

Lesley Griffiths MS  
Minister for Rural Affairs and North Wales, and Trefnydd  
Welsh Government  
Tŷ Hywel  
Cardiff Bay  
CF99 1NA

14 July | 2022

Dear Minister,

**Re: Outline Sustainable Farming Scheme**

We are pleased to see the publication of the Outline Sustainable Farming Scheme and welcome the role the Scheme will have in tackling the climate and nature emergency. We are very encouraged by the support for environmentally sustainable farming and food production within the envelope of the strong set of outcomes set out in Section 2.2. In particular, we are excited to see:

- provisions for nature, including reference to protected sites, the 30 by 30 target and the requirement for at least 10% habitat actively managed for nature – it is crucial that this is well-managed and covers a diverse range of habitats.
- requirements for a minimum of 10% tree cover on farms
- provisions for peatland
- provisions for access and the historic environment
- actions to reduce carbon emissions and pollution, including ammonia emissions
- requirement for all farmers to commit to the Universal Outcomes to access the Scheme; and
- provisions for collaborative action between farmers that could help deliver nature's recovery at the landscape scale.

Concerns about the outline Scheme from our membership are focused heavily on the budget. We understand that you are awaiting decisions from UK Government on this, and that this means that commitments to the anticipated higher levels of the Scheme are currently less sure, meaning that detail on these elements is not yet forthcoming. We cannot stress enough how important investment in collaborative, landscape-

scale action to tackle the nature and climate crisis is. If budgets are low, then it is even more crucial that all actions that receive publicly funded payments – even in the universal element of the Scheme – deliver the scale and pace of change required to achieve the fundamental shift the government seeks. We also look forward to discussing the opportunities to bring in private investment to help support the scheme in achieving Welsh Government’s objectives.

We welcome the commitment to work with stakeholders to develop the details of the Scheme and we will be putting together a more detailed and evidenced response to aid officials that are developing the Scheme. Aside from the budget, we suggest that areas that need working on include:

- integration of the complex matrix of actions and outcomes to avoid a siloed approach to securing environmental, social and economic benefits, whilst retaining the welcome flexibility this matrix offers;
- clarity on how transition from BPS to the SFS will be implemented;
- clarity on the status of stability payments, what they will be for, for how long they will be available and how they will interact with the universal actions’ payment and the continued payments of BPS;
- development of more specific outcomes/actions for species recovery;
- the criteria and interactions between the 10% minimum requirements for semi-natural habitats and for tree cover, and how to ensure farms that already have more habitat are not perversely incentivised to reduce this to 10%;
- ways of supplementing the role of Farming Connect as the main provider of appropriate, ecologically sound advice and training on the Scheme;
- the status and provisions around the farm sustainability assessments, which should underpin actions each farm should take;
- re-consideration of certain proposals that appear to provide less value, such as payment purely for data collection and reporting on pesticides/nutrient management, rather than enacting improvement/reduction plans; and
- ensuring there is an effective monitoring regime in place to ensure that the required outcomes of the Scheme are achieved.

We urge you to be ambitious in ensuring the right actions will be funded, especially in the remainder of this decade, to deliver sufficient reductions in agricultural sector emissions, and respond to our 2030 nature ambitions. To address this, we wish to see

the government come forward with their analysis of anticipated delivery (year on year) in both areas and deliver a legislative commitment to link the scheme to the Low Carbon Plan by requiring scheme funding priorities modification should the monitoring and assessment processes identify that our climate and nature targets are at risk.

Welsh Government's approach to restoring and maintaining nature and natural resources is essential to maintaining our ability to produce food now and in the future, as explained in our recent [food security briefing](#). WEL members are keen to continue working closely with your officials to develop an effective Sustainable Farming Scheme that delivers real benefit and value for public money. We look forward to meeting you again in October (as requested in our recent letter) to discuss the Scheme and the Agriculture Bill further.

Yours sincerely,



Arfon Williams  
Co-Chairs of WEL Land Use Working Group



Andrew Tuddenham

**Swyddfa Caerdydd**

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