



11th November 2022

Gweithwyr y Tir – The Landworkers' Alliance Cymru Response to Agriculture (Wales) Bill Consultation

Senedd Economy and Rural Affairs Committee

Dear Senedd Economy and Rural Affairs Committee,

Thank you for this opportunity to contribute to your consultation on Agriculture (Wales) Bill. The Landworkers' Alliance (LWA) is a grassroots union of farmers, growers, foresters and land-based workers with a mission to improve the livelihoods of our members and create a better food system for everyone. We have over 2000 members across the UK and Gweithwyr y Tir (our Cymru branch) represents over 320 members in Wales. Our members are workers, trainees and small business owners, who practice, or are seeking opportunities to work in, agroecological farming, sustainable forestry and other land work. Their markets are largely local, using short supply chains, keeping money in local rural communities.

Please note that we have not had the opportunity to consult our forestry members in relation with this consultation. Therefore, we have not responded to Part 4. If there is an opportunity to provide a response to this in future we would welcome this.

We welcome the overall direction of travel of the Agriculture (Wales) Bill. It is high time that farmers be rewarded based on how they farm; not simply the amount of land they own. In light of the climate and ecological emergencies it is important that farmers are rewarded when they use methods that mitigate and build resilience to both. Those currently using unsustainable practices should be supported to transition to away from them.

We have some concerns that some highly sustainable farms may be excluded on account of scale, whilst others are included despite being unsustainable with no transition path. Below we provide more detail on this.

PART 1: SUSTAINABLE LAND MANAGEMENT

Cross Legislative Coherence

The Environment (Wales) Act 2015 covers much of what the agricultural bill covers; therefore, it makes sense to cross reference. In particular, the Agriculture Wales Bill should reference and expand the Diversity, Extent, Condition, Connected and Adaptability (DECCA) Framework

that the Environment (Wales) Act uses for ecosystems, in relation to the definition of Sustainable Land Management.

SLM Objectives

We support the four objectives, namely to:

1. Produce food in a sustainable manner;
2. Mitigate and adapt to Climate Change;
3. Maintain and enhance the resilience of ecosystems and the benefits they provide; and
4. Conserve and enhance the countryside and cultural resources and promote public access to and engagement with them.

However, we are concerned that there is still too much room for interpretation, particularly with Objective 1. We welcome the fact that all the objectives are defined as meeting “the needs of the present without compromising the ability of future generations to meet their own needs;” but it is important to be clear what this really means in practice, so as to avoid public money going to fund farming that does not meet the common sense understanding of the objectives above.

There should be references to targets for climate change mitigation and adaptation; biodiversity enhancements; and reductions in nitrogen; phosphorus and pesticide pollution.

As it currently stands, the Sustainable Farming Scheme proposals would allow highly unsustainable farms, that are not transitioning to more sustainable farming, to continue to be subsidised. For example, intensive poultry, dairy and pig units are currently causing substantial damage to Wales’ rivers, creating dead zones, destroying biodiversity, polluting downstream farms and reducing public amenity. Despite these farms failing on the common sense understanding of all the above objectives, it appears that they could meet the universal actions under the Sustainable Farming Scheme; without changing their fundamentally unsustainable business model or their impact on Welsh rivers. A farm with sufficient land could ensure 10% tree cover; 10% for nature; winter soil cover and meet all the testing and reporting requirements; thus, qualifying them for the SFS Payments, but still emit substantial levels of nitrogen; phosphorus and pesticide pollution into our waterways.

We appreciate that the detail of the Sustainable Farming Scheme is not the topic of the Committee’s consultation; but if Welsh Government believes that the proposals in SFS are compatible with the SLM objectives, as currently drafted; despite them continuing to allow these intensive livestock units; then it is clear that the definitions need to be strengthened.

Missing from the objectives

Missing from these objectives are any references to the food system overall; access to healthy food; community prosperity or food sovereignty. The Bill deals principally with food production and land management; but if we are to achieve true sustainability, then then the Bill needs to either also include objectives that refer to planning policy; local market development; food access, consumption and nutritional health; and overseas impact; or it should reference other legislation that covers these issues.

To address the need for a more holistic approach, we propose an additional objective of a transition to agroecology, as defined by the United Nations Food & Agriculture Organisation:

Agroecology is a holistic and integrated approach that simultaneously applies ecological and social concepts and principles to the design and management of sustainable agriculture and food systems. It seeks to optimize the interactions between plants, animals, humans and the environment while also addressing the need for socially equitable food systems within which people can exercise choice over what they eat and how and where it is produced.¹

Please also see our enclosed response to the proposed Food (Wales) Bill for more on the need for a more detail on holistic whole food systems approach and additional proposals for how this can be achieved. If the Food (Wales) Bill is not passed or our recommendations are not included in it; then they should be included in the Agriculture (Wales) Bill.

PART 2: SUPPORT FOR AGRICULTURE ETC.

Purpose of support

We agree with the particular purposes listed in in clause 8 (2), namely:

- (a) encouraging the production of food in an environmentally sustainable manner;
- (b) reducing emissions of greenhouse gases;
- (c) maximising carbon sequestration and storage;
- (d) maintaining and enhancing the resilience of ecosystems;
- (e) conserving and enhancing landscapes and the historic environment;
- (f) improving air quality;
- (g) improving water quality;
- (h) maintaining and enhancing public access to and engagement with the countryside and the historic environment;
- (i) mitigating flood and drought risks;
- (j) achieving and promoting high standards of animal health and welfare;
- (k) maximising resource efficiency.

We would add an additional purpose of “promoting resilient and sustainable local food systems”.

Eligibility for support

We agree that Welsh Government should have the power to determine and check eligibility; however, we are concerned that their proposed definition for the Sustainable Farming Scheme of requiring at least 3 hectares of land would exclude many excellent sustainable farms, particularly fruit and vegetable farms.

This eligibility criteria appears to assume that small farms are “hobby farms”, rather than commercial businesses providing rural employment. We believe that this is due to a misunderstanding of the turnover, start-up and labour costs per hectare of horticulture, which are significantly higher than that of livestock. For example, our [research](#) on start-up costs for

¹ <https://www.fao.org/agroecology/overview/en/>

different farm types. Note that a 3 acre (1.2 hectare) market garden estimated start-up costs (excluding land and housing) range from around £75,00 to £152,000. Turnover can be around £80,000, the majority of which would be spent on labour. Other [research](#) on small farms (primarily horticulture or mixed) shows that they employ an average of 3.2 FTE per hectare.

Alternatives to area-based eligibility criteria exist:

Welsh Government used evidence of running a business as eligibility for the Horticulture Development Grant and a business plan as the basis for the start-up grant.

Farming Connect use an estimate of 550 labour hours per year as the basis for the eligibility for niche farm businesses.

We appreciate that the specific criteria is not included in the Bill itself; however, we would suggest an addition to the Bill that requires an examination and understanding of all agriculture sectors, including those that are underrepresented in Wales, such as horticulture.

We welcome this opportunity to respond to this important and timely inquiry and hope that you will take our contributions onboard. We would be happy to speak to the committee or provide further information.

Kind regards,

Holly Tomlinson

Welsh Policy Coordinator
Landworkers' Alliance Cymru