

Response to Sustainable Farming Scheme Keeping Farmers Farming Consultation

Question 1: The Scheme will provide a long-term approach to support for our agricultural sector to respond to evolving challenges and changing needs, contributing to the Sustainable Land Management objectives. In your view, what may strengthen this support?

Farming and forestry are both experiencing cultural, economic and skills barriers to integrating trees on farms. We need to resist polarisation by developing closer working relationships between professional foresters and farmers. We know that we need all types of woodland to tackle the environmental crisis - including the materials crisis - and we know that all types of woodland support biodiversity. We must continue working towards a better, more nuanced understanding of this, challenging divergence of debate. Our members recommend the follow actions to strengthen the support of the Sustainable Farming Scheme, in affiliation with our response to the Agriculture (Wales) Bill consultation:

Integration and Regulation. Regulatory barriers are at times impeding management decisions, particularly in relation to licencing and land use. It is crucial that we rationalise our regulatory system to remove these barriers, whether real or conceptual, and enable the sustainable management processes that we so desperately need to occur. As such, the Institute supports the objectives set out for Sustainable Land Management within the bill and it is positive to see that these are interlinking with the Sustainable Farming Scheme.

However, whilst the Institute supports Government in delivering against Sustainable Land Management objectives, it is noted that overall, an increased focus on bringing existing woodlands into management is needed alongside the welcome integration of sustainable forestry and afforestation targets with agriculture.

Skills. Whilst we welcome Continuous Professional Development (CPD) being a Universal Action (UA), government and regulators need to recognise the skills of woodland managers and stakeholders who are key to the successful delivery of the Sustainable Land Management objectives. There is an important job to do in upskilling farmers, land managers and other stakeholders on the management of trees and woodland. There is an opportunity for better knowledge exchange across land management professions. The Institute would like to see a tree management CPD module featured; this seems pertinent if farmers will be required to have 10% tree cover on their farms by 2030. Government needs to consider carefully how advice will be provided and the Institute would welcome a discussion on this and how we could provide support.

Advice. We must also ensure that advice provision by professional foresters is in place, and we must see an increase in trust between the public and private sectors. This trust can only be gained by explicit clarity from knowledge exchange with practicing professionals and engaging with the industry on a level of shared understanding. There is currently a critical lack of skills and resources with a much greater capacity needed. We would urge for our involvement in the development of advisory services. The opportunity for earned recognition would help address the skills crisis and encourage partnerships throughout the sector, with individuals renowned for their expertise demonstrated through chartership.

Question 2: There will be Universal requirements in the SFS to have woodland cover at least 10% of suitable land, and to manage a minimum of 10% of your farm for biodiversity.

a) What are your views on these requirements?

The Institute and our members wholeheartedly welcome the recognition of the importance of trees and the inclusion of trees and woodland within the area of land eligible for annual payments, rather than exclusion, as in the past. But Government must recognise that this more inclusive approach will require a culture change, where farmers view trees as valuable components on farms. They must develop the confidence to grow and utilise trees, as we must gain an improved understanding of the interaction of trees, farming, and environmental management.

We recognise and support the need to see more woodland being created and actively managed on farms. The target of 10% for both woodland cover and habitats for individual farms is a great step forward and one which we support in principle. However, we would like to emphasise that a majority of our members have shared concerns on how this has been presented and received by the agricultural community. Previously, woodland creation has been supported through voluntary grant schemes where farmers and landowners were not compelled to undertake tree planting but did so because it met their objectives, and the grants were sufficient.

With regards to the scheme rule of at least 10% tree cover as woodland or individual trees, it is important that unplanted areas are removed from this calculation, whether this is due to habitat sensitivity or alternative use. We therefore support Welsh Government's recognition of this, and hope that the unplanted areas will be identified in the Habitat Baseline Review. We also welcome the flexibility to create new woodland on areas of lower habitat value, which should be able to be carried out without regulatory hinderance.

We recommend rephrasing around the ambition to create woodland within the scheme literature to "New woodlands can be designed to suit the site conditions and achieve a range of benefits including timber production where that is the owner's objectives." The current phrasing "*Block planting may be suitable if you are interested in investing in a future timber crop,*" implies the loss of land, opposed to a planting scheme that complements current outcomes. Overall, we feel that Welsh government has failed to capture the narrative on this issue with the result that the prevailing opinion focuses on potential loss of food production, rather than the benefits of the proposals they are making.

b) What support might you need to achieve them?

Whilst we support the proposals in principle, as the UAs have a role in tackling climate change, it will be unattainable without appropriate payment rates, reflective of current market conditions. Financial support should help cover access and provision for professional advice to support farmers and land managers with this transition. It is vital that all management decision is in the landowner's best interest, with multifunctional land use driving outcomes.

The Institute welcomes the inclusion of agroforestry and orchards under woodland management and its compatibility with the associated options. We recognise that scale, production, and accessibility are all influencing factors in woodland being viable for management and this requires woodlands to be well designed. This needs to be acknowledged and needs to demonstrate forward thinking for future management interventions, such as harvesting.

It has been recognised that the woodlands need to be managed and created under UK Forestry Standard (UKFS) and woodland planners can develop plans for planting large areas or in sensitive areas. We therefore need Welsh government to ensure efficient signposting is given to helping each farm



accessing professional advice. Guidance is needed on species choice versus productivity and economic return to ensure farmers are well informed to make to right decisions for their business. We acknowledge that Welsh government wants to support farmers through knowledge transfer and advisory activities. The Institute welcomes this, and we support a discussion on how we and our members can support the implementation of these events.

Question 4: On-farm data reporting allows the Welsh Government to confirm actions are being undertaken and help you to make decisions about your farm. In your view, is the reporting requirement for the Universal Actions appropriate?

We believe the policy objective of increasing woodland cover needs to be delivered through a scheme that is not perceived as having arbitrary targets, but by a scheme that enables farmers to increase woodland cover in ways that they consider will help them to improve the management of their land. This should not be a tedious task, but simple and accessible.

Our members have questioned whether the scheme is too prescriptive. Though there are elements of flexibility, the scheme does seem to overlap between woodland and habitat. The frustration surrounding the 10% woodland cover requirement has arguably been emphasised by its announcement ahead of farmers being aware of the existing total woodland cover on their farms. We propose the initial appraisal of a farm must consider the condition of existing trees and woodlands to identify the most suitable opportunities for increasing woodland cover. We recommend that co-development is emphasised as part of the appraisal process, to reduce hostility and build trust.

We would like to see support for managing existing woodlands with access being the main issue, with support to provide sustainable working access. This would allow the resource to be managed and ensure farmers take an active interest in managing their woodlands as part of their business.

Question 6: We have proposed that applicants should have sole management responsibility for the land for 10 months and ensure completion of the Universal Actions for the full scheme year (12 months). In your view, is the 10-month period sufficient?

We have questions around the accessibility of the scheme for tenant farmers. Currently, a tenancy agreement does not permit planting so under the proposed scheme, tenants would have to forfeit the UA payment. To ensure the scheme is accessible for all, we would welcome clarification on this matter.

A balance is needed between the length of time needed to complete actions and the need to be inclusive to tenants who may have shorter term leases. Overall, our members consider 10 months an insufficient length of time to complete the UA's given the time scale of grant application and payment processing and the year-to-year variations in weather. A 3-year period would be more desirable and no less than 24 months.

Question 7: We are proposing the use of a single carbon calculator for everyone in the Scheme. Do you agree and how might we best support you to complete this?

Our members support this in principle, but it is difficult to justify without additional details. Many forestry schemes are already operating under the Woodland Carbon Code. We would welcome additional details on how this scheme would fit and avoid duplication. The process should be easily replicable, and we advise that any carbon calculations are undertaken by registered professionals and a grant should be available for landowners to undertake this assessment, if this is to be a requirement.

It needs to be ensured that the carbon calculations are in no way luring farmers into a false sense of security, as many carbon calculators and schemes are still very much smoke and mirrors, proving



unviable against costs of verification. Any carbon calculators need to be implemented with transparency and consultation, to ensure it is applicable across the whole scheme with amicable technical support from Government and Rural Payments Wales for this to function.

Question 16: We would like to know your views on which information and evidence should be used to monitor and evaluate the Scheme.

While we broadly support the proposals, the critical part to the evaluation will be the competence of those evaluating and the implementation of technology is critical to ensure it is done efficiently. The UKFS applies to all woodland across the UK and is the reference for sustainable forest management. We are encouraged that the UKFS is referenced as the measurable standard throughout, but question why this is not featured within the evaluation.

We note that broadleaved woodland will count as habitat and conifer woodland as non-habitat. However, there is environmental and silvicultural value in mixed woodland. To demonstrate equitability and avoid arbitrary de-coniferisation, we recommend that where there is a mixture of conifer and broadleaved trees, the area will be treated pro-rata whereby the whole area would count as woodland, while the broadleaved element would also count as habitat. Many of our members believe the current system under the Woodland Creation Planning Grant delivers against industry needs and provides appropriate environmental protection. If this is not to be replicated, rationale and approach for these changes needs to be clearer and be carried out in full consultation with the sector. Any evaluation should be completed by those qualified and competent to do so. In relation to woodland management, we recommend this relates back to the registered planners list.

Question 19: Do you have any additional comments on any aspect of the consultation document?

The Institute questions the government's overall approach to the Sustainable Farming Scheme and its presentation of the consultation. Whilst we welcome the additional emphasis on trees and woodland and the recognition of the multifunctional benefits that they bring, we are concerned that there is unprecedented tension developing between the agriculture and forestry sectors.

We need to act in a way that promotes trust in the forestry profession and farming sector. The lack of clarification over the 10% figure and the delivery of the scheme so far demonstrates that a scheme as ambitious as this requires much more effective communication to enable stakeholders to shape the scheme and prevent misconceptions developing. Whilst support the 10% figure in principle, we recommend that this is not promoted as a perceived statutory target for landowners and needs to be part of a cohesive agenda, encouraging farmers to go above and beyond this requirement, should it support the wider farm business.

As mentioned in our response, we believe the policy objective of increasing woodland cover needs to be delivered through a scheme that is not perceived as having arbitrary targets, but by a scheme that enables farmers to increase woodland cover in ways that they consider will help them to improve the management of their land, whilst benefitting the environment and contributing to our production targets. We would welcome clarification as to how government sees the woodland offer within this scheme positively contributing to the development of the Timber Strategy.