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Evidence from Professor Terry Marsden, Cardiff  
University

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**Taking back control? Wales and Agri-food in 2021.**

**Terry Marsden**

**Emeritus Professor of Environmental Policy and Planning, Sustainable Places Research  
Institute, Cardiff University.**

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## 1. Introduction

The Committee asks for comments on the effects of TCA for the agri-food sector in Wales. In particular on issues to deal with disruptions caused by regulatory changes in trading relationships, supply chains, between the UK and EU, Northern Ireland and Ireland. At the time of writing, after two months of post EU, there is much confusion and not least regulatory uncertainty. Here I try to identify some of the key issues for the Committee to consider, given the fact we are all learning. Indeed this is one of the problems, post Brexit, and related Covid, has changed the agri-food policy landscape, so as to encourage in the current UK government its natural tendency towards a lack of transparency, and indeed, as I am discovering, a serious decline in democratic accountability; both more generally, and in particular in relation to the crisis in agri-food and food policy.

Just to start with some acknowledgments. I write this note as an individual academic. But I will draw on supportive and evidence-based work in three related collaborations: the WWF/ Sustainable Places Research Institute Report, March 2020<sup>1</sup>; The collective Food Policy Alliance Cymru Manifesto 2021<sup>2</sup>; (FPACManifestoEnglish.pdf); and my continuing collaborations with Professors Tim Lang, Erik Millstone and Gary Macfarlane (see the latest Open-Letter-on-the-food-emergency-to-the-Prime-Minister-and-Government.pdf).<sup>3</sup> All of this work has been evidence-based and long-standing, and so my points in this note can be supported by a considerable agglomeration of research, debate, and, indeed co-production with agri-food stakeholders. I thus make the following points for consideration by the Committee in summary form, but can furnish the Committee after the discussion with further materials and evidence at their request.

## 2. Key areas of regulatory disruption

1. Considerable regulatory disruption in food supply chains is already occurring before the end of the importing transition period in April and at the end of the year. This is, and indeed combines with Covid restrictions, creating major pressures especially upon SME exporters and importer food businesses. In fact the negative economic effects of the combination of Brexit and Covid have impacted most upon SMEs. The evidence suggests that this is already changing business behaviours and supply chain routes to market. It is making exporting and importing more difficult and therefore is creating new market rigidities.
2. Front-line public sector bodies (especially Environmental Health Officers) and private sector professionals (like Vets, EHOs and TSOs) are experiencing considerable pressure in dealing with inspections and paperwork, at the same time that the UK Food Standards Agency (FSA) is consulting on relaxing and deregulating professional recognition and competency in these areas. This is of major concern for both the upholding of independent professional accreditation and food standards. And it is calling into question the national (and regional) the changing role of the FSA in a TCA

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<sup>1</sup> Welsh Food System Fit for Future Generations. WWF Cymru/Sustainable Places Research Institute, Cardiff University.

<sup>2</sup> Food Policy Alliance Cymru Manifesto 2021.

<sup>3</sup> Open Letter of the food emergency to the Prime Minister and Government PDF, Lang, T, Millstone, E and Marsden, T.K. Food Research Collaboration, City University, London.

regulatory environment. There seems to be growing regulatory divergence in this role across the UK.

3. Food businesses are incurring additional costs in obtaining Export Health Certificates (EHCs) and sorting out problems with documentation. Delays have been caused by border control post checks in destination countries as well. The rules for exporting food have always been complex but reached their most streamlined during membership to the European Single Market. There is a lack of knowledge and understanding about how the new export system operates; businesses report differing advice given by government departments and border control posts. For example, whether one export health certificate can be issued with multiple destinations. This is a complex issue which is about customs duties as well health and food standard issues. Exporting businesses can no longer 'group' and combine paperwork, so it significantly multiplies administration as well as slowing down passage to final destinations. This is particularly the case with processed and foods with a range of ingredients from different sources and/or with multiple market and retail destinations.

In addition, the issuing of EHCs for products other than fish and fishery products, must involve an official veterinarian (OV). This includes for meat, meat products, meat preparations and dairy products. There is a shortage of suitably qualified OVs. In England and Wales the OVs that issue EHCs are employed in the private sector. The requirement for only qualified OVs is largely derived from the EU. In the UK and Ireland local environmental health practitioners (EHPs) deliver food official controls. They are highly trained, competent professionals. Food safety and standards form a core part of their academic and practical training. Locally- based EHPs are familiar with the businesses they regulate, understand their processes and are local. But these are growing staff shortages and workplace pressures.

4. The pressure on existing regulatory bodies, both local authority and private sector is being exacerbated by local authority staffing cuts and the current FSA consultation/proposal to speedily bring in a deregulation of professional accreditation in environmental health enforcement (proposed for Northern Ireland and England). This latter process will have long-term implications if implemented as it could lead to a diminution of independent professional standards. For instance, the CIEH argue in their response to the FSA consultations: 'At Ports there will be pressures to employ unqualified staff which, since amendments were made to the Trade in Animals and related Products Regulations in 2019, will be permitted. Over time the workforce could transform to one of largely unqualified officers. This is not in the interest of health protection and therefore public health. It is also likely to impact on pay and reward meaning qualified officers may seek employment

elsewhere. Were this to happen, this would further challenge workforce capacity rather than provide solutions.’<sup>4</sup>

One overall conclusion from these combined regulatory changes suggests that the problems encountered post Brexit are not restricted to questions of more frictional trade and obstructions to ‘just-in-time’ food supply chains. Given the pressures especially upon public sector and private sector health and food standards professionals and local authorities more generally, there are considerable workforce and food quality risks over the medium and long term which will need addressing.

5. The complex delays and disruptions so far created are unlikely to be ‘teething’ and short-term. Rather, and with further frictions expected after the ‘grace period’ on UK imports occurring from April, evidence suggests from industry that these will be longer term and ‘endemic’.<sup>5</sup> And a permanent feature of Brexit will be higher costs for doing business with the EU. This will make export EU markets less attractive for UK businesses, and reduce EU demand for UK imports to the EU; this will as we see in Italian imports, is already reducing transcontinental food trade. In addition, Welsh ports (Holyhead and Fishguard) have faced over a 50% drop in their traffic, mainly with Dublin, as Northern Ireland more directly now bypasses Dublin (opting for Cairnryan or Liverpool), and Dublin exports to EU go direct by sea to France rather than via land through Wales and England.
6. A new slowly unfolding and more disruptive geography of food supply and consumption is occurring.<sup>6</sup> A key question is whether and how the WG want to attempt to intervene in these processes, given the heightened political and economic significance of food supply and provision in the current context (i.e even before the complications and vulnerabilities of Brexit and Covid, the need for de-carbonisation and ecological restoration, and sustainable and healthy diets).
7. Brexit and Covid have unleashed in many respects endemic new conditions for the UK and the Welsh Food system. In the short and medium term this requires strategic and integrated thinking and vision to put in place; a Welsh food policy fit for building resilience. At the same time this needs to be recognised as not ‘business as usual’. It reinforces the recommendations of the recent WWF reports and FPAC manifesto cited above. The principles need to be based upon more decentralisation and re-localisation of supply chains, embedding diversity in both ecological and economic terms, creating more flexibility, capacity building in small farm and food businesses in line with re-connecting consumers to healthier diets.

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<sup>4</sup> See Chartered Institute Environmental Health (CIEH) (Dec 2020) Consultation Response to FSA ‘Review of Food law code of practice, food law practice guidance and implementation of competency framework in England and Northern Ireland. CIEH. Point 4 in their response.

<sup>5</sup> Make UK: James Brougham comments Guardian 2/3/2021.

<sup>6</sup> See for instance HIS Markit and Chartered Institute of Procurement and Supply report, 2<sup>nd</sup> March 2021.

8. At the same time Wales will need to forge new agri-food relationships and cooperative arrangements with its main market: England; and develop effective working relationships with the rest of the UK under the auspices of the UK internal market regulations.<sup>7</sup> It will need to develop mechanisms for policy intermediation between Cardiff and London which create programmed but distinctive forms of agri-food, rural and regional development, and ecological restoration which encourage more food supply chain diversity and resilience. Critical here, as I concentrate on below is the development of Wales farming policy. But this also extends to a more integrated overall food and rural development set of policy objectives.

9. In the documents cited here, upon which this briefing is based we have proposed a key set of policy priorities for Wales. These include:

Agro-ecological farming transitions

Skills development in agro-ecology, horticulture and hospitality

Local food procurement

Sustainable food hubs

Fostering food cooperatives

Digital markets

Sustainable dietary guidelines

High quality food standards

Welsh food promotion in the British Isles context.

Wales will continue to have devolved powers in these areas and it becomes critical to develop a more holistic and integrated agri-food policy in the new parliament.

10. Wales has then the post Brexit opportunity, given its devolved powers in the agri-food, rural development and environmental field to 'take back control' and develop a public and people-based vibrant food economy over the next decade. Currently 'new visions' are being proposed of a new, or revised Welsh food strategy, but so far the details are vague. Similarly a recent announcement by the Welsh Government for a new post EU rural development programme has been announced, (as of Feb 2021) but with few details. It will be important in for the new government in Wales from May to develop a far more integrated and systematic approach to these so far outline proposals. This necessitates detailed new and innovative policy development, as I

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<sup>7</sup> These are still subject to considerable debate between Whitehall and Cardiff, as well as with the other parts of the UK; and they stand to challenge the degree of autonomy Wales will have in the future with regard to food standards, labelling and branding.

begin to indicate below with particular reference to developing multi-functional and sustainable farming in Wales as part of the wider agri-food and rural development strategy below.

### **3. The Agriculture Bill (Wales) White Paper: into a new era?**

#### **(i) Introduction**

In December 2020, just before the 'thin' Brexit deal was struck, the Welsh Government published its Consultation Agriculture Bill White Paper, following its earlier 'Brexit and our Land' consultation exercises in 2019, and 2020.

This sets out the post-Brexit set of principles upon which devolved agricultural (and, not so clear, food policy more generally; and even less clear, rural development policy), will be progressed as Wales disentangles itself from the EU CAP arrangements. The key principle here is the adoption and endorsement of a 'Sustainable Land Management Scheme'; which is generally defined as (para 2.52, p35):

"The use of land resources, including soils, water, animals and plants, for the production of goods to meet changing human needs, while simultaneously ensuring the long-term potential of these resources and the maintenance and enhancement of their environmental benefits".

It is argued that (para 2.53, p35):

'This policy approach will ensure the economic, environmental and social outcomes from land management practice can be delivered for the long-term benefit of the people of Wales. This reflects the obligations placed upon the Welsh Ministers and public bodies set out in the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. Further details on the ways in which our proposals are consistent with both Acts were set out in Sustainable Farming and Our Land'.

The plan is to remove the 'twin pillars' of the former CAP (Basic payments, and rural development/environment payments) with a single 'holistic' farm funding mechanism which will explicitly target payments **only** for positive environmental enhancements (improvements in soils, water, air quality, bio-diversity and net-zero climate targets), so-called 'public goods'. As such it will not support particular agricultural production systems or their production directly- so it suggests. However, as any farmer or land-holder will argue, to achieve these generalised as well as farm-level, public good environmental outcomes, it will necessitate changes in farm production practices associated with production intensity, stocking densities, land use and landscape management. These farm-based issues and the implications for farm practices are currently side-stepped in the documentation in favour of a generalised reliance on assumed aggregated improvements in standard environmental indicators. I will come back to this point below regarding direct and indirect public goods.

## (ii) National Minimum Standards

Sustainable land management principles and funding will be conditional upon meeting nationally agreed minimum standards (yet to be finally specified, but would include baselines for soil and water quality, biodiversity, reductions in carbon emissions, animal welfare, and public health ( the latter is narrowly defined as associated with pollution and potential disease risks, but not including dietary health).

Clearly a key issue and question here is where and how demanding these National Minimum Standards are likely to be. As well as how specific and focussed they are with regard to such critical areas as flora and fauna habitats, pesticide use, nitrate and phosphate pollution, landscape conservation and peat and soil management and restoration. These areas need far more detail and discussion given that we are not starting from a 'blank' regulatory page here; nor is Wales performing well in terms of agricultural ecological recovery- as recent NRW state of nature reports indicate. **Clearly there are opportunities here to ramp up minimum standards beyond what currently exist, such that the SLMS funding does not end up being another 'polluter- gets- compensated' scheme. Thus the clarity and ecological ambitions of the National Minimum Standards (NMS's) is a major forthcoming opportunity to reset the 'ecological license to operate' for Welsh Farmers; and thus then to apply selective public funding (SLM) to real restoration and agro-ecological and landscape enhancements.** So far these discussions are avoided by the assumptions that the WG will initially 'roll over' existing and inherited environmental regulations thus it argues:

'We propose the National Minimum Standards would initially be based on the existing legislation which underpins Cross Compliance requirements. This would maintain the existing legal requirements we already have in place. As mentioned above, all SMRs and most GAEC's ('Good agricultural and environmental conditions') are already reflected in domestic legislation. Therefore, we are **not proposing to significantly change the current legal requirements**, but to consolidate what is already in law into one place. As described in Section 2, the National Minimum Standards are proposed to have a new proportionate enforcement regime which will be subject to further consultation. We do not propose to carry over the current system of BPS penalties for a failure to meet the requirements of Cross Compliance. However, as described in Section 3, given regulatory compliance is required for the proposed new Sustainable Farming Scheme, failure to comply with regulation may put scheme payments at risk. We will consider and consult on this further as part of our detailed scheme design'(para 2.7,p16).

The danger is then that NMS's will become at minimum a bureaucratic 'tidying-up' exercise aimed at reducing 'environmental red-tape', rather than a much needed ratcheting up of national safeguards for enforcing higher ecological, biodiversity and landscape standards across the whole of the farmed landscape in Wales. In addition the work 'landscape' is largely absent from the narrative.

**It will be important to set minimum regulatory standards at a higher and more spatially specific level than has been the case under EU and CAP rules, such that SLM grant funding does not end up continuing to subsidise environmental damage on the vast majority of farmed landscape. This could then give farmers the correct incentives under SLM to undertake additional and truly restorative land use and agricultural**

**practices. Hence it is important that the SLM represents the very top echelons of the environmental and ecological pyramid, necessarily supported below this by national minimum standards.**

### **(iii) Sustainable Land Management**

Clearly, and of course depending upon where and how NMS's are located, defined and constructed, SLM provides a real opportunity to re -set Welsh farming by incentivising necessary agro-ecological transitions.<sup>8</sup> This argues:

'We propose the Bill should contain provisions establishing SLM as the overarching principle for future agricultural policy, including future support. This will improve farm business resilience by providing an income stream not tied to the markets for agricultural products. It will also offer a way of making Welsh agricultural products unique in the marketplace (through demonstrating evidenced sustainability) and should reduce farm business' reliance on external inputs (and therefore costs) through a focus a circular economy approach to resource management. (Para 2.48, p27) .

And more specifically:

'To realise these benefits, we propose replacing the BPS and EU agri-environment support schemes with the Sustainable Farming Scheme (SFS). The SFS will be a business improvement programme, increasing long-term farm business resilience by rewarding farmers for the delivery of societal outcomes alongside, and as a consequence of, food production. This new income stream will not be market dependent and should increase the farm's ability to manage in a future, potentially more volatile, market environment. The SFS should reward farmers appropriately for the production of outcomes (healthier soils, clean air, clean water, improved biodiversity, actions to reduce global warming) at levels above those set by regulation, through and alongside the production of food in a sustainable way. We will need to consider the different opportunities for the delivery of these outcomes on each farm as it enters the scheme. This work will define the actions needed to deliver sustainability for that farm business. This is why we set out the need for detailed advice and support for each farm entering the scheme (**the Farm Sustainability Review**) in our previous consultation. We consider that this initial review is so important to future success that it must be a mandatory part of entry into the scheme.' (Para 2.60 p29)

And..

' The SFS is intended to reward farmers for the delivery of outcomes rather than compensate them for the cost of their inputs. This will offer farmers an income stream not subject to market volatility and whose outcomes cannot be substituted by imports. We propose moving away from traditional agri-environment schemes which paid farmers on the basis of compensation for income foregone and additional costs incurred. We want farmers to regard their input costs to meet the requirements of the **scheme as an investment** in order to reap the reward of continued payments for the outcomes they deliver. As part of our economic

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<sup>8</sup> See not least these arguments outlined in ' A Welsh Food System Fit for future generations.' Sanderson-Bellamy, A and Marsden T.K. Sustainable Places Research Institute and WWF Cymru, March 2020; and Food Policy Alliance Cymru, Manifesto 2021: Our Priorities for a Food System Fit for Future Generations.

analysis work we will be undertaking cost-benefit analysis to ascertain the best way to incentivise farmers to do the additional work required to deliver the outcomes we seek. We plan to further develop the option or options that demonstrate the greatest cost/benefit ratio as part of the proposed scheme design. ( para 2.63 p31)'

Moreover, there is a passing reference to the encouragement of short and local food supply chain development as part of SFS:

'Whilst the supply chains established by food retailers meant they were largely able to maintain the supply of food, the pandemic has led to an increased focus upon food security and the international nature of some supply chains. There is also likely to be increased focus on the maintenance of supply chains at the end of the EU transition period. Whilst it is not possible for Wales (or the UK) to be self-sufficient in terms of food supply, there is an opportunity to consider how we might shorten the supply chain, improve food security and retain the value of food produced within Wales based on its local and sustainable credentials.' (Para1.51., p7).

There are some important opportunities contained in these principles which will need building upon in the very near future. The fact that Wales will (unlike the ELMs in England) ditch 'income- forgone' arrangements in any funding payments is to be welcomed; and the focus upon the delivery of ecological outcomes, assessed by 'whole farm planning' and a regular 'Farm Sustainability Review', is a recognition that micro- farm-by -farm business planning, supported by necessary advice will be critical in the delivery and efficacy of the scheme. Of course, the 'devil' is in how these infrastructural changes will be developed and funded as part of the scheme, how they will involve at least if not more of the 16,400 current claimants of the current CAP system, and how a 'whole-farm' approach will be rolled out and by whom. Farm-by- farm ecological planning will need expertise, the development of constructive partnership with landholders, and extension and education. This is potentially ground-breaking and innovative, not in principle unlike what was accomplished in the 1930s, New Deal, where top-down and bottom-up planning and participation processes were based not least on over 10,000 local county agricultural committees made up on farmers and experts across rural America.<sup>9</sup>

#### **(iv) 'Out of the box' issues and the need to open it for indirect public goods**

Because there has been created such a binary of thinking in the UK discussions about post-Brexit agricultural policy between what constitutes 'private-market' and 'public common' goods this framing has somewhat 'boxed in' the current Welsh agricultural proposals. Under SLMS it would seem that public funding for farmers will (as in England) only be granted on the basis of delivering, or promising to deliver direct public goods, not marketized goods i.e products. That is public environmental facilities like clean water, soils, air and bio-diverse natures.

But in reality, in farming especially compared other economic activities, 'goods' are produced for the commodity markets (local, national and international) which are in themselves of critical public worth. The whole point should be to develop a compatible sustainable farming

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<sup>9</sup> See Jess Gilbert's (2016) history of the agricultural new deal in the US: 'Planning democracy: agrarian intellectuals and the intended new deal. Yale University Press, USA.

system which **produces both public and private goods simultaneously and in harmony with each other**. As, indeed the farming industry has been doing for centuries.

The logic of too stricter definition here in the new policy proposals restricts their framing, and reduces or excludes the possibilities for providing targetted support for initiatives like organic conversions, agro-ecological and horticultural conversion of some land uses, payments for extensive grazing, and conversions from intensive dairying, beef and poultry production. Because the framing says that the state should not support directly changes in commodity production.

Thus the current proposals need confront this too rigid definition of public versus private goods. Why wouldn't you want the flexibility with the SLM scheme to incentivise directly conversions from intensively farmed arable and dairy land- or at least some of it- to horticultural or organics production. Why box your policy options in to such a restricted binary?

This also extends to promoting an already significant wave of farm-based diversification and energy production practices which as we know can sit compatibly with other sustainable farm practices. In addition it currently excludes post-Brexit opportunities farmers might have for forging new green food procurement links (thus new markets) with local public and private bodies (like schools, local authorities, and town and city-based food poverty campaigns).

Thus we can sense a rather conventional and conservative 'market-thinking' going on behind the scenes in the current proposals which fails to understand the very definition of farming and the producer of both public and private goods- the question is which and in what combination, and where?

I would therefore suggest, at the very least we define the production of public goods from farming far more flexibly and indeed encompass this flexibility into what the public purse might support. Here I suggest the idea then that there **are both direct and indirect public goods in farming and landscape support**, and have been for a long time. Sheep and cattle have been indirect public goods as well as privatised market goods; farmers have been incentivised to produce them on hill lands not just for their commodity worth. They have maintained farm families, and they have continued to shape upland landuse and the landscape, rightly or wrongly. Today state support, through tax breaks and reductions in business rates continue to uphold polluting forms of intensive agricultural production- not such a public good, but it needs recognising.

**To create a transformation in Welsh agriculture we have to address farm practices and what it is that we want, as a public, farmers to qualitatively produce. And make this clear in any sustainable land management policy.** As a result, we need to understand that **both, direct and indirect public goods, make up the mix for a sustainable agri-food transformation.** As such, and in fact I predict this will need to be an essential element of whole-farm sustainable plans and reviews, policy support, extension and advice will need to harmonise both the objectives of direct and indirect public goods. This involves not only managing the environmental protection of the farm land, but also planning with the farmers

*in situ*, what is sustainably going to be invested in, produced and what practices this implies.<sup>10</sup> That is what I think we should mean by a 'whole-farm' approach.

On a more general level, agricultural and farm policy leadership needs to give clear guidance as to what it wants its farmers to produce. As such politicians and policy makers cannot just leave this to some binary notion of 'the market'. Farmers need help to shape 'the market', and the state needs to foster these more sustainable markets in a post-Brexit world.

**(v) Conclusions: Placing the Sustainable land management scheme for the future: building a new democratic infrastructure.**

Brexit is providing the opportunity for Wales to develop a more distinctive national agricultural policy which could contribute to a significantly distinctive direction of travel for Welsh farming not witnessed since after the war. **The basic principles and framework are outlined in this consultation document, but with little detail as to how this will contribute to wider and more holistic goals surrounding food policy or rural development more generally. There is nothing on the direction of travel in which we see specific land use change in Wales beyond net zero targets for carbon emissions,** and suggestions that certain land use changes (more woodland and forestry in the order of 2000 has per year as specified in the Future Wales National Development Framework; organic and horticulture hectareage) need to be given special priority in the sustainable land management scheme. 'Building resilience', 'circular economy', changing the reliance on existing farm inputs and 'improving resource efficiency' all get a mention, but need more specification as to how they would inform farm-level sustainable plans and reviews. **We have to recognise that 'Sustainable Land Management' does not revolve around the 'head of a pin'. It is both farm and landscape specific. And so to achieve these goals each farm, nested in their particular and communal landscape, needs to evolve specific ecological and farm business plans.** This is far more challenging than completing compliance farm mapping exercises for current single farm payment or Pillar two compliance. And it will require a different farm-based 'skill set' for the army of planning advisors who will need to work with the farmers.

Moreover, the work of the NRW in its area statements, catchment plans and existing environmental monitoring and enforcement work will need directly aligning to this framework. In addition the top-down nature of the policy development thus far now needs to develop a more collaborative and co-produced approach with farmers and landowners, such that they can become the owners of the new, potentially innovative approach. There are plenty of good examples around the world where landholders, NGOs and community groups collaborate to produce integrated land-based policies.

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<sup>10</sup> This *in situ* point needs to recognise the imperatives for cooperation between neighbouring farmers in their catchments and in their communities. Previous individualist and neo-classical economic policy approaches have tended to ignore what we can call the *farm pollution 'nearest-neighbour' problem*. If Farmer A is paid to abide by strict ecological rules (say on air/ water/ soil management, but neighbouring Farmer B does none of these actions, the ecological benefits are largely cancelled out, and indeed the public finance wasted. Hence the need for individual whole farm planning to be seen in a spatially nested way, encouraging their neighbours.

The SLM scheme needs to empower more collaborative place-based working, and be sensitive to the particularities and different environmental priorities in different parts of Wales. It will require a new institutional architecture built upon sound expertise, advice and education, involving groups of family farmers engaging in collaborative environmental restorative ventures. Here Wales has good practices to build upon with former schemes like Ty Cymen and Glastir, but this will need mainstreaming. Here the vast areas of Designated landscapes in Wales, covering 25% of the total area, can also take a devolved and innovative lead. In short, to progress SLM will require an inclusive and holistic rather than a narrowly defined sectoral, centralised approach. In the absence of other funds for rural or regional development it may become the only funding 'game in town'. As such it needs to be a farming policy for the rural community, and as such needs to encourage transformative changes over the next decade.

**In the second part of this paper I have focussed on one of the few areas where the Welsh Government has detailed its post-brexit proposals with regard to agri-food - that of agricultural support. This will need to be matched with equivalent detailed policy proposals in the wider multi-sectoral areas of food policy and rural development policy. Linking these together and embedding them directly into the provisions of the Well Being and Future Generations Act and Environment Act will be critical. Despite the disruptions outlined in the first part of this paper, these indeed should encourage more urgency and resolve do develop an innovative and distinctive agri-food and rural development policy for Wales within the wider context of the UK. One which builds resilience and more diversity within a more turbulent and volatile international context.**