

## CONSULTATION QUESTION SECTION

### ABOUT YOU SECTION

Your name: Revd Gethin Rhys

Organisation (if applicable): Cytûn – Churches Together in Wales

Please note here if you prefer to remain anonymous

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### GENERAL QUESTIONS

Please indicate whether you are responding as:  
(Please tick)

- a. An individual
- b. On behalf of an organisation ✓

Please indicate which of these best represent you or your organisation  
[Please tick all that apply]

- a. Farming
- b. Forestry
- c. Environmental interests
- d. Tourism/hospitality
- e. Food and timber supply chains
- f. Public sector
- g. Private sector
- h. Third sector ✓
- i. Trade Union/Representative
- j. Other, please specify below

This response has been compiled by the Wales & Europe Working Party of Cytûn following extensive consultation with church members and others across Wales, including individual members, many with significant expertise in land use matters; denominational rural chaplains and advisers; and a public meeting in Lampeter at which agriculture and the environment were key topics of discussion. It has also been informed by the minutes of a meeting held by the Union of Welsh Independents in Dolgellau on October 12, entitled 'Pastoring the Countryside'.

## **Question 1 of 20**

### ***From Chapter 4: Land Management Programme***

We propose a new Land Management Programme consisting of an Economic Resilience scheme and a Public Goods scheme. Do you agree these schemes are the best way to deliver against the principles?

1. Yes
2. No
3. Unsure ✓

If NO, what alternatives would be best?

We support principles 1,2,3 and 5.

The Christian churches are deeply concerned about climate change and other forms of environmental degradation, and we therefore have considerable sympathy for principle 4. However, principle 4 (that future support should be based solely on the provision of public goods) pre-empts the answer to this consultation question – it is not a principle, but a policy prescription.

Our consultation with farmers in the Lampeter area has indicated deep concern about such a change, in particular for sheep farmers, who are currently heavily dependant on EU exports. “Sheep farming cannot survive without subsidy” we were told. Similar concerns have been expressed to our rural officers by dairy producers. This stark reality is not acknowledged in *Brexit and Our Land*.

We believe that the sustenance of rural (human) communities as well as the rural environment and economy is a public good, and we believe that this should be specifically referenced in the programme. In our Lampeter consultation we found deep fear that whole communities could be lost with the loss of BPS payments. We support the notion of remunerating farmers for the provision of public goods rather than for simply owning land. However, we believe that the production of food locally to Wales is a “public good” - albeit not under the definition used in this document, para 6.14, which excludes any activity which has a market value. We do not believe that there is an inherent contradiction between ‘public good’ and ‘market value’ – indeed, if we can support activities that promote both, that is surely in everyone’s interests, and helps to contribute to more of Wales’s well-being goals. It is in the interests of the public that high quality, nutritious food is produced in Wales. It is in the interests of the public that this food be reasonably priced and that the price should be relatively stable. It is in the interests of the environment that we do not have to import all our food from elsewhere and this is a clear public good. We therefore believe that in addition to the Economic Resilience and Public Goods scheme there should be a Food Production Scheme, encouraging the production of high quality, environmentally sustainable, nutritious food within Wales. We would emphasise that this would relate to the production of all food, not only livestock, and would support the reintroduction of food crops previously farmed in Wales (Carwyn Graves’s recent book *Apples of Wales*, and the related work of the National Botanic Garden for Wales provide one practical example of what might be possible) and the introduction of new food crops.

We agree with the comment in para 3.18 that many things may change in the next ten years, and that supporting economic resilience through change is essential, but we would argue that the requirement for access to food is unlikely to change.

We also note the comment in para 5.36 that one positive feature of the Basic Payments Scheme has been its ability to smooth risk in an inherently risky business. We would argue that this points to some kind of Food Production Scheme payment to avoid these risks being transferred from producers to wider rural society and to food consumers.

### **Question 2 of 20**

#### ***From Chapter 4: Land Management Programme***

Does the Welsh Government need to take action to ensure tenants can access new schemes?

1. Yes ✓
2. No
3. Unsure

If YES, what action would be best?

We support tenant farming and would wish to see tenant farmers being able to access the schemes on the same basis as owner-farmers.

### **Question 3 of 20**

#### ***From Chapter 5: Economic Resilience***

From your experience of current programmes, what do you feel would work well for the future?

This response is not written by people with direct experience of current programmes, so we have no comment.

### **Question 4 of 20**

#### ***From Chapter 5: Economic Resilience***

Do you agree with the focus of the Economic Resilience scheme being on growing the market opportunities for products from the land throughout the supply chain, rather than restricting support to land management businesses only?

In general, yes.

## **Question 5 of 20**

### ***From Chapter 5: Economic Resilience***

Are the five proposed areas of support the right ones to improve economic resilience?

1. Yes
2. No
3. Unsure ✓

Are there any areas which should be included but currently are not?

We do not have the expertise to answer this question directly. We note, however, that Brexit and our Land, unlike the corresponding DEFRA White Paper, does not discuss in any detail the relationship between what is proposed and WTO Green/Amber box rules – the very brief discussion at 6.32-6.34 is wholly inadequate. This is an important omission and we believe that Welsh Government should publish an analysis of this matter before deciding how to proceed.

## **Question 6 of 20**

### ***From Chapter 5: Economic Resilience***

Of the five proposed areas for support, which are the priorities, both in terms of funding, and the sequence of delivery? For example, are certain measures needed in advance of others?

We note and understand the inclusion of diversification at para 5.32-35, and agree that public funding should be available for this area. However, there is a limit to the amount of holiday accommodation and farm shops required in particular areas, and we would like to see some clearer examples of the kind of schemes that Welsh Government would seek to support.

While many of our members in rural areas are very concerned about the proposed reduction in support for cattle and sheep farming, others in our membership are aware of the considerable contribution made by this kind of farming to climate change (about 10% of Wales's contribution to greenhouse gas emissions). We note that the numbers of sheep in Wales doubled during the 1970s as a result of the arrangements at the time under the Common Agricultural Policy, and many of our members would support a gradual return to pre-1973 numbers of farmed animals. This would also reduce the pressure (encouraged at one time by CAP payments) to 'improve' upland areas by draining, fertilizing and reseeded, and allowing them to return to a more natural state.

However, such changed emphases in the payment schemes must still allow for sustainable human communities in the Welsh countryside. We would therefore wish to ensure that diversification *within* food production (e.g. introducing agro-forestry or turning some pasture to growing crops or fruit) would be eligible under this scheme. We would likewise wish to see support for diversification which enables on-land processing of food products and 'farm to fork' enterprises, including the local production of dairy produce using local milk. We note that some enterprises of this kind (such as Rachel's Dairy) have ended up being sold to outside conglomerates,

thus enabling the injection of additional capital, but at the same time reducing the local social and economic value. While appreciating that this can be a dilemma, we would urge the Welsh Government to ensure that payment conditions are appropriate to deal with such situations when they arise.

The document appears to accept as inevitable that imports from elsewhere will increasingly compete with Welsh produce as post-Brexit trade treaties come into play. We are aware that Government grant schemes cannot fully counteract the effects of the market, and that parts of the supply chain other than farmers and rural communities benefit from such payments – e.g. they may enhance the ability of supermarkets to squeeze farmers' margins, thus removing some of the value of the payment from the intended recipient.

While we understand that this is not entirely devolved, we would like to see an outline of Welsh Government's approach to promoting Welsh produce and reduced food miles – in line with the goals of the Well-Being of Future Generations Act – as well as encouraging Welsh farmers to improve their export readiness.

In our Lampeter consultation, participants were interested in further exploration of greater local self-sufficiency in food and other products produced by the land (as exemplified by the [Lampeter Permaculture Group](#)), and we would encourage Welsh Government to see this form of economic resilience as a priority.

### **Question 7 of 20**

#### ***From Chapter 5: Economic Resilience***

Should we be investing in people, for example to bring in new ideas, skills and people into land management and the supply chain in Wales?

1. Yes ✓
2. No
3. Unsure

If YES, how should we look to do this?

We would strongly encourage enhanced funding for the relevant parts of the FE and HE sectors in Wales for the delivery of tailored programmes for this purpose. This includes education in marketing skills and the promotion of Welsh produce as well as land management per se. In view of the importance of rural Wales to the Welsh language, we would wish to see all such programmes provided through the medium of Welsh as well as English. The provision should be co-funded with the Education Department and co-produced with all relevant stakeholders.

### **Question 8 of 20**

#### ***From Chapter 6: Public Goods***

We have set out our proposed parameters for the public goods scheme. Are they appropriate?

1. Yes
2. No ✓
3. Unsure

Would you change anything?

1. Yes ✓
2. No
3. Unsure

If YES, what?

See our comment on Q.1 above regarding local food production and sustaining rural society as public goods. We do not believe that there is an inherent contradiction between 'public good' and 'market value' – indeed, if we can support activities that promote both, that is surely in everyone's interests, and helps to contribute to more of Wales's well-being goals.

We therefore support the proposal in para 6.21 to seek to measure the value of keeping people on the land and would like to see robust proposals in this area being issued for consultation as soon as possible.

We support the use of the Public Goods Scheme to help combat climate change. However, we recognize that some change in our climate is now already happening and is irreversible. This opens up the possibility of growing new crops, as well as restoring the growing of traditional Welsh crops (as in our answer to Q.1 above). We would wish to see diversification of crop production from grass grown to feed animals to crops edible by humans as a priority for support.

### **Question 9 of 20**

#### ***From Chapter 6: Public Goods***

This scheme is meant to offer land managers the opportunity to access a significant new income stream as the BPS comes to an end. How could we improve what is being proposed to attract land managers whilst still achieving our vision and objectives?

See Q.1 for our comments regarding a Food Production Scheme.

### **Question 10 of 20**

#### ***From Chapter 6: Public Goods***

Are there any other Public Goods which you think should be supported?

1. Yes ✓
2. No
3. Unsure

If YES, why?

Food production and the sustaining of rural communities (see Q. 1 and Q. 8) and the Welsh language (see Q. 19).

**Question 11 of 20**

***From Chapter 6: Public Goods***

A number of public goods could potentially take several years, sometimes decades, to be fully realised. E.g. carbon sequestration through broad leaf trees. To deliver on these, land managers may need to enter into a long term contract. How do you see such agreements working? What do you see as the benefits or disadvantages to such agreements?

We strongly support such long term planning, as required in any case by the Well-Being of Future Generations (Wales) Act and the Environment (Wales) Act. Short-term grant schemes can be deeply counterproductive to sustainable land management.

**Question 12 of 20**

***From Chapter 6: Public Goods***

A collaborative approach to delivering public goods may in some instances provide better value for money than isolated activity. How could the scheme facilitate this approach? How could public and private bodies contribute to such partnerships?

We strongly favour a collaborative approach, between landowners, tenants, rural businesses and rural communities. We would wish to see extensive consultation and planning during an extended changeover and roll-out phase (see Q. 16). In this area more than most, the saying “act in haste, repent at leisure” may be appropriate.

**Question 13 of 20**

***From Chapter 6: Public Goods***

Some actions can deliver multiple public goods in the same location. For example, peat bog restoration can have benefits for carbon sequestration and flood risk reduction. However, some locations could be suitable for multiple public goods from different activities. For example, one location may be suitable to either plant trees for carbon sequestration, or to revert to wetland for biodiversity. How could locations for single, multiple or competing benefits be prioritised?

No comment.

### **Question 14 of 20**

#### ***From Chapter 6: Public Goods***

Given that support for the delivery of public goods will be a new approach in Wales, there will be a requirement for a significant amount of training and advice for the sector. How best could this training and advice be delivered? Which areas of the sector need the most attention?

See Q.7. We agree that the public goods approach requires Welsh Government to put appropriate education, training and support in place BEFORE any changeover of systems begins (see Q.16), and look forward to consultation on a detailed delivery plan.

### **Question 15 of 20**

#### ***From Chapter 6: Public Goods***

Private investment in the purchase of public goods is already happening, but at a relatively small scale. How could the new scheme promote greater involvement from the private sector? What are the barriers to this type of investment?

No comment.

### **Question 16 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

What are your comments on the phased transition period and our ambition to complete the changes by 2025?

We consider this timetable to be very rushed, given the degree of change that is proposed and the long lead-in times for planning land management (as acknowledged in your wording of Q.11 and Q.14). We note that the Agriculture Bill 2017-19 currently before the UK Parliament, which includes sections relating to Wales, envisages a seven year phased transition period starting in 2022, and thus continuing until 2029. We would consider this to be the very quickest timetable possible for such drastic and long-lasting change and do not consider that completing the changes by 2025 is realistic or desirable.

This consideration is strengthened by the very recent announcement of the appointment of Lord Bew to lead an inquiry into distribution of funding between the UK nations, and realistic planning for a new system in Wales can begin only when the conclusion of that inquiry is available.

See also the comments in Q.20 below.

### **Question 17 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

What is the most appropriate way to phase out the Basic Payment Scheme to start implementation of the new schemes?

The very high proportion of their income which many Welsh farmers receive from the BPS means that withdrawal must be carried out in a gradual, controlled and predictable manner if there is not to be a social disaster in the Welsh countryside (similar to the social disaster visited upon coalfield communities when the coal industry was closed in haste and without alternative plans for those communities in the 1970s and 1980s). Rural depopulation is already a significant issue, and any rapid or disorderly phase out could irreparably damage the fabric of rural life and undermine all the aims of these proposals. Given that the UK commission led by Lord Bew regarding funding is not due to report for some months, we do not believe that Welsh Government should set even a provisional timetable until clarity is achieved on that matter. It should then engage in consultation with all current recipients of the BPS as well as other stakeholders to determine a way forward.

### **Question 18 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

How can we simplify the current administration and delivery of the Basic Payment Scheme during the phased transition period?

No comment.

### **Question 19 of 20**

#### **Welsh Language standards**

Will the proposed land management programme have any effects (either positive or adverse) on:

- opportunities for persons to use the Welsh language;
- treating the Welsh language no less favourably than the English language?

In many parts of Wales, the Welsh language is a key component of rural life, and the maintenance of viable rural communities is essential for the health of the Welsh language. Key voluntary institutions, such as places of worship, local eisteddfodau, village halls, branches of Merched y Wawr, Young Farmers' Clubs etc are anchors for the language and culture of Wales. It is the view of many rural congregations that the proposal to phase out the BPS by as early as 2025 would be highly detrimental to the Welsh language.

Some changes to land use will require planning permission and the current guidance regarding the Welsh language in Planning Policy Wales 10 (paras 2.47-2.51 of the consultation draft) and especially TAN20 will need strengthening to cope with this unprecedented situation.

## **Question 20 of 20**

Do you wish to make any further comments?

A number of rural churches, Rural Chaplains and [Tir Dewi](#) have expressed deep pastoral concern at the effect of the uncertainty caused by Brexit and the inevitable resultant changes on the mental health of farmers and others dependant on the rural economy. The disturbing number of suicides amongst the farming community, as well as the incidence of mental ill-health and simple loneliness (as most farm businesses in Wales are single-handed or single family enterprises). This is only partially acknowledged in the current Welsh Government consultation, *Connecting Communities*. It is the view of those who are assisting to support those under such pressure in rural Wales that a major transition in payments of the kind envisaged in *Brexit and Our Land* is as significant for these communities as the roll-out of Universal Credit – much criticised by Welsh Government ministers as by the Christian churches – has been for some other communities. It therefore needs to be managed in a controlled, gradual and explained way, showing great care for the individuals most affected.