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NFU Cymru Response: Welsh Government consultation on draft regulations to implement fine particulate matter (PM2.5) air quality targets

NFU Cymru welcomes the opportunity to respond to the Welsh Government consultation on draft regulations to implement fine particulate matter (PM2.5) air quality targets.

NFU Cymru champions Welsh farming and represents farmers throughout Wales and across all sectors. NFU Cymru's vision is for a productive, profitable and progressive farming sector producing world renowned climate-friendly food in an environment and landscape that provides habitats for our nature to thrive. Welsh food and farming delivering economic, environmental, social and cultural benefits for all the people of Wales.

The importance of the farming industry in Wales cannot be overstated. Welsh farming businesses are the backbone of the Welsh rural economy, the axis around which rural communities turn. The raw ingredients that we produce are the cornerstone of the Welsh food foundation sector, a sector which has now grown to reach a turnover of £10.2 billion whilst employing 223,500 people, the equivalent of 17% of Wales' total workforce.

We are proud that the Welsh public associate Welsh farmers, first and foremost, with providing safe, high quality and traceable food and at NFU Cymru we want to ensure that consumers in Wales, the UK and further afield can continue to enjoy and choose the top-quality food that we produce here in Wales – now and in the future.

Welsh farmers look after over 80% of the land area of Wales, maintaining and enhancing our natural environment – Wales' key asset. Farming activity supports a diverse range of species, habitats and ecosystems, provides a range of ecosystem services including flood alleviation, carbon sequestration, climate change mitigation; and delivers the significant backdrop for Wales' tourism and recreation sector.

Welsh farmers are key promoters and protectors of our culture, heritage and the Welsh language. The Welsh agricultural industry has the highest proportion of Welsh speakers, more than any other sector at 43%, more than double the population as a whole and Farming Connect's 'Iaith y Pridd' concluded that the relationship between the various factors – both positive and threatening – which face the agricultural industry, rural Wales and the Welsh language, overlap to such an extent that there is no point, nor is it possible, to separate one from the other.

Overall Welsh farming makes an unparalleled contribution to the economic, environmental, social and cultural well-being of Wales in line with the Well-Being of Future Generations Act summarised in Annex 1.

We note, in line with The Environment (Air Quality and Soundscape) (Wales) Act 2024, Welsh Government is required to make regulations in respect of the annual mean level of fine particulate matter, known as PM2.5, in ambient air in Wales. The Act requires that regulations are introduced by February 2027 and Welsh Government is seeking views on:

- An Annual Mean Concentration Target (AMCT) of 10 µg/m³ by 2035
- A Population Exposure Reduction Target (PERT) of 25% by 2035

Views are also sought on the proposed arrangements for assessing PM2.5 levels and the subtraction of the 'natural contribution' to particulate matter where exceedances of a target are due in whole or in part to these natural contributions.

- **Proposed targets**

NFU Cymru would express concern at Welsh Government proposals for PM2.5 targets for the Annual Mean Concentration Target (AMCT) and the Population Exposure Reduction Target (PERT) which appear highly ambitious in the context of the analysis presented within the consultation.

While Welsh Government recognises that air is generally cleaner in Wales than at any time since the industrial revolution and baseline emissions and concentrations for PM2.5 are projected to reduce by 2030, the modelling shows that concentrations are predicted to exceed the WHO guideline across wide areas of Wales with annual mean concentrations of up to 16 µg/m³ in some parts of Wales – significantly above 10 µg/m³.

The extent to which the proposed targets are achievable is challenged by the fact that PM2.5 is emitted from both manmade and natural sources and acts as a transboundary pollutant impacting areas far away from where it was released. Welsh Government modelling identifies that just 22% of annual mean concentration of PM2.5 is as a result of emissions in Wales. 78% is, therefore, predicted to be outside the control of measures taken in Wales deriving from either natural sources or from pollution that travels into Wales from other parts of the UK and beyond.

Welsh Government, through the consultation, acknowledges that if there were no manmade emissions in Wales at all it would be extremely challenging, if not impossible, to meet the annual mean WHO air quality guideline for PM2.5. While the WHO air quality guideline sits below the target for PM2.5 proposed by Welsh Government, NFU Cymru remains concerned that this could prove extremely challenging and that actions required to meet PM2.5 reductions will disproportionately impact on emissions arising in Wales (which are less than a quarter) and sectors which fall under devolved competence, specifically. This is likely to include agriculture with the result that the costs and impacts associated with meeting statutory PM2.5 targets are borne unequally by farm businesses, food production in Wales and our rural communities. This is unjust in the context of the modelling that suggests that agriculture is just 7% of the primary emissions from Wales and domestic combustion (an essential source of heating on Welsh farms and in our rural communities) is 4% - largely insignificant when compared to other sources.

NFU Cymru has long argued that any targets must have a clear evidence-base for inclusion, have a clear baseline, be achievable, measurable and affordable, and have the right supportive policy mechanisms in place to support delivery.

Given the transboundary nature of PM2.5 we question whether the proposed targets will, in fact, be achievable, and without sight of the proposed measures and actions for farming we are unable to comment on whether these will be practical and cost effective for Welsh farmers.

NFU Cymru has further concerns about proposed targets for PM2.5 and how they interact with the broad range of other environmental targets in place or being pursued by Welsh Government, including those for net zero and biodiversity as well as the impacts of wider policies such as nutrient neutrality in SAC river and marine catchments. It is important to recognise the in-combination effects of multiple targets may have the effect of reducing agricultural production with impacts on Wales' agricultural productive capacity. Such a consequence would be undesirable in the context of the predicted challenges to our global food production system.

In line with the Well-Being of Future Generations Act, it is vital that any legislative targets established for PM2.5 contribute to economic, social, cultural and economic well-being as per the duties on Welsh public bodies.

Through the consultation, Welsh Government identifies that more detailed evaluation will be necessary for any specific policy implemented to achieve the targets. NFU Cymru would place on record, in pursuing the delivery of targets for PM2.5, that NFU Cymru is strongly opposed to increased regulation of agriculture.

We highlight that the majority of farm businesses are small or medium sized enterprises and they do not have the capital or resources available to them to comply with ever-increasing levels of complex regulation. The burden of regulation on farming has long been a significant concern to us and we continue to call for an independent review of regulation that considers the cumulative burden of regulation, red tape and bureaucracy facing the agriculture sector.

By regulation we mean the full range of tools and mechanisms available to Welsh Government and Natural Resources Wales including the permitting and planning systems. It would be extremely concerning if even greater limitations were placed on the development of farming businesses as a result of air quality targets.

It is important to recognise that Welsh farming is operating in a period of profound uncertainty, with changing agricultural policy, regulatory requirements, market volatility and environmental pressures placing significant strain on farm businesses.

An enabling planning system is essential as farmers seek to invest in new, more modern and efficient buildings and on-farm infrastructure including those that improve environmental performance and those required for regulatory compliance. The need for a positive planning and development management service that enables farm businesses to meet changing regulatory requirements, innovate and expand cannot be overstated.

The Sustainable Farming Scheme offers opportunities to deliver action to improve air quality in Wales through the Optional and Collaborative layers of the Scheme. However, it is important to recognise that improved air quality is one of multiple objectives for the Scheme and NFU Cymru is clear that a multi-annual budget that reflects the scale of the ambition for the delivery of the multiple objectives of the Scheme including the production of food is needed.

In reality, government must commit to providing a ring-fenced, multi-annual budget to underpin the financial resilience of our family farms and rural communities, in harmony with our environmental and climate obligations and ambitions.

NFU Cymru believes that any measures developed for PM2.5 should be underpinned by sound scientific evidence and have clear benefits for productivity as well as the environment. It is important that targets are not delivered at the expense of food production in Wales and exporting production to other countries.

The future challenges to our global food production system are well documented. Wales is expected to become an area increasingly favoured for agricultural production moving forward, when compared to other regions where climate change impacts are expected to be more severe and disruptive. Wales' productive capacity should be maintained and enhanced.

When developing actions, conflicts and unintended consequences need to be clearly understood. For example, incentivising new technologies such as low emission spreading equipment to reduce ammonia emissions may increase nitrate leaching to waterways impacting on water quality targets. Actions to improve air quality cannot also be assumed to deliver Welsh Government's decarbonisation goals and could, for example, lead to an increased reliance on non-renewable fossil fuels.

Proposed actions to contribute to the delivery of PM2.5 targets also need to recognise the positive contribution farming can play in reducing 'natural' contributions of PM2.5. Wales has a long legacy of approaches on common land that have interfered with stocking and grazing regimes to such an extent that in some instances the ability to proactively manage the common has been lost leading to a build-up of vegetation that represent a significant risk of wildfire, and uncontrolled PM2.5 emissions. Policies that support continued active grazing, therefore, have a key contribution to future PM2.5 targets.

NFU Cymru is clear that any policies or measures relating to agriculture proposed by Welsh Government to contribute to revised PM2.5 targets should be developed in partnership with industry, subject to full consultation and regulatory impact assessment. The cost-effectiveness of measures needs to be a key consideration alongside the economic, social and cultural impact of proposals including the Welsh language.

- **Assessing PM2.5 levels**

NFU Cymru has long highlighted that environmental policies and targets need to be science-led and based on robust data. NFU Cymru identifies that adequate investment in modelling, data and analytical tools is needed to give the farming industry confidence and there is a lack of air quality monitoring upon which to base policy and regulatory decisions at the present time.

Given that there are just 11 air quality monitoring stations in Wales currently, we are concerned that establishing targets for reductions in air quality pollutants will be based on modelling, where there is less confidence with an uncertain baseline as a result of the limited air quality monitoring and the uneven spatial distribution of air quality monitoring sites currently.

NFU Cymru is clear that improved monitoring and data collection is needed across Wales. A transparent approach is needed to give confidence in the baseline, the source apportionment together with the effectiveness of the actions proposed by Welsh Government.

- **Domestic burning**

The consultation identifies that 4% of primary emissions in Wales derive from domestic combustion. NFU Cymru has highlighted previously our significant concerns that Welsh Government will introduce measures relating to the indoor burning of solid fuels as a means to address air quality.

We are concerned that measures relating to domestic burning are likely to disproportionately impact those living in rural areas where there is a limited choice of fuel available to many isolated properties. Welsh Government must also recognise that those living in older rural properties are restricted in the measures that can be taken to improve energy efficiency, e.g. if the property is listed so certain aspects, such as windows, cannot be changed, reducing the property's energy efficiency. Many rural

properties rely on solid wood as a main source of heat and to update, even where this is possible, would require a significant amount of investment that would be unaffordable to many.

We highlight that domestic burning of timber derived as part of the ongoing process of farm woodland management, which Welsh Government is seeking to encourage, is a very important source of supplementary heat in Welsh farmhouses and contributes significantly to affordable heating on Welsh farms. This source of firewood which reduces farmhouse heating costs often provides the economic rationale for ongoing woodland management which is a key climate objective for Welsh Government.

Overall, we are clear that any actions put forward to address the contribution of domestic combustion and on-farm biomass systems to PM2.5 should not disproportionately impact on farm businesses and rural communities. It is vital that comprehensive rural proofing is integral to the impact assessment process.

Annex 1 - The Contribution of Agriculture to the Well-Being of Wales

The Welsh Government Well-Being of Future Generations (Wales) Act 2015 is designed to improve the social, economic, environmental and cultural well-being of Wales. The Act establishes seven goals that all public bodies, including Welsh Ministers, must work to achieve. The contribution that farming makes to achievement of all seven goals is unparalleled by any other industry, as highlighted in the following below:

Well Being of Future Generations Act: Well-being Goals	NFU Cymru: Agriculture is the Answer
A prosperous Wales	• 60,000 employed full or part time in farming in Wales • £1.5bn Gross Output • Farming underpins a food supply chain worth over £10bn • Over 223, 500 people in Wales are employed in the agri-food sectors – that's 17% of the workforce and Wales's biggest employer • The Welsh countryside managed by farmers provides the backdrop for the tourism industry worth over £2.5bn • The Welsh agricultural industry is a key generator of wealth and employment for the people of Wales
A resilient Wales	• Farmers care for 81% of total land area of Wales – that's over 1.84m hectares • 600,000 ha of environmentally designated areas • Almost 560,000 ha managed under Glastir Entry Sustainable Land Management Scheme designed to combat climate change, improve water management and maintain and enhance biodiversity • Farming supports a diverse range of species, habitats and ecosystems • Farmers provide a range of ecosystem services including carbon sequestration and management, water quality and water quantity management for flood alleviation • Low carbon, local energy installations have the potential to meet 57% of Wales's electricity consumption and the evidence shows a large proportion of projects are located within Wales's rural local authorities • GHG emissions from agriculture have declined by 20% since 1990 and further decreases are being achieved through production efficiency measures • Welsh farmers play a key role maintaining and enhancing our natural environment and supporting the provision of a full range of ecosystem services
A healthier Wales	• Welsh agriculture is a key provider of safe, nutritious, high quality Welsh food which plays a fundamental contribution in supporting the physical and mental well-being of the people of Wales • Welsh farmers are known to operate to some of the highest standards of welfare and production in the whole world • Welsh farming also delivers a significant proportion of Wales's access provision which includes 16000 miles of footpaths, 3000 miles bridleways, 1200 miles of cycle network, and 460,000 ha of open access land • Welsh farming makes a key contribution to the physical and mental well-being of the people of Wales
A more equal Wales	• Rural Wales is home to 33% of the Welsh population.

	- The vitality and potential of rural areas is closely linked to the presence of a competitive and dynamic farming sector. The NFU Cymru 'Why farming Matters to the Welsh Economy' shows that each family farm is typically economically linked to some 40-80 other businesses in the region Through direct and indirect employment in rural communities, Welsh farming underpins the rural economy and contributes to a more equal Wales
A Wales of cohesive communities	- Local communities in rural Wales are heavily dependent on agriculture for financial and social prosperity. - Leadership and voluntary roles in rural communities Welsh farmers make a key contribution towards the provision of attractive, viable, safe communities in rural areas
A Wales of vibrant culture and thriving Welsh language	- Agriculture has the highest proportion of Welsh speakers of any sector. - Farming is the bedrock of rural communities across Wales which have been shaped by farming activity spanning hundreds of years. Farmers continue to maintain these traditions, preserving rural culture and sense of place Welsh farmers are key promoters and protectors of our culture, heritage and the Welsh language
A globally responsible Wales	- Current levels of self-sufficiency at a UK level are at 62% - Future challenges to our global food production system include climate change, a growing UK and global population, water scarcity. Given its climate and rainfall, Wales is predicted to be an area of favoured production in the future Welsh farmers have a key role to play feeding the people of Wales and in contributing to global food security now and in the future.