Sustainable Farming Scheme - Analysis of feedback to the outline scheme proposals

31st May 2023

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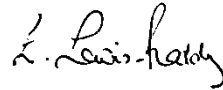
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ACRONYMS LIST

- ETS – Emissions Trading System

- FC – Farming Connect

- GAEC – Good Agricultural and Environmental Conditions

- INNS – Invasive Non-Native Species

- KPIs – Key Performance Indicators

- LEAF – Linking Environment and Farming

- NFFN – Nature Friendly Farming Network

- NFM – Natural Flood Management

- NMS – National Minimum Standards

- NRW – Natural Resources Wales

- OF&G – Organic Farmers and Growers

- PETA – People for the Ethical Treatment of Animals

- PfL – Pasture for Life

- PRoW – Public Rights of Way

- RPW – Rural Payments Wales

- SFS – Sustainable Farming Scheme, also referred to as 'the scheme'.

- SLM – Sustainable Land Management

- WFG – Wellbeing of Future Generations (Wales) Act 2015

EXECUTIVE SUMMARY

This report presents the analysis of 100 Sustainable Farming Scheme (SFS) Feedback Forms. Data was analysed using a mixed methods approach, providing a more complete overview of the research. Demographic data was analysed using MS Excel. Non-numerical feedback was analysed thematically using NVivo. Responses sent in a format other than the feedback form were reviewed and summarised to add substance where thematic gaps had been identified.

Responses were received from organisations and charities from a wide range of sectors based and operating in Wales. Feedback from individuals showed all respondents were Wales-based, with approximately half of them being farmers.

The Introduction to the scheme outline generated a large amount of feedback from respondents. Generally, respondents felt positive about the introduction, though there were concerns that participants of the scheme would not receive appropriate support. Respondents provided suggestions on eligibility requirements and flexibility, arguing for improved accessibility for a wider variety of farms. Clarification was sought by respondents where they felt information was lacking. These areas were the proposed environmentally-focussed actions and specific definitions for vague terms (e.g., food security and sustainable land management).

Chapter Three was praised for the layered structure presented. However, concerns were raised regarding the National Minimum Standards (NMS) and the legislation that will accompany them, particularly around the timing of the introduction, in relation to the SFS. Respondents sought clarification about whether there will be exemptions to the universal actions. This query was particularly about exemptions regarding tree cover for very small farms, or if the farm's topography is unsuitable for planting trees.

Respondents had the most to say about Chapter Four of the SFS proposal. Respondents showed positivity towards the environmental focus of the proposal and the integration of Farming Connect. However, clarification was sought on the administration, monitoring, and advisory support that would be offered. Respondents were supportive of improved access to training courses and technical advice. Funding of the scheme caused apprehension among respondents with some concerned that the universal actions could take up a large portion of the budget. Woodlands and habitats also received a large amount of feedback in this section. The proposed actions regarding these two areas were the most contentious areas of the scheme, with many respondents proposing changes to these actions and holding conflicting areas of concern.

Feedback on the proposed SFS process (Chapter Five of SFS) was generally positive, especially the proposal to support farmers with compliance. The length of the agreement raised some concerns, with respondents asking for it to be either shorter or longer depending on their needs. It was suggested that this should be more flexible to ensure that tenant farmers with short-term contracts could take part in the scheme and also accommodate longer-term agreements such as tree-planting initiatives. Reducing land coverage requirement from 3ha to 1ha was a popular suggested change to eligibility requirements as the current minimum land area of 3ha excludes many horticultural businesses. However, a few respondents requested more details on what constitutes a 'farmer', and clearer definitions of agricultural activity.

There were fewer comments on Chapter Six relating to the transition plan, although, the feedback was generally positive. A few concerns were raised about the rollout of the scheme, and the trials undertaken prior to this. Other respondents requested that the transition period be shorter. Respondents were curious about incentivising farmers to join and what support would be made available to Welsh speakers.

General feedback provided by respondents was mostly focused on the design of the SFS. Comments were wide-ranging, though the most prevalent ones were concentrated on inclusivity and adequate funding.

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1 INTRODUCTION

1.1 Background

In July 2018, Welsh Government published a consultation titled "Brexit and our land: Securing the future of Welsh farming"[1]. The paper explored the basis on which the Welsh Government planned on supporting farmers following the UK's departure from the EU.

Welsh Government published a further consultation in July 2019 titled "Sustainable Farming and our Land"[2] which sought to build on the proposals outlined in "Brexit and our land" and address some of the key concerns expressed during this consultation.

Instead of paying farmers a direct subsidy based on the amount of agricultural land they maintain, the "Sustainable Farming and our Land" consultation proposed to support Welsh farmers through the provision of payments in return for applying farming practices on their land which deliver outcomes which benefit all of Wales socially, economically and environmentally in line with the policy context provided by the Well-Being of Future Generations Act 2015[3].

The "Sustainable Farming and Our Land" consultation also outlined ambitions for an Agriculture (Wales) Bill which would form the legislative basis for future Welsh agricultural and land policy.

A consultation on this proposed legislation (The Agriculture (Wales) White Paper[4]) was launched in December 2020 and contained proposals for:

- Sustainable Farming Scheme: future policy and support;
- Future support for agriculture;
- Regulatory reform;
- Future support for industry and the supply chain;
- Forestry and woodland management;
- Improving animal health and welfare;
- Improving monitoring through the effective use of data and remote technology;
- Replacing certain powers contained in the Agriculture Act (UK) 2020.

Consultation responses were published in July 2021[5]. There was broad support for proposals relating to the proposed SFS. However, this support hinged on the need for greater clarity

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1 Brexit and our land - securing the future of Welsh farming (gov.wales)

2 Sustainable Farming and our land (gov.wales)

3 Well-being of Future Generations (Wales) Act 2015 – The Future Generations Commissioner for Wales

4 Agriculture (Wales) White Paper (gov.wales)

5 Agriculture (Wales) White Paper summary of responses (gov.wales)

surrounding the proposals, including more detail regarding the actions and processes farmers would be expected to undertake as part of the scheme.

The Welsh Government published outline proposals[6] in July 2022 in order to provide further clarity and demonstrate how the scheme is expected to work in practice. This is a fairly comprehensive publication which outlines the scope and design of the Sustainable Farming Scheme and details on the specific actions farmers will be expected to undertake as part of the scheme and the processes underpinning these actions.

Welsh Government undertook a series of engagement activities after the publication of the outline proposals to gather feedback on the scheme. This report sets out the findings from the analysis of the feedback forms[7] which were made available to farmers, other groups, organisations, and non-farmers.

The findings presented here will contribute to further development of the scheme, alongside other evidence and policy workstreams (including co-design phase two and specialist Working Groups).

1.2 Research Objectives

The core objective was to analyse the data gathered via the feedback forms, and identify consistent themes and issues raised by stakeholders. Particular focus was given to the following areas:

- Perceived practicality of proposals;

- Main barriers to implementing proposals;

- Whether proposals have been fully understood and clearly communicated;

- Concerns, practicalities and barriers to the proposal, and suggested changes and mitigations were specifically considered to best advise how the SFS proposals should move forward.

The analysis was guided by the structure of the Outline Proposals publication and focused on key elements of the publication, including Chapter Four (The SFS Framework) and Chapter Five (The SFS Process).

1.3 Methodology

1.3.1 Main Feedback of Analysis

The responses received via the feedback form process were analysed to produce a bilingual report, detailing the main themes and findings emerging from the responses. The feedback form gave respondents the opportunity to provide feedback on each chapter of the Outline

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6 Sustainable Farming Scheme: outline proposals for 2025 | GOV.WALES

7 Sustainable Farming Scheme: outline proposals for 2025: feedback form | GOV.WALES

Scheme publication which equated to six free-text boxes. Respondents were also asked to complete a series of demographic questions and farm related questions. This data was analysed using Excel.

A total of 105 responses were received as part of this engagement exercise, of which 100 were analysed with the remaining excluded either due to duplication or in the interest of data protection. Of the 100 responses that were analysed, 69 were provided using the feedback form, and 31 were free-form responses i.e. responses by emails or reports organisations had compiled.

The demographic data provided within the feedback forms was analysed quantitatively, whilst the feedback was analysed qualitatively. A thematic analysis of the feedback forms was conducted, and all other responses provided were critically reviewed and summarised to provide additional support and detail to the findings from the feedback form analysis.

1.3.2   Thematic Analysis

Thematic analysis was used to highlight the key themes that appeared in the data in combination with the research objectives. Researchers analysed respondents' perspectives through the process of reduction, segmentation and categorisation (Braun and Clarke, 2006)[8] using NVivo software.

The following process was followed:

1. Familiarisation with the data – reading through the transcripts and highlighting key comments or phrases in relation to the research objectives.

2. Generating initial codes – systematic analysis using analytical software, codes generated and text categorised through initial comparison and contrast of the transcripts.

3. Searching for themes – coding reviewed and areas of similarity and overlap identified, combined or recoded into broader topics/issues to produce underlying themes of the data.

4. Reviewing and defining themes – the themes are reviewed and defined as to clearly state unique and specific findings from the data as well as reflect on them in conjunction to the research objectives.

1.4   Report Outline

This report presents the findings from the analysis of 100 responses to the 'Sustainable Farming Scheme Outline Proposals for 2025' and is laid out as follows:

Chapter Two: Quantitative analysis on respondent demographics.

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[8] Braun, V. and Clarke, V., (2006). Using thematic analysis in psychology. *Qualitative research in psychology*, *3*(2), pp.77-101.

Chapters Three to Seven: Qualitative analysis of feedback (summary and then positives, concerns, changes, and areas of clarification relating to key areas highlighted in each chapter) on Sustainable Farming Scheme: Outline Proposals for 2025[9].

Chapter Eight: General feedback about the overall scheme.

Due to the characteristics of the research, no quantitative analysis was conducted on the feedback. Many elements of the scheme were discussed at length across multiple chapters, which has highlighted some level of repetition in the responses. Although every care has been taken to minimise repetition, there is some cross-over within the findings from each chapter. It is necessary for some elements and/or comments to be emphasised, to demonstrate their significance.

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2   DEMOGRAPHIC DATA

A total of 100 respondents provided feedback on the Sustainable Farming Scheme (SFS) proposal: 69% (n=69) used the feedback form and 31% (n=31) provided feedback in a different format.

Only respondents that used the feedback forms provided demographic data, so respondents that provided feedback in another format have been excluded from this analysis.

Of the respondents that used the feedback forms, ~77% (n=53) were organisations and ~23% (n=16) were individuals. Respondents that were either farmers or organisations from the farming sector total made up 45% (n=31) of all respondents that used the feedback form.

Of all the organisations that used the feedback form, environmental organisations (eNGOs) represented 45% of responses.

Table 2.1: Individual and organisational respondents.

Respondent type	Number
Organisation	53
Individual	16

2.1   Organisational Level Data

2.1.1   Organisation Operating Location

Of the 53 organisation respondents that used the feedback form, 68% are based and operate, in Wales. The remaining 32% operate only in Wales.

Table 2.2: Organisation respondents - base and operation locations.

Based/Operated in Wales	Organisations
Based and operate in Wales	36
Operate in Wales	17

2.1.2   Organisation Sector

Organisations that responded were from a wide variety of sectors, with the most common sector being the Environment sector at 58% (n=31). 51% of organisations were Third Sector, followed by 43% from Farming and Horticulture. The remaining sectors accounted for less than a quarter of all organisational respondents (Table 2.3).

Organisations were able to choose all sectors which apply to them, therefore, there may be some crossover in organisational sectors.

Table 2.3 Organisational respondents - sector.

Organisations Sector	Percentage of Organisations
Environment	58%
Third Sector	51%
Farming/ Horticulture	43%
Forestry	23%
Other	21%
Research/Academia	15%
Food and timber supply chains	13%
Public Sector	13%
Private Sector	13%
Tourism/ Hospitality	11%
Trade Union/Representative	11%
Veterinary	8%
Charity	8%

2.2   Individual Level Data

32% (n=16) of the respondents were individuals. 56% of individual respondents recorded having an occupation other than farming. 44% identified as being farmers only. 13% of respondents were farmers who also had a secondary occupation.

Table 2.4: Individual respondents – occupation.

Occupation	Percentage of individuals
Other	56%
Farmer only	44%
Both	13%

2.2.1   Farming Sector

Of the individual responses that were farmers, Sheep farming was the most common sector (56%). This was followed by Beef at 33%, and Suckler Beef and Dairy farming both at 22%.

Respondents could pick more than one option for this question. There were no Arable, Poultry and Pig farmers identified within the sample.

Table 2.5: Individual respondents - farming sector.

Sector	Percentage of farmers
Sheep	56%
Beef	33%
Suckler Beef	22%
Dairy	22%
Horticulture	11%
Other	11%
Arable	0%
Poultry	0%
Pigs	0%

2.2.2   Location

All individual respondents lived in Wales. 56% lived in South Wales, 31% in North Wales and 13% in Mid Wales. The majority of individual farmers lived in North Wales (56%).

Table 2.6: Individual respondents - region.

Region	Percentage of Individuals	Percentage of Farmers
North Wales	31%	56%
Mid Wales	13%	0%
South Wales	56%	44%

2.2.3   Age

75% of individual respondents were aged over 55. 19% were aged 41-54, and 6% aged 18-28. There were no respondents aged 29-40 years old.

Table 2.7 Individual respondents – age.

Age bracket	Percentage of Individuals	Percentage of Farmers
18 to 28	6%	11%
29 to 40	0%	0%
41 to 54	19%	11%
55 to 64	38%	44%
65+	38%	33%

3 FEEDBACK ON CHAPTER TWO: INTRODUCTION

3.1 Chapter Summary

Chapter Two of the SFS proposal was the introduction to the proposed scheme. This contained an overview of the scheme design and laid out the Sustainable Land Management (SLM) objectives and outcomes. This also contained a response to feedback from previous consultations.

Overall, respondents were positive about this chapter and there was a general perception that their voices had been heard. The SLM objectives and outcomes in particular received support. However, some respondents questioned whether the scheme would provide adequate support for farmers in general and by action (e.g. maintenance of public access and scheme administration), and whether certain actions had been considered in terms of the potential negative impact they might have (e.g. sustainable farming practices that reduce outputs could impact on food security).

The suggestions for changes included amending eligibility thresholds and enabling a tailored approach to actions to reflect the heterogeneity of farm types across Wales. Further clarification was sought regarding the actions proposed, details of the scheme's administration and the use of certain words or phrases (i.e. 'sustainable' in relation to food production). Respondents also called for a clearer definition of 'food security' and how this may differ from 'food sovereignty'.

These themes are explored in more detail below.

3.2 Sustainable Land Management (SLM) Objectives and Outcomes

There was widespread support for this chapter, particularly relating to the SLM objectives and their strong focus on environmental and social outcomes. Respondents were pleased to see the integration between food production and environmental actions within these objectives and outcomes.

The emphasis on 'land sharing' was well received, and respondents seemed positive about the concept of one piece of land providing multiple ecosystem services or be used to support both agriculture and the ecosystem. This was particularly supported by eNGOs, stating that land sharing aligns with agroecological principles and will support a whole farm approach to sustainability rather than relegating environmental activities to specific areas of the farm. The scheme's emphasis on public access and rights of way (PRoW) were identified as positive areas by ramblers' associations and similar organisations, though this was not a consistent finding from other sectors.

Concerns regarding the SLM objectives and outcomes focussed on potential trade-offs, for example, between preserving cultural practices and sustainability actions when these cultural practices may be environmentally damaging (over-grazing was used as an example of this). A small number of respondents also highlighted potential trade-offs between joining the SFS and privately funded schemes that support the delivery of ecosystem services. These respondents wanted assurances that the SFS would not 'crowd out' these schemes and that scheme participants would still be free to private initiatives whilst being members of the SFS.

Although the general scope and direction of the SLM objectives and outcomes was praised by a wide range of respondents, further clarification was requested with specific reference to the wording of the objectives and outcomes. Defining what 'Sustainable Land Management' and 'sustainable food production' meant in practice was frequently requested. A small number of respondents asked for clarification regarding the difference between 'food security' and 'food sovereignty', and what was meant by 'land sharing'. There were also a few queries about how the SLM objectives aligned with current and proposed legislation (e.g. Environment (Wales) Act and Agriculture (Wales) Bill) and it was suggested that definitions found within these pieces of legislation could be used for terms that are also mentioned in the SFS to aid clarity.

A small number of respondents also asked for greater clarity regarding how the scheme seeks to improve biodiversity and animal health as these were not specifically stated in the scheme design, despite being mentioned in the SLM objectives.

3.3   Support for Farmers

Respondents were keen to know more about the support that the scheme would provide. Funding wise, ensuring that joining the SFS was economically viable for farmers was a main concern for respondents. Some respondents also wanted more detail about the funding available for training and upskilling.

Knowledge sharing and advisory support were additional key areas raised by respondents. Respondents wanted assurance that the scheme would facilitate knowledge exchange between farmers. There were also calls to provide support to farmers with advice and guidance due to the stress and anxiety that change often causes.

Further concerns were highlighted regarding the amount of time farmers could have to spend on additional administration duties. This was raised as of particular concern for smaller farms which are often family-run or supported by income either from a second job or a spouse.

Several respondents were concerned that horticultural businesses and tenant farmers may not be supported by the scheme. There were suggested changes to eligibility thresholds, specifically reducing the land area requirement from 3ha to 1ha as currently the scheme is proposed to exclude businesses that operate on 1-3ha of land. Respondents highlighted that horticultural businesses successfully operate on as little as 1ha and felt that these businesses shouldn't be prevented from joining the scheme. Alternatively, a few respondents suggested using a threshold based on turnover or number of full-time equivalent employees to decide which businesses should be allowed to join the scheme. A reduction in the length of scheme contract was suggested by a smaller number of respondents as the current proposal for the contract to be up to five-years in length would exclude tenant farmers on contracts less than five years long. Conversely, some respondents wanted longer agreements under the scheme where appropriate, with habitat management and tree planting actions highlighted as areas where this would be most beneficial.

A limited number of respondents felt that making the SFS fully digital would be a barrier to farmers with poor internet connection or IT literacy, and that support would be needed to mitigate this.

Respondents from the animal rights sector suggested supporting farmers to transition away from livestock farming and grow crops for direct human consumption instead. However, this suggestion only came from a very limited number of respondents.

Finally, a few respondents highlighted concerns about the availability of suitably trained inspectors for the administration of the audits.

3.4 Action-Specific Comments

3.4.1 Comments Relating to Woodland

One of the most contentious topics raised was the scheme requirement for 10% of farmland to be under tree cover. This point is discussed at length in Chapter Four of this report, with a specific focus on the feasibility of the scale of tree coverage proposed. The concerns raised in this chapter focussed on the relationship between animal health and indigenous trees, and how woodlands will be managed under the scheme. If there was a requirement that the woodlands were to be un-grazed, respondents were concerned about the potential knock-on impacts (e.g. overstocking) for the rest of the holding. Allowing farmers to continue to use land under trees as pasture could mitigate this concern, however, it was recognised that this will not be possible in all situations. Grazing restrictions may also be required in certain cases where the trees pose a risk to livestock (e.g., toxicity concern associated with oak, sycamore and yew trees) and as such increasing woodland coverage may inevitably reduce the land available for grazing.

A small number of respondents were worried that there is currently a lack of local native tree nurseries to provide saplings, and the risk of disease spread from imported trees should be considered significant. Therefore, although respondents suggested that all trees used should come from the UK and Ireland, the lack of sufficient nurseries to provide the planting stock could make this difficult to achieve.

There were also some requests for clarification about the woodland actions proposed under the scheme. These requests included whether trees could be planted individually or if they had to be in blocks and whether the hedgerows and/or habitat would be included in the 10% requirement. These elements are discussed further in Chapter Five of this report.

3.4.2 Comments Relating to Public Access

Although some respondents raised concern about the resource it would require, others suggested that the SFS could do more to improve public rights of way (PRoW). These respondents, primarily from the third sector and advocates for increasing public access, stated that all PRoW and public access land should be improved to a 'usable standard', either in parallel or before new paths were created. These respondents suggested including a universal action for farmers to 'maintain and enhance' public paths on their land as this would reduce the resource concerns for local authorities. However, implementing this would require care to ensure farmers were not being paid either for actions under local authorities' remit or those required by regulation.

3.5   Increasing Flexibility

Many respondents were worried that the proposal was not flexible enough to suit a range of different farms across Wales and that this could reduce scheme uptake. These respondents suggested that a more tailored approach that adjusts thresholds to individual scheme participants might mitigate this. For example, a large number of concerns were raised relating to the tree coverage requirement. Respondents suggested that this threshold could be tailored specifically to the individual participant. Other suggestions included varying the percentage coverage depending on the size and/or suitability of the farm for tree planting. Cover crops were identified as acceptable alternatives for carbon sequestration and biodiversity benefits where land is unsuitable for tree establishment.

3.6 Suggested Changes

A range of additional suggestions were made by respondents, including sharing and collecting data to monitor animal health (benchmarking and KPIs). These are presented in Figure 3.1.
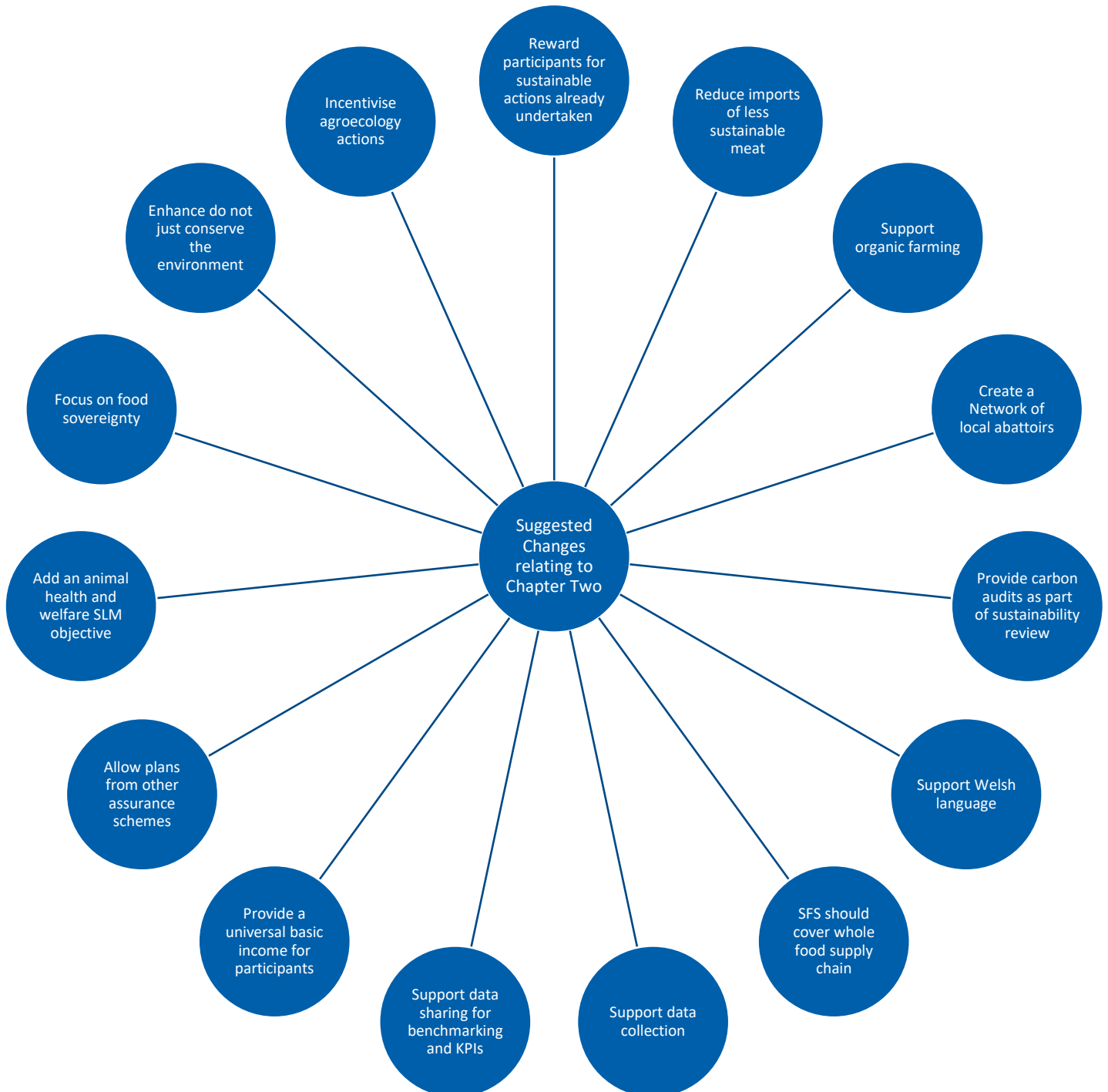

Figure 3.1 Spider diagram showing the suggested changes relating to Chapter Two of the SFS proposal.

4 FEEDBACK ON CHAPTER THREE: THE SUSTAINABLE FARMING SCHEME STRUCTURE

4.1 Chapter Summary

Chapter Three laid out the SFS structure. This chapter provided detail on the three different layers (universal, optional, and collaborative) and how these interact with each other. The chapter also provided details regarding the proposed National Minimum Standards (NMS) that would be implemented alongside the scheme.

Participant responses regarding the scheme's structure were positive with respect to the proposed layered approach, the inclusion of a collaborative layer, and the NMS. However, some concerns regarding the NMS, the legislation that will accompany them and the support mechanisms available for scheme participants were raised. A few respondents also questioned whether the scheme went far enough with regards to meeting the SLM objectives and outcomes set out in Chapter Two of the SFS proposals.

Changes suggested were mostly related to the administration of the scheme and the layered structure. The further clarifications sought, also related to these elements.

These themes are explored in more detail below.

4.2 Layered Structure

The layered structure was widely supported. The layers for different actions (universal, optional and collaborative) and the funding levels applied were found to be logical and simple to understand.

However, some respondents were concerned that the universal actions proposed would do little to improve standards at the pace the Welsh Government's Nature and Climate Emergency declarations suggest is necessary. As such, respondents suggested that the scheme should do more to incentivise undertaking optional or collaborative actions that will have a greater impact. Respondents suggested ensuring that the scheme's funding structure incentivised farmers first to join the scheme and then to aim higher and for more ambitious actions would be a good way of doing this. This would mean that the baseline payment needs to be sufficient to incentivise farmers to join, but not so high that there is little difference in payment for universal actions and optional or collaborative ones.

Other respondents suggested that the SFS should include actions that affect food supply chains also. The reasoning behind this was that improving farming practices was a step in the right direction but would do little to improve the food supply system overall. An example given was that the scheme should support shops to stock local and sustainably produced food, as this could improve demand and make the whole food system more sustainable. A respondent also suggested that a new level above the collaboration level could be added for more 'systemic' actions looking at food systems and not just the supply chain.

A small number of respondents said they wanted greater linkage between the three layers, with the possibility of collaboration on universal and optional actions. The reasoning for this suggestion was that it would make it easier for farmers to undertake actions that have a greater environmental impact. Within this, some respondents wanted clarification regarding

the measures that would be used to ensure that the actions undertaken under the collaboration layer would be truly collaborative and cover a large area of land.

Similarly to comments mentioned in the previous chapter, some respondents suggested the scheme's actions should be more tailored than the proposal outlined, specifically regarding universal actions that the scheme's participants are required to undertake. Respondents felt that the scheme should take into account varying circumstances, especially with regards to the fact that some actions may be more challenging for smaller farms than larger ones. As part of this, some respondents also wanted clarification over the potential use of scheme derogations and exemptions. For example, derogations could be granted to farmers who were not able to comply with all scheme requirements for reasons beyond their control (e.g. land being unsuitable for tree planting).

4.3   National Minimum Standards,

The National Minimum Standards (NMS) was raised frequently by respondents. They received widespread support, were seen as a useful update to existing agricultural legislation, and respondents praised the intention of using these to improve agricultural sustainability. Respondents also agreed with the scheme's proposal that payments should only be made for actions that go beyond the ones set out in the NMS.

Just as some respondents felt the universal actions did not go far enough, some respondents felt the same regarding the NMS, saying that there would be no substantial change. A limited number of respondents also felt that the current NMS proposals are missing an opportunity to make the voluntary Good Agricultural and Environmental Conditions (GAEC) mandatory as some are not currently included in legislation. Linked to this, respondents with the same background were concerned about the timeframe required to pass the necessary legislation and that this would only happen after the start of the SFS roll out.

A few respondents sought clarification regarding the timeframe for the legislation that will make the NMS statutory. Respondents felt that if the SFS was launched before the NMS had been made statutory then it would be 'putting the cart before the horse'.

Lastly, a small number of respondents seemed to be confused, interpreting the NMS as part of the SFS or as voluntary standards, rather than a new piece of legislation separate from the SFS. Comments such as how the NMS will change as legislation changes suggests that clarification that the NMS is new legislation might be needed.

4.4   Local Authorities

Some respondents raised concerns regarding local authority resources. They pointed out that local authorities deliver PRoW maintenance and common land maintenance; support local access, recreation, and biodiversity, and provide legislative support. As such, local authorities are crucial both in terms of implementing the SFS and as advisors due to their technical and practical experience. Therefore, any time and resource constraints they face could seriously impact the rollout of the scheme.

There were particular issues raised by organisations representing PRoW and local access users who felt that if the cost of creating and maintaining new footpaths proposed by the

scheme fell to local authorities that this would stretch an already tight budget too far. As a method to mitigate this, a local access forum suggested that farmers receiving funding for new paths on their land should accept responsibility for maintenance of them. However, this was only raised by a very limited number of respondents. An alternative suggestion was that the local community could contribute to maintenance as they are among the main beneficiaries of any improvements in public access. Respondents also highlighted the potential for increased litter on farmland and potential rural crime, because of increased public access and higher visitor numbers.

4.5 Monitoring and Enforcement

Many respondents repeatedly queried what penalties would be used to enforce the scheme. Some respondents wanted confirmation that the penalties would be proportionate to the infraction, whilst others wanted assurance that the penalties would be robust enough to deter non-compliance, such as withholding funding until noncompliance was remedied, or that civil and criminal prosecution would be used if deemed necessary for serial offenders.

4.6 Universal Actions

Some respondents queried some of the specific actions proposed under the scheme and suggested changes or new universal actions. Requests for clarification focused on the actions relating to forestry, habitats, and species recovery. However, as these relate to the SFS framework more so than the structure, these findings are discussed in the following chapter. Suggestions for additional universal actions and ways to further support scheme participants are summarised in Figure 4.2.

Figure 4.1 Spider diagram showing the suggested changes relating to Chapter Three of the SFS proposal.

5 FEEDBACK ON CHAPTER FOUR: THE SUSTAINABLE FARMING SCHEME FRAMEWORK

5.1 Chapter Summary

Chapter Four of the SFS proposals provided detail regarding the proposed actions of the scheme. All actions proposed were designated as either universal, optional or collaborative, and the reasoning behind each was provided. This section also detailed the Farming Connect support that would be available to aid compliance with the scheme.

Respondents provided the greatest amount of feedback on this chapter. The feedback about the environmental focus of the proposal was positive and there was particular praise for the conservation actions relating to the preservation of native breeds. Respondents also welcomed the integration of Farming Connect and showed support for access to training courses and technical advice.

There were four main areas of concern outlined in the feedback. These related to woodland and habitats, detail on regulations, financial support (payment mechanisms and level of funding) and scheme administration.

Respondents suggested a variety of changes to the scheme framework. These related to actions in the Universal layer (both adding and removing actions). Respondents also suggested that actions relating to habitat management, woodland management, watercourse management, soil health, improving public RoW (access and information) and reducing inputs should be added to the universal layer.

Areas requiring further clarification included woodland and habitat coverage, the administration and monitoring system of the scheme and the level of advisory support that would be offered.

These themes are explored in more detail below.

5.2 Proposed Actions – General Feedback

5.2.1 Proposed Actions – Positives

Despite the diversity of respondents (some respondents feeling that the scheme might be trying to do too much whilst others felt it did not go far enough), the overall response to the proposed individual actions were broadly positive. eNGO respondents were supportive of the environmental focus of certain actions (e.g. requirements for 10% woodlands and semi-natural habitats, protected sites, etc.), whilst those respondents with a public access focus were supportive of the focus on improving public access and PRoW, and respondents associated with the promotion of sustainable farming were supportive of the proposed actions to restore mixed farming methods and to protect the genetic diversity of the Welsh national sheep flock.

5.2.2 Proposed Actions – General Concerns

Some of the concerns raised related to the universal layer of the scheme. This related to how current actions could be strengthened and expanded (e.g. soil testing, PRoW, watercourse management), highlighting actions they felt were missing (e.g. animal health, invasive non-native species (INNS), and emissions reduction) and clarification over the level of support (advisory and financial) that would be available (e.g. for the implementation of natural flood management (NFM) actions, for increased livestock monitoring to mitigate impact in reduction of routine use of antibiotics).

With regards to soil testing, some respondents suggested that in addition to committing to the test itself, scheme participants should also be required to commit to changing practices in response to the outcome of the test. It was further suggested that strengthening of public access could be achieved by including the upgrading of pathways to multi-use paths and committing the responsible authority to ensuring the public are made aware of any new paths created. The additional watercourse management actions suggested included supporting the creation of buffer strips, supporting the use of beavers as natural watercourse managers (only suggested by respondents with environmental research backgrounds) and using keyline design (the use of farm's topography to sink and spread rainwater for storage) to slow the flow of water.

Respondents also wanted reassurance that the actions would be applied in a complementary manner to minimise negative interactions and trade-offs. For example, ensuring that on-farm feed production (was not undertaken on unsuitable land, that peatland rewetting actions were linked with appropriate above ground peatland vegetation management to minimise fire risk during periods of drought, and that reductions in grazing area in some fields through the increase of field boundaries to three metres in width and the creation of features such as ponds and scrapes would not result in over-stocking elsewhere on farm. Increasing the width of field boundaries was also raised by some respondents as needing greater clarification, with particular reference to the objective for the action. These respondents felt that if the objective were biosecurity, three metres may not be necessary for all boundaries. It may also not be applicable for existing robust boundaries (e.g. stonewalls).

A small number of respondents also queried the robustness of the universal actions and whether they would contain loopholes that mean intensive and unsustainable farms could continue to be subsidised without the need to improve overall sustainability. For example, it was pointed out that a farm could complete all the universal actions and not have to reduce pesticide or fertiliser usage. Respondents suggested that this risk could be mitigated through amendments to the universal action layer. Suggestions included bringing in actions relating to input reduction (e.g. mixed rotations), committing horticulture participants to not using artificial inputs, incentivising reductions in the use of pesticides and herbicides, and clear standards to monitoring the flow of pollution off farm into water courses.

Respondents also wanted to highlight the value of what had already been achieved through previous schemes and wanted assurance that farmers who were early adopters of sustainable management practices would somehow be recognised within the scheme (e.g. earned recognition).

As well as those mentioned above, there were a wide range of other changes suggested that only a few respondents mentioned. These are summarised in Figure 5.1.

Figure 5.1 Spider diagram showing the suggested changes relating to Chapter Four of the SFS proposal.

5.2.3   Proposed Actions – Woodland and Habitat Specific Feedback

As mentioned at the beginning of this section (5.3), the proposed woodland and habitat actions received positive support from the eNGO respondents. However, many other respondents raised conflicting concerns about how these areas would be managed (e.g. stocking rate), the potential impact upon public access, how these actions related to common land. Competing concerns mostly related to the 10% coverages of woodland and habitats and whether these should be combined or kept as separate elements.

Although many respondents suggested combining the 10% tree cover with habitat land or including hedgerows in either one of these quotas, a considerable number of eNGOs wanted assurance that the required coverage for tree cover and habitats would be kept separate.

Respondents representing the interests of commons associations sought assurance that the scheme will apply to common land. They wanted assurance that the importance of commons for biodiversity, habitats and ecosystems was reflected in the proposals. Others also raised the tension tree planting on common land would create between landowners and common rights holders, with some even querying the legality of planting trees on common land.

A wide range of changes were suggested to the proposed woodland and habitat related actions. The suggesting relating specifically to the habitat management actions are summarised in Figure 5.2. Those changes that pertain to woodland management action are summarised in Figure 5.3.
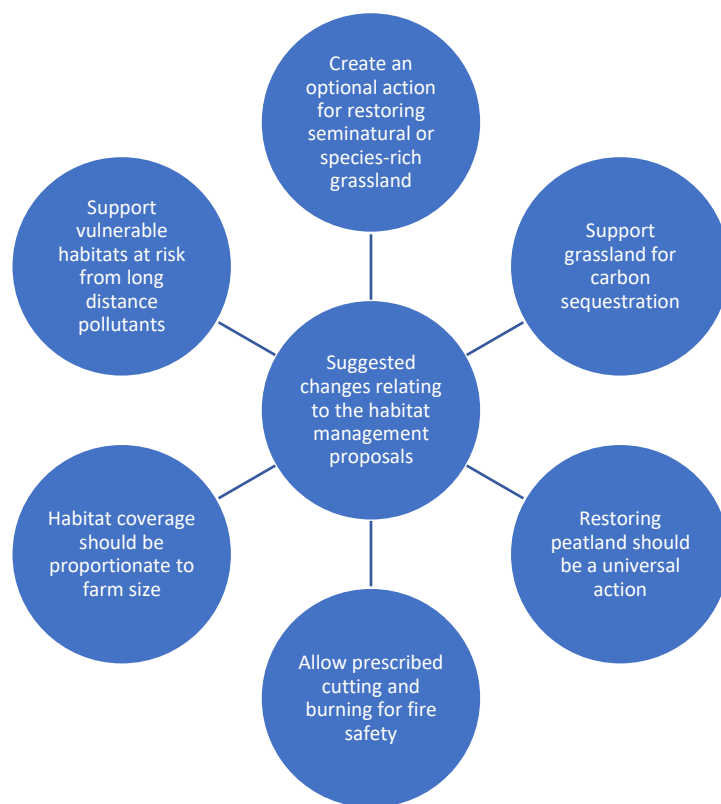

Figure 5.2 Spider diagram showing the suggested changes relating to the habitat management actions proposed in the SFS proposal.
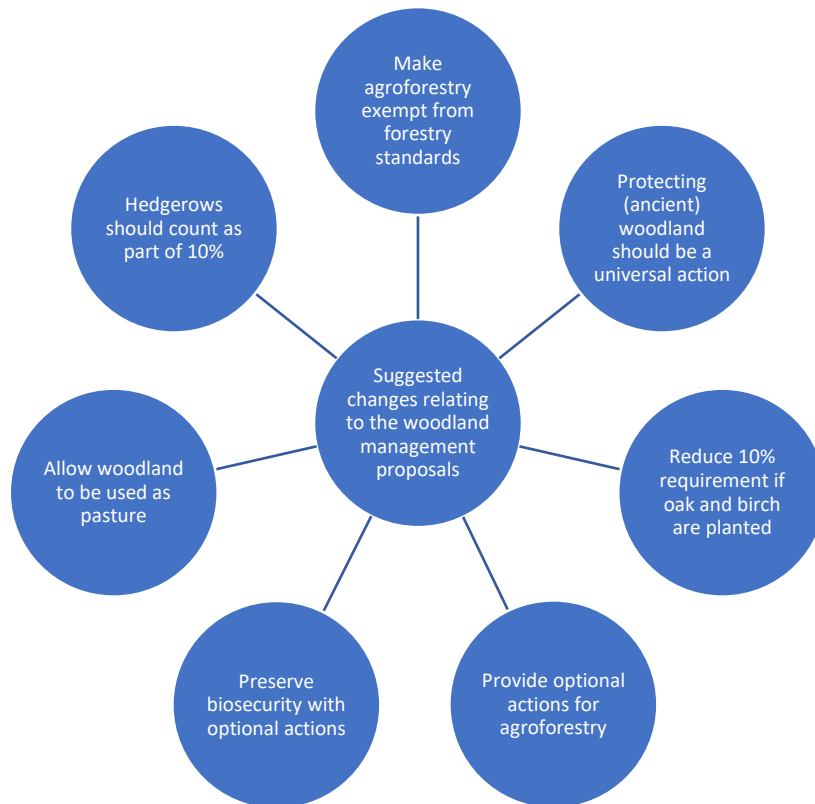
Figure 5.3 Spider diagram showing the suggested changes relating to the woodland management actions proposed the SFS proposal.

5.3   Monitoring and Reporting

The principles behind the proposals for how the scheme would be monitored and the associated mechanisms (e.g. use of key performance indicators (KPIs), integration with other assurance schemes) received broad support. However, respondents queried how the heterogeneity of the Welsh farming sector would be reflected in the mechanisms chosen. For example, a few respondents questioned the annual review and the use of carbon sequestration as a proxy for environmental sustainability. They felt that the specificity of this measure could not necessarily be equated to mean good ecological practice. In addition, some respondents highlighted that there was a risk the scheme would ask farmers to complete what they saw as 'excessive data collection' for little (or currently unknown) reward.

With regards to KPIs, clarification was requested on how these would be monitored, and a few respondents suggested that the KPIs should be made in partnership with the individual scheme member to ensure they best reflect their business (and the land classification on farm). The need to demonstrate comparability between schemes was also highlighted, and respondents acknowledged that this might restrict the ability to tailor KPIs to individual businesses.

Some respondents proposed that this comparability could be achieved through the inclusion of detail or forms from other assurance schemes such as Organic Farmers & Growers and LEAF. This could also help to reduce paperwork overall for farmers and mitigate the aforementioned risks associated with data collection.

There was a range of suggested changes to the administration of the scheme that were only mentioned by a small number of respondents. These are summarised in Figure 5.4.

Figure 5.4 Spider diagram showing the suggested changes relating to the monitoring and reporting processes of the scheme.

5.4   Provision of Financial Support

There was some feedback in Chapter Four of the SFS on how certain aspects of the scheme would be funded. The feedback provided here was again broadly positive, with an acknowledgement that the one of the principles of the scheme was to make agricultural businesses (including the horticultural sector) more economically sustainable.

Concerns and queries related to the level of support/payment rates and how these would be administered (e.g. arrears vs front end loaded, use 'payment-by-results' model to allow

farmers to experiment with how they deliver the SLM outcomes). With regards to the latter point, respondents were concerned that the upfront costs associated with specific actions, such as soil testing and smart technology, and the impact this may have on farm business cash flow might deter some farmers from joining.

The lack of detail, and whether the level of funding would be adequate to support the proposed actions (e.g. support for native breeds, PRoW maintenance), were the main areas of concern regarding payment rates. Respondents wanted assurances that there would be sufficient funding available for both optional and collaborative actions. They highlighted that insufficient funding would limit the potential of the scheme to support meaningful change, in terms of both delivery and uptake. For example, some respondents asked for more detail on the ongoing management payments associated with long-term actions (e.g. tree planting), whether there would be additional payments for those that went above and beyond what was required under the scheme.

5.5   Advice and Training Provisions

The continued role of Farming Connect and Natural Resources Wales (NRW) as sources of training courses and technical advice, and the commitment to knowledge sharing and peer-to-peer knowledge exchange was widely praised. However, respondents queried how well the availability of this support would be publicised, and whether both these organisations would be adequately resourced to ensure there was the necessary quantity and quality of advisors with the appropriate knowledge to provide suitable advice. This latter point was in particular reference to those actions that required detailed technical knowledge (e.g. advice to tenant farmers with short-term agreements).

To help mitigate any potential limitations in Farming Connect's technical capability, respondents suggested Farming Connect should facilitate knowledge exchange activities (training courses) in collaboration with third-party organisations (e.g. Pasture for Life (PfL), Nature Friendly Farming Network (NFFN)). These respondents felt that Farming Connect would benefit from the additional resource and advice they could provide, and that these organisations could also train Farming Connect advisors and fill any potential knowledge gaps.

A few respondents from the organic farming sector also highlighted specific areas (e.g. organic farming practices both ongoing and during transition, implementation of collaborative actions) for which they would like to ensure advisory support was provided.

Respondents concerned with the use of the Welsh language also suggested that this advice should be provided in Welsh and not just English.

6 FEEDBACK ON CHAPTER FIVE: THE SUSTAINABLE FARMING SCHEME PROCESS

6.1 Chapter Summary

This chapter set out the SFS' administrative processes. It explained what farmers needed to do to apply for membership of the scheme, the eligibility requirements and the monitoring processes of the scheme. This section also provided insight into the payment mechanisms of the scheme.

The general feedback on the scheme process was positive. This was in particular reference to the detail on the administration of the scheme and the focus on supporting farmers with compliance rather than punishing them for not complying.

Concerns raised mainly related to the monitoring of the scheme, with regards to data sharing, support (financial and technical) for farmers and eligibility requirements.

The changes suggested largely related to these requirements with many respondents suggesting a reduction in the 3ha land area requirement to enable horticultural businesses to take part.

Requests for clarification were limited, however a few respondents asked for more precise definitions for terms such as farmer (queries related to eligibility for the scheme), agricultural activity (again relating to eligibility) and social-economic sustainability.

These themes will be explored in more detail below.

6.2 Administration

The administration proposals a received broad support from a range of respondents, with the introduction of mobile apps highlighted in particular.

Given the challenges some rural communities have with limited broadband capability, concerns were raised regarding the use of the Rural Payments Wales (RPW) website as the main portal. The reliance on digital technologies may impact accessibility for some participants (e.g. those with limited IT capability and capacity), and respondents wanted assurance that the principle of being accessible to all also applied to the systems of scheme administration. Concerns were raised about the usability of RPW's current website and it was suggested that this should be improved before the rollout of the scheme.

Conflicting concerns were also raised with regards to the level of data sharing and associated protections. A few respondents wanted all data collected under the scheme to be easily accessible, whilst others were worried about how this accessible data might contravene GDPR. These respondents wanted assurance that personal data would be confidential and secure.

To enable farmers to gain a better understanding of the scheme as it develops and at the implementation stage, a small number of respondents highlighted the importance of clarity. This related to how key terms were defined within the scheme (e.g. farmer, agricultural activity, sustainability), how these linked through to eligibility, the process for selection and prioritisation of actions, and the links between scheme rules and regulatory compliance.

6.3   Monitoring, Reporting and Evaluation

As per the feedback presented in Section 5.3, respondents were again broadly supportive of the monitoring proposals outlined in the consultation document, with particular reference to the concepts of a sustainability review and the potential for self-monitoring. However, respondents queried the quality of the data on which the sustainability review would be based. For example, a number of eNGO respondents highlighted the need to update the priority habitat data and maps. Respondents suggested incorporating this into the inspection and monitoring process to do this. Respondents also wanted further detail on what would be involved in both the reporting and evaluation (e.g. the potential inclusion of social capital, emissions assessments of feed and fertiliser), and the robustness of the inspection and review processes (e.g. to mitigate risks of double funding; demonstrate real delivery against objectives).

Reducing the administration burden on scheme participants was again raised by a range of respondents, with integration with the reporting procedures associated with other schemes (e.g. Organic Farmers & Growers, LEAF) reiterated as way to reduce the amount of paperwork and administration duties required.

With specific reference to PRoW, respondents for whom PRoW was their core remit, wanted assurance that public access and PRoW were mapped as part of the inspections process and updates shared with the local authority.

In the feedback for this chapter, the issues associated with cross border farmers were also raised. A small number of respondents asked for greater detail on whether the scheme's requirements (e.g. 10% tree cover) would apply across the whole of the holding, or only to those parts of the farm that were located in Wales.

6.4   Penalties

How penalties would be used was also raised in feedback relating to Chapter Six of the SFS proposal. Respondents wanted assurance that these would be robust enough to enforce the scheme's standards but that they would be interpreted sensibly and fairly (e.g. flexibility around force majeure, use of warnings rather than immediate fine). Respondents felt this would help mitigate penalty anxiety by providing a support rather than punishment-based process.

Should penalties be deemed appropriate, respondents made a number of suggestions as to how they could be implemented. This included the withholding of further funding until corrective actions had taken place and that penalties should be higher than the cost to comply as otherwise the penalties could be seen as a cost of business as usual rather than an incentive to change.

6.5   Payment Mechanisms

Feedback for this chapter raised similar queries about the impact of timing and level of payment rates on cash flow and uptake (with specific reference to the imposition of a pay cap) as those that were raised in the previous. These were explored in Section 5.4 of this report.

A small number of respondents highlighted the need to consider resourcing of those involved in supporting the ongoing management of certain actions (e.g. Local Authorities and PRoW).

6.6   Advice and Training Provision

As per the feedback detailed in Section 5.5 of this report, Farming Connect's input to the scheme was seen as positive, providing adequate funding was provided to ensure that advisors themselves received the necessary training to ensure they were able to appropriately support farmers. It was also raised that support should be provided on accessing the UK's Emissions Trading System (ETS) as it might be an additional source of income for some participants.

6.7   Contracts and Eligibility

Many respondents suggested that the length of contracts should be individual to each scheme participant. For example, longer agreements may be appropriate to some landowners and help facilitate certain elements of the scheme (e.g. ongoing maintenance of trees planted to achieve 10% requirement), however five-year agreements would be too long for tenant farmers on short-term contracts.

In addition, many respondents suggested changes relating to the eligibility criteria of the scheme, suggesting that the 3ha coverage should be reduced to 1ha, or that eligibility should instead be based on turnover or another factor. It was stated that the current proposals excluded many successful horticulture businesses from accessing the scheme. Overall, the general perspective was that the eligibility and contract requirements should be made flexible to enable as many farmers as possible to participate.

6.8   General Ideas

A range of ideas were suggested, although each received very limited support. These are summarised in Figure 6.1.

Figure 6.1 Spider diagram showing the suggested changes relating to Chapter Five of the SFS proposal.

7 FEEDBACK ON CHAPTER SIX: THE SUSTAINABLE FARMING SCHEME: TRANSITION PLAN

7.1 Chapter Summary

This chapter set out the transition plan for the SFS. This included details regarding the prepare and pilot phase and the transition period and what would take place within each phase. There were also details relating to the pilots and trials outlined as part of the prepare and pilot phase.

Considerably fewer respondents provided feedback on this chapter. Positive comments were made with regards to the prepare and pilot stage from 2022-24, and many respondents offered their assistance in the pilot phase.

Very few concerns were raised in response to this chapter. However those that were raised were related to the rollout of the scheme and ensuring that enough trials and pilots were undertaken prior to the transition period. Other respondents requested that the transition period be shorter.

In relation to clarification, many respondents were curious about how farmers would be incentivised to join the scheme and what support would be made available to Welsh speakers.

These themes are explored in more detail below.

7.2 Prepare and Pilot Phase

Most respondents who provided feedback on this chapter were generally positive about the transition plan, especially the prepare and pilot period proposals. Respondents felt that this chapter represented a willingness to adapt the scheme to ensure that the scheme was as effective as possible. Many respondents also offered to assist with the pilot phase.

Although the feedback was mostly positive, a small number of respondents wanted assurance that sufficient trials were completed to ensure a smooth rollout of the scheme.

7.3 Transition Period

The transition period was also welcomed as respondents said it would allow farmers time to adjust their business models and ensure compliance.

However, many of the respondents that provided feedback on Chapter Six were concerned about the length of the transition period (2025-2029). A range of respondents from different sectors, including farming organisations and eNGOs, felt that this timeframe was too long and did not reflect the severity of the climate emergency.

As such, the main change suggested was that the length of the transition period should be reduced, with a wide range of respondents suggesting this. No respondents suggested that it should be longer. One respondent suggested that the rollout of the scheme should be prioritised in national parks, although they did not provide the reasoning for this suggestion.

7.4   Areas for Clarification

A few respondents requested clarification relating to Chapter Six. Some respondents wanted more detail about how the scheme proposed to incentivise farmers to join. An organisation concerned about preserving the Welsh language also asked for greater detail regarding how Welsh speakers would be supported by the scheme in practice.

8 GENERAL FEEDBACK ON SFS PROPOSAL

Respondents were offered the opportunity to provide general comments on the scheme. Respondents mostly focused on areas they felt should be considered for the final SFS scheme. The main suggestion was that the SFS should avoid excluding people, with particular reference to small holders and horticulture businesses. Other feedback related to concerns associated with the additional burden on farmers imposed by the scheme and the impact on farmers mental health, whether the level of funding for the SFS was adequate to ensure delivery against objectives; the need for the scheme to be integrated with other schemes (e.g. organic) and policies (e.g. the Well-being of Future Generations (WFG) Act) in the sector; and to ensure comprehensive coverage and measurements that allow for comparison so that KPIs can easily be compared with those of national schemes in other countries. The remaining feedback respondents gave in response to this section is summarised in Figure 8.1.
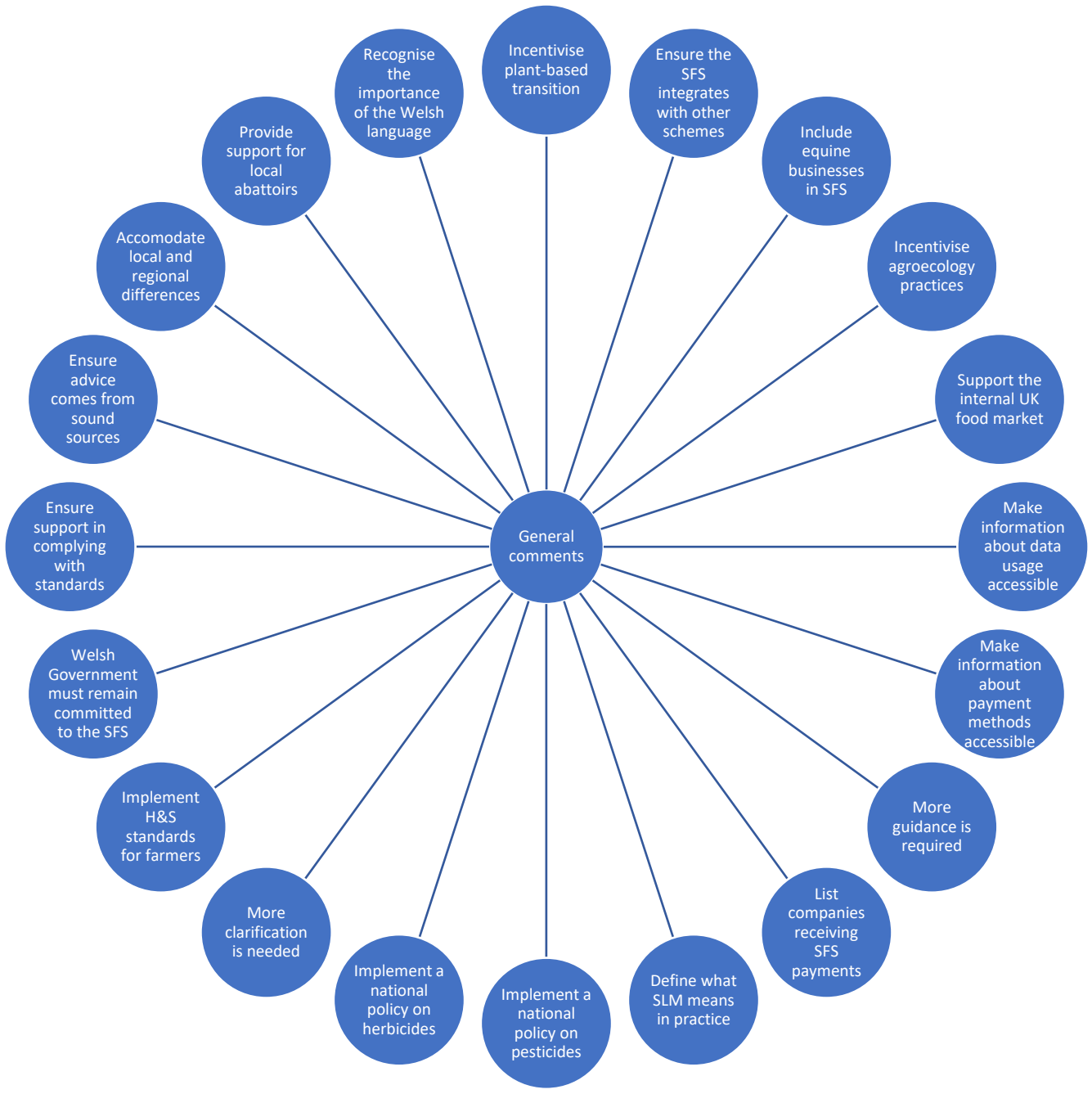
Figure 8.1 Spider diagram showing the general comments relating to the whole of the SFS proposal.

9 CONCLUSION

The feedback provided was very wide ranging, reflecting the array of different stakeholders that took part. Due to this, stakeholders often had conflicting opinions and feedback relating to the scheme. This issue was most prevalent relating to the 10% of tree coverage and 10% of farmland to be managed as habitat, with as many respondents suggesting these should be combined or reduced as those who felt that these should be kept separate. One aspect however for which there was near universal consensus was that the scheme requires further clarification on key themes: scope, eligibility, support (administrative, technical and financial), structure (layers, funding and monitoring) and proposed actions (including risk and trade-offs).

Stakeholder feedback relating to the objectives of the scheme was generally positive, however respondents queried the alignment of the SLM objectives with current legislation, and concerns were raised regarding the timeframe for implementing the NMS. On the whole, respondents agreed that the scheme should be made more flexible to ensure no one was excluded from participation (e.g. reduce the 3ha threshold and provide shorter agreement terms to enable tenants to participate). One of the other areas of consensus among stakeholders was that the transition period be shortened as the current length does not reflect the urgent need to improve the sustainability of farming practices and address the climate emergency.

Level of support, whether related to funding, advisory or with administration was frequently raised as both a point of concern and requiring further clarification. Integration with the successor to Farming Connect was welcomed, however, it was queried whether they would be given the adequate level of resource and have the requisite skills to support farmers with the scheme. Funding in general was a main area of concern for stakeholders, with the rate of payment, payment mechanism and funding for the different layers all receiving a considerable amount of attention. The administration of the scheme, including the monitoring and compliance processes, was also an area where respondents wanted assurance that there would be sufficient support for stakeholders and that the monitoring processes would be robust and thorough. Some respondents also suggested that plans and documents from other assurance schemes should be accepted for the SFS as this will reduce unnecessary additional bureaucracy for farmers. The penalties to ensure compliance with the scheme also received attention, as respondents wanted to ensure that they would prevent major non-compliance but would be applied fairly so that minor infractions or failure to complete actions due to external or unforeseeable actions do not result in unfair penalties.

Comments relating to the structure and framework, although largely supportive of the collaborative approach taken, suggested a number of changes that could be made either to the scheme layers or suggested actions to be added or moved to a specific layer.

Proposed actions also received a great deal of care and attention. There was a high level of attention paid to actions relating to public access and PRoW, woodland and habitats with respondents' opinions often conflicting regarding these. Although this means it is difficult to summarise responses into a coherent message, it does show that consideration is required to ensure that the proposed actions take into account all stakeholders' opinions at the next stage. In addition, comments about trade-offs and risks related to some actions means that

addressing any unintended consequences of the proposed actions would be helpful, along with added detail setting out proposed mitigations for such consequences.

APPENDIX 1: LIST OF ORGANISATIONS THAT PROVIDED FEEDBACK

List of all the organisations that provided feedback on the Sustainable Farming Scheme proposal.

1. Action Plan for Pollinators
2. Afonydd Cymru
3. AIC Cymru
4. Amphibian and Reptile Conservation Trust
5. Arfon and Dwyfor Local Access Forum
6. Black Mountains Graziers Association East
7. Brecon Beacons National Park Local Access Forum
8. Brecon Beacons National Park Local Access Forum
9. British Cattle Veterinary Association
10. British Horse Society
11. Bumblebee Conservation Trust
12. Celtic Rainforests Wales Partnership
13. Ceredigion Local Access Forum
14. Chartered Institute of Ecology and Environmental Management
15. Coed Cymru
16. Confederation of Forest Industries
17. Country Land and Business Association Cymru
18. Cycling UK
19. Dwr Cymru Welsh Water
20. Economic and Social Research Council's Festival of Social Science
21. Farmers Unions of Wales
22. Farming Community Network Cymru
23. Farming Wildlife Advisory Group Cymru
24. Grwp resistance
25. GWCT
26. Gwent Levels SMS Farmers
27. Institute of Public Rights of Way

28. Landsker Ecology

29. Lantra Wales

30. LEAF

31. Monmouthshire County Council

32. Monmouthshire Local Access Forum

33. National Parks Wales

34. National Sheep Association

35. National Trust Cymru

36. Nature Friendly Farming Network Cymru

37. NFU Cymru

38. NRW

39. Open Spaces Society

40. Organic Growers Alliance

41. Pasture for Life

42. Pembrokeshire Coastal Forum

43. People for the Ethical Treatment of Animals (PETA) Foundation

44. Plantlife

45. Powys County Council

46. Powys Local Access Forum

47. Powys Ramblers

48. Pembrokeshire Local Access Forum

49. Radnorshire Wildlife Trust

50. Ramblers Cymru

51. Rare Breeds Survival Trust

52. Rewilding Britain

53. RSPB Cymru

54. Size of Wales

55. Social Farms and Gardens

56. Soil Association

57. South Wales Fire and Rescue

58. South Wales Outdoor Activity Providers Group on Behalf of Wales Adventure Tourism Organisation

59. Tenant Farmers Association

60. The Landworkers' Alliance

61. Tyfu Cymru - Lantra

62. Wales Animal Health and Welfare Group

63. Wales Environment Link

64. Wales Resilient Ecological Network

65. Wales Young Farmers Club

66. Welsh Lamb and Beef Producers

67. Welsh Language Commissioner

68. Welsh Mountain Sheep Society

69. Welsh Organic Forum

70. Wildlife Trust Wales

71. Woodland trust

72. WWF Cymru