

Ymgyrch Diogelu Cymru Wledig Campaign for the Protection of Rural Wales

26th August 2015

Montgomery and Brecon & Radnor Branches
Campaign for the Protection of Rural Wales

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Consultation: A strategic framework for Welsh agriculture

1. The Campaign for the Protection of Rural Wales (CPRW), established in 1928, is Wales' foremost countryside charity. Through its work as an environmental watchdog it aims to secure the protection and improvement of the rural landscape, environment and the well-being of those living in the rural areas of Wales – aims which we are sure that Powys County Council also shares.
2. This report is prepared by Committee Members of the Montgomery and Brecon & Radnor Branches of CPRW which represent all of Powys.
3. CPRW would like to acknowledge the hard work in research, consultation and drafting that goes into preparing a response of this nature. We welcome the opportunity to comment and we hope that we may contribute to development of the issues we have highlighted through future dialogue with the Welsh Government

Q 1. Do you agree with our shared vision for agriculture? Would you suggest an alternative?

"Disagree"

1.1 We agree in general terms with the vision of '*a prosperous, resilient agriculture industry promoting Wales' present and future well-being*' and we fully support the premise that sustainable farming is key to the prosperity and quality of life for Welsh people.

1.2 However we think that agricultural policy is to do with more than productivity and economic growth and that it concerns other groups besides industry bodies. We also recognise that the stewardship of the countryside is largely in the hands of the agricultural sector which needs support to fulfil this crucial role.

1.3 CPRW finds the "vision" of limited use because it relies so heavily on generalisations and wishful thinking that it does not provide a clear framework for effective strategy. '*Wales' present and future well-being*' is open to wide and varied interpretation. Likewise "*Production must be sustainable in the widest sense – economically and environmentally – with these outcomes being mutually compatible*" is unlikely to generate robust strategy able to confront the very real dilemmas of modern farming and management of the environment. It is unrealistic to suppose that economic viability and environmental protection and enhancement are always mutually compatible or that agricultural businesses which manage to protect and

enhance the environment will necessarily thrive the best. It would be nice if this were always true but often it is not. The shorter-term objectives of building up a profitable business over a matter of years are often incompatible with longer-term environmental objectives stretching beyond the life times of current farmers. The quality and diversity of land must not be squandered when we are losing habitats at an unprecedented rate. We also face uncertainty and may require very different patterns of land use in the future.

Q 2 What is your reaction to our assessment of opportunities, threats and challenges that the agricultural industry must address. Are there others?

"Strongly disagree"

2.1. The bulleted lists of Challenges, Opportunities and Threats do not help define key areas or bring out the dual or triple nature of many plans which are simultaneously a combination of Challenges/Opportunities/Threats. This makes it difficult to assess the consequences of policy on other areas of agriculture and the wider environment and incorporate them into strategy and timely review procedures.

2.2 CPRW is concerned that environmental risks are not even mentioned as a Challenge although this document has the status of a Framework for a Strategy which should have the twin objectives of supporting agricultural productivity and improving the environment. This is what "sustainability" entails - see 1.3 above. The document should acknowledge the risks of environmental degradation and loss of soil fertility in pursuit of short-term agricultural growth and incorporate strong safeguards against this.

2.3 The Framework should consider water run-off and the consequent progressive soil erosion and downstream flooding and incorporate the need to manage tree and other vegetation cover on uplands and banks of watercourses to prevent this.

2.4 Similarly, impacts of intensive farming on pollution of watercourses must be incorporated to integrate the framework with the European Water Framework Directive. We note there is no specific source document on the intensive poultry farming that is causing widespread concern in Wales.

2.5 Safeguards against loss of habitats and biodiversity, including loss of essential pollinators, must be included in any sustainable agricultural framework to bring it in line with EU and National Policy.

2.6 In response to the threats of climate change, the need to preserve peat uplands, which provide carbon sinks, should be included in the framework.

2.7 The document notes a list of relevant sources and policy statements but there is no explicit attempt to integrate these into this document. For instance, we note from source documents that the red meat industry has a target of a 34% increase in financial turnover by 2020 and the Food and Drink Action Plan has a target of 30% growth by 2020 as its central driving objective (with no attempt at any breakdown between sub-sectors).

2.8 The ambitious targets above will require recruitment and training, including advanced specialist education for scientific research, monitoring and support for the agricultural sector. There are general public perceptions that public sector finance is being withdrawn rather than increased for such services, that the current ageing generation of Welsh farmers is not being replaced and that there is a flight of able young people from the countryside, which is increasingly populated by retired people. This document should contain reference to the problems of succession, new recruitment to farming, incentives for farmers to cooperate in establishing good practice, marketing and mentoring, and the urgent need for improved agricultural and scientific education in Wales.

2.9 Professor Wynne Jones' Independent Review of Learning Delivered by Further Education Colleges and

the Relevance of that Delivery in Supporting Farm Businesses in Wales was largely accepted for action by the Welsh Government. CPRW is dismayed to see that the current Framework ignores the urgent educational needs identified as recently as January 2015 – to professionalise the industry, retain skills and bring agriculture into the school curriculum.

2.10 A framework should also recognise that tourism and enjoyment of the countryside are important elements in the prosperity of Wales and of many individual farms. There must be provision to protect the landscapes and features which bring visitors to the Welsh countryside and for farmers to enable access to the countryside. Farmers will also probably be increasingly responsible for maintaining rights of way. Farming is a business and farmers will require realistic support to fulfil their role as stewards of rural Wales. This is not mentioned in the Strategic Framework.

2.11 The potential adverse effects of renewable energy projects on other aspects of farming, tourism, health and well-being of rural communities, and preservation of habitats and biodiversity should be included as a threat.

2.12 The opportunity to cite or encourage positive practices is missed. Wales has diverse small farms developing premium products, local markets and food fairs. Mixed grazing maintains landscapes. Existing projects for sustainable management of uplands could be disseminated. There is potential to develop a Centre of Excellence in the sector which would be ideally suited to Mid Wales providing a range of opportunities from CPD and mentoring, marketing, animal husbandry etc. from basic to degree level. Our young people should not have to go to Herefordshire for world-class education: Wales should aspire to drawing in those with agricultural interests from across the UK.

Q 3 Do you have other comments and views including on how the partnership approach should work?

“Yes”

3.1 CPRW Brecon & Radnor, and Montgomery is not absolutely clear about the status of this document. We assume it is intended to be a Strategic Framework rather than simply a proposal that a Strategic Framework should be developed in keeping with the ‘Vision’ described. As a Strategic Framework ready for progression, we do not believe it is fit for purpose. A Framework should be more than aspirational rhetoric – it should be a precursor to a coherent and realistic strategy which will implicate the agricultural sector, the Welsh Government and all other stakeholders. There should have been a far more thorough analysis of the issues facing Welsh Farming and the Welsh Environment and there should have been much broader participation by stakeholder organisations and the public.

3.2 The Strategic Framework addresses agriculture as a discrete sector, which it is not. CPRW believes that the successful future of farming will depend on much closer co-operation and understanding between farmers, other rural businesses, conservation organisations, educationalists and trainers and the general public. We regret that the Framework does not either acknowledge this or mention relevant European and National environmental legislation.

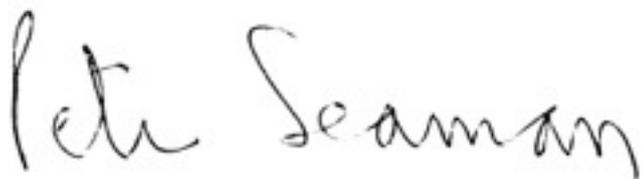
3.3 We also believe the Framework should address the relationship between the agriculture sector and the responsibilities of NRW and the National Parks (who will doubtless raise this point themselves).

3.4 We have had some difficulty in following up the various core reports and industry reviews. There is a plethora of these which provide a great deal of relevant information but their relation to the Strategic Framework is not set out. We are concerned that there have been too many initiatives and consultations for anyone to keep up. The number of these and their varied current state makes it difficult to integrate them into strategy in any sustainable and meaningful way. “*Working Smarter*” is a case in point: the latest we can find is on the Government web-site “*in Brief*” in May 2015. This says “*There have been no further*

updates since April 2013 on the current status of the remaining 49 recommendations, with the deadline date of July 2015 for the Welsh Government to complete all 74 approaching”.

3.5 Finally, the Partnership Group should not be confined to the agricultural industry and the Welsh Government because it is inappropriate for a limited group to “own” a vision which has such far-reaching impacts on us all. Nor would this limited partnership be optimal for successfully raising the positive profile of farming in Wales. The genesis of the Partnership Group is also unsatisfactory because it will already exist, formed from within the industry, before agreeing its membership. It will then have a direct relationship with the Welsh Government in developing policy and strategy without any public scrutiny.

3.6 Co-operation between the agricultural sector, rural businesses and rural communities (as described in the RDP SWOT analysis) would surely lead to better, more sustainable outcomes for us all.

A handwritten signature in black ink that reads "Peter Seaman". The signature is written in a cursive, slightly slanted style.

Peter Seaman MBE

Chair: Brecon and Radnor Branch of CPRW, on behalf of both the Montgomery and Brecon & Radnor branches of CPRW.