

**NFU Cymru Written Evidence to the Climate Change, Environment and Infrastructure Committee on the Net Zero Wales Plan**

- NFU Cymru has set the ambitious goal of reaching [net zero](#) greenhouse gas emissions (GHG) for agriculture by 2040. Our assessment is that to achieve net zero we will need to act across a range of internationally recognised inventories. At farm level this will require a focus on improving farming's productive efficiency; enhancing land use to capture more carbon; and boosting renewable energy and the wider bioeconomy. In line with being a 'globally responsible' Wales our climate change ambitions must not be achieved by exporting Welsh production, or our emissions, to other countries.
- NFU Cymru has considered the Net Zero Wales Plan (the Plan) which focuses on Carbon Budget 2 (2021-2025) and beyond. We make the following comments in relation to agriculture, which accounted for 14% of Wales' emissions in 2019, and the land use, land use change and forestry emissions sectors (LULUCF).
- For agriculture the Plan proposes mitigation action in the two broad areas of low carbon farming practices and measures to release land. Based on the available information we are concerned that there is insufficient focus on measures to underpin and improve farming's productive efficiency – Pillar 1 of our Net Zero Plan. These measures will be vital if we are to reach Net Zero by maintaining and enhancing our productive capacity in Wales and not off-shoring impacts to other parts of the world.
- Welsh Government's land sharing approach (as described in the Plan) also de-emphasises productive farming and is likely to result in destocking on Welsh farms. NFU Cymru is concerned that climate change targets are to be achieved at the expense of domestic food production and the vitality of our rural areas. NFU Cymru is clear that future policy must also underpin the delivery of a broader set of economic, social and cultural outcomes. Alongside the establishment of carbon targets, mechanisms are needed in the forthcoming Agriculture Bill to ensure that these wider objectives including food security are measured, maintained and enhanced. This will be vital in the context of the predicted challenges to our global food production systems in a changing climate.
- The Plan refers to a substantial decrease in the consumption of red meat and dairy products, reflecting UKCCC advice of a 20% cut by 2030. Given the nutritional benefits of red meat and dairy as part of a balanced diet, as well as the fact that Welsh red meat production systems are already significantly more sustainable than the global average, NFU Cymru believes there are compelling reasons to deviate from the UKCCC advice. We note Welsh Government has opted to do this elsewhere in the Plan.
- For LULUCF, the Plan proposes action in the two broad areas of increasing woodland creation and safeguarding in increasing the carbon stores in soils and biomass.
- Targets for tree planting (43,000 ha by 2030 and 180,000 ha by 2050) align with the UKCCC advice, with WG opting not to deviate from the advice despite doing so elsewhere. These are highly ambitious targets not matched by current rates of tree planting in Wales. We refer to NFU Cymru's [Growing Together Strategy](#) for increasing tree cover in Wales which sets out the multiple and increasing pressures on land use in Wales. We identify a lack of safeguards to minimise the damaging impacts for farming, our food security and our rural communities. This issue must be addressed within this Carbon Budget given the rate that Welsh farms are being bought up by external investors currently.
- Proposals to attract private sector investment into woodland creation are concerning and reflect wider concerns that future budgets do not match WG ambition for public goods delivery. We are concerned that WG are not addressing the difficult ethical question of making land available for tree planting in Wales to meet the off-setting objectives of others so they can carry on 'business as usual'. We are also unclear whether carbon sequestered through offsetting could, in fact, contribute to Wales's targets as that appears to be 'double counting'. It is also important to recognise that carbon trading may also stand in the way of Welsh farms achieving their own net zero targets.

- The Plan refers to the need for a Just Transition. We are disappointed that Welsh Government shy away from the establishment of a Just Transition Commission which, given the proposals in this Plan, is essential if the burden of decarbonisation is not to fall unequally on our rural communities.