



NFFN Cymru's Response to the Economy, Trade and Rural Affairs Committee Stage 1 Scrutiny of the General Principles of the Agriculture (Wales) Bill

The [Nature Friendly Farming Network](#) (NFFN) is a farmer led organisation established in January 2018. We are uniting farmers across the UK who are committed to growing and providing healthy, nutritious food whilst managing their land for wildlife and the environment.

We have 10 farmers on our NFFN Cymru steering group, as well as 364 farmer members and 620 public members in Wales who support our manifesto, clearly emphasising the support for a sustainable and nature friendly food system.

Key Points

- NFFN Cymru welcomes the introduction of a Wales Agriculture Bill. Nature friendly farming can help tackle many societal issues, including the nature and climate crises, food insecurity and decline in public health. The Bill is the first step in developing an agriculture policy that puts sustainable farming at its heart.
- We recommend that the Bill defines Food Security based on the [6 interconnected dimensions of food security](#).
- We recommend that the UN's Food and Agriculture Organisation's [10 Elements of Agroecology](#) be used as guiding principles for the Bill.
- The Bill should include a duty for Ministers to bring forward National Minimum Standards for agriculture prior to the launch of the Sustainable Farming Scheme.
- Whilst we welcome the proposed duty to report on the success and effectiveness of future agricultural support – this needs to be backed up by effective and adequately-funded on-farm monitoring and data gathering.
- We broadly agree with the purposes that will allow Welsh Ministers to provide support for or in connection with agriculture in Wales. Evidence shows that farming with nature, within the natural carrying capacity of the land, not only benefits the environment but also improves farm profitability.
- Full transition to a fully funded Sustainable Farming Scheme (SFS) should be completed by 2030, with this transition starting as soon as possible.

1: Sustainable Land Management Framework & Objectives

1.1 The Bill proposes to adopt the Sustainable Land Management (SLM) framework as the overarching principle for future agriculture policy. This is based on the United Nations definition;

“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 of their environmental benefits”.

Whilst we don’t object to this definition *per se*, we would argue that definitions are somewhat subjective and open to interpretation which often results in a lack of clarity. We believe this to be true for the SLM definition and objectives. The same can also be said of the World Bank’s SLM definition, which is also being mooted. For example, how does one define *produce food and other goods in a sustainable manner?* Or *conserve and enhance the countryside?* These terms will inevitably mean different things to different people.

1.2 NFFN Cymru believes that the Bill should instead be underpinned by clear guiding principles. We recommend that the United Nation’s 10 Elements of Agroecology be used as guiding principles for the Bill.¹ These include;

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| a) Diversity | f) Resilience |
| b) Co-creation and sharing of knowledge | g) Human and Social Values |
| c) Synergies | h) Culture and Food Traditions |
| d) Efficiency | i) Responsible Governance |
| e) Recycling | j) Circular and Solitary Economy |

These guiding principles provide a holistic and integrated approach that simultaneously addresses all four pillars of sustainability: social equity, economic, environmental and cultural sustainability. We believe that these principles encompass the multiple disciplines the UN and World Bank SLM definitions are attempting to cover, but in a clearer and more constructive way. The Welsh Government’s vision for food and farming aligns very well with these principles and as such we believe they should be included in the Bill.

1.3 We also challenge the word *use* in the UN’s SLM definition as this suggests that land exists solely to cater for human need. The definition is extractive in its nature and fails to take account of the benefits and *intrinsic* value of natural resources and ecosystems, which is one the SMNR principles outlined in the Environment (Wales Act) 2016.²

¹ [United Nations: The 10 Elements of Agroecology - Guiding the Transition to Sustainable Food and Agricultural Systems](#)

² [Environment \(Wales\) Act 2016](#)

1.4 Alternatively, the SLM objectives could be replaced or complemented by the 10 Elements of Agroecology.

However, if the WG intends to use the SLM framework then we would recommend including an objective that relates to promoting local food economies with the view of increasing farm gate prices. We would suggest the following.

“Reconnect producers and consumers through a circular and solidarity economy that prioritizes local markets and supports local economic development, and in doing so increase the incomes of food producers while maintaining a fair price for consumers”

1.5 Crucially, the objectives or principles adopted in the Bill need to be looked at in a joined up and holistic way. The Bill must not create the situation where a future government or farmer is permitted to deliver against one or some of the Bill’s objectives and outcomes but not others. The Bill should therefore include the duty for Welsh Ministers *to exercise the function in the way that best contributes to achieving those objectives (taken together)*, as written in the Explanatory Memorandum.

2: Reporting and Monitoring

2.1 We welcome the requirement for Welsh Ministers to set out indicators that are to be applied to measure progress towards achieving the SLM objectives as well as targets in relation to those indicators. However these need to be balanced and interlinked, ambitious but not unrealistic, and must avoid competing targets that are at odds with another. They also need to reflect the breadth of outcomes that this Bill is looking to deliver. We also suggest setting more than one indicator for each SLM objective. Setting a single indicator for each objective doesn’t necessarily offer an accurate reflection of success or failure.

2.2 We welcome the requirement to prepare an annual report that will provide details on all financial and non-financial support provided during each financial year, as well as an Impact Report to assess effectiveness of all support. However, success in this respect relies on effective on the ground monitoring and efficient data gathering. After all, you can’t manage what you don’t measure. Previous Welsh agri-environment scheme have been criticized for a lack of monitoring and follow up farm visits following the signing up process. Many farmers are therefore in the dark as to what positive effects their management practices have had, particularly on biodiversity and the wider environment. Increased monitoring can help in this respect whilst addressing issues surrounding data gaps and inaccurate reporting.

1.5 As currently worded, consulting on preparing or revising indicators and targets is limited to the Future Generations Commissioner. We would recommend that the Bill broadens the requirement to consult with a range of stakeholders relevant to the outcomes the Bill sets out to achieve.

3: National Minimum Standards

3.1 The Bill does not mention anything about the proposed National Minimum Standards outlined in the previous Agriculture (Wales) White Paper. We believe that the Bill should include a duty for Ministers to bring forward National Minimum Standards for agriculture prior to the launch of the Sustainable Farming Scheme.

3.2 This is necessary to make farms more nature friendly, whilst ensuring that the environmental benefits that farmers deliver through schemes are not undermined by damaging practices elsewhere. The NMS, where the *polluter pays* principle is properly applied, should apply to all farmers, irrespective of whether they receive financial support from the Welsh Government. Furthermore, we recommend that the Welsh Government undertake an audit exercise of current regulation and identify areas that require strengthening.

4: Food Security

4.1 The term *Food Security* is mentioned 26 times in the Explanatory Memorandum but isn't mentioned once in the Bill itself. We recommend that the Bill defines Food Security based on the 6 following interconnected dimensions.³

- **Availability:** When there is an adequate supply of food, determined by the level of food production, stock levels and net trade
- **Access:** When all people have economic and physical access to food
- **Utilisation:** When food provides a sufficient level of energy and nutrition to meet physiological needs
- **Stability:** The ability to access sufficient food at all times. Access to food should not be compromised by sudden shocks (e.g. an economic or climatic crisis) or cyclical events (e.g. seasonal food insecurity)
- **Sustainability:** Food system practices that contribute to long-term regeneration of natural, social and economic systems, ensuring the food needs of the present generations are met without compromising the needs of future generations
- **Agency:** Individuals or groups having the capacity to act independently to make choices about what they eat, the foods they produce, how that food is produced, processed and distributed, and to engage in policy processes that shape food systems

4.2 Despite the need to simultaneously deliver each of the dimensions of food security, *availability* often takes precedence. Indeed, food production is often conflated with food security. Failing to account for the other dimensions means that we'll never achieve food security. As stated in the NFFN's recent report [Rethink Food: The Need For Change](#), we must re-examine what a good food system looks like to encompass the multiple dimensions of a truly equitable food economy instead of focusing on the volume of output as our only indicator of success.

4.3 We recommend the Welsh Government set indicators and targets relating to food security along with a requirement to report and assess how they are meeting the 6 interconnected dimensions.

³ Clapp et al (2022) [Viewpoint: The case for a six-dimensional food security framework](#) – Food Policy V.106

5: Support for agriculture

- 5.1** We broadly agree with the purposes that will allow Welsh Ministers to provide support for or in connection with agriculture in Wales. However we suggest the following amendments and inclusions.
- 5.2** The first purpose of *encouraging the production of food in an environmentally sustainable manner* should be broadened to include economic, social and cultural sustainability.

Central to this is the provision of advice and support that increases efficiency and reduces the industry's reliance on external inputs. Evidence shows that farming with nature (within the natural carrying capacity of the land) not only benefits the environment but also improves farm profitability.⁴ Indeed, a regenerative approach to farming can further enhance the land's natural carrying capacity, delivering more for nature and farm business incomes. Already many farmers across the UK are capitalising on nature's business benefits⁵. In livestock systems, a partnership with nature can bolster profitability and build resilience to external shocks by reducing inputs such as feed, fertiliser, housing costs and veterinary medication.⁶

Empirical evidence also shows the huge potential and radical opportunities that agroecology offers to farmers that could (and should) be the basis for the future transformation of agricultural policies, since agroecology not only allows for more sustainable production of healthier food but also considerably improves farmers' incomes.⁷ On the contrary, recent academic research shows that direct subsidises based on the area farmed are associated with a relatively large decrease in the stability of farm income, across most farm types, whilst adopting agroecological farming practices and higher agri-environment payments increases income stability and raises farm income.⁸

Research shows that integrating a diverse range of habitats and features on farmland can maintain and even increase yields⁹. For example, a largescale study found that incorporating nature friendly habitats on just 8% of arable farmland boosted the yield of flowering crops by 25% and resulted in no losses of yield for wind-pollinated crops due to an increase in pollinators and crop pest predators arising from wildflower margins and other habitats¹⁰. Basically, if food is not produced sustainably, stability and utilisation are threatened, which risks long-term availability and access.¹¹

- 5.3** Farming is a very capital-intensive industry and as such we would include the provision of support payments to invest in technology/ machinery/ infrastructure/ equipment/ training/ advice that help deliver SLM objectives/ 10 elements of agroecology.

⁴ [Nature Means Business](#)

⁵ [Nature Means Business Establishing the Balance Between Food Production and Improving Nature](#)

⁶ [Less is more: Improving profitability and the natural environment in hill and other marginal farming systems](#)

⁷ [The economic potential of agroecology: Empirical evidence from Europe](#)

⁸ [Stability of farm income: The role of agricultural diversity and agri-environment scheme payments](#)

⁹ [Long-term evidence for ecological intensification as a pathway to sustainable agriculture](#)

¹⁰ [Wildlife-friendly farming increases crop yield: evidence for ecological intensification](#)

¹¹ [Food Security and Nutrition Building a Global Narrative Towards 2030](#)

- 5.4 We would also welcome provisions to facilitate/ support farmers to deliver educational activities relating to food production and how they deliver SLM outcomes.
- 5.5 The Bill also lacks provisions to support young farmers, new entrants and alternative community ownership models. The Bill should place a duty on government to include these in future support schemes as they are vital measures to secure a sustainable future for the industry.
- 5.6 Regarding eligibility for future payment under the Sustainable Farming Scheme - support should be targeted at genuine, active farmers. Whilst we support the direction of travel to facilitate and reward nature friendly farming - the scheme shouldn't set out to create *nature reserves* where agricultural output is removed entirely. It should rather support working farms in a landscape that delivers sustainable food and fibre alongside multiple environmental benefits.
- 5.7 We also reiterate concerns from other organisations and stakeholders regarding tenant farmers and common land. Ultimately, tenant farmers and those who manage common land mustn't be disadvantaged or hampered when it comes to accessing future agricultural support.

6: Intervention Following Exceptional Market Conditions

- 6.1 We cautiously welcome powers to allow Welsh Ministers to publish an *exceptional market conditions declaration*, bearing in mind that there are numerous factors that disrupt markets that are outside farmer's control. As such farmers will no doubt be glad to know that the WG will support them in times of turmoil.
- 6.2 However, it's unclear how *exceptional market conditions* will be defined. Some would argue that we're currently experiencing *exceptional market conditions* and as such should maintain direct income support and delay transitioning to more progressive and sustainable policies that facilitate agroecological food and farming systems. Whilst this may provide short term stability, we would argue that many of the difficulties faced by the agricultural industry today are symptoms of a fragile food system close to breaking point.
- 6.3 Recent global shocks have exposed how vulnerable our food system really is. Brexit threatened the economic viability of Welsh agriculture and highlighted how reliant we are on export markets. Empty supermarket shelves during the COVID-19 pandemic exposed fragilities in our food supply chains, whilst the war in Ukraine has exposed how reliant farming systems are on inputs from outside of the UK, particularly fertilisers and animal feed. The costs of these commodities have skyrocketed, and farmers are facing unprecedented input costs as a result. And let's not forget that the biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity.¹²

¹² [United Kingdom Food Security Report 2021: Theme 2: UK Food Supply Sources](#) (2021)

6.4 We have reached a fork in the road where we must question what we currently produce, how we produce it, how it's distributed and if more of the same is the answer. We must boldly reimagine how healthy food farmed in nature-friendly systems can reach more tables, how extractive supply chains are shortened and localised, and how active food citizenship and community-led initiatives engage more of society with where and how our food is produced. Our latest report [Rethink Food: A Plan for Action](#) puts nature-friendly farming at the heart of a better food system and examines the challenges and opportunities presented to farmers in the current food system.

7: Forestry

7.1 NFFN Cymru supports the proposed amendments to the Forestry Act 1967 in relation to Wales. Fundamentally, these amendments should be used to ensure the following.

- Protect existing woodland and trees of high biodiverse and cultural value
- Facilitate the removal of invasive non-native tree species
- Promote sustainable woodland management
- Facilitate the removal of woodland or trees that are damaging or hindering valuable species and habitats. For example, conifer plantation on deep peat or shelter belts adjacent to areas utilised by ground nesting birds

7.2 We also wish to reiterate comments we have made in previous WG consultation responses regarding planting the right tree in the right place. There is no doubt that trees play a vital role in addressing the nature and climate crisis – woodland makes us more resilient to climate change and can create a nature-rich landscape that is beneficial to both farmland and wildlife. However, when it comes to tree planting, we *must* plant the right tree in the right place and avoid a cavalier attitude that could negatively impact valuable biodiversity and damage rural communities. Policies that supported a post-war drive for domestic timber production led to large swathes of commercial forestry dominating the Welsh landscape, unintentionally affecting wildlife. These commercial plantations, usually dominated by the non-native *Sitka spruce*, are more often than not of limited biodiversity value. And to make matters worse, thousands of hectares were planted as single-species forests on upland wildlife habitats. This most certainly contributed towards losing 44% of our upland heathland between the 1940s and late 1980s.

7.3 Inappropriately placed woodlands can also affect some of our most iconic ground-nesting birds. Curlews, a severely threatened species in Wales, tend not to use areas within 200m of forestry as they prefer open landscapes, whilst the associated increase in predator populations (in particular foxes and crows) affects chick survival rates. In some instances, the opposite of tree planting is more appropriate for contributing to the bigger picture of climate mitigation and nature restoration, where we should be *felling trees* on peatland or shelterbelts near areas used by ground-nesting birds.

7.4 Whilst we greatly welcome plans that support and reward farmers for planting trees, hedgerows, shelterbelts and facilitating natural regeneration of woodland – we need a holistic approach to tackling climate change. We need to ensure that our efforts to tackle climate change also benefit wildlife, farmers and our rural communities.

8: Wildlife

- 8.1** NFFFN Cymru do not have strong views on prohibiting the use (including licensed use) of a snare and glue traps. However, we note that species control is an important element of biodiversity management e.g. predator control to safeguard ground nesting birds such as curlews, or grey squirrel control to protect native woodland. Any change in regulation should take this into consideration and should not hinder achieving important conservation objectives.
- 8.2** We also note that if we provided enough habitat and food for wildlife across the farmed landscape instead of creating a landscape that favours general predators, then perhaps predation wouldn't have such an impact which would reduce the requirement to manage their populations for conservation reasons.

9: Transition

- 9.1** The Bill provides the Welsh Ministers with powers to enable the continued operation of existing farming support and to ensure the effective operation of the agricultural sector and agriculture markets following our departure from the EU. We understand the need for Ministers to have the power to run two support schemes in parallel during a transition period, however it is unclear whether these will be time limited or indefinite.
- 9.2** Transitioning to more nature friendly/ regenerative/ agroecological farming practices will not happen overnight, and it's suggested that this transition can take between 3-5 years. As such, the BPS can act as an important safety net during this transition period when farmers experience short term yield losses. This will also help avoid a *cliff edge* scenario where direct support is lost overnight. However, to manage this transition smoothly transition needs to begin now. Farmers need advice and support to prepare for a policy framework that doesn't include direct income support.
- 9.3** We recommend that these powers be time limited until a fully funded SFS is up and running, which should be by 2030 at the latest. Otherwise there's a risk of kicking the can down the road in relation to developing a new scheme and realising the outcomes that the Bill sets out to deliver. This is something we can't afford to do.

Conclusion

Farming holds the answer to tackling many of the societal issues we're facing, including the nature and climate crises, food insecurity and decline in public health. But to do that we need the Welsh Government's support. The Agri Bill is the first step to developing a farming policy that puts sustainable farming at its heart. Now is not the time to water down the ambition to create a truly sustainable Welsh agricultural sector.

As farmers, it's a privilege to be able to produce food – and even more so when we can help restore the environment and support rural economies and communities. These proposals look positive; however the devil will be in the detail. There are still uncertainties about future budgets and payment rates for example. We look forward to engaging with the Welsh Government and other stakeholders in Wales on this vitally important legislation.