category, FWAG Cyntaf. It is a charitable trust with steering committees comprising farmers and representatives from partner organisations from both the farming and conservation industries.

We note that one of the key elements of the proposals as initially suggested is a 30% “Greening” element that farmers will need to adhere to in order for them to draw down their full entitlements.

In essence, FWAG Cymru does not object to this greening, element as it should contribute towards securing a robust eco-system. However, it has grave concerns about the over-emphasis or perceived over-emphasis (this dependent on the detail of the definition of the proposed “greening”) on greening and the environment within the proposals. FWAG Cymru has worked tirelessly with the farming industry to ensure that farmers are supported, guided and inspired as they combine a high standard of agricultural production with sound environmental management. The farming industry has recognised its role and responsibility within the environmental realm, and FWAG Cymru is determined that this is further developed and encouraged. There is every danger that without careful management and attention to detail of the greening elements, that the proposals will manage to alienate the industry, so giving little hope of the momentum created to be developed.

It will be appreciated by the group that the way Glastir was structured and presented to farmers with an emphasis on the options which had to be undertaken on agriculturally improved land had a massive negative impact on farmers’ perception of agri-environment schemes and the entire field of environmental management. They were understandably angry, perplexed and confused by the conflicting messages – on the one hand, use your agriculturally improved land to maximise agricultural production, on the other the majority of Glastir active options had to be undertaken on improved land, so taking it out of agricultural production. The only explanation that can be given to this emphasis in Glastir is the current requirement to base agri-environment payments on profits foregone and the cost of any capital works such as fencing – this particular basis for payments

seems to be the crux of the problems in setting up a workable, effective, agri-environment scheme. FWAG Cymru would welcome a move to a value being put on a wildlife, landscape, historical or habitat feature with no reference to the loss of production. A value needs to be put on, for example, a mature oak tree or a two acre species rich bog – is the tree worth £5 per year or £150 per year to the nation if managed correctly for its wildlife , carbon sequestration, landscape & historic value?

We welcome the recognition that organic farmers contribute to greening through their farming systems, and further suggest that many conventional farmers do so too albeit perhaps generally to a lesser degree – a scaling up to the 30% could be applied with farms assessed for their contribution to greening.

The detail of the CAP proposals may affect farmer response to the adaptation of the reforms vis:

- 1) **Ecological Focus Areas (EFA).** FWAG Cymru are pleased that the commission wishes to implement some basic protection of the landscape and wildlife through these proposals. However, the proposals suggest that all farms will need to have at least 7% of their declared area to encompass EFA. The UK, and especially Wales, has a long and noble history of adopting agri-environment schemes going back over 30 years. We note that the qualifying criteria for the Welsh Government's Tir Cynnal scheme was 5% or more of habitat and we suggest that this is a more appropriate figure.

FWAG Cymru suggests that gauging a farm's ecological contribution on the basis of a straight percentage of the farm covered with habitat or landscape features is too simplistic. Careful consideration needs to be given to the way the ecological focus areas are measured and FWAG Cymru suggests that some weighting will be useful. A well-managed small pond, brimming with aquatic life may contribute little to the percentage cover of habitat features on a farm, but make a huge contribution ecologically.

We are very concerned that if EFAs are additional to any land already entered into agri-environment schemes (or any other environmental grant schemes), this will materially affect:

- (a) Glastir – Farmers may not wish to enter into a Glastir All Wales Element (AWE) agreement if it means taking an additional 7% of land over and above any options selected into EFA. This may affect uptake of this scheme.
 - (b) Glastir Woodland Creation and Glastir Woodland Management Schemes. As (a) above.
 - (c) Glastir Targeted Element. As (a) above.
 - (d) Further, some of the proposals such as the multi-cropping one (as detailed below) may materially affect Glastir options resulting in more reforms of this scheme.
 - (e) Food Security. It seems to FWAG Cymru that there should not be an emphasis to remove potentially productive land from producing food. FWAG Cymru welcomes making the criteria for EFAs as wide as possible. In Wales, the most intensive farms are likely to be dairy units and FWAG Cymru suggests that the Welsh Government should ensure that EFA criteria includes such qualifying features as hedgerows, protected ponds and field tree canopies. Further, scrub and indeed bracken banks should legitimately qualify as “Landscape Features” as these areas are useful repositories for a host of creatures and often frame the Welsh landscape in any case.
- 2) 3 Hectare rule. Under the proposals, it is suggested that farms growing more than 3ha of arable crops would need a diversity of a minimum of 3 different crops of which one cannot exceed 70% and none less than 5%. FWAG Cymru understands that this rule has been proposed to break the cycle of monoculture but we feel that the figure of 3ha (7.5 acres) is ludicrously low when consideration is given to the size of individual UK farm units in comparison with other European countries. Further, this rule will greatly impinge on dairy farmers growing maize & short term leys only. There is also likely to be great impacts on farmers taking arable options under Glastir where, in order to secure points over threshold levels, in excess of 3ha of roots may

have been selected and now these farmers will have to seek alternative crops to the detriment of their farming businesses.

We feel that the UK as a whole should seek a derogation to increase the trigger threshold for the 3 crop rule to at minimum of 15ha. This would allow grassland farmers to diversify their farms with small scale arable cropping.

- 3) **95% Permanent Pasture.** FWAG Cymru welcomes the intention to retain as much permanent pasture as possible as this is an invaluable resource for carbon storage, water management and is important for soil health. However, there needs to be enough flexibility to allow farmers to be as self sufficient in crops as possible and to encourage the uptake of the arable options under agri-environment schemes for the benefit of food production, sustainability and wildlife.

Minimum tillage methods should be encouraged where appropriate and consideration should be given to grassland leys on a very long rotation – perhaps 10–15 years between ploughing.

We are concerned about how this will be monitored without adding to the bureaucratic & regulatory burden imposed on farmers.

FWAG Cymru also notes that there are three voluntary elements to the proposals that the Welsh Government, if it was so minded, can adopt. We would be supportive of the Welsh Government seeking to trigger these options. They are:

- A) **Areas of Natural Constraint (ANC).** We note that up to 5% of the national (Welsh) ceiling can be taken off to provide for additional payments to ANCs. We recognise that there are significant areas of Wales that are difficult to manage. We suggest that farmers and land managers, with their stock management skills, are best placed to deliver enhanced biodiversity benefits to these areas and we would support the Welsh Government in providing additional payments to farmers meeting agreed targets for those aims.

- B) **Recoupling.** FWAG Cymru notes that there is provision for allocating up to 10% of the national (Welsh) ceiling to recoupling. We would be strongly supportive of this provision if it was targeted at encouraging a diversity of livestock in the marginal areas or where an industry sector is been unfairly disadvantaged. For example, the Welsh Government may wish to consider supporting suckler cows in the uplands, the small dairy producer or the beleaguered Welsh pig industry even if on a temporary basis. By undertaking such actions, the Welsh Government can be seen to be maintaining farm structures.
- C) **Pillar Two.** FWAG Cymru notes that compulsory modulation will cease but that there is provision to add a further 5% into pillar two for use in rural development. FWAG Cymru would encourage the Welsh Government to make use of this provision to support Glastir and rural communities with strong cultural ties to the betterment of the country as a whole.

Although beyond our specific environmental remit, FWAG Cymru are keen to see that the proposals encourage and support young farmers providing a sound base for future generations of people with skills in stockmanship, crop production and environmental management. We would also encourage the Welsh Government to reduce the burden of “red tape” as much as possible on the farming community and to ensure that the CAP reforms do not unnecessarily add to this burden.

Finally in these times of shifting emphasis on all farms to environmental sustainable farming practices it is vital that on-farm support in the form of advice is provided. FWAG Cymru will be delighted to continue to assist with this, and ideally at least partially through the Welsh Government’s Farming Connect programme.

ENDS

