

Position Statement on The Implementation of Proposed Agriculture and Land-use Policy Changes in Wales

July 2021

In 2019, the Welsh Government introduced their proposals for a new system of agriculture and land-use support designed around the principle of sustainability, known as Sustainable Land Management (SLM), to urgently address the climate emergency and biodiversity crisis. These proposals were introduced through two consultations: *Brexit and Our Land* and *Sustainable Farming and Our Land*.

We strongly support the proposed shift towards rewarding land managers for delivering non-market public goods, such as clean air and water, improved habitat condition and actions to sequester carbon. We also welcome the development of an outcomes-based approach to incentivise significant changes in the natural environment and are pleased to see that Welsh Government are proposing that financial support will deliver additionality in all cases.

Welsh Government also set out its proposals for regulatory reform through the *Agriculture (Wales) Bill White Paper* to simplify the standards to which farmers must comply through a set of National Minimum Standards (NMS). We support these proposals and that NMS apply to all farmers, however, NMS must provide significant benefits for the natural environment and go above standard good agricultural practice. We also welcome the shift to a proportionate approach to enforcement, which must be funded, in order for regulators to deliver.

Recommendations for the Implementation of Sustainable Land Management

Reform of the current land management system to deliver public goods offers an exceptional opportunity to reverse the ongoing declines of our biodiversity. However, new policies must be delivered strategically, with sufficient funding, long term protection and in collaboration with experts to ensure the right measures are being employed in the right places.

It is important that lessons from past and current agricultural schemes are taken into consideration, and that in the development of Sustainable Land Management (SLM) schemes, the following is taken into account:

- A 'one size fits all' scheme fits no-one - A scheme must operate at a local level, with bespoke flexible options.
- Agreements need to be developed on a site-specific basis.
- Clarity of nature conservation outcomes and what they mean on the ground are essential to delivery.
- Farmers need well-informed support and feedback to achieve agreed outcomes for nature.
- Flexibility is needed over how the agreed outcomes are achieved, with flexibility to change what isn't working for nature - A scheme which is well-resourced in terms of skilled field staff e.g. CIEEM accredited ecologists and experienced professionals for NGOs etc. will achieve more and be more equitable.

Strategic Planning of Climate Measures

In delivering a wide range of public goods, there is a potential for unintended consequences, if not planned strategically. The stated purposes of meeting Welsh Government's net zero target and increasing levels of carbon sequestration through land management, must be delivered in tandem with the ambition to increase biodiversity and ecosystem resilience. For example, we welcome the proposals to utilise strategic opportunity mapping for forest expansion, however, it does not provide the detail required to ensure planting will not harm existing biodiversity of conservation importance or to achieve a net biodiversity gain. This is achieved through site-specific Environmental Impact Assessments. Similarly, any earned recognition approach must not undermine the need for detailed assessments of the impact on other habitat types and biodiversity.

Any planting should follow the principle of 'the right tree in the right place', i.e. using native species of local provenance where possible and avoiding 'planting up' of key open habitats that are not only important for biodiversity, but may also have a higher carbon capture capacity. Any tree planting programme on existing habitat of conservation value should be subject to an Environmental Impact Assessment.

Woodland expansion can also be achieved through natural regeneration. This can significantly reduce costs, maintain local adaptation to conditions and, in woodlands, create a varied age structure. Consideration will need to be made of the means to financially support natural regeneration through the SLM scheme.

Action to address the climate emergency through Nature-based Solutions must utilise the full suite of high-carbon habitats. For example, bog restoration/preservation is equally important for carbon sequestration and biodiversity, and is a major habitat in Wales, but does not receive the same attention as planting trees. When they are degraded, peatlands act as a source of greenhouse gases, and have reduced biodiversity and capacity to improve water quality¹. Converting one hectare of drained blanket bog back to intact blanket bog can result in

¹ The IUCN reports 10% of all Carbon emissions from land use worldwide comes from degraded and damaged peatlands. <https://www.iucn.org/resources/issues-briefs/peatlands-and-climate-change>

absorption of around five tonnes of carbon dioxide equivalents per year and so must be a priority.

It is important that the SLM prioritise investment in existing high-quality habitats that are maintained in good condition so that they become valuable assets, generating reliable income from SLM scheme payments. This should include restoring Priority Habitats as defined in the Environment (Wales) Act including, but not limited to those in designated sites. Options are to buffer, extend and restore. SLM should also seek to prioritise landscape scale projects, and nature-based solutions approaches in line with Welsh Government Natural Resource Policy.

Natural Resources Wales' ongoing work on Area Statements should also assist Welsh Government with informing spatial priorities, along with other landscape-scale initiatives or projects.

Advice

We welcome the proposed approach of an initial assessment of agricultural land and agreeing actions with the farmer. A personal approach with individual farmers will build trust and a sense of ownership of the SLM scheme.

The role of a person carrying out the initial assessment and putting together a Farm Sustainable Plan would carry significant responsibility. The range of skills and experience staff must have in order to support this work properly is broad, and CIEEM strongly recommends that this be conducted by qualified professionals with expertise in each subject area. 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.

Farmers must have access to advice that is professional, objective and evidence-based from advisors who are competent to deliver this. 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.

NMS and appropriate advice and support should be introduced at the earliest opportunity to set a clear regulatory baseline and provide certainty.

Monitoring and enforcement

The success of any new regulations will rely on the provision of adequate monitoring and enforcement. Natural Resources Wales and other regulatory bodies **must be fully funded** to deliver these.

We recognise the need to reduce costs of running the SLM scheme associated with monitoring and enforcement in order to maximise financial contributions that go directly to farmers. However, we advise that remote monitoring approaches must also include a level of ground-truthing by competent ecologists, to ensure both accurate data gathering, and a local approach to engaging farmers is not lost, i.e. a balance must be struck between remote approaches and site-specific engagement. The addition of ground truthing and direct engagement must be adequately funded to ensure thorough monitoring is possible.

It is important that wider stakeholder engagement, including liaison with Non-Government Organizations (NGOs), is undertaken, and support provided where necessary for data gathering.

Clear monitoring requirements and enforcement measures are essential to build credibility of the regulations. Good practice guidance encouraging farmers and land managers to go above and beyond the NMS is also essential to deliver the urgent changes required, but should be clearly separated from regulatory compliance measures to avoid confusion.

The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland. CIEEM has approximately 420 members in Wales who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practicing ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.