



Game & Wildlife Conservation Trust response to the Welsh Government consultation on the Sustainable Farming Scheme

Who we are:

The Game & Wildlife Conservation Trust is a leading UK charity conducting conservation science to enhance the British countryside for public benefit. For over 80 years we have been researching and developing game and wildlife management techniques. We use our research to provide training and advice on how best to improve the biodiversity of the countryside. We promote our work to conservationists, including farmers and landowners and offer an on-site advisory service on all aspects of game and wildlife management, so that Britain's countryside and its wildlife are enhanced for the public benefit.

General Comment:

Before we commence completion of the questions below, we wished to express our key concerns with the scheme as outlined so far. Whilst it is to Welsh Government's credit that they wish to address both the climate and nature emergency, there are some very real threats which left unaddressed will likely see this scheme fail due to lack of participation. What is clear from consultation with our members is the adage that "you can't be green if you're in the red", meaning that the farming community will find it increasingly difficult to help tackle the climate and nature emergency if they are not properly financially supported and if their businesses are not economically sustainable in the long-term.

Whilst the consultation includes sentences such as "*It recognises the delivery of environmental and social outcomes are dependent on ensuring farm businesses are economically sustainable in the long term*", the GWCT, our members and the wider farming community are concerned that the reality of the universal requirements will make this incredibly difficult.

This scheme offers what really is a last chance saloon for biodiversity recovery in Wales. Whilst on one hand that claim may encourage strict sanctions to enforce nature recovery with an iron grip, in trying to do so we believe that many farmers will be put off and participation will drop to levels offering little hope of a recovery of any kind. What GWCT

believes is preferable and achievable, is working with the farming community and taking a bottom-up, trusting approach. To join together on a journey which encourages participation and collaboration in such a way that nature recovery can slowly be built from the ground up, one step at a time to surpass levels previously seen. Welsh Government's Farming Facts and Figures, Wales 2022 data shows there to be 10,229 farms in Wales (very small farm types excluded), yet only approximately 3,100 claims were made under Glastir. The percentage of farms in stewardship in Wales pales in comparison with the equivalent in England and highlights the lack of appeal of Glastir for Welsh farmers. Lessons must be learnt, and a more accessible scheme must be created. We would reiterate that climate and nature recovery will not be achievable unless Welsh Government works with the farming community and creates a scheme which encourages participation at the lowest level.

Consultation with our members re-enforces four themes which we believe are key to the Sustainable Farming Scheme's success and which similar themes were previously stated by Welsh Government staff during discussions prior to the latest consultation document.

1. The scheme should be simple to enter and administer
2. It should be flexible and avoid being prescriptive
3. It should be governed by a light regulatory touch
4. The rewards should reflect the effort expended and the public benefits which result.

It is essential that that these principles are embedded in the final scheme. Beyond this there are areas that could be improved, and we hope that our answers to the questions below provide some constructive commentary.

Q1) 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?

As outline above, GWCT believes that the scheme should be:

1. Simple to enter and administer
2. Flexible and avoid being prescriptive
3. Governed by a light regulatory touch
4. The rewards should reflect the effort expended and the public benefits which result.

We are concerned that, whilst the Welsh Government have tried to take a belt and braces approach to tackling the nature and climate emergencies, it has created a scheme which is none of the above, despite prior assurances from Welsh Government officials that they were indeed sharing our thought process.

We have all seen the concerning discontent these proposals have created within the agricultural sector recently. For a scheme which should have a broad and shallow universal layer which encourages participation, it would seem from the discontent created that the

proposals have missed their mark. Certainly having 17 universal actions which are all mandatory and include losing up to potentially 20% of a farm's productive land does not seem a flexible approach. Of course, we understand that many farms will already have certain percentages of land which can be used towards the 10% woodland and 10% habitat goals, and that some of that land can count towards both, but the outward facing message is one of potentially taking a lot of land out of production, which is a bitter pill to swallow for many marginal Welsh farms. With a suggested 34% of Welsh farm holdings facing financial difficulties and 44% of agricultural land in Wales being vulnerable to land use change or abandonment ([Arnott et al., 2021](#)) it is obvious why having such a divisive universal layer is problematic in Wales and for the Welsh Government.

We are also aware of incredibly poor uptake of previous schemes in Wales and would remind the Welsh Government that this really is a last chance saloon for many species in Wales. [The State of Nature report 2023](#) for Wales highlighted:

- 20% of Welsh wildlife has decreased on average by 20% since 1994.
- 43% decline of Moth species.
- 18% (one in six) Welsh species are threatened with extinction.
- 42% of Wales' plant species are found in fewer places than before.

GWCT believe in this instance that it is far better to bring 100% of farmers 1% of the way and start a journey and positive experience with them, than it is to have 1% of farmers go 100% of the way along the journey, especially at the universal layer (bottom level) of the scheme. The process must be about starting off on the front foot and mending previously broken relationships.

In other parts of the UK, entry level schemes are doing just that, offering a variety of options farmers can pick and choose from to suit their needs and the needs of their farm businesses. By building on positive experiences and creating trust agri-environment schemes can make a difference. However, if we get more of the same prescriptive, inflexible options farmers will be forced to make very difficult decisions which would be very likely catastrophic for the Welsh Countryside. The Welsh Government must take this opportunity to wake up to this very real threat of disengagement with the agricultural sector. If farms do not like the scheme, they will be forced to either sell up or further intensify, both of which are undesirable given the current climate and nature emergencies.

GWCT proposes the Welsh Government should remove the mandatory requirements and instead offer many optional actions allowing farms the flexibility to choose those which best suit their businesses. Additionally, give farmers the flexibility to decide how they can meet outcomes, the Welsh Government can suggest ways of achieving set outcomes, but it is a very powerful message to trust the farming community to do what is right and to give them the freedom to achieve the objectives in the most suitable way for their circumstances. Below (in answer to question 4) we have highlighted novel ways of practitioner monitoring which could provide the required feedback to ensure actions have been undertaken.

Furthermore, GWCT has developed, scientifically researched, and successfully demonstrated many forms of successful nature and localised population recovery for many threatened species of conservation concern. GWCT has shared a paper with the Welsh Government

highlighting the need for alternative conservation strategies above and beyond habitat management for the conservation of certain species, where payments for habitat management alone are wasted if not used in conjunction with alternative methods.

It is noticeable and extremely worrying that the current Sustainable Farming Scheme consultation completely omits any reference to predation management or wildlife management as a tool for the restoration of species of conservation concern or for more efficiently delivering nature recovery alongside profitable, productive farming. It is perhaps even galling that wildlife management, including both non-lethal and lethal methods of predation management is not mentioned once, not even in relation to non-native invasive species such as the American mink which impacts our native water vole and freshwater pearl mussels, or the grey squirrel which heavily impacts our native woodlands and woodland creation. This is despite meetings with Welsh Government officials discussing the matter and despite Julie James, Minister for Climate Change fully understanding and agreeing upon the importance of legal, targeted, and effective predation management to protect species of conservation concern.

If Welsh Government are indeed serious about tackling the nature emergency in Wales, and do indeed want to protect biodiversity as they are bound to do by law, they need to seriously consider the consequences of avoiding this serious but understandable difficult topic. There is a growing body of evidence demonstrating that for certain species, high quality habitat, paid for by the public purse is not effectively achieving nature recovery targets and that predation management is required to save certain key species of conservation concern from extirpation in Wales before it is too late.

In Wales curlew rank as the species of highest conservation concern amongst several threatened ground nesting bird species. Poor breeding success, often attributable to predation, typically by foxes, stoats, crows and gulls, is a mechanism for decline. In Europe over half of published studies quote less than the 0.5-0.6 fledglings per pair per year required to offset adult mortality and to maintain a stable population.

The GWCT does not believe that predation caused the decline of these species, although it may have contributed. We have evidence that predation is playing a key role in preventing recovery even in the presence of sufficient quality habitat. We can demonstrate that legal, often seasonal predation management, as prescribed by current wildlife and welfare laws, including the General Licences, is an important 'tool' in the conservation recovery 'toolbox' and that, for some species like curlew, every measure in this 'toolbox' should be available to avoid curlew extinction in Wales. This is now the consensus of the stakeholders involved in Wales's Gylfinir Cymru who were tasked by Welsh Government to write a species recovery plan.

The strongest evidence for fledging success following predation management comes from large scale, long-term, manipulative experiments whose findings have been published in peer reviewed journals where predators are legally removed from an area and the responses of their prey monitored in comparison to areas of similar landscapes where predators remain. In the pantheon of experimental approaches, these randomised, replicated removal

experiments are considered the best way to identify the importance of predation. Academic ornithologists and other UK-based wildlife charities agree and have gone into print confirming this. They also agree that the experimental approach is more robust than the correlations of various datasets. Statistically significant correlations do not indicate cause, and effect can be caused by unmeasured factors. The absence of a significant correlation may indicate weak investigative methodologies. But scientifically robust experiments conducted by GWCT on Salisbury Plain and Otterburn, and the large-scale demonstrations at Royston, Loddington and elsewhere, provide this evidence.

Through several scientific studies and well documented case studies, there is good evidence that the combination of habitat improvement alongside targeted, effective predation management can lead to the recovery of species of conservation concern where habitat improvement alone has failed. This is not only for curlew but for many other species too, including many Section 7 species within the Environment (Wales) Act 2016 such as Lapwing and Hen Harrier. Furthermore, predation management does not only protect avian species and there is good evidence to demonstrate water vole and brown hare population recoveries too.

GWCT as the leading expert in this field has offered Welsh Government the opportunity to discuss this matter further and we are happy to continue the conversation with Welsh Government to navigate this difficult topic. We would also remind Welsh Government we are including non-lethal means of predation management as a necessary requirement for nature recovery.

Q2) 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?

b) What support might you need to achieve them?

General comment:

Given the backlash from the agricultural community surrounding the proposals of the Sustainable Farming Scheme, it might be appropriate for Welsh Government to consider alternative options. GWCT recommends that farmer participation will be the key driver of success and ultimately the key to delivering nature recovery. It might be sensible for the entry level of the scheme to measure existing semi-natural permanent habitat, existing woodland and provide opportunities to encourage farmers to look at increasing their delivery of nature friendly habitat by a certain percentage up to a threshold which could be 10% but would not necessarily need to be 10%. This would be an interesting development, especially if habitats were scored on their ability to support a diverse range of wildlife i.e., a higher scoring habitat might need to occupy less area of the farm, especially if it was

combined with other conservation actions. For example, a fallow plot or spring sown cereal for lapwing, combined with predation management. Or a wildlife cover crop for linnets combined with supplementary feeding.

Furthermore, the lack of flexibility and overly prescriptive nature of the universal actions will undoubtedly be off putting for farmers. An example of unrealistic expectations is the definition and requirement for a good hedge being stockproof in its own right and having one tree per 50m of length. These two requirements compete with one another as a tree can shade out the hedge below causing it to be gappy and not stock proof. Additionally, a tree every 50m of hedgerow is not a good idea where certain birds of conservation concern frequent as hedgerow trees can act as predator perches, turning optimal habitat into sub-optimal habitat for certain species like curlew, lapwing or grey partridge as examples.

Creating better quality habitat more efficiently i.e., quality over quantity:

It has been frustrating to see the over-simplified, prescriptive and inflexible message from this Sustainable Farming Scheme consultation do so much damage, when it need not have been the case.

As discussed throughout this response. This was a very important opportunity to get the next Welsh farm stewardship scheme right as the next ten years offers some Welsh wildlife species a last chance saloon to avoid extirpation in Wales. If this scheme is not successful, and if it does not engage correctly with farmers and encourage high levels of participation, we will see further catastrophic declines for Welsh wildlife. How then did Welsh Government get the scheme design and messaging so wrong, when it was so essential to engage with and most importantly listen to the farming community.

Previous scientific studies, including a GWCT, RSPB and FWAG collaborative paper, have noted that on arable areas, if farmland bird measures are adopted on at least 7% of farmland, bird populations are likely to increase ([Winspear et al., 2010](#)) and so scheme options at the time were designed around 7% habitat for the higher tier. This paper also noted that for entry level the percentage could drop to 3 – 4% which was deemed sufficient to maintain farmland bird populations. More recently, in ([Sharps et al., 2023](#)) they suggested that “farmland bird populations bounce back when farms devote 10% of their land to nature-friendly measures”. It is also worth noting that in a grassland dominated landscape (like Wales) that habitat measures for farmland birds such as establishment of wildlife cover crops and supplementary feeding have magnified benefits ([Parish & Sotherton, 2008](#)), suggesting that in grassland landscapes a smaller percentage might yield similar results.

We therefore know that to stop declines of farmland birds in Wales, less than 10% habitat managed in a nature friendly way is required and to reverse declines approximately 10% is required. It is strange therefore that the universal layer proposed as part of the Sustainable Farming Scheme i.e., the entry level scheme has set such high percentages managed for habitat as mandatory to enter the scheme.

Additionally, we suspect that ecologically enhanced habitat can often deliver enhanced nature recovery above what semi-natural habitat can deliver. GWCT use the mantra, “biodiversity by design, not by accident” to demonstrate that nature recovery is about good quality habitat and a strategic approach which delivers the necessities for wildlife throughout the year.

GWCT would prefer to see semi-natural habitats managed appropriately, alongside high quality ecologically enhanced habitat which offers the farmer flexibility as a non-permanent feature of the farm which can be rotated as necessary.

It is frustrating then that Welsh Government did not take the opportunity to highlight such measures as being very useful, farmer friendly options which allow efficient use of less productive areas without the need for a permanent buy in. This offer, alongside measures such as supplementary feeding and predation management would have been much more palatable for many farmers. In addition, there is also evidence to show that these methods work, whereas the 10% habitat requirement seems on the face of it to be more of the same, which hasn't yielded wildlife recoveries for the past 32 years. There is more information on wildlife cover crops and their benefits in answer to question 12 below.

Whilst GWCT recognises the proposals are not design specifically for farmland birds, research demonstrates that such measures also benefit a plethora of other wildlife, as seen in GWCT's [PARTRIDGE](#) Interreg North Sea Region Project which demonstrated such measures can increase general farmland biodiversity by a minimum of 30%.

The inclusion of hedgerows towards the woodland target:

The GWCT understands the driver behind the 10% woodland cover scheme rule is Welsh Government's commitment to plant 86 million trees by 2030 in response to the climate crisis.

Firstly, we want to highlight that there must be scope within the scheme for derogations where tree planting is not the correct option for a farm. For example, in areas where vulnerable ground nesting birds such as curlew nest and forage, or where peatlands could be damaged by tree planting.

Secondly, we want to highlight that, whilst we support planting the right tree in the right place and woodland creation and management in the right places, the research surrounding carbon sequestration is far from simple. Just planting trees everywhere is an over simplified political view to solving the climate crisis.

Welsh Government is completely missing the huge amount of carbon already stored in the vast amounts of permanent pasture in Wales. Preserving this carbon store through extensive grazing in the correct areas could well be key to the agricultural carbon accounts for Wales.

GWCT also recommends that Welsh Government commits to reviewing the available scientific research on carbon sequestration and not be fully reliant on tree planting to meet its targets. Research from the Wakehurst project suggests that agricultural grasslands can contain up to 70% of our sequestered carbon, with 17% in woody biomass and trees and approximately 6% in root structures. Further research is needed to better understand the carbon equation, rather than the oversimplified view that planting trees is always the right option.

Given that Welsh Government is happy to count traditional orchards, scrub, wood pasture and in-field trees as woody habitat, we find it difficult to comprehend why hedges and their ability to sequester carbon have not also been included as woody habitat?

It is very strange that a hawthorn bush in an area of scrub can count but the equivalent species in a hedge cannot. This is especially strange considering that hedgerows can sequester carbon at twice the rate of some woodland due to their three-dimensional structure. Research also shows that good-sized hedgerows provide equal or better carbon storage than 1 ha of low-yield woodland of all species commonly planted in Wales, such as Sitka spruce for example. In several cases, hedgerows exceed the carbon sequestration of moderate-yield woodland over ten years.

Professor Pippa Chapman and Dr Sofia Biffi also found interesting carbon sequestration benefits from hedgerows. From a study by the University of Leeds as part of the [Resilient Dairy Landscapes project](#), funded by the Global Food Security's Resilience of the UK Food System Programme, Professor Chapman stated "that the top 50cm of soil beneath hedgerows stored, on average, 31% more carbon than the adjacent intensively managed grass fields, with old hedgerows storing almost double that amount. The larger soil organic carbon stocks found beneath older hedgerows compared to young ones indicate that these stocks progressively build up over time, contributing to offsetting emissions". Dr Biffi followed this stating "Our estimations show that a 40% increase in hedgerow length across England will result in 4.7% of present-day agricultural CO2 emissions from agriculture being sequestered each year for four decades" and that "this figure could rise to 6.4% by increasing hedgerow width by just 50cm." This result could be replicated in Wales too.

Allowing hedgerows to be classed within the woodland 10% would also really help farmers meet the target without worrying about taking further land out of production, and encouraging farmers to restore and maintain good quality hedgerows can support over 600 different plant species, 1,500 insect species, 65 bird species and 20 different mammal species too.

This view is more widely supported too. The Climate Change Committee has identified hedgerow planting as a way to help reach the UK Government's zero carbon target for agriculture by 2050. We believe that hedgerows should be included within the 10% tree cover required by the Sustainable Farming Scheme. There will be farms where tree planting up to the required 10% is impractical, either in terms of suitable soils, or where there would be adverse impact on farm resilience or negative effects on biodiversity. Allowing hedgerows to be recognised for the carbon they deliver would encourage greater uptake from farmers.

Like the Woodland Carbon Code, GWCT have developed a 'Hedgerow Carbon Code' which will become the quality assurance standard for hedgerows and aims to generate hedgerow carbon credits. GWCT's Allerton Project has been researching the value of hedgerows for both biodiversity and carbon sequestration. It is calculated that there are some 402,000 km of hedgerows in the UK along with an additional 145,000 km of relict hedgerows in need of management. Wales is no exception, indeed with the switch to ranch style sheep farming in upland Wales many hedges have been neglected and there is considerable capacity to plant new multi-species hedges to the benefit of improved biodiversity, animal welfare, on-farm biosecurity, and carbon capture. The improvement and creation of new hedgerows would bring the same benefits to all forms of livestock and arable farming in Wales.

Our 'Hedgerow Carbon Code' is a matrix used to calculate a baseline for stored carbon both in biomass and in the soil beneath. This matrix can also project the increase in stored carbon created by different management of hedges making it a valuable tool for the calculating 'additionality' where carbon is sequestered by growing existing hedges out over the long-term or planting new hedges will contribute to the potential creation of carbon credits.

GWCT has offered and continues to offer advice and support to Welsh Government to further discuss the potential for hedgerows to sequester carbon. We strongly recommend that hedgerows are included in whatever percentage of woodland habitat that Welsh Government propose for the Sustainable Farming Scheme so that carbon sequestered by hedgerows can be accurately incorporated into the Government's targets. We believe this change could dramatically help Welsh Farmers participating in the scheme and may help increase numbers of participants too.

Q3) Aside from the 10% woodland and habitat requirements, will the Universal Actions:

a) Provide benefit for your farm business?

b) Provide an achievable set of actions paid for through the Universal Baseline Payment?

There should be benefit to some farm businesses from some of the universal actions, but whether every action is appropriate or required for every farm business is unlikely. We have mentioned previously but we view the requirement to delve deeply into 17 universal actions will be dramatically off-putting for most farmers. It is too prescriptive and involves too much bureaucracy for it to be deemed a simple, straight forward entry level scheme.

GWCT would recommend that the universal actions are reviewed, simplified and also made optional so farmers can pick and choose those which best suit them. There is power in being able to decide an activity and outcome for yourself rather than being forced to comply with actions which may waste your time or not interest you. Flexibility and free choice are required to create a very good entry level scheme.

Unfortunately, this consultation comes across as a consultation in name only, as Welsh Government has received a plethora of feedback prior to this consultation regarding elements of the scheme farmers did not like and Welsh Government have not listened and pressed on regardless. To get high rates of participation and have a positive impact with regards to nature recovery and delivery of public goods in general, Welsh Government must listen to the farming community and offer them something that they can get on board with, be part of and grow with.

Currently, Welsh Government might consider they have produced a good scheme. However, if only a minority of farmers participate (like Glastir) then nothing will change, time and energy will have been wasted and we will continue to see the dramatic and devastating of our wildlife. It is frustrating that Welsh Government are being handed the answers but are not listening.

An additional point can be made in relation to UA2 – Continuous Personal Development in that there is nothing within the suggested framework which involves learning about wildlife recovery. Nothing for farmers to learn what is possible and what is achievable and nothing to motivate them with regards to wildlife recovery. It is the experience of the GWCT that demonstrating conservation successes are achievable and realistic on comparable farms is of high value to farmers. Especially when combined with the freedom to choose a focus for such nature recovery, be it barn owls, lapwing or water vole and everything in between. Furthermore, in our experience forced learning very rarely creates desired outcomes. It would be much better to offer a range of desired outcomes and allow the flexibility for the farming community to choose their own CPD rather than have it forced upon them.

Q4) 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 are supportive of the desire to include an element of self-assessment in the monitoring of the Sustainable Farming Scheme agreements but also understand that light touch regulatory checks will be required as public money is being invested.

The methods for self-assessment need to be accessible to all with hard copy and IT based approaches operating in tandem. Given the average age of the hill farmer in particular and the current uneven playing field in terms of access to rural broadband, such applicants should not be discriminated against. Self-assessment might therefore take the form of an annual review by a farm assurance inspector or chosen adviser. The Farm Inspection Review led by Dame Glenys Stacey highlighted the value of earned recognition in minimising regulatory oversight.

Self-assessment for those on-line could simply require a scheme holder to report annually on the provision of habitat or the confirmation of activities undertaken by uploading geo-

tagged photos, submitting work diaries, or using other land management GIS-based apps or online data capture platforms such as Living Record to record activity or results. The key will be the usability for the farmer of the system adopted; many current platforms are designed for conservationists and require time and expertise to use. A good example is the GWCT's work with Nestle and the Nestle approach. A bespoke web-based platform was designed to allow each farmer to record their natural capital assets/environmental measures. In most instances this is habitat creation or maintenance for the benefit of biodiversity. Each measure is automatically given a points value and when this exceeds 3,000 it triggers a premium payment of 0.005 pence per litre on the milk supplied. Bonus payments of a similar amount are available for different activities promoted by Nestle such as hedge planting. There is no formal inspection process, farmers simply up-load pictures of their tree or hedge planting schemes onto the platform where they can be viewed by their customer.

We have long felt that land managers/farmers are practised in collecting data to drive their farming businesses and so the collection of environmental data would be a natural extension to this with data collected via the Sustainable Farming Scheme important in gaining an idea of species/habitat prevalence across the 'wider landscape' and not just on scientifically monitored sites. The key will be designing monitoring approaches that are simple and practical for the farmer/land manager to adopt.

It makes sense to link methods to the habitats that the farmers will be paid for under the Sustainable Farming Scheme. The Sustainable Farming Scheme options could have a menu of monitoring methods that farmers could choose from such as:

- counting species found in a quadrat or other sample sites; or
- counting species along a transect; or
- pond dipping or kick sampling; or
- species observed during a specific time-period.

In addition to individual habitat options the monitoring could be at the farm scale and involve counting species such as butterflies on a circular route round the farm or mapping bird territories.

Technology is also an ever-developing area for wildlife monitoring and the use of trail cameras, remote audio recorders and apps are being trialled to save time and improve efficiency. Technology could be incorporated into the Sustainable Farming Scheme monitoring as and when it is robust enough to do so. However, pilots and trials could be considered to develop new novel ways to record data.

There are a number of farm biodiversity monitoring schemes already operating such as the Big Farmland Bird Count (see below), the GWCT's Partridge Count scheme, the Big Butterfly Count and the British Bird Survey. These require different levels of rigour in data collection. The key for the Sustainable Farming Scheme will be ensuring that useful information is collected without the need for a lot of time or expertise.

In England the Trust is involved in a Test and Trials in this regard called “On Farm Practitioner Monitoring”. This is testing the idea of selecting ‘indicator’ species or habitats that are straightforward to measure, and teaching farmers/land managers/volunteers how to survey them. Working with six farmer clusters those involved were offered a suite of methodologies from which they could choose the one that related to their area of interest. Workshops were held to provide guidance on how to undertake the method chosen and the data collected by the farmer was verified by a follow up visit. Feedback was sought but this has been affected by the Covid pandemic. What is clear however is that single species monitoring works best and provides useful data where an indicator species is chosen such as yellowhammers or grey partridge.

Furthermore, our experience shows that farmers involved in the monitoring of their schemes are more engaged. An example is the Big Farmland Bird Count (“BFBC”) which was started by the Trust in 2014 (<https://www.bfbc.org.uk/>) and is sponsored by the NFU and partnered by the FUW, NFU Cymru, CLA, FWAG, Leaf, and others. The BFBC was launched to highlight the positive work done by farmers and gamekeepers in helping to reverse the decline in farmland bird numbers. The count offers a simple means of recording the effect of any conservation work currently being instigated by farmers and gamekeepers on their land, such as the supplementary feeding of birds through winter or growing crops specifically to provide seed for birds. In 2023 over 1700 farmers took part and recorded more than 149 species across 1.5 million acres.

For the optional and collaborative layers where local and national targets could be addressed for species recovery or water quality or habitat restoration, individual self-assessment could be supplemented by third party monitoring – for example the facilitator/coordinator of the farmer cluster or local wildlife groups.

Consideration could be given to yearly reviews consisting of independent assessors and farmers working together, rather than inspections with verifiable standards and failures. These assessors would be UKAS-registered inspectors, able to perform a complete farm assessment, reducing the need for multiple visits. Yearly action plans would be drawn up, based on the advice given at these reviews. Increased farmer engagement with such a collaborative, advisory process could increase motivation to achieve conservation goals. These reviews would be commissioned, paid for, and the inspector chosen by the farmer – as with many current certification schemes. The review cost would be reflective of farm size.

In either case, the key will be to monitor the trends – not results at a given point in time – and to support the inspection or review with appropriate advice if necessary.

Q7) 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?

Given the current market and understanding of carbon, we believe Welsh Government proposing the use of a single carbon calculator for everyone in the Scheme is a completely unrealistic aspiration.

Currently, there are several carbon calculators available to farmers which all have their strengths and weaknesses. Whilst GWCT agrees that it is of course important to measure carbon output, it is vital that Welsh Government realises that we are all on a journey. Welsh Government must accept that farmers will be asked to use the calculator which their customer wants them to use; if Welsh Government introduce a separate universal Scheme calculator it will create a duplication of effort and cause real problems for farmers in Wales.

Additionally, that duplication might look different for each individual farmer depending on their customer, and to our knowledge no single calculator offers a silver bullet which incorporates the whole carbon equation. For example, big food companies which we work with predominately use the Cool Farm Tool for benchmarking purposes, but that does not include any methane emissions in the audit. Whereas other companies we have worked with prefer to use The Farm Carbon Toolkit which doesn't include any diesel used by contractors on the farm.

At GWCT's Scottish demonstration farm Auchnerran we used Agricalc which may be the best all-round calculator in our opinion. However, we reiterate that we strongly advise Welsh Government to re-think the merits of stating "*As a result, we expect to specify that you will need to complete a particular carbon calculator, rather than, for example offering a choice of calculators*" as it will create more problems for Welsh farmers. Having a list of recognised industry carbon calculators to choose from is a much more realistic approach.

Q8) To ensure continued high standards on our farms, we have outlined a proportionate approach to controls and sanctions, including compliance with additional legislation as a condition of Scheme payment. Do you have any views on this approach?

We believe the key here is a *proportionate approach* to controls and sanctions. Many of our members and the wider farming community have commented that the trust has been completely lost with Welsh Government, and NRW to a certain degree. Overly prescriptive rules, poor scheme administration, delayed payments, and uncompromising inspections with unnecessary focus on minor infringements have all played a role in creating this situation and now appear as barriers to future Scheme participation. Those that do participate can often find themselves demotivated and their enthusiasm for helping tackle the nature and climate emergency diminished. We need a fundamental shift away from the focus on finding failings, to an attitude of rewarding and celebrating success.

Whilst we support the adoption of the polluter pays principle, we wish to point out a key consideration. If Welsh Government is to incorporate the polluter pays principle into the Sustainable Farming Scheme, it is important that the polluter pays principle is equally applied across all sectors of society and the economy; it is unfair to single out farming. For example, wastewater treatment plants and septic tanks are responsible for a significant proportion of elevated phosphate levels in rural watercourses. It would be entirely unfair to target farmers by effectively allowing other pollutant sources enhanced permissions compared to farming.

Furthermore, with regards to audits and compliance with additional legislation, we ask if Welsh Government will be able to appropriately fund Natural Resources Wales so that it may competently function? Or how does Welsh Government envisage that it can enforce compliance with existing legislation in the future?

It is our view that NRW is now under resourced compared to the equivalent period when the Environment Agency Wales was formed in 1996. Welsh rivers are now under-monitored, and effective enforcement has been missing for many years. This is also true for designated sites.

For example, only 44% of Welsh rivers meet good ecological status and only 20% of SSSI's are classed as in favourable condition. A further 30% of SSSI's are in unfavourable condition and 49% of SSSI's status is unknown, despite NRW undertaking a baseline evaluation in 2020, which was the first time SSSI condition had been assessed since 2003. It would be interesting to know how many of those SSSI's in unfavourable condition or of unknown status are managed by NRW?

Q11) Farmers outside the Scheme may wish to access support for actions similar to those offered in the Optional and Collaborative Layers. In your view, should farmers within the Scheme receive priority support to undertake these actions?

GWCT does not believe that the optional and collaborative layers of the scheme should be exclusive, or that farmers within the scheme should receive priority support. We believe Welsh Government are fundamentally wrong to suggest adopting this approach.

Optional and collaborative layers should be inclusive and should be targeted at delivering the biggest bang for your buck i.e., targeted at delivering nature recovery in the areas not only where it may be needed most, but also in the areas more likely to achieve success. These areas may not necessarily overlap with farmers already in the scheme.

There may be reasons why a farm does not or cannot opt into the universal layer but might be an essential component to a collaborative layer or well-placed and able to deliver an optional layer. Farms which do not opt into the universal layer may be better located to deliver much greater benefits than a farm which has opted into the universal layer, but which is poorly placed to deliver a desired outcome.

Q12) What actions and support within the Optional and Collaborative layers do you believe should be prioritised?

General approach considerations:

GWCT believes that optional layers should be simple, straightforward and allow flexibility as we have discussed elsewhere. We believe that the optional and collaborative layers should be prioritised to deliver the biggest bang for your buck i.e., the most efficient way of delivering public goods i.e., nature recovery. GWCT would like to see priority given to those farmers with the opportunity, motivation, and ability to conserve threatened species in Wales.

This could be viewed as two equally justifiable approaches:

- To focus on areas where the most threatened species i.e., closest to extirpation such as curlew, can be conserved. Including a focus on species (again such as curlew) for which their conservation demonstrates extensive additional benefits. This approach could be judged to be most important to maintain over all species diversity but is more difficult.
- Or alternatively, to focus on areas containing species which are declining but have not yet reached catastrophic levels such as linnet for example. In a bid to halt the decline before it becomes too severe. This approach could yield greater abundance and would likely be less difficult.

The best approach will most likely be a combination of the two approaches across Wales, focussing on abundance, diversity, and range of species where appropriate. We would however like to highlight the significance of not discounting focusing on a single species (such as curlew) as the Trust has vast experience of using one key species to really ignite a passion amongst farmers for conservation. Using a bottom-up approach, the farmers decide which priority species they connect with the most and champion that species, often starting a journey which opens the door(s) to other species, and always having the knock-on effect of supporting a vast plethora of additional species along the way.

We cannot state strongly enough that incorporating farmer choices and flexibility into this type of conservation strategy is key to achieving engagement and success.

Priority Optional Actions considerations:

Flexibility and trust is needed -

GWCT is pleased to see many useful optional actions in Annex 2. Many of these actions could help tackle the nature and climate emergency. These include but are not limited to those to lower ammonia emissions, those to manage and enhance habitats such as woodland, hedgerows, ponds and water courses, water and soil management and further

CPD and education. However, the below is included to provide constructive commentary which we hope will be of use.

An optional action in Annex 2 is to:

- *Establish and / or maintain a mixed sward of grasses, legumes and herbs (or native wildflowers).*
There may be two options available:
 - *the sward contains at least five species of grass, three species of legumes and three species of herbs or wildflowers*
 - *the sward contains at least three species of grass, two species of legumes and two species of herbs or wildflowers.*

We believe this is an example of being too prescriptive with an option and demonstrates little change from previous schemes, despite being promised more flexibility prior to this consultation. As an example of how farmers can be encouraged and trusted, in the Sustainable Farming Incentive in England for the same or similar option they state:

“It’s up to you how you complete this action, as long as you do it in a way that can reasonably be expected to achieve this action’s aim”.

“Your seed supplier can help you choose a seed mix that’s the best match for your land and local conditions”.

We believe actions worded like the above will lead to much better outcomes rather than being too prescriptive.

Wildlife cover crops and supplementary feeding –

GWCT is disappointed that wildlife cover crops and supplementary feeding are not mentioned in as an optional action in Annex 2, although they may be covered in the action to *“Manage and enhance habitats through more tailored and bespoke site-specific actions (over and above the Habitat Maintenance Universal Action)”*. GWCT has provided much information to Welsh Government highlighting the enhanced ability of wildlife cover crops to deliver nature recovery incredibly efficiently both at the local and landscape level. They deliver ecologically enhanced habitat which can meet the needs of many species of farmland birds throughout their annual life cycles, providing winter food and cover, nesting habitat, and insect rich brood rearing habitat. Additionally, they provide a haven for invertebrates including pollinators and have enhanced carbon sequestration abilities compared to other standard crops. This can be delivered on less productive areas of a farm, has magnified benefits in a grassland landscape and is a temporary habitat making it much more attractive to farmers. In one Welsh project combining wildlife cover crops and supplementary feeding, overwintering farmland birds increased six-fold when wildlife cover crops were established, and resident farmland breeding birds doubled. Recent data analysis of the GWCT’s BFBC

data from 2022 revealed that of those farms which established wildlife cover crops and undertook supplementary feeding had a statistically significantly higher 1.6 times as many farmland birds as those that did not. There is a plethora of scientific research available on this topic and it is an area GWCT strongly urges Welsh Government to further consider more closely. It should be noted that previously under Glastir the wildlife cover crop option was too prescriptive and the payment too low at £604 per hectare. Research in Wales in relating to 2022 suggested an appropriate payment for establishing and managing a wildlife cover crop of between £644 and £797 per hectare, whilst 2023 research in Scotland demonstrated an appropriate payment of £775 and £875. The rate set for the equivalent in England is currently £853 per hectare.

GWCT would be happy to discuss any areas of our consultation response further with Welsh Government officials.

Predation management -

It is noticeable and extremely worrying that the current Sustainable Farming Scheme consultation completely omits any reference to predation management as a tool for the restoration of species of conservation concern. It is perhaps even galling that wildlife management, including both non-lethal and lethal methods of predation management is not mentioned once, not even in relation to non-native invasive species such as the American mink which impacts our native water vole and freshwater pearl mussels, or the grey squirrel which heavily impacts our native woodlands and woodland creation. This is despite meetings with Welsh Government officials discussing the matter and despite Julie James, Minister for Climate Change fully understanding and agreeing upon the importance of legal, targeted, and effective predation management to protect species of conservation concern. If Welsh Government are indeed serious about tackling the nature emergency in Wales, and do indeed want to protect biodiversity as they are bound to do by law, they need to seriously consider the consequences of avoiding this serious but understandable difficult topic. There is a growing body of evidence demonstrating that for certain species, high quality habitat, paid for by the public purse is not effectively achieving nature recovery targets and that predation management is required to save certain key species of conservation concern from extirpation in Wales before it is too late.

In Wales curlew rank as the species of highest conservation concern amongst several threatened ground nesting bird species. Poor breeding success, often attributable to predation, typically by foxes, stoats, crows and gulls, is a mechanism for decline. In Europe over half of published studies quote less than the 0.5-0.6 fledglings per pair per year required to offset adult mortality and to maintain a stable population.

The GWCT does not believe that predation caused the decline of these species, although it may have contributed. We have evidence that predation is playing a key role in preventing recovery even in the presence of sufficient quality habitat. We can demonstrate that legal,

often seasonal predation management, as prescribed by current wildlife and welfare laws, including the General Licences, is an important 'tool' in the conservation recovery 'toolbox' and that, for some species like curlew, every measure in this 'toolbox' should be available to avoid curlew extinction in Wales. This is now the consensus of the stakeholders involved in Wales's Gylfinir Cymru who were tasked by Welsh Government to write a species recovery plan.

The strongest evidence for fledging success following predation management comes from large scale, long-term, manipulative experiments whose findings have been published in peer reviewed journals where predators are legally removed from an area and the responses of their prey monitored in comparison to areas of similar landscapes where predators remain. In the pantheon of experimental approaches, these randomised, replicated removal experiments are considered the best way to identify the importance of predation. Academic ornithologists and other UK-based wildlife charities agree and have gone into print confirming this. They also agree that the experimental approach is more robust than the correlations of various datasets. Statistically significant correlations do not indicate cause, and effect can be caused by unmeasured factors. The absence of a significant correlation may indicate weak investigative methodologies. But scientifically robust experiments conducted by GWCT on Salisbury Plain and Otterburn, and the large-scale demonstrations at Royston, Loddington and elsewhere, provide this evidence.

Through several scientific studies and well documented case studies, there is good evidence that the combination of habitat improvement alongside targeted, effective predation management can lead to the recovery of species of conservation concern where habitat improvement alone has failed. This is not only for curlew but for many other species too, including many Section 7 species within the Environment (Wales) Act 2016 such as Lapwing and Hen Harrier. Furthermore predation management does not only protect avian species and there is good evidence to demonstrate water vole and brown hare population recoveries too.

GWCT as the leading expert in this field has offered Welsh Government the opportunity to discuss this matter further and we are happy to continue the conversation with Welsh Government to navigate this difficult topic. We would also remind Welsh Government we are including non-lethal means of predation management as a necessary requirement for nature recovery.

Collaborative layer considerations:

We want to provide advice regarding the collaborative layer. It is essential that there is scheme flexibility, good advice, appropriate consultation and engagement and an understanding of what is involved so that the financial reward is commensurate with the public goods delivered. However specifically the key to supporting farmers working collaboratively is ensuring they take the lead in a "bottom-up" approach. The Trust has extensive experience of this having designed the "Farmer Cluster" concept in England in association with Natural England.

Clusters are designed to be farmer-led so the right choice of lead farmer is important to success. Invitations are sent to prospective members to an informal meeting, where they can discuss the area they manage – whether that's centred on a geographical feature such as a river or valley, or simply some friends who farm a contiguous area of land – and what they hope to achieve. This is why we say it is vital that there is clear spatial targeting of national and local environmental priorities so that this information is known. Once the members have agreed on what their priorities are, the final step is to choose a facilitator – a local professional conservationist who can advise on improvements; offer training in monitoring techniques, law and other practicalities; liaise with Welsh Government; bring in experts for assistance and training; expand the participation and otherwise provide support to the project.

However, we are aware of potential clusters that lack a dynamic coordinator as the lead farmer is motivated but too busy to coordinate the group. The GWCT has experience of running courses for conservationists and farmers/land managers alike and so would be in a good position to work with Welsh Government on developing and running such courses. In addition, Welsh Government needs to carefully consider the application method for a group of farmers working together (Farmer Clusters). If the intention is to deliver large scale biodiversity outcomes or land use change, it is likely to be necessary to submit a single application across the proposed scheme area rather than, say, 40 individual applications (it is not unusual for up to 40 farmers to be in a Farmer Cluster). These landscape scale projects will develop and evolve over time, so need to be flexible as to how measures are apportioned appropriately across the farms as the project progresses. This also has the merit of administrative simplicity with a single scheme application covering a large area of land. Furthermore, experience shows that this approach can add significant value for money, and we would be happy to discuss this further with Welsh Government officials.

NB - One additional scheme element that our experience of being involved in collaborative schemes has revealed is the need for a training scheme for facilitators.

We do however have concerns surrounding the administration for such collaborative work in Wales, having seen first hand the difficulties such groups encountered with RPW when collaboratively delivering Sustainable Management Schemes at a landscape scale in Wales. If the underlying supporting system is flawed to begin with it could have serious repercussions relating to the success collaborative, landscape-scale nature recovery and eco-system resilience.

Public access:

Whilst GWCT recognises the health benefits to the general public of improved access to the countryside we also urge Welsh Government to carefully consider where access is granted or encouraged. Increasing public access directly conflicts with nature recovery in many areas for many species and we would encourage Welsh Government to weigh nature recovery equally when considering public access and consider protecting key areas from improved access where necessary.

Q16. We would like to know your views on which information and evidence should be used to monitor and evaluate the Scheme.

We cannot comment on the Sustainable Land Management Targets and Indicators until they are published. However, GWCT are pleased to see that there appears to be a robust monitoring and evaluation plan in place.

The detail will however be key in determining whether the monitoring and evaluation is fit for purpose and the determination of the targets will be central to this.

To have seen reports detailing how successful Glastir was, when less than a third and more often less than a quarter of Welsh farms participated was farcical. Welsh Government must avoid celebrating mediocre or indeed poor results in the future if they are to be realistic about tackling the climate and nature emergencies. To make a real difference, surely participation levels must be at least 50% to be deemed acceptable and not failing. In other areas of the UK, their objectives are much higher and aim to have between 65% to 80% of landowners and farmers adopting nature friendly farming practices. Does Welsh Government truly believe the current proposals are sufficiently attractive to achieve high participation rates? Additionally, the goals for the amount of land each farmer enters is more realistic elsewhere in the UK with an estimated 10% to 15% of farmers land being farmed in a nature friendly way by 2030. This is much more palatable and Welsh Government should take note.

GWCT encourages the use of practitioner data and evidence combined with data from NGO's to robustly demonstrate local nature recoveries even when national recoveries may not have materialised.

We would also encourage Welsh Government to look to NGOs such as the British Trust for Ornithology Breeding Bird Survey trends and reports such as the State of Nature to ascertain the success of the scheme if nature recovery is an objective.

Q17) What, in your opinion, would be the likely effects of the SFS on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

**Do you think that there are opportunities to promote any positive effects?
Do you think that there are opportunities to mitigate any adverse effects?**

As the SFS stands at this moment in time it would most definitely have a negative effect on the Welsh language.

19% of the Welsh population speak Welsh, within the farming community of Wales 48% speak Welsh which is a much higher percentage. This is also higher than within any other industry in Wales ([Iaith y Pridd report.pdf](#)).

The agricultural / farming community are the backbone of the Welsh language in Wales. Without it the Welsh language would die out. Our language in Wales is intrinsically linked to the land we farm, it is said if you are first language Welsh speaking in Wales you are never usually 1 generation away from working the land.

To sum up the figures from the associated economic report:

- A 122,200 reduction in Welsh livestock units, in effect a 10.8% reduction in Welsh livestock numbers.
- An 11% cut in labour on Welsh farms – the equivalent of losing 5,500 jobs based on current employment levels on Welsh farms.
- A £125.3m hit to output from the sector, and a loss of £199 million to farm business income (85%).

A loss of 5,500 jobs within the industry would see individuals possibly moving out of Welsh communities to seek employment. This again would mean a loss of Welsh speakers from high percentage Welsh speaking communities.

If the Welsh government truly cares for the Welsh language / culture and wishes to meet its goal of achieving 1 million Welsh speakers by 2050 then it must re-think how it views the SFS scheme. It is not only about tackling the climate and nature emergencies (which every farmer also wants) but it is also about the economy, food security and ensuring the protection of the indigenous population of Wales.

Q18) In your opinion, could the SFS be formulated or changed so as to:

- **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or**
- **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

The universal layers proposed will in effect create the main problems regarding detrimental effects on viable farming businesses, and therefore the Welsh language.

The universal layers (and other areas we have noted) need to be revisited in order to ensure it will not reduce the rural community's ability to communicate in the language born of the land.

It should be recognised and acknowledged that it is no coincidence that the high percentage of the farming community speak Welsh and are often first language Welsh speakers.

ioned Evans • Director, Environment & Marine – Gian Marco Currado

The Director of Environment and Marine, Gian Marco Currado visited a farm we have worked closely with as part of a Sustainable Management Scheme. The farm operates as a GWCT demonstration farm in Wales and Gian Marco met with 5 farmers involved in the GWCT Cors Caron SMS project. He had excellent conversations with all of the farmers present and they all felt their voice was heard. The parting comment by one of the lead farmers as Gian Marco left was –

“Diolch am ein cyfarfod heddiw, hoffwn ddweud – mae dyfodol yr iaith Gymraeg yn eich dwylo chi!”

Which translates as:

“Thank you for meeting with us today, can I just say – you have the future of the Welsh language resting in your hands!”

This is an indigenous population fighting for survival, for their family’s future, and the land that they have worked so hard to protect and conserve.

[laith y Pridd report.pdf](#)

[Agriculture and the Welsh language - Arsyllfa - Supporting the Welsh rural economy](#)

Q19) Do you have any additional comments on any aspect of the consultation document?

We have concerns regarding NRW’s capacity to help manage the scheme’s designated site management plans. We are also concerned that those managing a designated site would not be able to access any help until an optional or collaborative layer is added in the future.

Based on experience delivering landscape scale collaborative projects in Wales, we are concerned that RPW is not set up or flexible enough to allow this type of work to take place easily and without unnecessary complications. Unfortunately, we are aware of many farmers which were put off collaborative working by the failed administration elements of the project, which relied upon RPW to function competently. We encourage Welsh Government to explore alternatives or adjustments which would create or adjust a better, fit for purpose administrative and financial system for projects in the collaborative layer. If this is not undertaken, then it will likely demotivate those farmers needed most to tackle the climate and nature emergencies.

We would like to know what happens to those farmers who choose not to participate. How are basic cross-compliance type actions to be secured and their performance monitored?

Game & Wildlife Conservation Trust 07th March 2024

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