

Agriculture (Wales) Bill

Plantlife response - November 2022

The Welsh Agriculture Bill is vital in paving the way to providing 'resilient ecosystems' and implementing an integrated approach to tackling farm emissions, improving the health of our soils and ability to store carbon, and ultimately reaching the overriding goal of Net zero by 2050.

As such the objectives and powers set out in this Bill need to formulate an accessible, environmentally sound and economically viable scheme for the next period of agri-environment delivery.

Part 1: Sustainable Land Management (SLM)

Plantlife welcomes the four SLM objectives; (1) to produce food in a sustainable manner, (2) to mitigate and adapt to climate change, (3) to maintain and enhance the resilience of ecosystems and (4) to conserve and enhance the countryside and cultural resources and promote public access.

Effective management of permanent grasslands is at the heart of Wales' livestock production and wider farming economy, and is essential in meeting all the SLM's objectives. Permanent grasslands are often overlooked as a Nature-based Solution (NbS) to climate mitigation, due to limitations in grassland soil carbon datasets and an emphasis on tree planting and peatland restoration in policy. Yet they are estimated to hold a third of the UK's terrestrial carbon in topsoils alone¹. Species-rich grasslands are generally able to store more carbon than cropped land, monocultures, or grassland under intensive agricultural management². Studies show that greater plant diversity, particularly with deep-rooting species, can enable species-rich grasslands to sequester and store more carbon in their soil³. Less intensive land management regimes, such as rotational grazing practices, promote plant biodiversity and soil health - which also enables greater storage of soil carbon in semi-natural grasslands⁴.

In addition, reducing grazing livestock numbers and fertiliser inputs to achieve grassland restoration will help to reduce methane and nitrous oxide emissions, lower input costs for farm businesses, benefit biodiversity, public health, air and water quality and contribute to achieving net zero, while improving soil health and keeping the land in economically productive use. At least 40% of the nitrogen fertiliser added to farmland is lost to the natural environment; greater efficiencies in nutrient

¹ N.J.Ostle, P E. Levy, C.D. Evans, P. Smith, UK land use and soil carbon sequestration, Land Use Policy Volume 26, Supplement 1, 2009. Available at:

<https://www.sciencedirect.com/science/article/abs/pii/S0264837709000945?via%3Dihub>

² Emmett, B. A., Reynolds, B., Rowe, E., Spurgeon, D., Brittain, S. A., Frogbrook, Z. Woods, C. (n.d.). Countryside Survey: Soils Report from 2007 Soils Report from 2007.

³ Stafford, R., Chamberlain, B., Clavey, L., Gillingham, P.K., McKain, S., Morecroft, M.D., Morrison-Bell, C. and Watts, O. (Eds.) (2021). Nature-based Solutions for Climate Change in the UK: A Report by the British Ecological Society. London, UK. Available at: www.britishecologicalsociety.org/nature-basedsolution

⁴ Yongfei Bai, M. Francesca Cotrufo, Grassland soil carbon sequestration: Current understanding, challenges, and solutions, Journal Article, (2022), Science, pg. 603-608, 377. Available at: <https://www.science.org/doi/abs/10.1126/science.abo2380>

management can be a significant contributor to achieving net zero in a pro-business way. Land managers need government support, clear advice and a strong regulatory baseline to deliver these multiple benefits.

We are encouraged by the factors listed as relevant to the resilience of ecosystems - diversity between and within, connections between and within, scale, condition and adaptability. When considering the resilience of ecosystems, we would like to press the importance of semi-natural and species-rich grassland habitats due to their vast decline and traditionally lower payment rates, which we feel is disproportionate to the associated restoration and maintenance costs, and the multiple societal and environmental benefits they provide. Although nearly two thirds of land in Wales is grassland, most of this is agriculturally 'improved' grassland, with semi-natural grassland only covering 9% of land in Wales⁵. Of this, only a small percentage can be classed as species-rich and is found in isolated fragments.

Moving forward, it is essential to restore and maintain species rich grasslands, which in turn provide a huge range of benefits; improving biodiversity, sequestering and storing carbon, providing natural flood defences, locking up pollutants, improving⁶ nutrition for livestock, enhancing our health and wellbeing, and supporting the continuation of an irreplaceable part of Wales's cultural heritage. The Agriculture Bill and SFS should therefore reflect the importance of semi-natural and species-rich grasslands in meeting the SLM objectives and subclauses; recognising them as vital NbSs to climate change, and directly supporting land managers to restore and maintain their permanent pasture in a way that provides 'public goods' for 'public money', facilitates sustainable agricultural livelihoods, and helps Wales to meet its greenhouse gas emissions and net zero goals.

Whilst we welcome the factors considered for providing 'resilient ecosystems', the four objectives are extremely broad. This could result in important targets being overlooked and make the setting of targets more difficult going forward. We would like to see soil health and air quality highlighted, for example, as these are two vital areas which will need to be monitored as part of providing sustainable land management at a whole farm scale.

We welcome the commitment to provide Indicators to measure the progress of the objectives. The wording currently commits to providing at least one distinct indicator for each SLM objective. Considering how wide the current objectives are, we feel that 'at least one' indicator is setting the bar very low and that this should be increased to be more in line with the objectives set out on the 'Sustainable Farming Scheme; Outline proposals for 2025' consultation. Currently the outcomes

⁵ The State of Natural Resources Report (SoNaRR): Assessment of the Sustainable Management of Natural Resources. Technical Report. Chapter 3. Summary of extent, condition and trends of natural resources and ecosystems in Wales. Accessed at: [chapter-3-state-and-trends-final-for-publication.pdf](#) (naturalresources.wales)

⁶ Stafford, R., Chamberlain, B., Clavey, L., Gillingham, P.K., McKain, S., Morecroft, M.D., Morrison-Bell, C. and Watts, O. (Eds.) (2021). *Nature-based Solutions for Climate Change in the UK: A Report by the British Ecological Society*. London, UK. Available at: www.britishecologicalsociety.org/nature-basedsolution

in this consultation have not been grouped under the four objectives listed in the Bill, and this relationship ought to be much clearer.

We would welcome continuing transparent consultation, as these objectives become more defined and the targets are set, as this element of the scheme will be absolutely vital to its success. Robust targets also need to be underpinned by comprehensive monitoring. Traditionally, for example, ecological monitoring on the progress of species-rich grassland maintenance and restoration has been low, resulting in the risks that grasslands are mismanaged, representing a poor use of public money and farmers' resources and delivering poor environmental outcomes. We would like to see farmers thoroughly supported to not only get the management right at the beginning of the scheme, but also to gain continued support as their managed habitats evolve.

Part 2: Support for Agriculture

We welcome the annual report, which will detail the financial support provided and therefore uptake of the scheme. It would be useful for this report to detail locality of uptake, farm type, options applied etc., so that any farms/sectors who are having accessibility issues are highlighted.

We also welcome the 5 yearly impact report which analyses the effectiveness of the scheme when meeting the overall objectives, and particularly any steps necessary to rectify areas where support has failed to achieve its purpose.

We note that there is currently no obligation to use the powers relating to compliance checking and enforcement. A robust regulatory baseline and advice will be key to implementation on the ground and building positive relationships with land managers going forward.

In part 2, section 8, we would ask that Welsh Ministers should also have the power to provide support in connection with biodiversity. Biodiversity has not been included here in its own right as an ancillary activity, and we feel it is important include it, perhaps under point d) 'maintaining and enhancing the resilience of ecosystems'.

Part 4: Forestry

We support the introduction of powers to amend the Forestry Act (1967), to amend, suspend or revoke felling licences once granted. We agree that NRW should have the right to amend a licence where an activity becomes detrimental to the environment. It would be useful to have more clarity on how sites will be monitored where licences have been issued.

Part 6: General

What are the potential barriers to implementation?

In the past we have found that the main barriers to the implementation of agri-environment schemes are lack of advice and communication for farmers to apply early on, ongoing advice throughout complex and evolving habitat management, and

the economic viability of the scheme. The payment rates need to provide sufficient incentive to attract the farming community, especially with the phasing out of BPS, and furthermore options need to allow farmers to continue to manage the land in an economically viable way. These factors have previously affected the uptake of permanent grassland options. Due to the extent of grassland under agricultural management across Wales, crucial to getting this right will be vital support to incentivise farmers to deliver widespread environmental outcomes.

Will there be any unintended consequences?

We understand that information surrounding National Minimum Standards (NMS) will be brought forward under a separate bill. It is vital that there is no gap in delivery of the NMSs under the BPS scheme and the introduction of NMSs through the SFS in January 2025. It is extremely concerning that we do not currently have a clear communication on what the environmental standards will be. It is essential to take the time to ensure that the future agricultural baseline is fit for purpose and sufficiently integrated across the whole sector.

We are very pleased to see the Bill includes the duty to implement effective monitoring and reporting of the scheme. This will help us to grasp the effectiveness of the options and understand more about the habitat gains made as a result of implementation. Whilst effective monitoring is essential when delivering environmental outcomes, the monitoring of schemes must not become an off-putting element to farmers, and therefore unintentionally limit the uptake of the scheme. The farming community should be supported, through bespoke advice, to effectively monitor environmental outcomes and make best use of the scheme.