

CONSULTATION

Response Document



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Sustainable Farming and Our Land
Llywodraeth Cymru | Welsh Government

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Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge-sharing through events and publications, skills development through its comprehensive training and development programme, and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- Greener UK¹
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

¹ Supporter Member

Comments from CIEEM

Overview of Position

CIEEM supports the proposal that future agricultural support in Wales should be designed around the principle of sustainability and pursue the broad objective of Sustainable Land Management (SLM), based on the principles outlined in Section 3(2) of the Environment (Wales) Act. The principle of rewarding existing sustainable land management practices, including maintenance of viable wildlife habitat, is also strongly supported. In particular, an outcomes-based approach supported by evidence, is very welcome.

We would further encourage Welsh Government to ensure the scheme is flexible enough to respond to future needs. Scheduled reviews of the desired outcomes should be delivered as part of the scheme, together with identification of new ecosystem services and biodiversity outcomes where there is the need to do so.

Specific Comments

The Landscape-Scale Approach

CIEEM welcomes the concept of collaboration (see paragraphs 4.90 – 4.93), particularly when this is applied to creation and management of habitats across many farms. This would facilitate delivery of SLM at the landscape and/or catchment scale, as well as reflecting the Lawton principles: in four words, these essentially mean *'more, bigger, better and joined'*. Whilst this wording came out of a 2010 review of England's wildlife sites and ecological networks, it supports the building ecosystem resilience approach in Welsh Government's Natural Resource Policy.

CIEEM absolutely agrees that Natural Resources Wales' (NRW's) ongoing work on Area Statements should assist Welsh Government with informing spatial priorities (paragraph 4.93), along with other landscape-scale initiatives or projects. For example, the Living Landscape Wales scheme delivered by the Wildlife Trusts in Wales, which aims to deliver a *'national network of high-quality natural areas for people and wildlife'*. In addition, data collected via the State of Natural Resources (SoNaRR) reporting process will be useful, together with the proposed updating of the Agricultural Land Classification mapping capability.

The Advisory Service and Technical Competence

CIEEM broadly supports the general concept of an Advisory Service, however we do also have some concerns. We are aware that the advisory service *'can provide an initial gateway, but the support may need to be provided by a wide range of individuals and organisations.'* The *'wide range'* is not defined in the current document, and CIEEM would therefore welcome further clarification on this.

The role of a person carrying out a Farm Sustainability Review (FSR) and putting together a Farm Sustainable Plan (FSP) would carry significant responsibility. The range of skills and experience staff must have in order to support this work properly is large, and CIEEM would advise that whilst a broad overview of all aspects of FSR and FSB would be needed, significant levels of specialist input would also be required from additional individuals.

For example, anyone assessing the condition of existing habitats in terms of biodiversity, identifying

those which are in good or poor condition, and subsequently advising on how to improve condition, would require input from a competent ecologist in each relevant habitat. Thus, someone who completes an assessment of a semi-natural woodland block would need input from a competent woodland ecologist, as well as a forester. Someone who completes an assessment of several fields of unimproved grassland would need input from a competent grassland ecologist, as well as a cattle farmer. Likewise, maintenance of semi-natural habitats in favourable condition and creation of new habitats requires the advisor to be appropriately qualified, experienced and ultimately competent.

CIEEM has invested considerable resources into developing a competency framework to support its members – ecologists and environmental managers – in assessing the skills, knowledge and behaviours that are required to perform certain activities well and which are critical to success in specific professional roles. The Competency Framework allows members to clearly demonstrate that they meet a certain level of competency at each membership grade. As a Chartered Body, CIEEM also has the powers to grant Chartership.

CIEEM is interested in discussing how we can support the delivery of the proposed Advisory Service, particularly in relation to biodiversity. We are keen to ensure that farmers receive advice that is professional, objective and evidence-based from advisors who are competent to deliver this.

Comments on Specific Actions and Habitats

Some examples where a broad-brush, non-expert view may be misleading are as follows:

1. Paragraph B75 – Bracken control needs expert advice to ensure that no unintentional adverse impacts on biodiversity occur. For example, the Pearl-bordered Fritillary butterfly is found in mosaics of grass, bracken and dense scrub, such as particularly occur in ffridd, and may be impacted (if present) as a result of bracken control. If bracken removal was advocated, other alternatives to herbicide spraying may be considered, such as rolling or cutting & composting.
2. Paragraphs B82 to B85 – New woodland planting should – where possible – aim to use native broadleaved species, using UK sourced stock to reduce tree disease risk. Planting should not be located on existing semi-natural vegetation but increasing tree cover through natural regeneration and colonisation may be locally desirable. Whilst timber may currently be the main output of forestry operations, creation of other products may also be of economic as well as biodiversity value. For example, more traditional management techniques such as coppicing, may yield more niche products including charcoal, hurdles, hedge-laying stakes and firewood, and at the same time improve the diversity of the woodland in question.
3. Paragraph B25 and Figure B3 – Maps such as this can give a useful general indication of vegetation condition, however it is important to recognise that this doesn't give an indication of protected site condition – absence of negative indicator plant species or presence of positive species is only a component of overall site condition. On site assessment is essential.

Working in Partnership

CIEEM strongly believes that Welsh Government and – when it is established – the proposed Advisory Service, should work closely with other relevant organisations with regards to the biodiversity aspects of the scheme, in order to ensure the outcomes of the new scheme are based on the best evidence available. In particular, there should be an adequate and functional link to NRW, especially in relation to land within or adjacent to statutory sites, and/or where protected species are involved. As mentioned previously, work on Area Statements and SoNaRR will also be extremely

relevant.

In addition, we expect WG to engage with the wider biodiversity network in Wales, including NGOs (such as the Woodland Trust, RSPB, Wildlife Trust, National Trust, Buglife, Plantlife, PONT etc), as well as academic/research institutions (such as CEH and the universities) and the Local Environmental Record Centres (LERCs). Organisations that already run projects and have existing relationships with landowners will be of huge value in terms of the expertise and evidence they can supply.

Common Land

CIEEM agrees that areas of common land represent a significant biodiversity resource across Wales (paragraph 4.94). However, we are not clear whether Associations or Councils are the best way forward to facilitate agri-environmental support for these areas and encourage Welsh Government to explain how such bodies would be resourced to undertake this work. We therefore look forward to the forthcoming Commons Councils consultation later this year.

Self-assessment by Farmers

CIEEM takes on board proposals relating to self-assessment and monitoring (paragraphs 4.47 – 4.50) and understands the need to reduce costs of running the scheme in order to maximise financial contributions that go directly to farmers. However, we would encourage Welsh Government to ensure that any tasks carried out by farmers themselves were within the bounds of their likely competence, and don't stray into the realm of tasks that should be carried out by more specialist professionals. For example, keeping simple records and carrying out soil testing may well be appropriate, but completing Common Standards Monitoring of grassland or carrying out mammal survey work will be outside the competence of most farmers. Ultimately, any self-assessment scheme should run in tandem with an audit system.

At the same time, it may be useful to encourage farmers who would like to, to have the opportunity to share incidental observations at the time of reporting. That might include a general reference to less birds of prey being noted flying above the farm during that particular summer, thus giving some clue about the farm's changing small mammal population – and therefore the quality of the habitat that would support it.

CIEEM would also like to note that there is a risk that measuring simple parameters may not measure all changes. Other, more complex parameters would no doubt need to be monitored as well, perhaps not at the same frequency, but certainly by more specialist professionals. A combination system where farmers monitored some aspects and allowed specialists to monitor others, would appear to be a sensible way forward.

Technology and Ground-truthing

CIEEM acknowledges the reference to emerging technologies and, for example, the use of remote sensing to judge conditions of habitats. However, we would also advise that any such approach must also include a level of ground-truthing by competent ecologists.

Regulatory Framework and Evidence-Based Monitoring

CIEEM broadly agrees that the Advisory Service and the enforcement system should function separately. However, if necessary, it is considered that this could be provided by the same agency, with an 'ethics wall' in-between. For example, Welsh Government or NRW could provide this service.

We would also advise that any monitoring work carried out must be evidence-led to ensure outcomes are being achieved, and to highlight where they are not.

The Advisory Service and Funding

CIEEM believes that the proposed advisory service needs to be free at the point of delivery for aspects relating to ecosystem benefit or biodiversity/ecological management. For income generation aspects of farming – for example, food production – we consider it reasonable to charge for advice.

CIEEM very much welcomes the statement regarding continuing *‘to call on the UK Government to provide further clarity on the level of agricultural funding which will be returned to Wales after Brexit’*, and that *‘Welsh Ministers are clear that leaving the EU should not mean any reduction in the funding returning to Wales’* (paragraph 1.60). We urge Welsh Government to continue to press the UK Government on this, since adequate funding underpins the entire Sustainable Farming and Our Land proposal, and without it would not be possible.