

Consultation Questions

Confidentiality
<p>Responses to consultations may be made public on the internet or in a report. If you do not want your name and address to be shown on any documents we produce please indicate here</p>
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Demographic questions:

Name	Cambrian Mountains Society	
Are you responding as an individual or as an organisation?	Organisation	
Are you or your organisation based in Wales?	Yes	✓
	No, but I or my organisation operates in Wales	
	No - not based in Wales and does not operate in Wales	
If you are answering as an individual, do you identify as Welsh speaking?	Yes	
	No	
First half of postcode (4 digits)	LD54	

Please indicate which of these best represent you or your organisation (please select only one)	Farming	
	Forestry	
	Environmental	
	Veterinary	
	Tourism/Hospitality	
	Food and timber supply chains	
	Public Sector	
	Private Sector	
	Third Sector	✓
	Trade Union/Representative	
	Research/Academia	

	Other	
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If you have indicated that you are a farmer, please identify your main farm activity (please select only one).	Sheep	
	Beef	
	Dairy	
	Arable	
	Horticulture	
	Poultry	
	Mixed	
	Other	

Do you currently have rights to graze stock on a common?	Yes	
	No	✓

Are you a tenant farmer?	Yes	
	No	✓

Are you a BPS recipient?	Yes	
	No	✓

If you are responding as an individual, what age bracket are you in?	Under 18	
	18-34	
	35-49	
	50-64	
	65+	

Are you currently a participant in any agri-environment schemes?	Yes	
	No, but I have participated in agri-environment schemes in the past	
	No, I have never participated in any agri-environment schemes.	✓

Framework

Q1. The Scheme will provide a long-term approach to support for our agricultural sector to respond to evolving challenges and changing needs, contributing to the Sustainable Land Management objectives. In your view, what may strengthen this support?

The Cambrian Mountains Society, a charity focussed on conserving and promoting the Cambrian Mountains uplands of Mid-Wales, accepts the premise that upland farming in particular is not economic without public support. Farming has been the mainstay of the upland economy for centuries, and public money should support farmers to remain on the land to help maintain balance in the local economy. This cannot be justified unless that money also delivers public goods.

The majority of upland farmers, however, are in the industry because they understand and value the work of producing food. In totality, the Scheme seeks to co-opt farmers to become Land Managers with farming as only a portion – albeit the major part – of what they do day-to-day. Additional responsibilities of habitat management and adaptation of their land for greater benefit to nature, such as those stipulated under the Scheme, are not for many their main purpose in being on the land. At present the Scheme appears to assume that farmers understand plant, insect and bird species, their lifecycles and interactions, which make their restoration both feasible and a reward in itself. In reality, however, whilst some farmers do observe and understand the nature around them – notably the members of the Nature Friendly Farming Network - many have little more of the detailed knowledge required than do city dwellers. To this latter group, the substantial additional complexity and labour required to comply with the Scheme is likely to appear a matter of using significant effort, which they may feel could be better spent elsewhere, purely in order to qualify for support payments, and in no way encourages them to take an interest in and work willingly at these additional roles.

Accordingly, to enlist farmers' whole-hearted support in the transformation of Wales' upland farms to a sustainably managed regime which conserves and restores threatened biodiversity and peatlands, the Scheme needs a much stronger focus on education, training and practical support to assist farmers in recognising that their contribution to the future health of the environment is as worthwhile an undertaking as the raising of livestock and management of traditional farming assets. This recognition as a matter of principle needs also to be transformed into lived experience through helping farmers recognise the increasing health over time of the flora and fauna with which they interact and the fact that improvement results from their efforts.

There is a particular need for greater focus on encouragement and training in Less Favoured areas such as the Cambrians where farming increasingly has to compete with other tax-payer supported land uses such as conifer plantation for forestry and renewable energy schemes. The spread of these may well lead to more farms being abandoned as the current generation of farmers retires – with the consequent loss of local employment and hollowing-out of communities, in particular Welsh-speaking communities to which farmers are core. Support for smaller scale and diversified farms focussed on less traditional areas such as market gardening (which do not presently receive any form of subsidy but have great potential to reduce the carbon footprint of the sector and increase employment), could help to bring new entrants into the sector and restore MidWales' vibrant farming communities.

On the other side of the scale, it has been recognised that farming practices have contributed to a range of environmental problems as farm intensification has increased over recent decades. The Scheme does not contain any provisions which would disincentivise such practices as the pollution of watercourses – again, something of key concern in the uplands of the Cambrian Mountains which include the headwaters and catchments of seven major Welsh rivers. Failure to comply with the Scheme is penalised; but actions such as burning farm waste which are not addressed by the Scheme at all, also need to be monitored since they detract from the value for public money which the Scheme seeks to deliver. The supervisory arrangements for the Scheme could well be expanded to include a general supervisory remit.

Universal Actions

Q.2 See response on separate sheet.

Q.3 Aside from the 10% woodland and habitat requirements, will the Universal Actions a) Provide benefit for your farm business?

B) Provide an achievable set of actions paid for through the Universal Baseline Payment?

Q4. On-farm data reporting allows the Welsh Government to confirm actions are being undertaken and help you to make decisions about your farm. In your view, is the reporting requirement for the Universal Actions appropriate?

Q5. The Stability Payment will provide additional support during the Transition Period. In your view, is this appropriate whilst the Optional and Collaborative Actions are being introduced?

It is essential to provide meaningful transitional support since components of the Universal layer – such as devising management plans for SSSIs – attract no additional payment whilst increasing the administrative workload for farmers. Not many farmers relish the accounting and reporting components of the work for their own sake! This will inevitably act as a disincentive to join the Scheme and may, for farmers approaching retirement age or potential successors who already have secondary occupations bringing in additional income, act as a spur to give up farming altogether.

Scheme Operation

Q6. We have proposed that applicants should have sole management responsibility for the land for 10 months and ensure completion of the Universal Actions for the full scheme year (12 months). In your view, is the 10-month period sufficient?

Q7. We are proposing the use of a single carbon calculator for everyone in the Scheme. Do you agree and how might we best support you to complete this?

Q8. To ensure continued high standards on our farms, we have outlined a proportionate approach to controls and sanctions, including compliance with additional legislation as a condition of Scheme payment. Do you have any views on this approach?

In all human affairs, legislation that is not enforced is ineffectual. The Scheme provides an opportunity to remedy some areas of regulation which are not currently effectively supervised, such as management of protected areas, which could make a significant contribution to halting the decline of biodiversity and habitat loss in marginal farming areas such as the Cambrian Mountains.

Q9. Adopting the Welsh Government appeals process will provide an effective and efficient mechanism. Is there any reason we should deviate from this?

Payment Methodology

Q10. We would like to know your views on the proposed approach to:

- a) the SFS universal baseline payment
- b) the SFS stability payment

Transition Period

Q.11. Farmers outside the Scheme may wish to access support for actions similar to those offered in the Optional and Collaborative Layers. In your view, should farmers within the Scheme receive priority support to undertake these actions?

The hurdle facing the Scheme is to use limited public funds to deliver a vast improvement in the farming industry across Wales. The available funds are already less than has been estimated to be needed in order to manage Welsh land for biodiversity recovery by a 2023 independent review for various large charities including the Woodland Trust and RSPB. In these circumstances, there is a real risk that extending Scheme support to farmers who are not otherwise within Scheme supervision will stretch scarce resources too far to deliver the maximum possible value for public money.

Whilst it is clearly desirable for the purpose of nature recovery and climate change resilience for all farmers to undertake actions similar to those in the Optional and Collaborative layers, and it may in some places be necessary for some non-Scheme farmers to participate in partnerships in order to deliver these objectives, this should be separately funded. Farmers within the Scheme should receive all of the support available under the Scheme. Collaboration with farmers outside the Scheme may, inevitably, result in the delivery of some forms of support (such as peer-to-peer training) to those farmers.

Q12. What actions and support within the Optional and Collaborative layers do you believe should be prioritised?

See separate response sheet.

BPS

Q13. Do you agree with the proposed changes to BPS from 2025? This includes:

- a) The rate at which BPS payments are reduced.
- b) Closing the National Reserve to new entrants.
- c) Thresholds for capping.
- d) Restricting the transfer and lease of entitlements.

Regulations

Q14. We would like to know your views on our proposed approach to secondary legislation, which will support BPS and the introduction of support schemes under the powers in the Agriculture (Wales) Act 2023.

Evidence

Q15. Economic analysis and modelling will conclude in 2024 and will provide evidence to inform the final decision on Scheme implementation by Welsh Ministers. We would like to know your views on the existing analysis and evidence required.

The lack of information on how the payments will be split between the three layers makes it difficult to see how current modelling can provide robust and credible guidance. Clarification of this is essential for farmers to begin their planning for undertaking all of the forms of work required by the Scheme.

We also note with concern the conclusion in the Consultation Document that the evidence surrounding the benefit values for food risk management, biodiversity and water supply is less robust than that supporting the values of Carbon and air pollution reductions, recreation and physical health; and water quality. This indicates that those aspects of the Scheme which are intended to deliver the values of biodiversity, water supply and flood management and food risk management require strengthening. In our view, specifically educating and empowering farmers to understand the impact of all of their activities on biodiversity and water supply, and prioritising the introduction of Optional layer actions which will help to bolster those objectives, would help to deliver these benefits.

Monitoring & Evaluation

Q16. We would like to know your views on which information and evidence should be used to monitor and evaluate the Scheme.

The monitoring of the Scheme should focus on ensuring that the objectives of actions have been achieved – that the mischief the Scheme is trying to rectify, has been rectified - rather than merely that actions have been taken. Thus, for instance, planting additional woodland (in the form of conifers for future timber production) whilst felling individual ancient trees or patches of native woodland would completely undermine the purpose of stipulating 10% woodland cover to increase the total area of woodland and increase biodiversity.

Other

Q17. What, in your opinion, would be the likely effects of the SFS on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Unless the SFS is effective in supporting farmers in Welsh-speaking regions such as the Cambrian Mountains there is not so much a risk as a certainty that rural depopulation of these areas will continue, with the resultant ebbing away of daily use as Welsh as a working medium. This reinforces the importance of supporting farmers in Less Favoured Areas in their adoption of the Scheme through providing more comprehensive and effective training and support for the conservation-focussed components of the Scheme as well as the traditional food production components.

Q18. In your opinion, could the SFS be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Additional support for smaller scale farms, including in particular market gardening, would provide a greater incentive for the growth of small scale horticulture in rural Welsh speaking Wales. This could in turn help to promote the area to a wider range of ages including families, off-setting the current ageing trend and potentially boosting Welsh-speaking schools and the spread of Welsh into the broader community.

Q19. Do you have any additional comments on any aspect of the consultation document?

The lack of detailed resourcing, both for the payments under the Scheme to farmers and to Natural Resources Wales and other administrations which will necessarily participate in delivering the Scheme, makes this consultation document something of a moveable target. As noted above, the budget of £300m has already been suggested to be too low to meet all of the needs the Scheme sets up. To ensure that the Scheme delivers its objectives, resources will be required not only to make the payments which farmers deserve for their non-farming actions making them into the land and biodiversity managers for future generations, but also that NRW and all other agencies which will help to deliver the Scheme have the resources to act as adviser, trainer and partner in helping them to do so appropriately and effectively.