



16th February 2026

Air Quality Evidence, Monitoring and Assessment Branch
Environmental Protection Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ
airqualitypolicy@gov.wales

RE. Consultation on draft regulations to implement fine particulate matter (PM2.5) air quality targets

Dear Sir/Madam

Thank you for the opportunity to provide feedback on the proposed fine particulate matter air quality targets.

The Farmers' Union of Wales (FUW) was established in 1955 to exclusively represent the interests of farmers in Wales. Since 1978 the Union has been formally recognised by UK Governments, and subsequently by Welsh Governments, as independently representing those interests. The FUW's Vision is thriving, sustainable, family farms in Wales. We have therefore consulted with our membership on these proposals, as any future incentives, regulations, or targets relevant to agriculture will have an impact on those family farms across Wales.

Firstly, whilst the Union would obviously be in favour of reducing pollution exposure and limiting the concentration limit for the health of Wales' population, it is difficult to comment on the level of ambition given that there are no specific proposals on how this would be achieved relevant to agriculture. There are currently a number of (both legally binding and aspirational) targets being enacted in Wales, however, focus should be given to the pathway, practicalities and cost of achieving these, with accompanying impact assessments.

The Union would be opposed to any further regulation on farming families in regards to air quality, particularly given that emissions from agriculture are secondary particulate matter, and therefore only a pollutant once they react with other pollutants (such as from traffic and

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industry). The agricultural sector is already struggling to cope with the significant cost and administrative burden imposed by the controversial Control of Agricultural Pollution (CoAP) regulations introduced in 2021. The Welsh Government's own Regulatory Impact Assessment (RIA) estimated the infrastructure costs alone for Welsh farmers to be as high as £360 million. This represents an average cost of £14,600 per Welsh holding, rising sharply to £37,700 for holdings with cattle. Critically, this latter figure is about £11,500 more than the average Welsh farm business income reported in the 2019-20 financial year.

Any discussion of further regulations affecting agriculture must therefore take heed of the major mistakes and negative impact associated with the introduction of CoAP regulations, and involve relevant stakeholders such as the FUW at every stage of discussions.

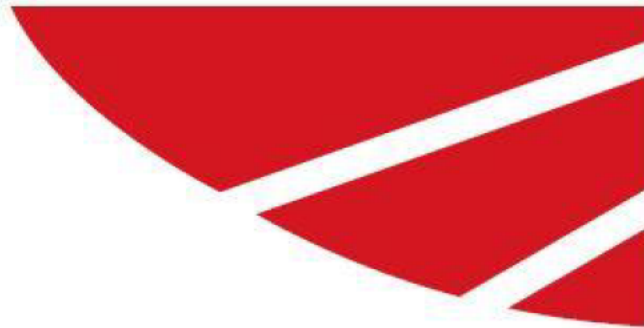
Furthermore, whilst Agriculture is positioned as the 'second largest domestic contributor' (at 7%), this statement should be contextualised with the secondary PM matter, and the fact that spatial maps clearly show the pollution levels only being above the recommended annual mean concentration in urban (i.e. non agricultural) areas. Whilst not specific to this consultation, it continues to infuriate members that agriculture and food production receives such a focus on emissions reduction, whilst climate policies (such as CCC recommendations¹) predict that aeroplane travel will continue at current levels. In regards to PM, car numbers have increased by roughly 60% over the last thirty years, whilst livestock numbers in Wales have already decreased by around 20% in the last 20 years. Therefore, it is important that any further regulation is proportionate to the industry and businesses/families involved.

In regards to ammonia, it is recognised that this increasing pollutant can travel far, and has other environmental impacts wider than its airborne pollution risk. Within the statutory review of CoAP regulations, Dr Susannah Bolton suggests ammonia mitigation is most effective when concentrated on specific management stages².

Dr Bolton further recognises key focus areas where practical reductions could be made including livestock housing, nutrient storage, land application, and efficient use of inorganic fertiliser. The FUW is somewhat agreeable with these suggestions, but would argue that to encourage the necessary reduction of ammonia emissions (with a focus on the key areas

¹ <https://www.theccc.org.uk/wp-content/uploads/2025/05/Wales-Fourth-Carbon-Budget-advice>

² [Statutory review of the Control of Agricultural Pollution Regulations: 2025 review](#)



outlined above), the Government should provide farmers with practical and well-publicised support incentives.

Yours faithfully



Redacted information - regulation 13 - personal data.

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