

# NFU Cymru Consultation Response

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Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /  
Climate Change, Environment and Infrastructure Committee  
Bil drafft Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)/  
Draft Environmental Protection (Single-use Plastic Products)(Wales) Bill  
SUP\_10  
Ymateb gan / Evidence from NFU Cymru

## NFU Cymru Written Evidence to Climate Change, Environment and Infrastructure Committee Draft Environmental Protection (Single-Use Plastic Products) (Wales) Bill

1. NFU Cymru welcomes the opportunity to provide written evidence to the Climate Change, Environment and Infrastructure Committee on the draft Environmental Protection (Single-Use Plastic Products) (Wales) Bill.
2. NFU Cymru's vision is for a productive, profitable and progressive farming sector producing world renowned climate-friendly food in an environment and landscape that provides habitats for our nature to thrive. Welsh food and farming delivering economic, environmental, cultural and social benefits for all the people of Wales whilst meeting our ambition for net zero agriculture by 2040.
3. The importance of the farming industry in rural Wales cannot be overstated. Welsh farming businesses are the backbone of the Welsh rural economy and the axis around which rural communities turn. The raw ingredients produced on Welsh farms are the cornerstone of the £7.5 billion Welsh food and drink supply chain employing 229,000 people.
4. The Welsh public associate Welsh farmers, first and foremost, with providing safe, high quality and traceable food. Welsh farmers also look after 80% of the land area of Wales, maintaining and enhancing our natural environment – Wales' key asset. Farming activity supports a diverse range of species and habitats, provides a range of ecosystem services including carbon sequestration, flood alleviation; also delivering the significant backdrop – our iconic Welsh landscapes – for Wales' tourism and recreation sector worth an estimated £3 billion annually.
5. Welsh farmers are key promoters and protectors of our culture, heritage and language with the highest proportion of Welsh speakers of any sector and it has long been recognised that moves to undermine the viability of Welsh agriculture are likely to represent a significant threat to the Welsh language.
6. Overall Welsh farming makes an unparalleled contribution to the economic, environmental, social and cultural well-being of Wales as shown in the NFU Cymru [Farming – Bringing Wales Together report here](#).
7. The Committee seeks views on the draft Bill which makes provisions to ban commonly littered single-use plastic items listed in the schedule of the draft Bill including products made of oxo-degradable plastic.
8. The introduction of the draft Bill follows Welsh Government consultation on proposals to ban nine single-use plastics in Wales in 2020. Oxo-degradable products were referred to in that

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consultation as plastic products which breakdown by oxidation into micro-fragments including products such as carrier bags and agricultural mulch films.

9. Firstly, it is important to highlight that farmers share the concerns of wider society with respect to plastics in our environment and recognise the need to minimise the use of single-use plastics. As managers of 80% of the land area of Wales, farmers are deeply concerned and frustrated about littering in the countryside and welcome steps to address this issue.
10. At the time of consultation, NFU Cymru did not support Welsh Government's proposals to ban oxo-degradable products used for agricultural purposes. This is because Welsh Government could not specify the products that would be banned under this heading. This hindered our ability to engage and consult properly with our members about the impact of proposals.
11. NFU Cymru believes that decisions to introduce legislation to ban the use of products in Wales should only be taken forward on the basis of evidence with a comprehensive understanding of the full costs and benefits as well as unintended consequences. In the case of oxo-degradable plastics, Welsh Government cannot have had any understanding of the impact or the costs and benefits, since it did not appear to know what specific products it was proposing to ban, the extent of their use on Welsh farms or the availability and costs of suitable alternative products. Before advancing legislation, more research was needed to understand the extent of oxo-degradable plastic use in agriculture in Wales.
12. The issue of what products used in agriculture are classified as oxo-degradable and, therefore, subject to a ban remains unclear. We understand oxo-degradable plastics used in agriculture could include agricultural mulch films for horticulture production. It has been suggested that commonly used products like some silage wraps could also be oxo-degradable.
13. Where alternative products are not yet available or prohibitively costly, then the proposed ban on the use of oxo-degradable products such as agricultural mulch films need to be balanced against wider Welsh Government policy objectives such as the expansion of the horticulture sector in Wales.
14. Proposals to ban oxo-degradable plastics, where suitable alternatives are not available, should also be considered in the context of the current challenges to food security caused by supply chain disruption and inflationary pressures. The global pandemic and war in Ukraine have served to highlight that ensuring a stable supply of a broad range of home-produced, high quality food for consumers is in the nation's interest and should be a priority for government.
15. It is also important to recognise that global climate change means that Wales will need to increase levels of food security to offset potential disruption of food imports from countries that face even more extreme climatic conditions than we do here in Wales. In the context of being a 'Globally Responsible Wales' we identify there are persuasive reasons to encourage the home production of horticultural products, where possible, to displace imported goods with a higher water footprint from countries that face greater climate change pressures than the UK. Enabling a broad range of production systems, including the use of agricultural mulch films to control the conditions of growing crops may be needed to facilitate this.
16. Where suitable alternative products do not yet exist, Welsh Government should support research and development into products that are cost effective and able to perform the same function whilst minimising the impact on the environment.

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17. In the context of the transition to a low-carbon economy, the government's aim should be to accelerate the use of bio-based alternatives to fossil fuels in energy and products. As an example, NFU Cymru now mails its monthly publication, 'Farming Wales', in fully compostable packaging made from potato starch.
18. Wool is an inherently sustainable, fully degradable product that also merits a specific focus to consider its potential across a range of functions including packaging and crop protection after sowing.