

Cynulliad Cenedlaethol Cymru | National Assembly for Wales
Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig | Climate
Change, Environment and Rural Affairs Committee
Ymchwiliad i ddyfodol Polisiâu Amaethyddol a Datblygu Gwledig yng
Nghymru | Inquiry into the Future of Agricultural and Rural Development
Policies in Wales
AAB 02
Ymateb gan RSPB Cymru
Evidence from RSPB Cymru

Dear First Minister and Cabinet Secretary for Environment and Rural Affairs,

The decision to leave the EU presents us with a unique opportunity to develop new policies that will help Welsh Government meet its aspiration for Wales to be a world leading sustainable country. Key to this will be reform of existing land use policies, most significantly the Common Agricultural Policy, which despite supporting farmers for decades has failed to build resilient agriculture and prevent damage to the environment.

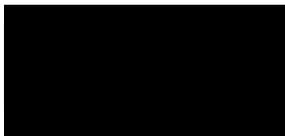
The attached letter written by a range of interested organisations calls for such reform and also highlights the opportunities and benefits to everyone in Wales that sustainable management of land will provide. The letter has been written by:

RSPB Cymru, National Trust Wales (NT), World Wide Fund for Nature (WWF), Wildlife Trust Wales (WTW), Woodland Trust (WT), Salmon and Trout Conservation Cymru, Butterfly Conservation, Bat Conservation Trust (BCT), Buglife, Amphibian and Reptile Conservation (ARC), Plantlife, Snowdonia Society, Campaign for the Protection of Rural Wales (CPRW), Soil Association and Confor Wales

These 15 organisations represent a broad range of land management, environmental and biodiversity interests and also the interests and values of wider society many of whom are members e.g. NT has 243,000 members, RSPB Cymru 51,000 members, and Wildlife Trusts Wales 25,000 members.

Several of the above are included in the Environment and Rural Affairs Stakeholder Group tasked with establishing Wales' priorities as we prepare to negotiate a favourable post-Brexit outcome, initially with the UK Government. As individual organisation we welcome the opportunity to be involved in these vital discussions, however, we also believe that it is important that Welsh Government is aware of and recognises the extent of agreement on the need for progressive reform of existing land use policies.

Regards



Katie-Jo Luxton, Director, RSPB Cymru

cc:

Andrew Slade, Director, Agriculture, Food and Marine, Welsh Government

Matthew Quinn, Director, of Environment & Sustainable Development, Welsh Government

A framework for the future of land management in Wales

Our departure from the EU will have a huge impact on Wales including our inevitable exit from the Common Agriculture Policy (CAP). This presents us with a unique opportunity to develop a new *made in Wales* sustainable land management policy framework that secures benefits for people, the environment and nature as well as an economic future for land managers.

With over 70% of Wales farmed, agriculture has a significant impact on our environment and landscapes and there is increasing consensus that the principles of sustainability must apply to farming as to all land management to ensure the best use of the land in Wales for everyone. The following proposal, supported by the undersigned, applies the principles of sustainable development and natural resource management now enshrined in Welsh law to provide for future generations.

Wales needs an approach to farming and land management that:

- restores and protects the soil, air, water and biodiversity (wildlife and habitats) that society as well as rural businesses depend on and value;
- produces sustainable amounts of safe, healthy food and timber;
- provides a diverse range of sustainable products that generate income and employment for rural businesses and contributes to a diverse rural economy;
- supports vibrant rural communities;
- fashions landscapes socially valued for their distinctive natural, cultural and heritage characters;
- reduces risks from the impacts of climate change; and is
- globally responsible and makes a positive contribution to global well-being.

Therefore, as we consider a replacement for the CAP, we urge Welsh Government to take this opportunity to develop new integrated policies framed within Wales' commitment to sustainable development and to make this objective central to our forthcoming negotiation with the UK Government, including on the future allocation of budget. We believe that a new policy framework must be founded on the following principles:

1. To support sustainable land management, which maintains and enhances biodiversity and the resilience of ecosystems and the benefits they provide to improve the social, economic, environmental and cultural well-being of Wales.
2. To deliver value for all public money in the ways sustainable land management is implemented and in the benefits it delivers to wider society.
3. To transition toward new arrangements at a pace that allows time for land managers to adapt, and for new policies to be piloted.
4. To engage with wider society to help people make choices that recognises and reward sustainability as the norm in the way they live.

This approach will support progressive, innovative farmers and land managers, providing them with the certainty to engage in sustainable production. It will ensure public money is focused on supporting resilient rural businesses capable of meeting diverse environmental challenges such as the restoration of habitats, sequestration and storage of atmospheric carbon and the natural management of flood risk and drinking water and in doing so enable Wales to meet international sustainable development, environmental and climate obligations.

It will encourage and facilitate partnership working to help build markets for sustainably produced goods. It will seek to improve the value of existing commodities such as food and timber and develop new markets or provide public money for goods and services for which farmers and land managers currently receive little or no economic benefit for maintaining such as natural resources, species and habitats and landscapes.

A realistic transition period will be vital and particularly important for the most economically vulnerable, such as those in our extensive livestock sector who are often farming in marginal areas but which are of high environmental, landscape and nature value.

To ensure a fair deal from the forthcoming negotiations Wales must engage as an 'equal partner' and we fully support the Welsh Government in this regard. This will be essential if we are to receive a fair allocation of the budget and secure an approach which guarantees common, progressive environmental standards and measures across the UK, whilst providing the flexibility to accommodate the needs of devolution. Success in this regard will enable us to build on our considerable progress to date and work towards achieving a sustainable future for all the people of Wales.



Katie-Jo Luxton, Director, RSPB Cymru



Justin Albert, Director of Wales, National Trust



Anne Meikle, Head of WWF Cymru



Liz Bowles, Head of Farming, Soil Association



Helen Jobson, Wales Officer, Salmon and Trout Conservation Cymru



Peter Ogden, Director, CPRW



Andrew Whitehouse, Wales Manager, Buglife



Russel Hobson, Head of Butterfly Conservation, Wales



Steve Lucas, Wales Officer, Bat Conservation Trust



John Harold, Director, Snowdonia Society.



Rachel Sharp, Chief Executive Officer, Wildlife Trust Wales



Jerry Langford, Wales Director, Woodland Trust



Mark Barber, Wales Officer, Amphibian and Reptile Conservation



Colin Cheeseman, Head of Plantlife Cymru



Mike Harvey, Chair of Confor Wales

RSPB Cymru evidence to the Climate Change, Environment and Rural Affairs Committee
Inquiry into the future of agricultural and rural policies in Wales

1. Introduction

- 1.1 RSPB Cymru welcomes the opportunity to participate in the Committee’s inquiry into the future of agricultural and rural policies in Wales. The policy debate around Wales’ future post *Brexit* has huge implications for Welsh nature as a vast amount of our environmental protections, legislation and delivery mechanisms are European in origin.
- 1.2 Of course the full extent of *Brexit* is still yet to be defined and therefore the prospects for Welsh nature are not yet clear. What we do know however is that the recent Welsh legislation¹, which sets in train a more sustainable approach to the management of our natural resources should put Wales in a strong place for defining a *Made in Wales* new policy for **Sustainable Land Management** that restores and protects nature.
- 1.3 Key to this will be fundamental reform of existing land use policies, most significantly the Common Agricultural Policy (CAP), which despite supporting farmers for decades has failed to build resilient agriculture, prevent damage to the environment and protect farmland wildlife – *all key objectives of the CAP*. With c. 80% of Wales farmed, agriculture has a significant impact on our environment and landscapes and there is increasing consensus that the principles of sustainability must apply to farming as to all land management to ensure the best use of the land in Wales for everyone.

2 What are the fundamental outcomes that we want to see from agricultural, land management and rural development policies?

- 2.1 New policies must support sustainable land management, which maintains and enhances biodiversity and the resilience of ecosystems and the benefits they provide which improves the social, economic, environmental and cultural well-being of Wales.

¹ The Well-being of Future Generations (Wales) Act 2015 and The Environment (Wales) Act 2016

- 2.2 Restoring and protecting nature must be a key objective of future land management policy if Wales is to meet international obligations and halt the loss of biodiversity². The State of Nature (SoN) 2016³ report reveals that nature continues to disappear from our countryside and that over half (56%) of UK species assessed have declined since 1970. One in nine farmland species are threatened with extinction from Great Britain. Agricultural management has been identified as one of the major drivers of wildlife change in the UK in recent decades.
- 2.3 Welsh Government identifies the CAP (Rural Development Plan in particular) as a major delivery mechanism for achieving its biodiversity objectives in the Nature Recovery Plan for Wales⁴. In its programme to develop a Prioritised Action Framework (PAF) for Wales' Natura 2000 sites⁵, Natural Resources Wales (NRW), identifies inappropriate land management as the major cause of biodiversity degradation on these sites. NRW also illustrates that providing funding for management action through a targeted agri-environment scheme is necessary to address land management failings⁶.
- 2.4 Welsh Government is bound by the Environment (Wales) Act 2016 section 6 biodiversity and resilience of ecosystems duty⁷. As such, a revised land management policy must include measures that will ensure that adequate resources are directed towards appropriate and effective land management to halt wildlife declines (as well as ensuring wider environmental security and associated socio-economic benefits).
- 2.5 Given the need to develop an approach to land management that secures multiple benefits Wales needs a new sustainable land management policy framework that:
- restores and protects the soil, air, water and biodiversity (wildlife and habitats) that society as well as rural businesses (including farming) depend on and value;
 - produces sustainable amounts of safe, healthy food and timber;
 - provides a diverse range of sustainable products that generate income and employment for rural businesses and contributes to a diverse rural economy;
 - supports vibrant rural communities;
 - fashions landscapes socially valued for their distinctive natural, cultural and heritage characters;
 - reduces risks from the impacts of climate change; and is
 - globally responsible and makes a positive contribution to global well-being.

² International agreements and commitments such as the Convention on Biological Diversity (including the Aichi 2020 targets) have been transposed into domestic Welsh law by the Environment (Wales) Act 2016.

³http://www.rspb.org.uk/Images/State%20of%20Nature%20UK%20report_%2020%20Sept_tcm9-424984.pdf

⁴ Welsh Government (2015) The Nature Recovery Plan for Wales – setting the course for 2020 and beyond.

<http://gov.wales/docs/desh/publications/160225-nature-recovery-plan-part-1-en.pdf>

⁵ Natural Resources Wales (2015) LIFE Natura 2000 Programme for Wales Summary Report

<https://naturalresources.wales/media/674556/life-n2k-summary-report-final-english.pdf>

⁶ The LIFE Natura 2000 Programme for Wales Summary Report identifies the Glastir agri-environment scheme as the mechanism to address issues and risks in 245 separate cases, at an approximate cost of £20,114,000 up until 2020.

⁷ Welsh Ministers and government departments are defined in the Environment (Wales) Act 2016 section 6(9)(a) and (e) as a “public authority”, and in section 6 (1) the Act states, “A Public Authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions.”

- 2.6 A new public policy must:
- deliver value for all public money in the ways sustainable land management is implemented and in the benefits it delivers to wider society;
 - engage with wider society to help people make choices that recognises and reward sustainability as the norm in the way they live.
- 2.7 This approach will support progressive, innovative farmers and land managers, providing them with the certainty to engage in sustainable production. It will ensure public money is focused on supporting resilient rural businesses capable of meeting diverse environmental challenges such as the restoration of habitats, sequestration of atmospheric carbon and the natural management of flood risk and drinking water. This in turn will (a) enable Wales to meet international sustainable development, environmental and climate obligations and (b) and has the potential to reduce overall costs of environmental management to the public.
- 2.8 It will encourage and facilitate partnership working to help build markets for sustainably produced goods. It will seek to improve the value of existing commodities such as food and timber and develop new markets or provide public money for goods and services for which farmers and land managers currently receive little or no economic benefit for maintaining such as natural resources, species and habitats and landscapes.
- 2.9 There will be need for a *reasonable* transition period toward new arrangements that allows time for farmers and land managers to adapt. This is particularly important for the most economically vulnerable farmers, such as those in our *extensive* livestock sector, who are often farming in marginal areas but which are of high nature and natural resource/landscape value. The economic vulnerability of these valuable farming systems raises the prospect that they may require an element of long-term public support in return for the delivery of societal goods and services; something that may be increasingly challenging as we move away from seven year CAP funding periods to UK Treasury three year Comprehensive Spending Reviews (CSR).

3 What lessons can we learn from current and previous policies? What about policies elsewhere?

- 3.1 The CAP has not worked – it has failed to build a resilient Welsh agriculture⁸, it has not adequately protected the environment⁹ or nature. Pillar 1 income support payments do not represent value for public money and have served as a barrier to development as there has been no need/incentive for farming to respond to market pressures and/or opportunities.
- 3.2 Despite the introduction of Pillar 1 '*greening*' the last reform failed to improve the environmental performance of income support payments, which make up the bulk of the CAP. In Wales c. 90% of farmers automatically satisfied *greening* requirements without having to change farming practises despite the obvious need for broad

⁸ National Assembly for Wales – research briefing (2016), The Farming Sector in Wales.

⁹ NRW identifies diffuse pollution from agriculture as the cause of 18% of Water Framework Directive failures.

environmental improvements e.g. to water quality. Pillar 1 payments are unsustainable. In the context of Welsh legislation, public money should only be made available for delivery of public benefits. There should be an end of support to farming (and forestry) that externalises costs as this compromises Wales' ability to deliver sustainable management of natural resources and invest in restoration of ecological resilience to deliver the greatest public benefit.

- 3.3 The CAP has created a one dimensional industry that sees its only/main purpose as the production of a limited number of commodities (red meat and dairy). As such the progression towards sustainable land management will have to be supported by a programme of awareness raising (about the need for and benefits of the approach) plus investment in building relevant skills and knowledge to ensure effective implementation.
- 3.4 RSPB Cymru recognises the importance of food security¹⁰ and the role of farming in contributing to meeting our food needs, now and in the future. In considering food security however, it is about more than just the amount of food we produce. What we produce, how we produce it, our dietary choices, access to good food and food waste all matter. Our vision is for an approach to sustainable land management which addresses all these issues, therefore in developing new policies we should also consider the merits and opportunities associated with:
- the production of a greater diversity of agricultural commodities,
 - improved supply chains so more money gets through to farmers and other producers.
 - markets that reflect the sustainable niche of Welsh produce.
- 3.5 Two Wales Audit Office (WAO) reports have indicated that agri-environment schemes have failed to secure value for all public money and that there is room for significant improvement¹¹. The reports highlight un-ambitious, entry-level schemes/agreements/prescriptions as being of particular concern as these tend to pay farmers for existing (non-objective) management as opposed to securing environmental enhancements. The WAO's conclusion that a targeted approach that delivers specific outcomes is a more effective and justifiable use of public money is one that we agree with and should form the basis of future public policy.
- 3.6 An evaluation of Glastir Advanced concluded there is a good prospect that most Glastir Advanced contracts will deliver against most of their objectives, though generic weaknesses were found in the management for individual species and for flood risk reduction¹². Recommendations for improvements (accepted in full by Welsh Government¹³) include:
- more effective targeting of resources,

¹⁰ Food security is met when all people at all times have access to sufficient, safe, nutritious food to maintain a healthy and active life.

¹¹ Tir Gofal, Wales Audit Committee, September 2008. Glastir, Wales Audit Office, September 2014.

¹² Glastir Advanced Evaluation; Panel Findings and Recommendations, 2014

¹³ Glastir Advanced Evaluation; Synopsis and the Welsh Government's response, 2015

- a landscape approach to interventions where required,
- appropriate advice and guidance to Contract Managers and farmers, including ongoing support to scheme participants.

If fully implemented the evaluation's recommendations have significant potential to improve the scheme's ability to secure multiple and integrated environmental and biodiversity objectives especially if allied to an approach (a) based on results and (b) rewarded by realistic payments (that are not constrained by the current narrow *interpretation* of income foregone).

- 3.7 Natural Resources Wales' Section 15 agreements are a *flexible* and targeted means of managing protected sites (SSSIs) and are often used in preference to more prescriptive agri-environment measures to establish the required management for priority habitats and species. The positive aspects of the Section 15 approach should inform future land management policy and delivery mechanisms. Note that every £1 invested in SSSI management secures £8 of wider benefit¹⁴.
- 3.8 To be a success future policy must be underpinned by a robust and well-resourced enforcement system based on high minimum standards and subject to adequate monitoring which, in addition to evaluating process effectively assesses delivery against objectives.

4 Should Wales develop its own agricultural, land management and rural development polices or should it be part of a broader UK-wide policy and financial framework?

- 4.1 Future sustainable land management policies must fit within Wales' new legislative and developing policy framework (*the Well-being of Future Generations (Wales) Act and the Environment (Wales) Act*) and provide a placed based approach through the National Natural Resource Policy and Area Statements. To ensure a fair deal from the forthcoming negotiations with the UK Government Wales must be able to engage as an 'equal partner'.
- 4.2 An adequate financial settlement for Wales is crucial if Wales is to deliver on its environmental objectives. We know that to recover wildlife and our natural environment/resources we need to increase investment in management of our countryside [and seas]. A settlement based on the Barnett formula would result in less money/funding than currently comes to Wales for conservation and consequently would be an insufficient allocation of funds to enable the transition to a sustainable future for the Welsh environment.
- 4.3 To ensure that Welsh land managers are not disadvantaged in the future we must secure an approach which guarantees common, progressive environmental (and welfare) standards and measures across the UK (that are at least as good as they are now), whilst providing the flexibility to accommodate the differing policy contexts within the nations.

¹⁴ GHK (2011) *Benefits of Sites of Special Scientific Interest*. Final Report for Defra, 2014.

5 Conclusion

- 5.1 It is essential that future Welsh land management policies contribute to the creation and maintenance of a coherent network of well managed protected areas for nature if we are to prevent further loss of species and reverse biodiversity declines. This approach will secure bigger, better more joined up sites ensuring that nature becomes more resilient, including being able to withstand the pressures of climate change. Many of our most valuable wildlife sites are the product of extensive farming and it is vital these environmentally valuable farming systems are maintained if we are to have a countryside in which nature thrives¹⁵. The habitats within these wildlife sites also provide society with a diversity of environmental goods and services, including carbon storage, clean water, and cultural values as well as contributing to wider economies such as tourism and recreation and, health and well being¹⁶.

¹⁵ Often referred to as High Nature Value (HNV) farming these farms often operate in the most marginal agricultural land, under difficult social and economic realities such as in the upland regions (but they occur throughout Wales).

¹⁶ The National Ecosystem Assessment 2012 states that *the wider value of the environment is estimated to be £9 billion/annum, with £1.9 billion/annum being attributed to wildlife based activities (c.f. £1.6 billion/annum for agriculture*