

The Nature Friendly Farming Network¹ (NFFN) is a farmer led, independent organisation established in November 2017. We are uniting farmers across the UK who are committed to managing their land for wildlife and the delivery of public goods, as well as growing and providing healthy, nutritious food. A Wales NFFN steering group was established in June 2018. We welcome the opportunity to respond to this consultation as we are concerned about the widespread species declines and the general degradation of the environment which is being witnessed across our countryside².

How could the Welsh Government's proposed Public Goods scheme, set out in Brexit and Our Land, be applied to restore biodiversity?

We believe agriculture needs to be profitable and sustainable, and farmers should receive adequate payments for undertaking environmental and nature friendly activities. Future policy should focus on rewarding farmers to provide those benefits, especially environmental benefits that are not normally paid for through the market. We therefore strongly support the public money for public goods approach and we believe that this is where the majority of taxpayer money should be focused.

The NFFN believes that in order to restore and enhance biodiversity, a Public Goods scheme requires the following elements:

- Payments for environmental works must be fair and generous and make economic sense to farm businesses. Payments should also reflect the **true value of the public good** delivered and therefore need to move beyond the current system of income foregone/ costs incurred. It is vital that land managers that are already delivering public goods on their land should continue to be supported and rewarded. In order to do this, a public goods scheme must be **adequately funded** to properly reward farmers and incentivise them to adopt or maintain environmentally sustainable practices.
- A public goods scheme should cover **all farmers**, with no limits on uptake based on the size of the land holding. All farmers have the potential to restore and enhance biodiversity, as well as other environmental services and this can be encouraged without prejudice to any one sector.
- Basing management interventions on sound **evidence** is key. The farmer's local knowledge is also very important and should be valued. Farmers must be involved in the development of agri-environment options - our knowledge and experience will be crucial in delivering something that works, representing good value for money and greater buy in from the farming community. Ongoing monitoring will also be vital in order to measure the success of a public goods scheme and ensure value for money.
- Payments should be received for delivering benefits that go **above and beyond the regulatory floor**, and any new scheme should adopt the polluter pays principle.
- It is vital that farmers are supported with sound **advice and guidance** when developing and delivering a public goods scheme. Contract managers are vital to the success of agri-environment schemes, and support should be made available for farmers and land managers throughout the duration of their

¹ <https://www.nffn.org.uk/>

² The [State of Nature 2016 Wales Report](#) shows that there has been a long term decline in biodiversity, whilst the [State of Natural Resources Report 2016](#) shows that none of our ecosystems are resilient. The [State of Birds in Wales 2018](#) shows that half of all farmland species having suffered loss of breeding range since relative to the 1970 Atlas.

contracts. Regular support from a trusted advisor makes a significant difference in achieving success and ensures that land managers are fully equipped to do what is best in each area. Entry into schemes should look at the outset at what type of advice is needed and how it will be accessed.

- **Flexibility** should be built into the design of new schemes, so that farmers can alter management practices if required. We feel this is a major flaw in the current design of schemes. Management options available under Glastir are often too prescriptive which makes it difficult to manage adaptively and respond to external factors.
- Future schemes should aim to work at a **landscape scale**, both in the wider countryside and within priority areas, and payments should be calculated to account better for this collaborative, coordinated approach. This helps connect the good work of farmers in each area, to contribute more effectively towards environmental outcomes, rather than creating fragmented areas of good quality habitat within 'biodiversity deserts'.

In terms of scheme design we believe there should be both a **comprehensive element**, open to all farmers, with rewards increasing in relation to effort, and **targeted element**, with more complex requirements. The comprehensive element should be based on simple interventions such as hedgerow restoration and management, tree planting, creating wildflower field margins, establishing bird cover crops, creating wetland features, establishing stream-side corridors or leaving unsprayed arable crops (flowers/ pollinators) to be retained as winter seeds for birds. These are simple measures that could be implemented by the majority, if not all, farmers and land managers. Small and simple management changes over larger areas can deliver substantial biodiversity benefits. For this to work, it is crucial that this comprehensive scheme is more ambitious than the previous Glastir Entry Scheme, with payments only to be made for actively maintaining and enhancing habitats/species, as opposed to paying a farmer not to undertake a specific action e.g. applying fertilising.

A targeted element will address specific problems that need more investment and more complex management, including management, restoration and creation of priority habitats (e.g. peatland) and species recovery programmes.

There should also be support for specific types of farming that benefit the environment - including payments to support **organic**³ and other **agro-ecological farming** systems (based on the known benefits they provide) and to support the continuation of **High Nature Value**⁴ farming and forestry, especially in the uplands and more marginal farming areas.

There is good evidence that **payments based on outcomes**, or at least results, can improve environmental benefits, and increase farmer engagement and awareness of public good schemes. However, there are technical challenges with this approach that must be addressed before it can be rolled out as the primary mechanism for rewarding farmers and land managements. Results are not always in the control of the farmer and could present a higher risk to them. Outcomes should therefore be based on the quality of the *habitat* rather than individual species. Payment for results could also be used to top up payment for management actions (e.g. paying to plant a wild bird seed crop and then paying an additional sum if certain results are achieved from this).

In addition, the measures offered to land-owners need to be sufficiently **targeted** to those of conservation concern and which are directly affected by land management activities. For example, there is only a minor conservation benefit to providing bird boxes on most farms, as it is not addressing a particular agricultural impact and as they are used almost exclusively by common species. This reduces the cost effectiveness of the overall scheme and should be avoided in favour of measures with wider benefits more directly countering land use impacts. In order to be effective, we cannot continue to treat the symptoms only - the problem of biodiversity is the loss of habitat diversity and structure through intensive land management and this is what the public goods payments need to be aimed at.

³ Consumer demand for organic produce is rising steadily, which is known to benefit both food quality and the environment.

⁴ <http://www.highnaturevaluefarming.org.uk/>

How could the various existing Welsh Government policies and legislation for biodiversity restoration be applied in the design and implementation of the proposed Public Goods scheme?

The Environment (Wales) Act 2016 is an important primary piece of legislation around which to base a Public Goods scheme. Part 1 of the Act sets out the purpose of promoting the sustainable management of natural resources and the specific main objective to **restore and enhance the resilience of ecosystems** and the benefits they provide. A Public Goods scheme should therefore be centred around achieving these objectives. In doing this, a Public Goods scheme must take account of the 5 aspects of ecosystem resilience, which include.

- (i) diversity between and within ecosystems*
- (ii) the connections between and within ecosystems*
- (iii) the scale of ecosystems*
- (iv) the condition of ecosystems*
- (v) the adaptability of ecosystems*

Biodiversity (which is defined a natural resource within the Act) clearly underpins ecosystem resilience, therefore a public goods scheme which invests in restoring and enhancing biodiversity makes sense. A biodiverse natural environment also underpins food production and provides a host of valuable ecosystem services. For example, restoring hay meadows⁵ not only enhances biodiversity but also benefits pollinators, enhances soil carbon sequestration and improves soil health and structure. This, in turn provides other valuable ecosystem services such as water regulation through increasing the land's capacity to retain water, reducing surface run off and maintaining steady flow rates, thus helping alleviate flood risk. Likewise, restoring and managing habitats such as blanket bog and woodland not only delivers for biodiversity but also helps mitigate climate change by sequestering carbon, reducing flood risk through increased water retention and maintaining steady flow rates, and enhancing both water and air quality. The multiple benefits of nature conservation management strengthen the case of public investment in this area.

The act clearly states that biodiversity has an **intrinsic value**, which means that it is worth protecting regardless of its value to humans - it also has the moral right to exist. A future public goods scheme should take account of this.

Biodiversity, improved soil health, water quality, air quality and climate change mitigation are all incredibly important and interlinked public goods, and in order to successfully and efficiently deliver on each of those issues, the new Publics Goods scheme will have to address them together in a holistic way.

What lessons can be learned from the Glastir Monitoring and Evaluation Programme (GMEP) to ensure effective monitoring and evaluation of schemes to support the restoration of biodiversity. How should the new Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) be designed and implemented effectively for this purpose?

Monitoring and evaluation will be important and should drive management decisions. Species and habitat monitoring is vital and must be included in schemes in order to assess their impact on wildlife. Ongoing monitoring will also be vital in order to measure the success of a public goods scheme and ensure value for money.

We are fortunate in the UK that there is already incredibly close monitoring of a wide range of species/groups including birds, butterflies, moths, plants, amphibians, bats and other legally protected species. This monitoring base, partly supported by public funds, should be used and could be an integral part of a Public Goods scheme, with annual information feeding into the calculation of payment rates for different habitat/land use and geographic areas.

A collaborative approach that brings in a wide variety of stakeholders would be beneficial. These might include local government staff, academics, the private sector, environmental organisations and of course farmers and land managers. Involving farmers and land managers in the monitoring process can create a sense of ownership

⁵ Over 97% of wildflower meadows have been lost since the 1930s in Wales and England.

over outcomes and encourage positive management. It will also develop a greater understanding of how land management can positively effect nature and wildlife. The farmer's local knowledge is also very important and should be valued.

Furthermore, we should be looking at remote monitoring e.g. automatically via satellite imagery, drones and photographs.

We are concerned that the staff required for monitoring a payment for outcomes scheme would significantly reduce the funding available for farmers but without them the scheme wouldn't work. To this end, we believe there is a need for higher level of funding to cover the staff support needed.

Conclusion

A public goods scheme that rewards farmers and land managers to deliver environmental goods that benefit all is the right thing to do to ensure both sustainable farming and environment protection for the future. We believe that nature friendly farming is not only better for nature, but is also the most productive and sustainable way of getting food from our land.

Producing food in a way that benefits the environment and wildlife justifies public investment in the sector and help ensure value for money. Many farmers are already playing an incredible role in helping wildlife flourish on their farms - we believe that they should be better supported and rewarded for their good work.