



Llywodraeth Cymru  
Welsh Government

# Sustainable Farming Scheme

## Keeping farmers farming

Summary of responses prepared by Miller Research



## Sustainable Farming Scheme: Summary of Responses

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## Glossary

Agriculture (Wales) Act 2023	Also referred to as ‘the Agriculture Act’: new Welsh legislation which provides Welsh Ministers with the legal powers to support agricultural activities in Wales. The Act established the Sustainable Land Management objectives.
Animal Health Improvement Cycle (AHIC)	An ongoing process by which each farm business will work with their vet to proactively improve animal health.
Basic Payment Scheme (BPS)	The main current agricultural support scheme providing financial support to the farming industry.
Biodiversity	The wide variety of plant and animal life (including variety of genetics and ecosystems) found throughout our environment.
Carbon Calculator	A mechanism for measuring the carbon footprint (the amount of carbon emitted and the amount of carbon offset) of various activities, applied here to farm business activities. This can provide a baseline measurement and help identify opportunities for lowering carbon emissions.
Carbon sequestration	The method through which natural systems extract carbon dioxide from the atmosphere and store it in soils or plant life, such as peatland.
Collaborative Actions	The proposed Sustainable Farming Scheme is structured on three layers. The highest layer comprises the Collaborative Actions where farmers can choose to work together and with others in a coordinated way to collectively deliver outcomes that cannot be delivered on a single farm scale, in exchange for being paid additional scheme payments.
Continuous Personal Development (CPD)	An ongoing learning and development process to build skills and knowledge.
Farming Connect	Farming Connect is an all-Wales service for farming families which provides farm businesses with a range of services tailored to a particular need. The advice offered is independent, bespoke and confidential.
Habitat / Semi-natural Habitat	For the purposes of this consultation, habitat refers to the wide range of land types such as heathlands, flower rich meadows or wetlands. They each comprise of a different array of plants and animals that depend on that habitat for their survival. ‘Semi-natural’ means habitats have been modified by human activity, but they still support plants and animals that occur naturally.
Key Performance Indicators (KPIs)	A set of measurable targets (related to the business, livestock or management practices) which can be used to make data driven management decisions.

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Natural Resources Wales (NRW)	A Welsh Government sponsored organisation responsible for advice and regulation regarding the natural resources of Wales.
Optional Actions	The proposed Sustainable Farming Scheme is structured of three layers. The middle layer comprises the Optional Actions where farmers can choose Actions above and beyond the Universal Actions depending on what suits their farm business and ambitions the most, in exchange for being paid additional scheme payments.
Rural Payments Wales (RPW)	The Division with the Welsh Government responsible for administering information and payments in relation to farming and land management.
Site of Special Scientific Interest (SSSI)	A formal designation for areas of land or water considered to have special value for wildlife or geological features. SSSIs are given statutory protection through specific legislation.
Stability Payment	Payment beyond the Universal Baseline Payment to support transition from BPS to SFS during the Transition Period.
Sustainable Farming Scheme (SFS), also referred to as the 'Scheme'	The proposed main support scheme for Welsh farmers from the Welsh Government from 2025 onwards.
Sustainable Land Management (SLM)	A holistic approach to incorporate environmental, economic, cultural and social resources in such a way that the needs of the current generation are balanced with obligations to future generations. In Wales, SLM is defined by the four SLM objectives in the Agriculture (Wales) Act 2023.
Transition Period	The period of time, proposed in the consultation to be between 2025 and 2029, where the Sustainable Farming Scheme would be launched and the Basic Payment Scheme is tapered in value. It is proposed that some aspects of the SFS would be introduced in 2025 while others would be introduced over the course of the Transition Period.
Universal Action (UA)	The foundation layer of the SFS comprises of the Universal Actions which all farmers participating in the Scheme will need to undertake, in exchange for being paid the Universal Baseline Payment. These may be referred to as "UA1", "UA2", etc., following the convention of the consultation document.

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Universal Baseline Payment	The annual payment each farmer will receive from the Welsh Government in exchange for completing the Universal Actions as part of the SFS.
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## Executive Summary

- i. This report provides a summary of the responses to the Welsh Government consultation on the Sustainable Farming Scheme (SFS). This consultation is the third formal consultation exercise held in relation to the SFS, and sets out the proposals, detailing:
  - how farmers will be rewarded for actions that align with the Sustainable Land Management (SLM) Objectives set out in The Agriculture (Wales) Act 2023, producing food in a sustainable manner, responding to the climate and nature emergency, and conserving and enhancing the countryside and cultural resources.
  - the support that will be available to undertake these actions and meet the SLM objectives.
- ii. The consultation received substantial engagement from the public, with a total of 12,108 responses received, including responses to the online survey, campaigns by organisations, and letters or emails sent to the Welsh Government. The majority of responses came from farmers, either as a part of a campaign, or as individual responses submitted to the online survey, 72% of which were self-reported as farmers.

## Summary of findings

- iii. A wide range of opinions was expressed in response to the consultation, both supportive and unsupportive of the proposals.
- iv. Opposition to the proposals was most strongly expressed in response to the proposed Universal Actions and changes to the Basic Payment Scheme (BPS) during the transition phase to the SFS. Such opposition was prominent in responses from the farming sector.
- v. Opposition was not universal, with those from the environmental and third sector generally more supportive of the proposals, along with a

minority of farmers who welcomed measures to support actions aimed at greater environmental sustainability.

- vi. Not all elements of the Scheme were opposed. The proposals for a Stability Payment received more support among responses, while some aspects of the SFS, such as the proposed use of a single carbon calculator, received a notably mixed response.
- vii. The consultation asked a series of specific questions relating to the proposals, yet it is possible to set out a number of areas that emerged as themes throughout responses received. These were as follows:
- viii. **The perceived complexity of the Scheme:** Many responses were concerned that the Scheme was overly complex, with too many Universal Actions to carry out. In addition, many opposed the introduction of what was perceived as more complicated eligibility rules and reporting requirements and methods, which place a heavy use on information technology. However, some farmers suggested the Universal Actions were practices they were already undertaking and reporting on through accreditation schemes. There was concern about the potential for duplication of reporting, and an increase in administration with little benefit.
- ix. **Farmers want to focus on food production:** Many responses from farmers throughout the consultation expressed frustration with the direction of the Scheme and suggested the focus should be on producing food, rather than on the environment.
- x. **Opposition to the woodland requirement:** Although the phrasing used in Question 2 of the consultation did not allow for a quantitative analysis, opposition to the woodland requirement was clear for the majority of responses. Whilst the woodland requirement proposal was supported by the environment and third sectors, they too expressed caution that it must be carried out in a sensitive way that also supports habitats.
- xi. **Differing interpretations of the proposals:** For certain proposals, particularly the woodland and habitat requirements, responses offered

varying interpretations. For the woodland and habitat requirements, a common interpretation was that it would result in a loss of 20% of productive land on every farm. However, the consultation states that existing woodland and habitat will count towards the respective thresholds, and in some cases, broadleaf woodland can be counted as both woodland and habitat. In addition, certain woodland and habitat can function as productive land, such as agroforestry and active management of semi-natural habitat through grazing.

- xii. **Disagreement with the purpose and position of agricultural support:** There were varied views on the purpose of agricultural support, with those who supported the proposals suggesting that public money should be used to procure public goods, such as biodiversity. The majority of responses viewed the provision of agricultural support as a subsidy to lower the cost of food for the consumer, whilst supporting farmers to maintain viable businesses.
- xiii. **Strain on farmers:** A consistent concern raised throughout responses was that the uncertainty of change and the perceived additional burden of bureaucracy within the Scheme would have a negative impact on farmers' well-being and mental health. There was also a general feeling of farmers being held responsible for biodiversity loss and greenhouse gas emissions, with consequent impact on their mental health. Responses called for well-being support to mitigate this.



## 1. Introduction

### Addressing the UK's exit from the EU

- 1.1 The development of the Sustainable Farming Scheme (SFS) is the result of the UK leaving the European Union, and the desire by the Welsh Government to develop a Wales-specific agricultural support framework. The Agriculture (Wales) Act was passed in the summer of 2023, providing the Welsh Government with the powers to implement the SFS. The Agriculture Act also places duties upon Welsh Ministers to set indicators and targets to measure progress towards achieving the Sustainable Land Management (SLM) objectives, and a reporting framework to monitor progress made against support schemes (such as the SFS) and the SLM objectives. The Scheme has been designed to support farmers to deliver on the SLM objectives.

### The Sustainable Farming Scheme

- 1.2 The current proposal for the SFS has been shaped by two earlier consultations, carried out in 2018 and 2019. The 2019 consultation, Sustainable Farming and Our Land, found broad support for the proposed SLM framework. However, it highlighted key concerns including ensuring the competitiveness and financial sustainability of the Welsh farming sector. The consultation highlighted the need to balance environmental goals with the economic viability of farms, emphasising sustainable food production as a vital component of the SLM approach.
- 1.3 The SFS builds on the need to improve farm resilience and productivity, with the July 2022 SFS Outline Proposals stating the intention to support farmers to be resilient and productive as the first of five points setting out the Scheme's characteristics<sup>1</sup>. In addition, the

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<sup>1</sup> Sustainable Farming Scheme: Outline proposals for 2025 (2022): <https://www.gov.wales/sites/default/files/publications/2022-07/sustainable-farming-scheme-outline-proposals-for-2025.pdf>

Scheme proposals introduced greater flexibility in tailoring aspects to fit specific strengths of each farm or area, and better accessibility to the Scheme through a stepped entry approach<sup>2</sup>. Feedback from two co-design exercises carried out in 2020 and 2022 demonstrated a desire from farmers and other stakeholders to avoid an overly prescriptive Scheme in favour of a partnership approach with its beneficiaries.

- 1.4 The latest consultation for the SFS, Keeping farmers farming, was held between 14 December 2023 and 7 March 2024 and included a number of differences in comparison to the Sustainable Farming Scheme – Outline proposals published in July 2022<sup>3</sup>. The formal consultation process was accompanied by ‘roadshows’, which involved Welsh Government officials presenting the proposals and answering questions from local community members, mainly farmers. There was a total attendance of around 3,200 across ten roadshows.
- 1.5 The consultation provoked a strong response as evidenced by the number of responses received, as well as a series of campaigns and protests associated with the Scheme<sup>4</sup>.
- 1.6 This report provides a summary analysis of the consultation responses and is organised as follows:
  - Section 2 – Methodology
  - Section 3 – Response breakdown
  - Section 4 – Standard response analysis
  - Section 5 – Non-standard response analysis
  - Section 6 – Campaigns
  - Section 7 – Sustainable Farming Scheme roadshows

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<sup>2</sup> Sustainable Farming Scheme: Outline proposals for 2025:

<https://www.gov.wales/sites/default/files/publications/2022-07/sustainable-farming-scheme-outline-proposals-for-2025.pdf>

<sup>3</sup> <https://www.gov.wales/sites/default/files/publications/2022-07/sustainable-farming-scheme-outline-proposals-for-2025.pdf>

<sup>4</sup> <https://www.bbc.co.uk/news/uk-wales-68414032>

- Section 8 – Correspondance

## 2. Methodology

2.1 The SFS Consultation received 12,108 responses in total. This included the following:

- in total, 3,757 responses from those identifying as individuals with 3,294 responses in the standard format and 463 submitted in the responses' own formats. These are referred to in this report as 'standard individual responses' and 'non-standard individual responses' respectively. Individual respondents may have selected 'individual' as an option. However, there is evidence in the responses that some were intended to represent multiple people, including members of the same household. This suggests that the number of individuals represented by the 3,757 individual responses is likely to be higher. The report refers to 'responses' as opposed to 'respondents' throughout to reflect this
- in all, 386 responses were received identifying as organisations, with 282 responses in the standard format and 104 submitted in the organisations' own formats. The former will be referred to in this report as 'standard organisation responses', with the latter referred to as 'non-standard organisation responses'. While respondents may have selected 'organisation' in their submission, there is evidence within the submissions that responses in this category were received from individual farms
- a total of 7,885 responses were submitted through seven campaigns. These will be referred to in this report as 'campaign responses'
- a further 80 emails were received, addressed to the then Minister for Rural Affairs, North Wales and Trefnydd, which have been referred to as 'correspondence'.

## Qualitative Analysis Method

- 2.2 The qualitative analysis of the consultation responses began with a systematic sampling of the submissions. For each of the 19 Questions posed in the consultation, an initial sample of between 150 to 200 responses was selected for preliminary analysis. In cases where responses provided more detailed insights, or where clear new themes were still emerging after 200 responses, the sample size was increased to approximately 300-350 responses to capture the complexity and depth of the feedback.
- 2.3 A thematic framework was developed to organise and interpret these data. The framework involved an iterative process where key words and concepts were identified from the initial sample of responses. These identified themes served as a preliminary framework for coding the responses. This framework facilitated the categorisation of responses into coherent themes that reflected the central issues and ideas expressed by the responses.
- 2.4 Following the establishment of the initial thematic framework, the full set of responses, totalling 3,228, was analysed. Each response was analysed, with attention paid to the emergence of new themes and the evolution of existing ones (e.g., the emergence of sub-themes, or a change in the relative weighting by volume of thematic points). This phase allowed for the refinement of the thematic framework, accommodating new insights and perspectives not initially evident.
- 2.5 Throughout the analytical process, particular attention was given to changes in the relative weighting of themes based on the volume of responses. This dynamic approach ensured the analysis remained responsive to the data, reflecting the prevalence and significance of each theme accurately. The relative weighting of the most common thematic points therefore highlights the areas of highest concern or interest in the responses.
- 2.6 To assist the reader of this report in interpreting the relative weighting of views in responses, a framework is used to convey the most

commonly identified themes and viewpoints. Weighting is represented in the text below as follows:

- 'the majority' is used when over 60% of responses raise a particular theme
- 'many responses' is used to denote a prominent theme mentioned in more than 20% of responses
- 'several responses' denotes where a theme has been raised by between 10 and 20% of responses
- 'some responses' is used when a theme is mentioned by fewer than 10%
- 'a few' or 'a small number' is used when fewer than 5% of responses raised a theme.

2.7 It should be noted that it is only possible to represent the views of those that provided an explanation or justification in their answer. Therefore, the terms above apply to the percentage of responses that provided an explanation rather than the percentage of total responses. The majority of responses to some questions were either single word answers or blank, with other questions having received more substantive responses.

2.8 Organisation responses were analysed in two different ways, depending on the type of response. Many organisation responses followed the question structure of the online consultation. These were analysed using the framework as above, with any new organisation or sector-specific views that were different to the standard individual responses noted. Organisation and individual responses that were free form were analysed separately. As above, key themes were identified, a framework developed, and all responses analysed to understand the relative weight of themes.

2.9 Due to the variety of formats with which organisations chose to respond, not all organisations gave explicit consent for their details to be published. In order to maintain consistent treatment of all



responses, this report does not contain a list of organisations who responded to the consultation.

### Qualitative Analysis Method: Campaigns

- 2.10 In total, 7,885 responses were received through seven campaigns. Several campaign organisers enabled individuals to alter their campaign response, providing 6,960 additional individualised responses for analysis. The instances of campaign responses that followed each campaign template were counted. Any responses that were customised by individuals were further analysed individually, with a similar approach taken to the analysis of standard responses, with key themes identified, a framework developed, and all responses analysed.

### Quantitative Analysis Method

- 2.11 Quantitative analysis was conducted for seven questions identified as suitable for this approach. These questions were identified as suitable for quantitative analysis as they asked the respondent a direct question in relation to the proposal, rather than asking for their views on a proposal more generally. These questions were:
- **“Q.3** 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?
  - **“Q.4.** On-farm data reporting allows the Welsh Government to confirm actions are being undertaken and help you to make decisions about your farm. In your view, is the reporting requirement for the Universal Actions appropriate?”
  - **“Q.6.** We have proposed that applicants should have sole management responsibility for the land for 10 months and ensure completion of the Universal Actions for the full scheme

year (12 months). In your view, is the 10-month period sufficient?”

- “**Q.7.** We are proposing the use of a single carbon calculator for everyone in the Scheme. Do you agree and how might we best support you to complete this?”
- “**Q.9.** Adopting the Welsh Government appeals process will provide an effective and efficient mechanism. Is there any reason we should deviate from this?”
- “**Q.11.** 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?”
- “**Q.13.** Do you agree with the proposed changes to BPS from 2025? This includes: a) The rate at which BPS payments are reduced; b) Closing the National Reserve to new entrants; c) Thresholds for capping; d) Restricting the transfer and lease of entitlement.”

2.12 As the consultation used open text boxes, analysis of responses was subject to interpretation. To minimise potential misinterpretations, six categories of answer were devised for analysis: ‘Yes’, ‘No’, ‘Don’t know’, ‘Inconclusive’, ‘N/A’, and ‘Content not related to the question’. The categories were applied to an answer in the following circumstances:

- ‘Yes’ was used when the response clearly illustrated that yes was the applicable answer to the consultation question. In Questions 3, 4, 6, 7, 11 and 13 this was when responses expressed agreement with the proposal. For Question 9, it was when responses expressed disagreement with the proposal
- ‘No’ was used when the response clearly illustrated that no was the applicable answer to the consultation question. In Questions 3, 4, 6, 7, 11 and 13, ‘No’ was used when responses expressed

disagreement with the proposal. For Question 9, it was when responses expressed agreement with the proposal

- ‘Don’t know’ was used when a response indicated that they did not know enough to answer, did not have enough information, or when their answer was dependent on information not available in the consultation, such as final Scheme payment rates
- ‘Inconclusive’ was used when the response had submitted a substantial response and the analysis team could not determine whether it expressed agreement or disagreement with the proposal, or where the response focussed on other aspects of the proposal<sup>5</sup>
- ‘No answer (N/A)’ was used when responses did not answer the question by either leaving it blank or stating that they had no opinion or view
- ‘Content not related to the question’ was used when the responses used a question to address their opposition to the Scheme as a whole, rather than addressing the specific question. Opposition to the Scheme as whole has been captured in the qualitative analysis and particular quantitative questions such as Question 3.

2.13 Quantitative analysis was conducted through reading responses and manually assigning each answer a category on the response database dependent on the responses’ answer in-line with the framework in paragraph 11 above.

2.14 These answers to each question were then analysed against demographic data provided by responses. Filtering for answers from only specific demographics (i.e. those responses that identified as tenant farmers), the responses were compared to the overall trend,

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<sup>5</sup> This is for the purpose of determining the scale of agreement or disagreement with a particular question, not whether the response is valid for inclusion. All responses were analysed qualitatively regardless of categorisation.

and any demographics that displayed substantial differences were identified. The thresholds for differences are:

- a difference of between 5%-10% was categorised as a slight difference
- a difference of between 10%-20% was categorised as a moderate difference
- a difference of 20% or over was categorised as a substantial difference.

2.15 Quantitative analysis was also conducted for “Question 12: What actions and support within the Optional and Collaborative layers do you believe should be prioritised?” After carrying out qualitative analysis to identify themes, responses were then analysed to identify how many times responses raised a theme to identify priorities.

### 3. Response Breakdown

- 3.1 The following section addresses the standard individual and standard organisation responses to the consultation. Non-standard responses (from both individuals and organisations), campaigns and correspondence are addressed in Sections 5, 6 and 7 respectively.
- 3.2 The consultation asked respondents to indicate whether they were based in and/or operating in Wales. The analysis focuses on the responses that confirmed that they were from a respondent based in and/or operating in Wales, totalling 3,228, (98% of the total 3,294 responses for standard format individual responses) and 271, (96% of the total 282 standard format organisation responses)
- 3.3 Table 3.1 shows that 73% of individual responses were from the farming sector.

**Table 3.1: Breakdown of response type**

Sector	Responses	Percentage
Farming	2,345	72.6%
Other	255	7.9%
Environmental	226	7.0%
Private Sector	78	2.4%
Public Sector	75	2.3%
Tourism/Hospitality	51	1.6%
Research/Academia	32	1.0%
Veterinary	28	0.9%
Forestry	20	0.6%
Food and timber supply chains	14	0.4%
Third Sector	12	0.4%
Trade Union/Representative	1	0.0%
Did not answer	91	2.8%
Total	3,228	100%

- 3.4 Of those who responded from the farming sector, over 40% farmed sheep, whereas mixed systems and beef each represented nearly 20% of farming responses. Table 3.2 provides the number and percentage of responses by farm type including those that did not answer this question.

**Table 3.2: Breakdown of individual responses by farm type**

Farm Type	Responses	Percentage
Sheep	1,070	33.1%
Mixed	457	14.2%
Beef	437	13.5%
Dairy	266	8.2%
Other	92	2.9%
Horticulture	37	1.1%
Arable	67	2.1%
Poultry	25	0.8%
Did not answer	802	24.8%
Total	3,228	100%

- 3.5 As shown in Table 3.3, the age band with the highest number of responses was 50-64, which accounted for over a third of responses. Responses aged 35-49 and 65+, each accounted for over 20% of responses.

**Table 3.3: Breakdown of responses by age category**

Age	Responses	
Under 18	17	0.5%
18-34	502	15.5%
35-49	757	23.5%
50-64	1,093	33.9%
65+	731	22.6%
Did not answer	128	4.0%
Total	3,228	100%

- 3.6 In terms of regional breakdown, Table 3.4 shows that most responses to the consultation were from south-west Wales, encompassing the Swansea (SA) area code and the counties of Pembrokeshire, Carmarthenshire, and (southern) Ceredigion.



**Table 3.4: Breakdown of responses by postal code**

Postal code	Corresponding Counties	Total responses	Percentage
Swansea (SA)	Carmarthenshire, Ceredigion, Neath Port Talbot, Pembrokeshire, Swansea	969	30%
Llandudno (LL)	Anglesey, Conwy, Denbighshire, Gwynedd, Wrexham	704	21.8%
Shrewsbury (SY)	Ceredigion, Powys	559	17.3%
Llandrindod Wells (LD)	Powys	352	10.9%
Cardiff (CF)	Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Rhondda Cynon Taff, Vale of Glamorgan	248	7.7%
Newport (NP)	Blaenau Gwent, Monmouthshire, Newport, Powys, Torfaen	221	6.8%
Chester (CH)	Denbighshire, Flintshire	70	2.2%
Hereford (HR)	Powys	39	1.2%
Did not answer		66	2.1%
Total		3,228	100%

3.7 The individual response breakdown for participation in an agri-environment scheme, rights to graze stock on common land, tenant farmers and BPS recipients was calculated for the farming sector and shown in Tables 3.5, 3.6, 3.7 and 3.8.

3.8 As shown in Table 3.5, 72% of responses from the farming sector were not currently participating in an agri-environment scheme, with 41.4% never having participated in an agri-environment scheme, and 30.6% having done so in the past.

**Table 3.5: Breakdown of individual farming sector responses by agri-environment scheme participation**

<b>Participation in an agri-environment scheme</b>	<b>Responses</b>	<b>Percentage</b>
No, I have never participated in any agri-environment schemes.	717	41.4%
No, but I have participated in agri-environment schemes in the past	970	30.5%
Yes	636	27.1%
Did not answer	22	0.9%
Total Farming Sector	2,345	100%

3.9 As shown in Table 3.6 25.5% of responses from the farming sector had rights to graze stock on a common land.

**Table 3.6: Breakdown of individual farming sector responses by right to graze stock on common land**

<b>Right to graze stock on common land</b>	<b>Responses</b>	<b>Percentage</b>
Yes	597	25.5%
No	1728	73.7%
Did not answer	20	0.8%
Total Farming Sector	2,345	100%

3.10 As shown in Table 3.7 18.9% of responses from the farming sector were tenant farmers.

**Table 3.7: Breakdown of individual farming sector responses by tenancy**

Are you a tenant farmer?	Responses	Percentage
Yes	444	18.9%
No	1871	79.8%
Did not answer	30	1.2%
Total Farming Sector	2,345	100%

3.11 As shown in Table 3.8 87.6% of responses in the farming sector were BPS recipients.

**Table 3.8: Breakdown of individual farming sector responses by BPS recipients.**

Are you a BPS recipient?	Responses	Percentage
Yes	2054	87.6%
No	257	10.9%
Did not answer	34	1.4%
Total	2,345	100%

3.12 As shown in Table 3.9, almost half of responses identified as Welsh speaking.

**Table 3.9: Breakdown of responses by Welsh speaking**

If you are answering as an individual, do you identify as Welsh speaking?	Responses	Percentage
Yes	1,559	48.3%
No	1,580	48.9%
Did not answer	89	2.8%
Total	3,228	100%

3.13 Table 3.10 shows the breakdown of responses by the predominant language used in the response. A comparison of Table 3.9 and the standard rows in Table 3.10 illustrates that a substantial number of responses that identified as Welsh speaking chose to respond in

English. It is worth noting that a number of responses answered some questions in Welsh in predominantly English responses, particularly questions relating to the Welsh language. Responses have been categorised depending on the language used in the majority of the response. In addition, those responding using the consultation form were able to download or complete an online version of the form in either English or Welsh. Standard responses have been categorised according to whether the English or Welsh version of the form was selected. Finally, where campaigns were fully bilingual, such as the Campaign for National Parks, they have been categorised depending on the language used in any additional text added by the individual respondent.

**Table 3.10: Answers received in English and Welsh**

<b>Response type</b>	<b>English or mostly English Count</b>	<b>English or mostly English Percentage</b>	<b>Welsh or mostly Welsh Count</b>	<b>Welsh or mostly Welsh Percentage</b>
Standard individual	3,042	92%	252	8%
Standard organisation	266	94%	16	6%
National Farmers Union Cymru campaign	5,525	91%	541	9%
The Farmers Union of Wales campaign	775	84%	149	16%
Wales Federation of Young Farmers Clubs campaign	221	62%	137	38%
Campaign for National Parks campaign	94	98%	2	2%
WT-WWF campaign	360	99%	2	1%
Landworkers' Alliance campaign	20	83%	4	17%
Tir Natur campaign	54	98%	1	1%
Non-standard individual	430	92%	33	8%
Non-standard organisation	103	99%	1	1%
Correspondence	73	91%	7	9%
<b>Total</b>	<b>10,963</b>		<b>1145</b>	

3.14 Of the 271 organisations based in Wales who submitted standard responses, almost half were from the farming sector, as shown in Table 3.11. This analysis was based on organisations' own identification of the sector to which they belong with all responses answering this question.

**Table 3.11: Organisations by type**

<b>Sector</b>	<b>Responses</b>	<b>Percentage</b>
Environmental	39	14.4%
Farming	124	45.8%
Food and Timber Supply Chain	10	3.7%
Forestry	5	1.8%
Other	20	7.4%
Private Sector	11	4.1%
Public Sector	20	7.4%
Research	6	2.2%
Third Sector	27	9.9%
Tourism	1	0.4%
Trade Union/Representatives	3	1.1%
Vet	5	1.8%
<b>Total</b>	<b>271</b>	<b>100%</b>



## 4. Question Analysis

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

### Summary of proposals

The SFS has been designed to support the agricultural sector by addressing evolving challenges and changing needs. It emphasises environmental sustainability alongside agricultural production, combining the latter with measures to enhance biodiversity, manage natural resources responsibly, and adapt to climate change. By providing financial incentives for adherence to sustainable practices, the Scheme seeks to support the sector's resilience, productivity, and environmental stewardship.

Sustainable Land Management (SLM) is the legislative framework underpinning the Welsh Government's Sustainable Farming Scheme (SFS), which aims to balance environmental, social, and economic outcomes.

The SLM framework is part of a broader strategy underpinned by the Well-being of Future Generations (Wales) Act 2015, which mandates sustainable development to protect the interests of current and future generations. The Welsh Government's approach reflects a plan to support farmers in adopting sustainable practices that contribute positively to the environment and the economy.

### Qualitative analysis

- 4.1 Many of the responses to Question 1 included content that went beyond the question asked. As the first question of the consultation, many responses set out their overall view of the SFS. Where responses went beyond the remit of the question itself, these views are accounted for in the Executive Summary. The analysis of responses set out in this section presents the breakdown of

responses that directly addressed the question, grouped thematically, with themes presented in descending order of frequency.

### Flexibility

- 4.2 Many responses expressed the need for the Scheme to be flexible to the context of each farm. A particularly common response was that the Scheme should avoid a “one-size-fits-all” approach. Within this theme, responses expressed concern that the diversity of farms would not be fully reflected by the Universal Actions:

“Consideration needs to be given to the diversity of farms that there are in Wales however I do not feel that this scheme considers the different geographical and variety of farm types which allows for the stratification of the sheep industry.” [Sheep farmer]

“I feel that the having a "one approach for all farms in Wales" will not be effective. Different approaches should be planned for different types of farms we have in Wales.” [Mixed farmer]

- 4.3 Responses that stressed the need for flexibility can be split into those that felt that Universal Actions should be optional and tailored to the farm, and those that emphasised the need for farmers to have flexibility to determine how Universal Actions are implemented on their farm:

“[...] Providing greater flexibility in selecting the best approach in achieving each UA’s objectives that suit the individual farm type and system will likely improve uptake in the scheme.” [Sheep farmer]

“The Universal Actions need to be flexible so it can be tailored to fit specific strengths of each farm or area.” [Beef farmer]

### Well-funded support

- 4.4 Many responses called for appropriate and well-funded support for those engaging with the SFS. Being able to access specialist advice was at the core of these responses, with responses mentioning the

need for professional support and expertise, including from agroecology, regenerative agriculture, and woodland specialists. Ensuring enough support is available for the sector was a common factor within this theme, with the need for adequate funding for these support avenues:

“Enough finance in the system to provide sensitive advice to farmers and landowners for implementation of universal actions.”

[Environmental stakeholder]

“Ensuring there is the right level of advice and support for farmers as the current proposals have a lot of additional work for a farmer to do.” [Beef farmer]

#### Payment rates

- 4.5 Many responses raised the need for appropriate payment rates under the SFS. A concern at the core of many of these responses was that the work carried out under the SFS should be reimbursed at a fair rate, with the term “fair” used often by responses. Whilst this included a fair rate for income foregone through carrying out activities relating to the Universal Actions, some specified that payments should go beyond simply income foregone or costs incurred:

“The support needs to realistically reflect the contribution that Welsh farmers make to the environmental, financial, and social benefits of Wales as a whole, going much further than the income foregone/cost incurred model to adequately compensated farmers for their efforts, and provide them with sufficient profit.” [Beef farmer]

“[...] farmers must be given an incentive to replace the income lost and it must reflect both the income loss and the management cost incurred in undertaking these habitat changes.” [Environmental stakeholder]

## Stability

4.6 Some responses suggested that the SFS needs to provide long-term stability to the sector. While these responses were united by their emphasis that long-term planning and stability was necessary, responses can be broken down into specific issues linked to longer-term stability:

- those that were dissatisfied with the five-year transition period away from BPS, expressing concern for longer-term planning
- those that expressed concerns with the SFS being based on a calendar year, again impacting long-term planning
- those that were concerned by challenges that may be faced with forward planning with the Scheme's payment rates as yet unannounced.

## Food production

4.7 Many responses were dissatisfied with the perceived Scheme focus on the environment at the expense of food production. These responses felt that the SFS would be strengthened by more of a balance between environmental actions and food production:

“[W]e believe that we should be encouraged to grow more food for a rising population, as well as continuing to protect the environment. Therefore, financial support should be split to improve efficiency in food production as well as support environmental requirements.” [Beef farmer]

4.8 Some responses raised the need to improve farm efficiency, which they suggested would have additional benefits for the environment. Some responses felt that more attention was needed within the SFS on land quality and land improvement:

“To support the sector in land management there needs to be improvements in the land - drainage, soil health and grass combos [sic] that would help boost production of grass or crop growth.” [Mixed farmer]

- 4.9 For those whose response to Question 1 centred on food production, Universal Action 13: Create new woodland and agro-forestry was an area of concern, with the notion of “taking land out of food production” expressed as a point of dissatisfaction by many responses<sup>6</sup>.

#### Administrative burden

- 4.10 Many responses highlighted the need to avoid burdensome bureaucracy for those taking part in the SFS. Avoiding too many new costs for those involved in the Scheme was also raised, often within the same comment. A small number of those responses that raised the issue of administrative burden expressed concern that support from an agricultural consultant would be needed to assist them with SFS administration.
- 4.11 Some responses expressed the desire for the Scheme to be simple and easy to understand. For example, there were views expressed around the number and complexity of Universal Actions:

“This proposed scheme is far too complicated, too many universal actions, so farmers are put off from entering.” [Mixed farmer]

#### Organisation responses

- 4.12 Themes emerging in the organisation responses to Question 1 broadly aligned with the individual responses. These included:
- food security and the importance of food production was highlighted by many responses from the food and timber supply chain, and farming sector, due to the perception that the Scheme would negatively impact food production
  - the potential for negative economic impacts of the Scheme, including references to Welsh Government economic modelling

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<sup>6</sup> There was a common misunderstanding as to the detail of Universal Action 13, with many responses believing that an *additional* 20% of a farm’s productive land would have to be set aside for tree planting and habitats.

and the habitat and woodland requirements, were raised by many organisations in the food and timber supply chain and farming sector

- to encourage participation in the scheme, as well support to achieve the Universal Actions, the need for clear communication with farmers, through the provision of clear and effective guidance, was raised by many environmental, private, third sector and academic organisations
- a perception of uncertainty facing farmers was raised by the majority of responses from the farming sector who suggested this made it difficult to make decisions and that farmers needed clarity, support and incentives.

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

### **Summary of Proposals**

The proposals for the Sustainable Farming Scheme (SFS) included a scheme rule for a minimum of 10% tree cover on each farm, including woodland and individual trees, to be met by 2030. The Scheme encourages the integration of trees through various means, including traditional woodland, agroforestry, shelter belts, and orchards.

To facilitate this, the consultation set out criteria for how the 10% cover is achieved, allowing farmers to count existing woodland, new planting, and individual trees within hedgerows towards this goal. Additionally, specific rules are proposed for farms under different types of ownership and geographical constraints, ensuring that the implementation of tree cover is practical and achievable.

In addition to the tree cover requirement, the SFS consultation also proposed that 10% of each farm's land should be actively managed as habitat alongside food production. This could involve maintenance of species-rich grasslands, maintaining hedgerows, developing wetlands, or management of other semi-natural habitats that exist on the farm. Where the farm does not have sufficient existing semi-natural habitats to meet the 10%, the Scheme proposes the creation of new habitats on improved land, such as through the establishment of mixed leys or fallow crop margins that serve to increase biodiversity.

**2a.i) 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 as habitat. What are your views on these requirements?:**

**Woodland**

Qualitative analysis

4.13 Many responses expressed concerns about these requirements, namely relating to their achievability, practicality, and desirability. Farmers focused on the effect the requirements could have on food production, the value of their land, and viability of their businesses. These responses requested clarity on the proposals, stressed the need for flexibility, and suggested amendments to the proposals to enhance achievability and impact.

10% woodland cover

4.14 The 10% woodland cover requirement was raised by the majority of responses in the consultation, across different questions. The issues raised in responses centred around:

- effect on food production and supply
- practicality of its implementation
- uncertainty around the relative effectiveness of trees as opposed to grassland for climate change mitigation
- effect on farm viability and the wider spillover effect on other businesses, Welsh language and rural communities
- appropriate payment rates for the work involved
- a perceived lack of flexibility, e.g., all farm types expected to work towards the same tree cover despite variations in the land type.

Food production

4.15 There was a perception amongst many responses that the two scheme rules would result in "20% of land" being taken out of production, though the Scheme proposals emphasise active



management of habitat through grazing and specify that existing trees count towards the 10% threshold. The perceived logic of these Scheme rules was questioned, with a particular emphasis on the impact on "good quality agricultural land". Responses suggested that the woodland requirement should focus on poor quality land, such as "the edges" and "hilly ground which can't be ploughed", or in some cases whole farms on Less Favoured Area (LFA) land. Some responses objected entirely to land use being changed for woodland or habitat creation.

4.16 Some responses recommended that land use decisions should be based on the most suitable use of land with a need to expand arable crop production and horticulture.

4.17 The woodland and habitat requirements were linked to food security, with some responses suggesting that they would harm Wales' food security. One response suggested that:

"In food security terms the Best and Most Versatile [sic] land should be protected for future food production. Conversion of land to woodland is not easily reversible." [Environmental stakeholder]

4.18 Food security was deemed particularly important by many responses due to perceived international instability. In addition, responses argued that the SFS requirements would lead to a fall in food production, which could mean that Wales' carbon emissions would be "offshored" to other countries with "poorer standards":

"The concept of farmers losing land and thus reducing the productivity means that there less food entering the supply chain, meaning that either there needs to be the same reduction in demand [...] or the loss in the supply chain means that needs to made up from abroad." [Private sector stakeholder]

4.19 The issue of food production was repeatedly raised by many farmers in the context that they felt they were not adequately paid for their

produce, so subsidies were required to ensure that farms were viable and able to feed the “growing population”.

#### Practicality

- 4.20 Many responses questioned whether the woodland and habitat requirements were practical. A common theme that emerged was the availability of labour to plant and maintain new trees, with farmers suggesting they themselves did not have the time, that farm labour was generally hard to recruit, and the payment would go to contractors rather than farmers who had traditionally received subsidy as a form of income. Responses suggested that the sector is currently experiencing a shortage of tree planting and fencing contractors and questioned the ability of existing tree nurseries to supply the necessary trees. As an alternative, some responses were open to the idea of a lower percentage.
- 4.21 Some farmers also repeated the view that not all land would be suitable for trees, such as saltmarsh or blanket bog, and emphasised the importance of planting the right tree in the right place. Some individual responses from the third sector and environmental sector repeated this, focusing on the need for native trees rather than conifers, suggesting that the 10% woodland requirement may not be practical at the scale of every farm.

#### Climate change mitigation

- 4.22 The issue of climate change mitigation emerged as a common theme across responses. A small number of responses suggested that the farming sector was being unfairly treated in comparison to other sectors, for example the transport sector. An urban-rural divide was highlighted, with farmers suggesting that they were being punished for carbon emissions in cities, and that by comparison the farming sector's emissions were relatively low. The woodland requirement

was closely tied to net zero<sup>7</sup> by responses, with suggestions that it was not the most effective way to meet net zero.

- 4.23 There was considerable uncertainty and questions raised around the carbon sequestration abilities of woodland compared to grassland, with some responses suggesting that grassland sequesters more carbon than trees. Finally, a small number of responses compared the contribution of Wales to climate change on a global level, and questioned whether the Scheme's proposed changes in Wales to reduce emissions would have a sufficient impact on a global scale.

#### Farm viability

- 4.24 A consistent message across many responses was the perceived effect woodland requirement may have on farm viability. Many responses highlighted farmers' reliance on the BPS as an income subsidy. They compared this to their perception of the SFS which they thought would cost them money to implement as well as reduce their production capacity without adequate return. A small number of responses also highlighted the potential impact that the requirement would have on the value of their land.
- 4.25 There were many references to the modelling that accompanied the consultation with strong views at the perceived prospect of 5,500<sup>8</sup> job losses in the sector. This was raised alongside the wider economic, social, and cultural value of farming in rural areas with responses suggesting that money invested in farms was spent locally and multiplied. A consistent issue throughout the consultation was the importance of the farming community for the vibrancy of the Welsh language, with concerns raised that any effect on farm viability would impact the Welsh language. The woodland requirement was also raised in relation to the worry that organisations may purchase land

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<sup>7</sup> Net-zero is a phrase commonly used for the process of reducing or removing greenhouse gas emissions and increase the sequestration of carbon to balance emissions produced with those captured.

<sup>8</sup> The Welsh Government published modelling suggesting that the SFS would reduce on-farm labour by 11%, which media reports and some responses have equated to 5,500 jobs lost. The modelling is indicative of worst-case outcomes.

on a large scale to take advantage of the Scheme and offset their emissions, a common concern raised across the consultation.

#### Appropriate payment

- 4.26 The subject of payment was raised, with many responses suggesting that payment levels would be too low, and that payments for the woodland requirement should account for the “true loss of income.” Responses suggested that “farmers should receive bonuses for planting trees”, or that farmers’ assistance in meeting “Welsh Government [...] targets to [...] combat climate change” should “come at a high premium.”
- 4.27 The uncertainty around the rate of payment left some responses unable to answer the question. Other responses suggested the illustrative payments in the accompanying economic analysis were too low, which indicates a lack of clarity around the proposals, and some confusion at what payments may be. In addition, concerns were raised about the length of the Scheme, with farmers suggesting that payments should continue for “at least 20 years” to account for the use of the land for that period for trees. Generally, farmers felt that the payments for the creation of new woodland needed to be attractive and compensate for the perceived loss of income, reduced land value, and work undertaken.

#### Flexibility

- 4.28 The 10% woodland cover requirement was challenged due to a perceived lack of flexibility, with responses suggesting that trees or woodland are not suitable for every farm:
- “Why 10% what's the rational [sic]? Every field is unique [sic] an area might be suitable for trees or habitat and each field should be allocated a range of options which makes best use of available resources and topography.” [Sheep farmer]
- 4.29 Responses argued that the overall target for tree cover could be better met with varying levels of woodland across different farm types, with each planting based on their suitability:

“[T]hat will likely be best achieved with 20% in some areas and 5% in others.” [Beef farmer]

4.30 Some responses highlighted that some farms, due to their productivity, location (e.g. coastal), or existing high-quality habitat, may struggle to meet the requirement. In addition, they emphasised that meeting the requirement should not come at the expense of other goals, such as planting in areas which are valuable wildlife habitats such as breeding grounds for Curlew<sup>9</sup>. These responses suggested the requirement to fulfil all Universal Actions could prevent some farmers from joining the Scheme, which would consequently prevent them from delivering any Scheme actions, including those they may perceive to be achievable. In a desire to increase the flexibility of the Scheme, a small number of responses suggested that farmers should be able to pool their area of tree cover according to the suitability of the land, rather than each farm having 10% woodland cover. Finally, responses suggested that more flexibility would be required for different circumstances, such as those farms with tenancy agreements or rights to commons.

#### Achievability

4.31 A small number of responses answered that the woodland requirement was both achievable and beneficial, with some suggesting that the 10% woodland requirement was unambitious. These responses suggested that Wales needed more woodland cover alongside other habitats such as marginal scrubland, marsh, and bogland, which all support biodiversity. This relates to a point raised by other responses that the benefits of woodland for their farming enterprise have not so far been adequately communicated to farmers and may require a new approach. Responses expressing support for tree and habitat requirements felt that 10% was a reasonable target, suggesting that many farms in Wales already exceed this.

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<sup>9</sup> In the consultation document, high quality habitats are excluded from the area on which tree planting calculation is done.

## Clarity

- 4.32 A small number of responses perceived a lack of clarity on how the woodland and habitat requirements would be measured. This was most observable with the combined 20% tree and habitat requirement, which responses occasionally suggested would require a loss of 20% of productive land even though they had existing woodland and habitat:

“[I]t is not clear whether all woodland already on my farm counts towards the 10% minimum requirement or not.” [Beef farmer]

- 4.33 A few responses also requested clarity on whether habitat and woodland could be the same land, or what would be included as woodland or tree cover:

“Clarity needed with regard to inclusion of hedge row tree.”  
[Unspecified farmer]

- 4.34 A small number of other responses recommended the inclusion of orchards in the woodland requirement, even though they are already included in the requirement’s proposals. There was perceived ambiguity around the meaning of “woodland cover” and “suitable land” which responses suggested has impacted the farming community’s perception of the proposals.

## Organisation responses

- 4.35 Themes emerging in the organisation responses to Question 2a.i broadly aligned with the individual responses. These included:
- support for the woodland requirement was expressed by many responses across the environment sector, third sector, public sector and academic sector due to the perceived benefits of increasing woodland for biodiversity and climate change mitigation. Some environmental and third sector organisations suggested the requirement should be more ambitious. One environmental organisation argued “These actions are

necessary from an environmental consideration and achievable on many farms. The 10% woodland cover has been mis-reported, many farms will not have to give up 10% of the farm for woodland. For example agro-forestry has multiple benefits and can work in conjunction with food production providing shade and shelter for livestock. Herbal leys are included as management for biodiversity and have multiple benefits with good livestock weight gain and improvements in soil structure”

- caution on adopting a ‘one-size-fits-all’ approach was expressed by many responses from the environment sector, academic sector and food and timber supply chain. This was due to the diversity of land uses, land types and businesses in the farming sector, with concerns about the impact of such an approach on food production and farm viability
- the importance of the multi-functional use of land was highlighted by many responses from the environmental, academic, third and public sectors, which would ensure food production, woodland cover and habitat management could be actioned on the same land
- concern regarding the woodland requirement was expressed by the majority of responses from the farming sector due to perceived impacts on food production, farm viability and rural communities.

**2a.ii) 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 as habitat. What are your views on these requirements?: 10% habitat management**

Qualitative analysis

4.36 The 10% habitat management requirement was less frequently mentioned than the woodland requirement, and generally responses agreed that it would benefit the environment. The main themes emerging related to:

- compatibility with other requirements
- communication
- achievability and ambition.

Communication

4.37 As with the woodland requirement, responses felt the communication of the habitat requirement was critical with many farms already meeting the 10% requirement without realising it. Additionally, responses pointed to productive habitat options such as the inclusion of herbal leys. Responses expressed the view that the benefits of habitat management should be advertised more effectively, particularly given that the 10% habitat requirement could allow land to continue to be productive and income generating.

Measurement

4.38 A common theme for both requirements concerned the measurement of the 10% woodland cover and habitat area. Responses expressed the need for accurate, up-to-date baseline mapping of existing habitats and woodland and suggested that current maps should be reviewed and corrected before the Scheme could progress. One response stated:

“Reliance on CCW/NRW habitat is not appropriate as it [is] a) old - collected in late 1980/early 1990s and b) was not accurately



mapped in the first place - we have wax cap and unimproved grassland that was mapped as improved grassland under the current temporary Habitat [sic] scheme.” [Sheep farmer]

#### Achievability and ambition

- 4.39 Although discussed less than the woodland requirement, a small number of responses suggested the habitat management requirement was achievable, with a sub-set of these responses suggesting 10% on a Wales-wide scale was unambitious. One response argued that “managing 10% of land for biodiversity is far too small a commitment to have any impact on Wales’ biodiversity losses.”
- 4.40 A few of these responses expressed the view that the 10% habitat requirement needed strengthening to provide more guidance to farmers, prioritising re-establishing lost habitats such as native wildflower meadows, and supporting habitats that may be low quality in one sense yet support rare and declining species.

#### Organisation responses

- 4.41 Themes emerging in the organisation responses to Question 2a.ii broadly aligned with the individual responses. These included:
- support for the habitat requirement from many third sector organisations, emphasising the need for flexibility in how it was achieved
  - the need to provide fair funding and access to advice and support for farmers was raised by many responses across all sectors, who emphasised the need for professional support to ensure the requirement could be achieved. One environmental organisation stated: “Welsh government need to give farmers the support they need to change.”

**2b) 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 as habitat. What support might you need to achieve them?**

Qualitative analysis

4.42 Responses suggested a range of support options that would be necessary to achieve the 10% requirements, although some perceived there was no level of support that would be enough to help them achieve the requirements. The suggested options for support, in order of frequency, were:

- adequate payment, with suggestions ranging from £1000/acre annual to £10,000/acre, to cover costs incurred, income foregone and loss of land value
- guaranteed long term payments for more than twenty years
- practical support, including for ecologist surveys, groundwork, tree planting, coppicing, hedge laying and fencing
- business support to understand commercial possibilities
- guidance, including clear instructions, what the biodiversity element should look like, and access to professional advice
- woodland and habitat grants
- an education programme
- support to access carbon credit style revenue streams
- investments in the agricultural and ecological consultation industry
- investments in tree nurseries
- technical support in how tree cover and habitat land can be used to aid production rather than replacing productive land
- adequate funding for regulatory bodies such as Natural Resources Wales (NRW).

## Organisation responses

4.43 Themes emerging in the organisation responses to Question 2b broadly aligned with the individual responses. These included:

- the need for support to ensure habitat and woodland creation meets the desired objectives was raised by many third and environmental sector organisations
- the need for increased financial support was highlighted by the majority of farming sector organisations with one farming organisation stating: “Support to achieve would be knowing what figures are likely to be available along with security for the future.”

**Question 3: Aside from the 10% woodland and habitat requirements, will the Universal Actions:**

**Summary of Proposals**

In addition to the proposed woodland and habitat requirements the Scheme proposal included 13 Universal Actions. These were:

**UA1:** Benchmarking

**UA2:** Continuous Personal Development

**UA3:** Soil Health Planning

**UA4:** Multispecies cover crop

**UA5:** Integrated Pest management

**UA6:** Managing heavily modified peatland habitat

**UA9:** Designated Site Management Plans

**UA10:** Ponds and scrapes

**UA11:** Hedgerow management

**UA14:** Historic environment - maintenance and enhancement

**UA15:** The Animal Health Improvement Cycle

**UA16:** Good Animal welfare

**UA17:** Good Farm Biosecurity

**3a) Aside from the 10% woodland and habitat requirements, will the Universal Actions: Provide benefit for your farm business?**

Quantitative analysis

4.44 As shown in Table 4.1, 61.7% of responses answered that the Universal Actions would not provide a benefit to their farm business.

**Table 4.1: Responses to Question 3a**

Response	Responses	Percentage
Yes	380	12.5%
No	1868	61.7%
Inconclusive <sup>10</sup>	309	10.2%
Don't know	116	3.8%
Content not related to the question	25	0.8%
No answer	530	17.5%
Total	3228	100%

Miller Research analysis of consultation responses

4.45 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

- the farming sector and former participants in an agri-environment scheme provided a slightly higher proportion of 'No' answers
- BPS recipients and those with commons grazing rights gave a moderately higher proportion of 'No' answers
- the environment sector had a slightly higher proportion of 'Yes' answers.

<sup>10</sup> Responses that addressed each of the Universal Actions were deemed inconclusive as they identified some actions as beneficial and others not beneficial.

## Qualitative analysis

### Unnecessary bureaucracy

- 4.46 Many responses argued that the Universal Actions would provide minimal benefit beyond “a tick box exercise.” It was also suggested by some responses that additional paperwork would add to farmers’ workload in a way that may worsen their mental wellbeing.
- 4.47 Interpretation of the question led some of these responses to state that many of the proposed Universal Actions were already being delivered and were therefore unnecessary. This raised concerns about duplication and increased workload:
- “[T]he universal actions will not benefit our business. Not because they are all bad ones but because a good proportion are already being done.” [Sheep farmer]
- “The government has no idea what the Farm Assurance requirements are as there are many Universal Actions in the SFS that would be a duplication of recording.” [Dairy farmer]
- 4.48 Some responses also expressed concerns about the requirement for regular data submissions, online courses, and the management of additional paperwork becoming overwhelming, especially for older farmers or those unfamiliar with technology:
- “Many of the older generation do not have access to technology to be able to complete the online learning.” [Mixed farmer]
- “Some of the universal actions are bordering on discriminatory against older farmers, who have less access to technology, and are not familiar with modern information technology systems.” [Individual, public sector]
- 4.49 A common caveat in some of those responses that felt the Universal Actions would be beneficial to their farm businesses was a concern about the volume of Universal Actions and requirements to be implemented at once. It was viewed that the administrative burden would be difficult for farmers in relation to time and money. Some of

the supportive responses also made reference to duplication, with requirements from other assurance schemes such as Farm Assured Welsh Livestock Beef and Lamb Scheme and Red Tractor.

- 4.50 Some of the supportive responses that highlighted these concerns recommended a staggered approach to implementing the Universal Actions and suggested that the financial implications for farmers should be monitored. A few suggested that the Universal Actions should be optional:

“Yes but should be introduced in stages and the initial costs to farmers examined in detail.” [Sheep farmer]

“Should be encouraged rather than forced upon us.” [Beef farmer]

#### Lack of flexibility

- 4.51 Many responses suggested that the Scheme’s requirements lacked flexibility. The perceived rigidity of the Scheme was criticised, particularly in relation to small farm holders. These responses suggested an approach that allows for flexibility, accommodating different farming systems:

“Universal Actions need to be changed so that they work for all farmers in Wales. There should be a cap on how many you are required to report on, as for mixed farms with different livestock there are too many.” [Beef farmer]

- 4.52 Some of the supportive responses also raised this issue, making specific reference to the “one-size-fits-all” nature of the Universal Actions and expressing concern this would not accommodate the variation in size or type of farms who may sign up to the Scheme.

#### Land use and value

- 4.53 Some responses, specifically those that were unsupportive, made specific reference to the loss or devaluation of their land due to Universal Actions, namely the woodland requirement. These responses indicated that farmers are concerned that complying with

the Scheme's requirements will result in their productive land being taken out of conventional use for food production, which could lead to a decrease in both the productivity and market value of their land. A few of these responses emphasised the potential difficulties facing small farms who they felt may not benefit from the Scheme, whilst also facing a reduction in production capacity.

#### Environment

- 4.54 Across the supportive responses, the most common justification for their position was an eagerness to contribute to improving the environment. Many of these responses acknowledged the benefits that the Universal Actions could afford to the wider environment beyond their farms. Becoming climate change resilient was another common rationale expressed by some responses:

“a healthy environment should always be good for business.”  
[Environmental stakeholder]

#### Benchmarking

- 4.55 A theme raised by some supportive responses was a recognition of the importance of data collection, and benchmarking in particular, to outline areas for improvement enabling farmers to optimise the use of their land.

#### Continuing professional development

- 4.56 Divergent views were expressed in relation to the requirement under UA2 to build additional skills and knowledge through continuing professional development (CPD). Those that thought it was a good idea suggested it should extend to attending conferences and industry meetings, and that all training related activity should be free for farmers. However, a similar number of responses suggested it was “insulting” and “patronising.”



## Organisation Responses

4.57 As shown in Table 4.2, 38% of organisations answered that the Universal Actions would not provide a benefit to farm businesses.

**Table 4.2: Organisation responses to Question 3a**

Response	Responses	Percentage
Yes	47	17.3%
No	103	38.0%
Inconclusive <sup>11</sup>	51	18.8%
Don't know	7	2.6%
Content not related to the question	2	0.7%
No answer	61	22.5%
Total	271	100%

Miller Research analysis of consultation responses

4.58 Themes emerging in the organisation responses to Question 3a broadly aligned with the varied and diverse views expressed by individual responses. These included:

- support for the creation of ponds and scrapes was expressed by many responses from the environment sector, due to the perceived benefits to biodiversity. Conversely, many responses from the veterinary sector, and the majority from the farming sector, expressed caution due to the potential animal health implications of the proposals. One veterinary organisation stated they “would request further consultation with the veterinary profession on the implications on this for livestock stock animal health and parasite control for livestock”
- concern about the potential impact of the proposals on farm viability and animal health and welfare was raised by the farming sector due to a potential increased administrative workload

<sup>11</sup> Responses that addressed each of the Universal Actions were deemed inconclusive as they identified some actions as beneficial and others not beneficial.

impacting on other farm work, including time spent caring for livestock.

**3b) Aside from the 10% woodland and habitat requirements, will the Universal Actions: Provide an achievable set of actions paid for through the Universal Baseline Payment?**

Quantitative analysis

4.59 As shown in Table 4.3, 59.6% of responses answered that the Universal Actions were not achievable.

**Table 4.3: Responses to Question 3b**

Response	Responses	Percentage
Yes	239	7.9%
No	1806	59.6%
Inconclusive <sup>12</sup>	339	11.2%
Don't know	179	5.9%
Content not related to the question	26	0.9%
No answer	636	21.0%
Total	3228	100%

Miller Research analysis of consultation responses

4.60 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

- the farming sector and former participants in an agri-environment scheme had a slightly higher proportion of 'No' answers
- BPS recipients and those with commons grazing rights had a moderately higher proportion of 'No' answers
- the environment sector had a slightly higher proportion of 'Yes' answers.

<sup>12</sup> Responses that addressed each of the Universal Actions were deemed inconclusive as they identified some actions as beneficial and others not beneficial.

## Qualitative analysis

### Bureaucracy and administration

- 4.61 There was little variation amongst responses which stated the Universal Actions were not achievable, with the majority aligning with one of two distinct perspectives. Firstly, responses objected to the perceived increase in bureaucracy and paperwork, which was felt to be disproportionate to the benefits and compensation. There were perceptions that the cost of compliance would leave no financial benefit, with payments received through the SFS only covering the costs of implementation. Concerns about the financial and managerial impact on smaller farms are also prominent, including the perception of potentially insufficient compensation for the effort required:

“The cost of compliance may make the scheme unviable from a farmer's point of view.” [Arable farmer]

“No, there is far too much paperwork and unrealistic requests to even meet the baseline.” [Mixed farmer]

“The additional paperwork would be a cost to my business.”  
[Mixed farmer]

### Environmental focus

- 4.62 The environmental focus of the Universal Actions was questioned, as concerns around the cost of compliance were felt to risk any potential benefits to productive agriculture. The increased administrative tasks were viewed as detracting from essential tasks such as livestock care and existing environmental management.

### Lack of information on payments

- 4.63 The other most common theme raised by those unsupportive of the Universal Actions concerned the unavailability of final payment rates in the consultation. These responses argued that uncertainty regarding these rates made it difficult to assess the feasibility of fulfilling the Universal Actions. Some responses expressed anxiety

about committing to a scheme without a clear understanding of its financial implications:

“We have not been made aware of any payment rates, even though farmers are expected to be willing to participate right away.” [Sheep farmer]

#### Support

- 4.64 The majority of the responses that had a positive position on the Universal Actions did not provide an explanation with their answer. However, of those that did, a common caveat was that Universal Actions appear achievable if the financial compensation and educational support provided are sufficient.

#### Organisation responses

- 4.65 As shown in Table 4.4, 11.1% of responses agreed that the Universal Actions were achievable, with 35% answering that they were not achievable.

**Table 4.4: Organisation responses to Question 3b**

Response	Responses	Percentage
Yes	30	11.1%
No	95	35.0%
Inconclusive	60	22.1%
Don't know	14	5.2%
Content not related to the question	2	0.7%
No answer	70	25.8%
Total	271	100%

Miller Research analysis of consultation responses

- 4.66 Themes that emerged in the organisation responses to Question 3b broadly aligned with the varied and diverse views expressed by individual responses including the perception that the Universal

Actions might not be achievable without knowing final payments rates from across all sectors. One farming organisation stated that “as there has been no figures published it is impossible to provide a response”.

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

### **Summary of proposals**

Under the SFS, the Welsh Government proposes an annual self-assessment for participating farms to support improvement in business and environmental outcomes. This assessment uses standardised Key Performance Indicators (KPIs) to monitor and compare various aspects of farm performance, such as production, efficiency, and resource use. By benchmarking against past performance and other farms, this process aims to identify areas for cost reduction, improved resource management, and environmental enhancements. This approach is intended to foster a resilient and prosperous agricultural sector by facilitating continuous improvement.

Data from these assessments would be entered into a Welsh Government online portal, providing farmers with actionable insights and comparative analyses. The data would also be used for the processing and validation of payments through the SFS.

Quantitative analysis

4.67 As shown in Table 4.5, 63.9% of responses answered that the reporting requirement was not appropriate.

**Table 4.5: Responses to Question 4**

Response	Responses	Percentage
Yes	402	12.4%
No	2062	63.9%
Inconclusive	190	5.9%
Don't know	63	2.0%
Content not related to the question	4	0.1%
No answer	507	15.7%
Total	3228	100%

Miller Research analysis of consultation responses

4.68 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

- amongst the farming sector, former participants in an agri-environment scheme had a slightly higher proportion of 'No' answers
- BPS recipients and those with commons grazing rights had a moderately higher proportion of 'No' answers
- the environment sector had a slightly higher proportion of 'Yes' answers.

Qualitative analysis

Administration

4.69 The majority of responses that answered this question objected to the reporting requirement on the grounds that they believed it to be onerous and unnecessary. It was described by one response as "an



administrative burden with little benefit" as farmers felt that they have limited opportunities to improve production.

- 4.70 A related point raised in many responses was that farmers are already completing some form of reporting for ecology compliance, or for other regulators, and this duplication would further increase their workload.
- 4.71 Among the responses that felt that the reporting requirement was appropriate, the majority highlighted the desire for support for data collection and transfer by farmers. It was felt that the reporting process needs to be simple, particularly for older and/or farmers less familiar with the relevant technology. One response stated that "user-friendliness is imperative" to the success of the Scheme. Additionally, it was mentioned in a small number of responses that submitting evidence online was preferred to in-person inspections to give farmers flexibility over when to conduct reporting. Moreover, a few responses suggested support and training be completed through Farming Connect, and that the Welsh Government could offer template reports to act as a guide for farmers.
- 4.72 A common caveat in the supportive responses was that the proposal was felt to be appropriate, subject to farmers receiving the appropriate compensation. Financial support from the Welsh Government to fulfil the reporting requirements was seen as essential, given this action may consume a significant portion of their operational responsibilities.

#### Data privacy

- 4.73 Concern around the privacy of data collected and shared with Welsh Government was the next most commonly discussed theme. Many made the point that this information was private and belonged to each respective farmer, and is therefore their choice to share. As such, they felt the reporting requirement should not be a condition of SFS participation, but rather an optional component.

### Farm variation

- 4.74 A final theme centred around the view that a uniform requirement for data collection across all farms was inappropriate. The diversity of farm sizes and types was perceived as a factor that may render data incomparable, and therefore meant reporting requirements “should not be a one-size-fits-all.”

### Benchmarking and carbon auditing

- 4.75 Many of the responses that expressed support for the reporting requirement were enthusiastic about the need for benchmarking and carbon auditing. Many of these responses agreed that all farming businesses should be taking responsibility for reporting on various facets of their operations. One response hoped that the implementation of the reporting requirement would:

“[E]ncourage farmers to take part in current and future collaborative actions to bring them up to standard or, as a minimum, to remove blockages.” [Private sector stakeholder]

### Monitoring and measuring impact

- 4.76 Some responses emphasised the necessity of data collection by farmers to evidence the use and impact of funding received, as well as to act as a baseline for assessing operational improvements that can be carried out by farmers:

“The Welsh Government should also use this data to form effective and impactful advice that they can give farmers to improve their practice.” [Sheep farmer]

- 4.77 This reciprocity was perceived by a small number of these responses to be fundamental to the dynamics of the relationship between Welsh Government and farmers. In this way, it was argued the data collected could be used to identify the potential of farmers’ land, set achievement targets, and agree on a monitoring schedule to ensure compliance.

## Organisation responses

4.78 As shown in Table 4.6, 43.5% of organisation responses answered that the reporting requirement was not appropriate.

**Table 4.6: Organisation responses to Question 4**

Response	Responses	Percentage
Yes	52	19.2%
No	118	43.5%
Inconclusive	40	14.8%
Don't know	4	1.5%
Content not related to the question	0	0.0%
No answer	57	21.0%
Total	271	100%

Miller Research analysis of consultation responses

4.79 Themes emerging in the organisation responses to Question 4 broadly aligned with the varied and diverse views expressed by the individual responses. These included the following themes:

- concerns about data protection and Welsh Government use of data were raised by some responses from the farming sector with one farming organisation stating: “No. It is intrusive. I do not consider that employees of the Welsh Government will have sufficient knowledge or skill”
- concerns about the “over-reliance on self-assessment” were raised by some environmental organisations who suggested this may result in poor quality data
- concerns about the supporting infrastructure from some private sector and environmental organisations, in particular poor digital infrastructure in rural areas.

**Question 5: The Stability Payment will provide additional support during the Transition Period. In your view, is this appropriate whilst the Optional and Collaborative Actions are being introduced?**

**Summary of proposals**

The Stability Payment within the SFS is designed to aid farmers during the transition from the current Basic Payment Scheme (BPS) to the new SFS. This payment acts as a continuity measure to ensure that farmers do not face abrupt financial shortfalls during the transition period. The Stability Payment acts as a top-up to initially match what farmers would have received under the BPS before tapering over the transition period, helping them adapt gradually to the new scheme that rewards sustainable and environmentally friendly farming practices. In the consultation, the transition period for the SFS was proposed to span from 2025 to 2029.

Optional Actions and Collaborative Actions are designed to enhance the flexibility and effectiveness of the Scheme by allowing farmers to go beyond the baseline requirements.

Optional Actions are additional practices that farmers can choose to implement based on their specific farm conditions and priorities. These actions are intended to provide more targeted environmental benefits and might include initiatives like advanced habitat creation, specialised crop rotations, or innovative water management techniques and support to improve biosecurity practices.

Collaborative Actions involve working together with other farmers, land managers, or external organisations to achieve broader environmental and sustainability goals on a larger scale. These actions are designed to facilitate collective efforts in areas such as landscape-level conservation, integrated pest management across multiple properties, or shared resource management.

The Optional and Collaborative Actions are part of the phased implementation of the SFS, but will not all be available from the Scheme's commencement. Instead, some actions will be available at commencement with others being

phased in over the initial years to allow farmers time to adjust to the new system.

### Qualitative analysis

- 4.80 Please note that the text for Question 5 was found to be inconsistent within the consultation documentation and consultation questionnaire. The English version of the consultation document included reference to common graziers which was not included in the Welsh language version of the consultation document, the online questionnaire (in Welsh and English), and the downloadable questionnaires (in Welsh and English). This section presents the qualitative analysis of all responses that answered Question 5.
- 4.81 The majority of responses to this question felt that it was appropriate for a Stability Payment to support farmers while Optional and Collaborative Actions are being introduced. Supportive responses can be split into two broad groups; firstly, those that felt it was appropriate, and secondly, those that felt it was appropriate but also added caveats or conditions to their answer.

### Financial certainty

- 4.82 Many supportive responses suggested the Stability Payment can play a role in providing financial certainty, security and avoiding a drop in income. These supportive responses suggested the Stability Payment may avert a “cliff edge” scenario and some of the anticipated “stress” associated with a transition from BPS to the SFS.
- 4.83 Some of the responses that centred on financial certainty made specific reference to the Stability Payment helping with longer-term business planning:
- “Yes, it helps businesses plan as they have financial certainty of this time period.” [Sheep farmer]
- “Yes, farms are businesses and need clarity to invest. [...]”  
[Sheep farmer]

## Transition

- 4.84 Many responses also highlighted that the Stability Payment would enable a transition to a new post-BPS subsidy arrangement:

“Yes, this is an essential part of ensuring a smooth transition to a new style scheme.” [Sheep farmer]

“It may help some farmers to put in place actions to move to the new scheme. Others it will prepare for a future without payments.” [Sheep farmer]

## Timeline and scale of transition

- 4.85 Among the supportive responses that added a caveat, many of these related to issues with the scale and timeline of the withdrawal of BPS. Responses agreed with the need for a Stability Payment but expressed concern at the reduction over time of the BPS-equivalent payment. These views were centred around the Stability Payment becoming too small, potentially providing farmers with a shortfall:

“Yes up to yr 2 Then it becomes too little.” [Sheep farmer]

“I agree that this is appropriate but obviously, most people are worried about what happens when the payments reduce 20% each year in line with the BPS reduction.” [Sheep farmer]

- 4.86 The timeline of the Stability Payment support was also raised by some responses who welcomed the payment but were critical of its proposed tapering. Responses expressed a desire for the Stability Payment to be retained for as long as possible:

“[A]gree with a stability payment during the transition period, however it should be a long term stability payment as an integral part of the SFS not a time limited one which is proposed.” [Mixed farmer]

“The stability payment is important, but the phasing out of the BPS payment between 2025 – 2029 still leaves LFA hill farmers facing a “Cliff Edge” at the end of the period. [...]” [Sheep farmer]

“I think the stability payment is welcomed. It needs to be extended for longer though, especially for farmers willing to sign up to this new scheme.” [Sheep farmer]

- 4.87 Dissatisfaction with assumed payment rates was commonly expressed in unsupportive responses. Many responses anticipated payments would be lower than they presently receive, which they believed would cause a shortfall.

#### Clarity

- 4.88 Many supportive responses caveated their support due to the need for more clarity and information on what the value of payments for Universal, Optional and Collaborative actions will be. A typical response read as follows:

“Yes in concept. However I am greatly concerned that nobody knows what any payments will be. [...]” [Poultry farmer]

- 4.89 A related point raised by some responses was that the Stability Payment is vital, especially as it is not yet known to the sector what payments will likely be, thus providing some degree of certainty.
- 4.90 Among unsupportive responses the proposed Stability Payment was seen as inappropriate due to the lack of information about the level of payments.

“More detail needed here to make informed business planning decisions. What will the level of the stability payment be? How can any decisions be made without the factual information needed[?]” [Private sector individual]

#### Rollout of Optional and Collaborative Actions

- 4.91 The need for the rollout of the Optional and Collaborative layers was raised as a caveat by some of the supportive responses. These responses highlighted the need for the Stability Payment, but also expressed a need to see the Optional and Collaborative layers as soon as possible. Some responses expressed a desire to receive these by 2025 or 2026 for the following reasons:

- land managers want to get started right away and may be disincentivised due to the delayed rollout
- Optional and Collaborative layers should be available to provide income to farmers from the outset.

4.92 Some unsupportive responses also raised the same issue, with these responses wanting to see Optional and Collaborative Actions introduced earlier:

“I am delivering on some of the optional actions and I would appreciate payment for these sooner rather than later.” [Beef farmer]

#### Commons

4.93 The implications of the SFS for commons farmers was raised by some supportive responses. These responses agreed with the appropriateness of the Stability Payment, but questioned whether BPS elements for commons would continue, and if they would be paid to individuals or grazing associations. On principle, it was felt that payments should go to those “actively grazing and managing the commons.”

4.94 Concerns surrounding common land was given as a justification in some of the unsupportive responses. These responses specifically felt common land should have been included within the Universal Actions, and that commons farmers may experience a loss of subsidy income until the Collaborative Actions are introduced:

“[...] common land loses out until such time as you develop the collaborative actions which you say are subject to budget anyway [...]” [Beef farmer]

#### Dissatisfaction with the Scheme

4.95 The majority of responses that did not feel the proposed Stability Payment introduction was appropriate tended to take issue with the wider design of the Scheme, describing it as “unworkable” or “asking



too much”, whilst also referring to the appropriateness of the previous BPS subsidy scheme.

## Organisation responses

- 4.96 Themes emerging in the organisation responses to Question 5 broadly aligned with the varied and diverse views expressed in the individual responses. These included:
- concern about the timing of the Optional and Collaborative Actions from many environmental and third sector organisations due to their perceived potential impacts on the environment. One environmental organisation was “concerned that with significant pressures on the budget, there will be insufficient funding to support the Optional and Collaborative Actions. Stability payments to farmers will undoubtedly put pressure on the budget available. The Welsh Government needs to ensure that the Optional and Collaborative Actions are fully funded and would therefore urge the Welsh Government to divert payments to farmers who are helping provide increased public services and public goods through the delivery of actions that go beyond the Universal Tier”
  - the majority of farming and private sector responses, as well as some third sector responses, were supportive of the stability payment but expressed concern (given its perceived role in supporting farm viability) that it would be reduced over time.
- 4.97 In contrast to the individual responses, many public sector organisation responses raised concerns regarding common land. Their responses highlighted the complexities surrounding common land governance. They also advocated for the creation of Commons Councils as a mechanism to manage these lands effectively.

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

### **Summary of proposals**

In the SFS, it is proposed that farmers need to have sole management responsibility of the land for a period of 10 months to ensure they can effectively complete the Universal Actions required for the full scheme year of 12 months. This requirement is designed to provide a clear and continuous management context – or management control – in which these actions can be reliably implemented and monitored. Having ‘management control’ is set out in the consultation document as being:

- the owner occupier;
- a tenant who has ‘exclusive occupation’ under either the Agricultural Tenancies Act 1995 with a Farm Business Tenancy, or a full Agricultural Holdings Act 1986 tenancy;
- a tenant with an unwritten tenancy with the same level of control as above.

### Quantitative analysis

4.98 As shown in Table 4.7, the response to the 10-month period proposal was split evenly. 31.1% of responses answered ‘Yes’ (i.e. that 10 months was sufficient) and 31.8% responses answered ‘No’ (i.e. that 10 months was not sufficient).

**Table 4.7: Responses to Question 6**

Response	Responses	Percentage
Yes	942	31.1%
No	962	31.8%
Inconclusive	256	8.5%
Don't know	122	4%
Content not related to the question	41	1.4%
No answer	905	29.9%
Total	3228	100%

Miller Research analysis of consultation responses

4.99 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

- BPS recipients and tenant farms had a slightly higher proportion of 'Yes' responses
- agri-environment scheme participants had a moderately higher proportion of 'Yes' responses.

### Qualitative analysis

#### Timescale

4.100 Many responses by those that felt a 10-month period was inappropriate, suggested a need for a 12-month period. Responses that expressed this view felt the requirements of the Universal Actions presupposed a longer-term or year-round relationship with managed land. Concern was expressed with what may happen in the two months when the farmer does not have management responsibility for the land:

“How can we guarantee actions for the 2 months, we are not in charge of the land.” [Sheep farmer]

“That is not sufficient or achievable for tenant farmers. Many have clauses within contract that may incur [sic] if the land is re-

called by the Landlord. They would not be able to plant trees?  
Change land to habitat? It is not theirs to alter! Better protection  
is needed for tenant farmers.” [Sheep farmer]

- 4.101 Some responses highlighted that not having year-round management of the land may cause problems for carrying out activities that are seasonal (e.g. planting), or sourcing contractors for specific or specialist work at certain times of the year.

#### Flexibility

- 4.102 Alternatively, many responses stated the need for a shorter or more flexible period due to the practice of using shorter-term rental agreements (both tenants and landowners shared this view):

“This wouldn’t work for our rented ground that is a 6month grazing license, the farm owner would also not be able to claim on this basis.” [Beef farmer]

“We rent out winter tack as we operate a hay making business in Summer. This would be a game changer for us taking on the grant. 7 [sic] months would be acceptable. This has huge implications to part time farmers like myself.” [Sheep farmer]

#### Payments to active farmers

- 4.103 Among substantive responses in support of the 10-month period many responses felt that this would help tenant farmers to claim on land where they put in the work, avoiding the cited issue of subsidy payments being claimed by the owners of the land instead of those that work it:

“This seems a reasonable option, so that the one in control during the biggest part of the year can make the management decisions for the universal actions.” [Mixed farmer]

“I feel this is a sensible time frame for the person actually doing the farming to be able to join the scheme.” [Dairy farmer]

## Organisation responses

4.104 As shown in Table 4.8, the response from organisations to the 10-month period proposal was mixed with 29.2% answering ‘Yes’ while 22.9% answered ‘No’ while 37.3% expressed no view.

**Table 4.8: Organisation responses to Question 6**

Response	Responses	Percentage
Yes	79	29.2%
No	62	22.9%
Inconclusive	22	8.1%
Don't know	6	2.2%
Content not related to the question	1	0.4%
No answer	101	37.3%
Total	271	100%

Miller Research analysis of consultation responses

4.105 Themes emerging in the organisation responses to Question 6 broadly aligned with the varied and diverse views expressed in the individual responses. This included:

- concerns that those with shorter rental agreements, including summer grazing, would be excluded from the Scheme were expressed by many third, environmental, public and farming sector organisations. One environmental organisation stated: “no, the situation of tenant farmers and graziers on seasonal agreements are not catered for with a one size fits all policy”
- the suggestion that those who are actively farming should receive the payment was made by many environmental, third sector and farming sector organisations
- concerns about the absence of management during the two months was expressed by some research and academia responses who linked this to potential non-compliance

- concerns that the proposal may have unintended consequences including landlords refusing to allow tenants to participate in the Scheme, or refuse to rent to Scheme participants, potential ambiguity when determining Scheme beneficiary when responsibilities are split, and a concern about the potential for loopholes which may be exploited by landlords.

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

**Summary of proposals**

The consultation proposed that each participant would be required to complete a carbon assessment within the first year of joining the Scheme. To complete the carbon assessment Welsh Government proposed the use of a single carbon calculator rather than a choice of calculators.

Quantitative analysis

4.106 As shown in Table 4.9, the response to the proposal for a single carbon calculator was mixed with 27% answering ‘Yes’ (i.e. agreement with a single carbon calculator) and 34.8% answering ‘No’ (i.e. disagreement with a single carbon calculator).

**Table 4.9: Responses to Question 7**

Response	Responses	Percentage
Yes	818	27.0%
No	1055	34.8%
Inconclusive	502	16.6%
Don't know	142	4.7%
Content not related to the question	22	0.7%
No answer	711	22.8%
Total	3228	100%

Miller Research analysis of consultation responses

4.107 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

- those with common grazing rights had a slightly higher proportion of ‘No’ responses

- the environment sector had a moderately higher proportion of 'No' responses
- tenant farmers and agri-environment scheme participants had a slightly higher proportion of 'Yes' responses.

## Qualitative analysis

### Scheme dissatisfaction

4.108 The majority of the unsupportive responses that did not agree with the proposal objected to the use of a carbon calculator at all, rather than the specific proposal to use a single calculator for everyone. It was commonly believed that the requirement to complete a carbon calculator should not be in the Scheme.

### Comparability

4.109 Many of the responses that expressed support for a single calculator stated the need for all farmers in Wales to use the same calculator to ensure a level playing field and comparability.

### Duplication

4.110 The need for a calculator used in the SFS to align with others used across the UK was noted in several responses. Many dairy farmer responses noted that they already complete a carbon calculator as a condition of their milk contract. While most of these responses felt that this would be an unnecessary duplication, some called for the same data to be used for both:

“Yes, but align the carbon calculator to the one currently used by milk buyers to avoid duplication.” [Dairy farmer]

4.111 Among the small number of responses that disagreed with the question and provided an explanation why, it was argued that they already use a carbon calculator. As such, they were thereby concerned this proposal would require them to complete a second calculator.



## Context

- 4.112 A further point made by some unsupportive responses was that the differences and nuances between farm types would make a single carbon calculator problematic:

“At minimum, I suggest a choice of a suite of carbon calculators, with brief explanations of the key aims of each, and what sort of farm businesses would suit them best. I suggest obtaining advice from the Farm Carbon Toolkit, who are currently conducting a study to compare different carbon toolkits.” [Mixed farmer]

## Accuracy

- 4.113 Many of those in support of the use of a single calculator expressed caveats, most notably the need to ensure the science underpinning the calculator is accurate. This view was shaped by the perception that calculators are not accurate, with several responses noting potential issues around how to assess methane emissions, for instance. Within responses that raised the issue of accuracy, some emphasised that the model underpinning the calculator needs to be robust, and based on up-to-date and transparent research:

“It really depends on how sophisticated the carbon calculator is. Carbon outputs are comparatively straightforward, but there needs to be transparency and detail and links to the underpinning science.” [Horticulturist]

- 4.114 The accuracy of carbon calculators was a common justification raised in responses that objected to the use of a carbon calculator at all. For example:

“Carbon calculators are still very much in their infancy and largely based on estimates and best guess data. Having had experience of a carbon audit on our farm I [sic] had no faith in the final data.” [Dairy farmer]

- 4.115 Among those that raised the issue of accuracy, some felt there was a difficulty in accurately representing the variety of farming systems and contexts which therefore called into question the value of a carbon calculator. It was noted that a calculator is only as accurate as the data entered into it. The challenges of creating a model relevant to all farming systems was also raised.
- 4.116 Verifiability was a common theme, with some responses suggesting the possibility of inspections or site visits to verify the data included in the calculator by the farmer. Independent auditing of the data was also suggested by some to be necessary for accurate data collection.

#### Usability and support

- 4.117 Some responses suggested the calculator would need to be simple to use. It was suggested that the calculator should be free and able to be completed without the need for consultant support.
- 4.118 Among these responses, many noted the need for advice and support, with some suggesting the need for one-to-one or face-to-face support. The need for training was also raised (particularly through Farming Connect), with suggestions including workshops, consultant support, or online guidance, including video guidance.

#### Administration and technical ability

- 4.119 The addition of extra administrative work was a justification provided by a small number of those who objected to the carbon calculator:

“[...] This will add even more paperwork for us.” [Sheep farmer]

“I believe this is additional responsibility and work for farmers without providing any benefit to their products. It will not allow them to increase the value of their end products to increase margin, it will only hinder them in adding to their workload and costs.” [Unspecified individual]

- 4.120 Concerns about the technical skills needed to complete an online calculator were raised. Some felt they would require consultant

support for this. Access to digital technology was also raised as a potential barrier for some:

“There will be farmers who cannot even use a computer, who already have to pay for BPS form filling every year. They will be further penalised. [...]”. [Sheep farmer]

### Organisation responses

4.121 As shown in Table 4.10, the organisation responses to the single carbon calculator proposal were mixed, with 34.7% answering ‘yes’ and 22.5% answering ‘no’ while 25.1% expressed no view.

**Table 4.10: Organisation responses to Question 7**

Response	Responses	Percentage
Yes	94	34.7%
No	61	22.5%
Inconclusive	44	16.2%
Don't know	4	1.5%
Content not related to the question	0	0.0%
No answer	68	25.1%
Total	271	100%

Miller Research analysis of consultation responses

4.122 Themes emerging in the organisation responses to Question 7 broadly aligned with diverse and varied views expressed by the individual responses. These included:

- support for a single carbon calculator within many third and public sector organisation responses, in order to provide a level playing field and data comparability
- conditional support from some third, private and veterinary sectors depending on the accessibility of the calculator, and the ability of the calculator to accommodate the diversity of farms

- concerns about a “one-size-fits-all” approach within many farming sector and food and timber supply chain responses due to the diversity of land types, uses and farm businesses. One farming organisation stated: “a single carbon calculator would not suit the needs of every farm as they are all have different farming methods.”

**Question 8: 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?**

### **Summary of proposals**

The SFS consultation document outlines an intention to take a proportionate approach to controls and sanctions in order to ensure compliance without placing undue burden on farmers. Maintaining compliance with the Scheme eligibility criteria, Scheme rules, regulatory baseline, and all applicable Scheme Actions are a condition of payment. The approach set out intends to balance the need for regulatory oversight with the practicalities of farming operations. Sanctions, while necessary for enforcement, are intended to be fair and proportionate, with a sanctions matrix clearly setting out consequences against a set of variable standards.

The Scheme sets out that guidance will be available to help participants correct minor problems, allowing time to put right any issues where possible.

### Qualitative analysis

- 4.123 Responses to this question focused on support for high standards, the importance of proportionality and the need to ensure compliance.
- 4.124 Many responses expressed the need for high standards on farms in Wales. However, this sentiment was divided, with some responses that suggested Wales already has high standards and opposed changes, compared with a few that supported the proposed changes. Many responses highlighted farm assurance schemes as good practice in driving standards in the farming sector, particularly in animal welfare, with cautions given that this effort should not be duplicated. Many responses proposed that those farmers who are “registered farm assured should be exempt from lots of these actions.”

- 4.125 Some responses emphasised the standards of Welsh farming compared with other countries that export their produce. They suggested that “Wales has one of the highest standards in the world.” They were concerned that “produce from countries with lower standards is allowed to be imported for cheaper,” and places Welsh farmers at a competitive disadvantage, which they often blamed on supermarket profiteering. However, a few responses viewed the standards of Welsh farms less favourably, suggesting that agriculture was responsible for environmental deterioration. Examples cited included river pollution and ammonia impacting sensitive habitats.
- 4.126 Many responses to this question emphasised the importance of a proportionate approach to legislation and enforcement, an approach that focuses on supporting farmers to resolve minor breaches rather than sanctions and financial penalties. When considering potential penalties, some responses felt the authorities should take a number of issues into account, particularly those that are “outside of the farmers control” such as the weather, the availability of trees and labour supply. A few responses further suggested that sanctions should not penalise the non-achievement of actions for requirements such as the woodland requirement as there are several reasons why trees planted may not succeed.
- 4.127 Many responses highlighted the potential impact of these proposals on farmers’ mental health with suggestions that the condition of “mental health in our industry is currently awful.” Responses suggested that the impact on a farmer’s mental health should be taken into consideration when determining a proportionate response to a breach. One response questioned whether the proposals would increase standards proportionately to the increased burden:

“Farming is hard enough as it is, physically, emotionally and mentally and the sanction and controls you're suggesting don't add to 'high standards' it adds and promotes stress and worry for farmers.” [Dairy farmer]

## Compliance and enforcement

- 4.128 Many responses agreed that enforcement to ensure compliance and address non-compliance will be an important factor within the Scheme, and thought payments should be linked to compliance. Some responses suggested focusing on wilful non-compliance, with an emphasis on repeat offenders, and inspections targeted at those who purposefully break the rules. Reflecting on how this could work in practice, responses suggested working with existing accredited farm assurance schemes as a part of an “earned recognition” or risk-based approach. Some responses suggested this would avoid duplication, reduce costs of enforcement and improve relationships between the government and farmers.
- 4.129 The adequate resourcing of enforcement was raised as a concern with the need for regulators to have adequate personnel capacity, budget, and skills to “support the development of farm plans, monitor and update and ensure compliance.”

## Organisation responses

- 4.130 Themes emerging in the organisation responses to Question 8 broadly aligned with the varied and diverse views expressed in the individual responses. These included:
- concerns about the proportionality of the proposed approach, particularly when compliance issues are a result of circumstances beyond the farmer’s control, and the potential impact on the mental health of farmers were expressed by the majority of farming sector responses and many, public, third and private sector organisation responses. One veterinary response stated: “my only view is that this will increase suicide rates and mental health problems within the industry”

- the importance of the “polluter pays principle” was highlighted by many environmental organisations who stressed this should be included in the approach
- support was expressed for public access by many third sector organisations who wanted to see a ‘public money for public goods’ approach. In contrast, many farming sector organisations expressed concerns with public access due to the potential for biosecurity issues, animal health and welfare concerns, and potential business liabilities.



**Question 9: Adopting the Welsh Government appeals process will provide an effective and efficient mechanism. Is there any reason we should deviate from this?**

**Summary of proposals**

The proposed appeals process for the SFS aims to streamline the current system, which is described in the consultation document as “costly and time-consuming”. Instead of the existing procedure managed by Rural Payments Wales (RPW) that includes an assessment by an independent panel and a final decision by Welsh Ministers, the new process is proposed to adopt a more administrative approach.

Under the proposed system, appeals will involve a two-stage review process. This process is designed to ensure fairness and thorough consideration by involving different officials from those who made the original decisions.

## Quantitative analysis

- 4.131 As shown in Table 4.11, 30% of responses opposed the adoption of the Welsh Government appeals process (i.e. indicated that ‘Yes’ there was a reason to deviate from this) while 38.6% expressed no view<sup>13</sup>.

**Table 4.11: Responses to Question 9**

Response	Responses	Percentage
Yes	909	30.0%
No	521	17.2%
Inconclusive	384	12.7%
Don't know	186	6.1%
Content not related to the question	58	1.9%
Not answer	1170	38.6%
Total	3228	100%

Miller Research analysis of consultation responses

- 4.132 There were no notable differences in the level of support when focusing on specific groups.

## Qualitative analysis

### Independent appeals body

- 4.133 Among those 30% of responses that felt the existing Welsh Government appeals process should not be used, the majority of responses called for the appeals process to be independent from the Welsh Government. Responses perceived that the absence of an independent appeals body would lead to biased decisions:

“Any appeals should be heard by an independent non biased organisation/authority.” [Sheep farmer]

<sup>13</sup> It should be noted that in some instances, those who started their response with a ‘No’ went on to provide a ‘Yes’ position on the question, with their response intended as a rejection of the appeals process (hence a ‘No’), but with the answer initially indicating otherwise. Where the intention behind the response is clear, the actual sentiment of the response has been taken into account. For example, one response read: “No, never works”

“There should be an independent appeals panel. SFS does not allow for this. It is difficult for civil servants to contradict each other.” [Unspecified farmer]

#### Inefficient

4.134 Many responses suggested that the Welsh Government’s appeal process may be inefficient, slow, or unresponsive<sup>14</sup>. Some responses that raised this point included examples of experience with a previous appeals process that was described as slow and bureaucratic. The need for an efficient response was noted by some responses with a small number of these highlighting an inconsistency between the expectations for the farmer and the Welsh Government during the appeals process:

“As farmers, if we undertake an appeal we are given a deadline (usually 30days) to respond or provide evidence, however are often left waiting for months (if not over a year) for responses or outcomes. If we are set a deadline, then there should also be a deadline on the other side.” [Arable farmer]

#### Satisfaction with current system

4.135 Among those that felt the Welsh Government appeals process should be used, many thought the current system worked well or well enough. However, some caveats were given, including the need for any appeals system to be sufficiently well staffed, and to process appeals in a timely manner.

#### Requirements for an appeals system

4.136 Some responses set out what they felt was needed from an appeals process. This included the following themes, listed in order of frequency:

- the appeals process needs to be effective and quick to respond

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<sup>14</sup> The SFS consultation document set out that the appeals process would *not* be handled through the existing RPW appeals system, however very few responses noted this in their response.

- the appeals process needs to be carried out by individuals who understand farming
- appeals need to take different farming systems and events beyond the control of the farmer into account
- all appeals must be heard fairly
- the process needs to be transparent
- the process needs regular evaluation and feedback from the sector.

### Organisation responses

4.137 As shown in Table 4.12, 25.1% of organisation responses opposed the adoption of the Welsh Government appeals process while 44.6% expressed no view<sup>15</sup>.

**Table 4.12: Organisation responses to Question 9**

Response	Responses	Percentage
Yes	68	25.1%
No	36	13.3%
Inconclusive	35	12.9%
Don't know	8	3.0%
Content not related to the question	3	1.1%
No answer	121	44.6%
Total	271	100%

Miller Research analysis of consultation responses

4.138 Themes emerging in the organisation responses to Question 9 aligned with diverse and varied views expressed in the individual responses. These included:

<sup>15</sup> It should be noted that in some instances, those who started their response with a 'No' went on to provide a 'Yes' position on the question, with their response intended as a rejection of the appeals process (hence a 'No'), but with the answer initially indicating otherwise. Where the intention behind the response is clear, the actual sentiment of the response has been taken into account. For example, one response read: "No, never works"

- the need for a streamlined, fair and transparent process was highlighted by many responses from the public, third and private sectors
- concerns around the “loss of an independent appeals panel” were expressed by the majority of responses from the farming sector and food and timber supply chain, as well as many responses from research and academia and farming unions. They suggested this could limit access to justice and result in bias against participants. One farming organisation stated “If it works, is fair, and legal, I have no objection. Previously in your appeals process, there would input from independent parties – this must remain. You need to retain the ability to differentiate between genuine mistakes and fraud”
- the importance of considering the impacts of any appeals process on farmers’ mental health was highlighted by the majority of the farming, veterinary and third sector responses, who suggested the process should minimise stress and be responsive to participants’ needs.

**Question 10: We would like to know your views on the proposed approach to:**

**10a) We would like to know your views on the proposed approach to:  
the SFS Universal Baseline Payment**

**Summary of proposals**

The Universal Baseline Payment within the SFS is the annual payment to farmers for carrying out the set of Universal Actions which go beyond the standard regulatory requirements. Based on the area of the farm, the value of the payment is proposed to be calculated as the sum of four separate payment values based on these four categories:

Universal – Maintenance of existing woodland: Payment value for each hectare of existing woodland that is managed;

Universal – Woodland creation: Payment value for each additional hectare of newly created woodland, once created;

Universal – Habitat maintenance: Payment value for each hectare of semi natural habitat managed, and/or each additional hectare of temporary habitat up to the required 10%, once created;

Universal – Actions: Payment value per hectare covering all other Universal Actions on the total eligible area.

**Qualitative analysis**

4.139 Themes emerging from responses to Question 10a concerned sustainability, concerns around area-based payments, the desire for clarity on payment rates, and the potential impact on smaller farms.

4.140 Many suggested that the Universal Baseline Payment would foster sustainable agricultural practices and highlighted the importance of encouraging environmentally friendly techniques. However, some responses expressed concern that area-based payments could have adverse effects by inflating land prices and increasing barriers to new entrants.

4.141 Many responses raised concerns that they could not evaluate the Scheme's impact on the financial viability of their farm as the final payment details had not been published. They were also concerned about the lack of detailed information on how payments are calculated and distributed. Some responses suggested that this led to challenges in evaluating the Scheme's financial viability:

“it is almost impossible to comment on this when we have no idea how much money will be available.” [Sheep farmer]

“[...] you indicate that budget may only be available year by year, this is concerning.” [Private sector individual]

4.142 Concerns around financial viability were also raised in many responses that felt that the Scheme might inadvertently disadvantage smaller farms. These responses suggested that the fixed-rate payment structure and Universal Actions required by the Scheme do not sufficiently consider the unique circumstances and constraints of smaller farms.

### Organisation responses

4.143 Themes emerging in the organisation responses to Question 10a aligned with the diverse and varied views expressed in the individual responses. These included:

- concerns around the inadequacy of the Universal Payment were expressed by the majority of responses from the farming sector Responses called for clarity and certainty and an increase in payment rates compared to the current BPS rates as well as their perception of SFS payment rates
- support for the proposals was expressed by many responses from the forestry, third and environmental sectors. Some responses from the farming sector viewed the payment as recognition of the efforts of farmers, although they emphasised

the need for adequate compensation for participating in environmental schemes

- perceived lack of incentive for younger generations and new entrants to join the farming sector was highlighted by many farming and private sector responses. One farming organisation stated: “There are no incentives for young people with this current scheme.”



## **10b) We would like to know your views on the proposed approach to: The SFS Stability Payment**

### **Summary of proposals**

The Stability Payment within the Sustainable Farming Scheme (SFS) is designed to aid Welsh farmers during the transition from the current Basic Payment Scheme (BPS) to the new SFS. This payment acts as a continuity measure to ensure that farmers do not face abrupt financial shortfalls as the systems change. The Stability Payment is essentially a financial bridge, providing farmers with a predictable income stream while they adjust to the new requirements and incentives of the SFS. The Stability Payment will be received if a scheme participant's Universal Baseline Payment is less than the 'notional' BPS payment that the farm business would have received prior to the transition period.

### Qualitative analysis

4.144 The majority of responses supported the concept of the stability payment. Many viewed it as a necessary measure to facilitate the transition from the BPS to the SFS. Many responses emphasised that such payments should be substantial enough to support farmers in adapting their operations to meet new environmental and sustainability standards, without financial hardship. However, as with responses to the question on the Universal Baseline Payment, many responses focused on the lack of specific information regarding payment details.

### Organisation responses

4.145 Themes emerging in the organisation responses to Question 10b broadly aligned with diverse and varied views expressed in the individual responses. These included:

- support for the stability payment from many responses from the environment, forestry third sectors as they felt that it would mitigate farmers' risk and encourage participation in the Scheme
- concerns about a perceived lack of detail about the stability payment from the majority of farming and private sector responses who suggested that the existing information made it difficult for farmers to assess the impact of the changes on their business. One farmer organisation stated: "No figures have been made available to us so how can we make an appraisal!"
- recommendations for the stability payment to adequately support farmers to adapt their operations to meet Scheme requirements were made by many environmental, farming and third sector responses.

**Question 11: 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?**

**Summary of proposals**

The SFS consultation proposed that the Universal Actions, which would launch in 2025, would be followed by Optional and Collaborative Actions.

Welsh Government proposed that those who joined the Scheme should receive priority access to the Optional and Collaborative Actions, while those who did not join the Scheme would be subject to a competitive process.

Quantitative analysis

4.146 As shown in Table 4.13, 34.3% of responses opposed prioritising support to Scheme participants, while 23.3% supported prioritisation and 32% expressed no view.

**Table 4.13: Responses to Question 11**

Response	Responses	Percentage
Yes	705	23.3%
No	1040	34.3%
Inconclusive	212	7.0%
Don't know	122	4.0%
Content not related to the question	183	6.0%
No answer	966	32.0%
Total	3228	100%

Miller Research analysis of consultation responses

4.147 There were no notable differences in the level of support when focusing on specific groups.

## Qualitative analysis

### Equal treatment

- 4.148 Many responses rejected the idea that farmers within the Scheme should receive priority support for Optional and Collaborative actions. The rationale given by many of these responses was a desire for farmers to be treated equally, regardless of their inclusion in the SFS or not.
- 4.149 Some responses expressed concerns about those farmers who may not be able to access the Scheme due to an inability to meet Universal Actions. These responses noted that these farmers should not be disadvantaged in seeking support for carrying out Collaborative and Optional Actions.
- 4.150 Some responses felt that all those who work towards environmental or public good should be supported, regardless of their inclusion in the SFS or not:

“All farmers must be fairly rewarded for the environmental/public goods they already deliver and will continue to deliver in future for society.” [Mixed farmer]

### Rewarding commitment

- 4.151 Among responses that agreed Scheme participants should receive priority support, many expressed the need to reward the commitment to opt into the Scheme:

“Yes, if farmers commit to SFS then they should receive priority as they have shown a leap of faith in Welsh Gov and the new scheme and should be rewarded for this.” [Sheep farmer]

“Yes, I believe that farmers within the scheme should have the first chance, as they have committed themselves to cooperating with the government<sup>16</sup>.” [Sheep farmer]

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<sup>16</sup> Original untranslated text: “Ydw, credaf y dylai ffermwyr o fewn y cynllyn gael y cyfle cynta, gan ei bod wedi ymrwymo ei hunain i gyd weithio gyda y llywodraeth”

4.152 Some responses focused on the perceived undermining of the Scheme if those outside it were to receive equal prioritisation:

“Yes, absolutely. If people can do none of the basics (not that they are anywhere near correct at the moment) but still access the “top-ups” what’s the point in any of this.” [Sheep farmer]

“Yes, otherwise, what on earth is the point of having the universal actions? If farmers can access the optional layers without having 10% habitat and 10% woodland then why would they bother with the universal actions?” [Individual in the public sector]

#### Organisation responses

4.153 As shown in Table 4.14, 28% of organisation responses opposed prioritisation of scheme participants as opposed to 21.4% who supported the proposal, while 30.1% expressed no view.

**Table 4.14: Organisation responses to Question 11**

Response	Responses	Percentage
Yes	58	21.4%
No	76	28.0%
Inconclusive	24	8.9%
Don't know	17	6.3%
Content not related to the question	12	4.4%
No answer	84	30.1%
Total	271	100%

Miller Research analysis of consultation responses

4.154 Themes emerging in the organisation responses to Question 11 broadly aligned with the varied and diverse views expressed in the individual responses. These included:

- many environmental, farming and third sector organisations expressed support for a strategic approach focused on

delivering benefits to habitats and biodiversity whereby access to support for actions similar to those offered in the Optional and Collaborative Layers would be available to those outside the Scheme rather than limited to only those participating in the SFS

- the belief that the Scheme should promote a level playing field for farmers was expressed by the majority of farming sector responses. These responses opposed prioritising Scheme participants as they felt that, since many farmers would not join the proposed Scheme, this would limit the promotion of better environmental practices. For example, one farming organisation response stated: “This discriminates against the farmers who may wish to join the scheme but can't due to impossible demands that would be placed upon them. The smaller farmers, who could not afford to hire people in to cover the workload of entering the current scheme, would probably be the ones who you would see the most benefit from completing these actions (i.e. from small grant schemes to improve stock recording, etc.)”
- support for prioritisation of participants of the Scheme was expressed by some farming, third, research and environmental sector responses. They suggested that participants would be better placed to undertake long-term planning of environmental actions.

**Question 12: What actions and support within the Optional and Collaborative layers do you believe should be prioritised?**

**Summary of proposals**

The SFS consultation proposed that the Universal Actions, which would launch in 2025, would be followed by Optional and Collaborative Actions.

Optional Actions are expected to lead on from or be informed by the Universal Actions with Scheme participants able to choose which actions they undertake. Annex 2 of the consultation included a list of proposed Optional Actions which they suggested could inform answers to Question 12.

Collaborative Actions are intended to provide Scheme participants with the opportunity to deliver action collaboratively with others at the local, landscape, catchment and national scale. Examples of Collaborative Actions were included in Chapter 5 and included: landscape scale action nature-based solutions and innovation and knowledge transfer in agriculture.

4.155 There were many actions proposed for the Optional and Collaborative layers. Table 4.15 shows the themes that were mentioned most frequently as well as the most frequently mentioned suggested support mechanisms, or actions suggested for support.

**Table 4.15: Optional and Collaborative Actions to prioritise**

Action/Support	Frequency	Types of actions
Food Production	169	Support to maintain food production
Environment and Biodiversity	156	Pond creation, habitat creation and maintenance
Soil and Coverings	67	Grassland management, soil health and conditioning, approaches to ploughing
Infrastructure	58	Farm buildings, hedges, roads and surfaces, water, internet
Waterways	51	Flood mitigation, river catchment management and planting buffer strips
Animal Welfare	46	Funding for fencing and biosecurity measures
Tree and Woodland Management	44	Funding for woodland creation and collaboration
Machinery	32	Funding for machinery and innovation investments
Renewables	26	Investment support, advice and guidance
Organic	16	Promote and support organic farming through funding

Miller Research analysis of consultation responses



## Organisation responses

4.156 There were many actions proposed by organisations for the Optional and Collaborative layers, Table 4.16 shows the themes that were most commonly raised.

**Table 4.16: Organisation Optional and Collaborative Actions to prioritise**

Action/Support	Frequency
Environment and Biodiversity	36
Food Production	17
Soil and Coverings	13
Organic	13
Animal Welfare	10
Waterways	9
Infrastructure	4
Tree and Woodland Management	4
Renewables	1

Miller Research analysis of consultation responses

4.157 The actions prioritised by organisations were broadly aligned with the varied and diverse views expressed by individual responses. There were minor differences in prioritisation as can be observed by comparing Table 4.15 and Table 4.16. Individual responses prioritised food production and requested support for the purchase of machinery whilst organisations tended to prioritise environment and biodiversity, as well a higher proportion indicating support for organic farming. The types of actions shown in Table 4.15 are reflective of the types of actions suggested by organisations.

**Question 13: Do you agree with the proposed changes to BPS from 2025? This includes:**

**13a) The rate at which BPS payments are reduced.**

**Summary of proposals**

As part of the transition to the SFS, the consultation proposed a phased reduction in BPS over a five-year period, starting in 2025 and concluding in 2029. The proposed reductions are planned as follows:

- In 2025, BPS payments will be reduced to 80% of their previous amount.
- The reduction will continue by 20% each subsequent year, with payments at 60%, 40%, and 20% in 2026, 2027, and 2028, respectively.
- By 2029, BPS payments will cease entirely.

This gradual tapering is designed to ease the transition for farmers from the BPS to the SFS, minimising financial disruption by allowing time for adaptation to the new system that rewards sustainable farming practices more directly.

**Quantitative analysis**

4.158 As shown in Table 4.17, 58.4% of responses opposed the proposed rate at which BPS payments would be reduced.

**Table 4.17: Responses to Question 13a**

<b>Response</b>	<b>Responses</b>	<b>Percentage</b>
Yes	589	19.5%
No	1769	58.4%
Inconclusive	243	8.0%
Don't know	132	4.4%
Content not related to the question	67	2.2%
No answer	428	13.9%

Total	3228	100%
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Miller Research analysis of consultation responses

4.159 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

- BPS recipients and those with commons grazing rights had a slightly higher proportion of 'No' responses.

#### Qualitative analysis

4.160 The following justifications were given by many responses that disagreed with the rate at which BPS payments were proposed to be reduced:

- BPS payments should continue in their current form
- replacement scheme payments should remain at the same level as BPS
- the perception that the step-down of BPS payments would occur too quickly and should occur over a longer period of time
- the SFS was seen to be unworkable, and therefore the BPS should be retained at the same rate until a more suitable scheme was put forth.

4.161 Responses given by many of those that agreed with the rate of reduction for BPS payments can be broken down into two broad themes. The first is comprised of responses that agreed that it was important that the payments are phased out gradually:

“[Y]es that's fine. [I]ts being phased out, makes sense to do it over a few years than in one hit. If we choose not to join the new scheme it at least gives us a few years to adapt.” [Dairy farmer]

4.162 The second theme raised in a small number of responses came from those who were satisfied with the proposed reduction on the condition that payments from the SFS would be sufficient to cover any potential losses:

“The rate the BPS is reduced is fine and long as the new scheme is phased in at the same rate to compensate for any losses.” [Sheep farmer]

### Organisation responses

4.163 As shown in Table 4.18, 14% of organisation responses approved of the proposed rate at which BPS payments would be reduced while 23.5% opposed the proposal. 41.7% expressed no view.

**Table 4.18: Organisation responses to Question 13a**

Response	Responses	Percentage
Yes	38	14.0%
No	88	23.5%
Inconclusive	21	7.7%
Don't know	5	1.8%
Content not related to the question	6	2.2%
No answer	113	41.7%
Total	271	100%

Miller Research analysis of consultation responses

4.164 Themes emerging in the organisation responses to Question 13a aligned with the views expressed by individual responses. These included:

- opposition to the proposed rate of reduction from the majority of farming sector responses who cited low farm incomes and potential financial hardship due to reductions that were deemed to be “too steep and rapid”
- the view that the proposed reduction was fair and reasonable was expressed by some responses from the farming and public sectors, and many environmental sector responses. One public sector organisation stated that “reduction rates seem clear and measured and will allow those transitioning over, and the

delivery mechanism, time to adjust and address teething issues.”

**13b) Do you agree with the proposed changes to BPS from 2025? This includes: Closing the National Reserve to new entrants.**

**Summary of proposals**

The National Reserve is a financial reserve set aside primarily to support new entrants and young farmers who might not have sufficient payment entitlements under the BPS. This reserve aims to ensure that these groups have fair access to agricultural payments, supporting the next generation of farmers.

With the transition to the SFS, the National Reserve is proposed to be closed to new entrants who will instead be directed to the SFS, under which there are no requirements to hold entitlements.

**Quantitative analysis**

4.165 As shown in Table 4.19, 55% of responses opposed the proposal to close the National Reserve to new entrants.

**Table 4.19: Responses to Question 13b**

Response	Responses	Percentage
Yes	547	18.0%
No	1667	55.0%
Inconclusive	237	7.8%
Don't know	127	4.2%
Content not related to the question	69	2.3%
No answer	578	21.0%
Total	3228	100%

Miller Research analysis of consultation responses

4.166 There were no notable differences in the level of support when focusing on specific groups.

### Qualitative analysis

- 4.167 Many responses justified support for closing the National Reserve for new entrants on the conditional basis that a new Scheme is proposed for new entrants:

“Yes, if new entrants can access payments to help start off under another scheme.” [Environmental stakeholder]

- 4.168 Many responses also suggested that as BPS was being discontinued in favour of the SFS, it made sense to close the National Reserve to new entrants. Some of these responses stated that new entrants should enter new schemes:

“Yes. New entrants should be brought into the new scheme, not the old.” [Unspecified farmer]

- 4.169 Some responses supported the proposal due to the perception that that the National Reserve and the entitlement basis of BPS was flawed, and that this should be moved away from:

“[T]his is good - it seemed like a strange and archaic process.”  
[Sheep farmer]

[S]hould never have been a national reserve- its [sic] just abused.” [Environmental stakeholder]

- 4.170 Among responses that disagreed with closing the National Reserve to new entrants, the majority centred on the need for support for new entrants which has previously been provided by the National Reserve:

“It is hard for new entrants to enter the industry, help from schemes such as BPS has enabled this.” [Dairy farmer]

“No - what benefit would this add when new entrants are in short supply and have some of the biggest struggle to get going in the industry. We should be supporting new entrants and promote farming to them, excluding this group entirely would be a huge mistake.” [Beef farmer]

4.171 Many responses expressed concern about closing off an avenue of support for new entrants when the industry is ageing. These responses highlighted the need for new and young entrants into farming and were concerned that closing the National Reserve would have a detrimental effect on encouraging new entrants into the sector. These points referenced the need for “new blood,” with some highlighting that new entrants bring energy and new ideas:

“This is a backwards step. The farmer age is always increasing and young well educated people should be encouraged to farm.”  
[Mixed farmer]

#### Organisation responses

4.172 As shown in Table 4.20, 14% of organisation responses supported the proposal to close the National Reserve to new entrants, while 29.9% opposed it and 44.6% expressed no view.

**Table 4.20: Organisation responses to Question 13b**

Response	Responses	Percentage
Yes	38	14.0%
No	81	29.9%
Inconclusive	18	6.6%
Don't know	7	2.6%
Content not related to the question	6	2.2%
No answer	121	44.6%
Total	271	100%

Miller Research analysis of consultation responses

4.173 Themes emerging in the organisation responses to Question 13b aligned with the varied and diverse views expressed in the individual responses. These included:

- support for the closure of the National Reserve from many environmental sector responses to encourage new entrants to the new Scheme



- opposition to the proposal from the majority of the responses from the farming and private sectors, and some third sector organisations due to concern that it could discourage new entrants into agriculture. As one food and timber supply chain response stated: “No, this a very important stage for developing the next generation of farmers.”

**13c) Do you agree with the proposed changes to BPS from 2025? This includes: Thresholds for capping**

**Summary of proposals**

It is proposed that the SFS would have capping introduced for the Universal Baseline Payment or payment categories. This is a proposed element of the Scheme and would be consulted on through with stakeholder groups before being introduced.

Quantitative analysis

4.174 As shown in Table 4.21, 42.4% of responses opposed the proposed threshold for capping.

**Table 4.21: Responses to Question 13c**

Response	Responses	Percentage
Yes	842	27.8%
No	1284	42.4%
Inconclusive	250	8.3%
Don't know	144	4.8%
Content not related to the question	70	2.3%
No answer	635	21.2%
Total	3228	100%

Miller Research analysis of consultation responses

4.175 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

- agri-environment scheme participants and tenant farmers had a slightly higher proportion of 'Yes' responses.

### Qualitative analysis

- 4.176 Many responses supported the capping proposals due to the perceived need to more fairly provide support, with more support provided to smaller and family farms.
- 4.177 These responses suggested that too many large farms and landowners have been able to claim large amounts through BPS with the perception that this support was not needed:

“I don’t disagree with this as larger farms don’t usually require the support.” [Mixed farmer]

### Organisation responses

- 4.178 As shown in Table 4.22, 17.7% of organisation responses supported the proposed threshold for capping while 22.1% opposed it while 47.2% expressed no view.

**Table 4.22: Organisation responses to Question 13c**

Response	Responses	Percentage
Yes	48	17.7%
No	60	22.1%
Inconclusive	21	7.7%
Don’t know	8	2.9%
Content not related to the question	6	2.2%
No answer	128	47.2%
Total	271	100%

Miller Research analysis of consultation responses

- 4.179 Themes emerging in the organisation responses to Question 13c broadly aligned with the varied views expressed in the individual responses. Themes included:
- support for capping payments to support small farmers was expressed by many responses from the environmental sector and farming sector. One farming organisation said “We support

thresholds for capping. As have argued throughout, smaller farms are severely disadvantaged, and redistribution of support from larger to smaller farms is not only fairer, but also recognises that small diverse farms can deliver proportionately higher benefits”

- many farming sector responses supported the cap to prevent funding from going to large owners (including environmental organisations)
- concern that capping payments may hinder growth or penalise larger businesses was expressed by many responses from farming sector, who argued that some farms may have to grow to become economically viable
- a desire to ensure a level playing field with neighbouring countries by mirroring capping rules in Scotland and England was raised by some farming sector responses, on the grounds that they compete in the same markets.

### 13d) Do you agree with the proposed changes to BPS from 2025? This includes: Restricting the transfer and lease of entitlement

#### Summary of Proposals

Entitlements are the rights that farmers acquire to receive direct payments. Each entitlement provides the holder the right to receive an annual payment per hectare of eligible land they farm. Farmers can acquire these entitlements through an initial allocation, purchasing, leasing, or inheritance. Once acquired, these entitlements can be used to claim payments under BPS.

The Welsh Government has set out a proposed restriction on the transfer of entitlements. Specifically, the Welsh Government proposes that once farmers choose to participate in the SFS, they must surrender their BPS entitlements. Under the current BPS, entitlements can be freely bought, sold, or leased independently of the land to which they are attached. From 2025, the transfer of BPS entitlements will be restricted to those instances where entitlements are transferred or leased along with the land to which they apply.

#### Quantitative analysis

4.180 As shown in Table 4.23, 49.4% of responses opposed the proposed restriction of the transfer and lease of entitlements.

**Table 4.23: Responses to Question 13d**

Response	Responses	Percentage
Yes	494	19.6%
No	1497	49.4%
Inconclusive	258	8.5%
Don't know	147	4.9%
Content not related to the question	73	2.4%
No answer	655	21.6%
Total	3228	100%

Miller Research analysis of consultation responses

4.181 There were notable differences in the level of support observed in the following groups when compared with the overall trend:

4.182 The farming sector had a slightly higher proportion of 'No' responses.

#### Qualitative analysis

4.183 Many responses that were supportive of restricting the transfer and lease suggested that support should be given to those who actively farm the land:

“There are a number of farmers at present who are not active receiving BPS and rent for land this should not be possible.

[The] public should not be paying these farmers as they are not contributing but using system to supplement income - farmers retiring [sic] selling stock and renting out land.” [Mixed farmer]

“Yes, entitlements should not be traded. If you are not farming, you don't get the money.” [Environmental stakeholder]

4.184 Some responses expressed dissatisfaction with the previous entitlements system, referring to it as “archaic,” “open to abuse,” and “questionable.”

4.185 The perceived impact of entitlement transfer on new entrants was the cause for concern given by many of those who felt that entitlement transfers should not be restricted. Restrictions were interpreted to potentially inhibit a way for new entrants and young farmers to enter the industry and build up a stake:

“No - again is going to impact young farmers/ new entrants more - trying to build up and take on more ground and not being able to access more entitlements puts us as a greater disadvantage.”

[Beef farmer]

4.186 Several responses suggested that transfer of entitlements should be permitted until the last year of BPS.

4.187 The need for flexibility to respond to changes in land ownership was raised as an issue by a small number of those who objected to restrictions, noting that farming can be a fluid business. Being able to respond to changes in the business was at the core of these views:

“I think farmers should be able to transfer and lease entitlements as circumstances can change, especially regarding succession in business.” [Dairy farmer]

“Some farmers need to rent ground, without the transfer and lease entitlements this closes off viability of renting ground. This will stop the farm from expanding and developing.” [Beef farmer]

4.188 Finally, a small number of responses expressed a preference to allow farmers to exchange entitlements as they wish, and that farmers should be free to choose.

4.189 There were a number of further justifications made by a smaller number of responses who objected to the restrictions. These include:

- restricting entitlements can cause issues for the transfer of entitlements within families
- restricting entitlements can affect land value, farm value, and mortgages.

### Organisation responses

4.190 As shown in Table 4.24, 14.8% of organisation responses supported the proposed restriction of the transfer and lease of entitlements, while 27.3% opposed the proposal and 46.1% expressed no view.

**Table 4.24: Organisation responses to Question 13d**

Response	Responses	Percentage
Yes	40	14.8%
No	74	27.3%
Inconclusive	19	7.0%
Don't know	7	2.6%
Content not related to the question	6	2.2%
No answer	125	46.1%
Total	271	100%

Miller Research analysis of consultation responses

4.191 Themes emerging in the organisation responses to Question 13d broadly aligned with the views expressed in the individual responses.

These included:

- support for restricting the transfer of entitlements within many environment and third sector responses, as they believed this would align entitlements with the delivery of environmental benefits
- the belief that the proposed restrictions would ensure subsidies would be directed towards "active farmers" rather than traded as commodities was expressed by many third sector responses
- opposition to restrictions from the majority of farming sector, private sector and food and timber supply chain responses, due to concerns that they would limit the flexibility of businesses and act as a barrier for new entrants. One farming organisation stated that "in the transition years it is a tool for change to be feasible for those leaving and staying."



**Question 14: We would like to know your views on our proposed approach to secondary legislation, which will support BPS and the introduction of support schemes under the powers in the Agriculture (Wales) Act 2023.**

**Summary of proposals**

The SFS Consultation document set out the intention of the Welsh Government to pass secondary legislation to establish a single Regulation in support of the SFS, capturing all regulation powers required to support the scheme and any future support schemes. The Regulation is a legal requirement of the Agriculture (Wales) Act 2023, and will provide the legal basis to effectively operate and administer support schemes, such as the SFS, to monitor against the purposes for which support was given, as well as enforce compliance, and investigate suspected non-compliance.

**Qualitative analysis**

- 4.192 Many responses interpreted the proposals as a potential increase in “red tape” expressing concern that this may lead to additional paperwork and perceiving that it will create barriers to entry of the Scheme.
- 4.193 Many responses expressed a preference for streamlined processes and less regulation with the perception that any increases in administrative work would disproportionately affect smaller farms.
- 4.194 Many responses highlighted that they needed clearer and more detailed information for what many anticipated to be a “complicated” Scheme. Many responses expressed that they had not received enough information on the topic of this question to provide a considered answer.
- 4.195 Some responses were concerned that they lacked the understanding of the legal and legislative process of creating secondary legislation, and potential implications for the sector, to effectively answer this question.

- 4.196 Finally, some responses indicated that there was a perceived disconnect between the Welsh Government and the rural farming population, relating to legislation. There was a perception that legislation does not consider what is best for farming and lacks relevance.

### Organisation responses

- 4.197 Themes emerging in the organisation responses to Question 14 broadly aligned with the individual responses. These include:
- a lack of certainty and a perceived lack of information to provide comment was expressed across all sectors
  - the desire that secondary legislation should be simple and proportional to the issues was expressed by some farming sector responses. One farming organisation stated that they support “the concept of simplified regulation which makes it easier for farmers and land managers to understand and comply and enables efficient and minimal administration, monitoring and reporting.”

**Question 15: Economic analysis and modelling will conclude in 2024 and will provide evidence to inform the final decision on Scheme implementation by Welsh Ministers. We would like to know your views on the existing analysis and evidence required.**

Qualitative analysis

Job losses in the agriculture sector

4.198 The majority of responses noted that the modelling and evidence currently presented on the SFS were a cause for concern for those working in the rural economy. The economic analysis presented figures relating to potential changes to on-farm labour requirements resulting from the Universal Actions, which were subsequently interpreted as a projection of 5,500 jobs lost. Many of these responses expressed concern over the potential scale of job losses, and questioned what mitigatory measures had been undertaken, and how the SFS has been adjusted according to these insights.

Impact on rural communities

4.199 Many responses were concerned about the effect of the potential reduction of rural workers would have on rural communities, with a few citing other pressures such as a reducing population of young people and mental health concerns amongst farmers.

Accuracy of modelling

4.200 Many responses questioned the methodology and accuracy of modelling, expressing a concern about the transparency or reliability in the information that had been provided. These included, in order of frequency:

- concerns that figures have been manipulated
- belief that the evidence was flawed
- the unreliability of economic modelling

- the suspicion of biased modelling felt to be tailored to fit proposals.

4.201 In addition, some also felt that modelling had not fully captured the complexities and scope of potential impacts. The elements that responses perceived as not adequately captured included (in order of frequency):

- impact on ancillary industries and wider rural economy
- perceived non-quantifiable issues such as community resilience and wellbeing, and wider rural community
- potential global impacts / scale
- the variations in impacts across business models and farm type
- cost volatility
- the value of biodiversity.

4.202 Many responses suggested alternative approaches to modelling, a majority of these wished to see modelling that was reflected by the most relevant and up-to-date figures.

### Organisation responses

4.203 Themes emerging in the organisation responses to Question 15 aligned with varied and diverse views expressed in the individual responses. These included:

- concerns about the economic analysis were expressed by the majority of responses from the farming sector and food and timber supply chain, as well as some environmental organisations, due to the perception that the Scheme would reduce the number of jobs in the sector by 5,500. An environmental organisation stated: “The Welsh Government’s modelling on the project decline in farming jobs needs to be addressed and a more thorough assessment of the Sustainable Farming Scheme and its impact on farming made. Further

analysis is needed on the impact of the Sustainable Farming Scheme on the wider rural economy. This would include assessing the increase in employment opportunities in the diversification of farming activities into woodland management, nature-based tourism due to nature's recovery and horticultural expansion”

- proposals to include potential cost savings from environmental actions such as flood alleviation, carbon storage and improvements to water quality were put forward by many environmental and third sector responses who felt this would better represent the wider impacts of the Scheme.

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

Qualitative analysis

4.204 Responses to this question focused on the requirements of ongoing monitoring and scheme evaluation with suggestions for data collection for indicators that measure the environmental, economic, and social impacts of the Scheme.

Ongoing monitoring

4.205 Responses were split regarding the ideal approach to ongoing monitoring with some responses favouring self-assessment by farmers and other responses opposing self-assessment. Many of the responses that favoured self-assessment did so due to the concerns about the impact inspections may have on farmers wellbeing. Some responses suggested that self-assessment would be a more cost-effective approach to monitoring. However, some responses opposed self-assessment, instead favouring audits by trained personnel including veterinary declarations. A few responses suggested audits could be conducted by Welsh Government staff through unannounced inspections and site visits. Many responses emphasised the reduction of administrative processes and the desire to streamline the monitoring process for farmers.

4.206 Self-assessment was raised in a few responses with divergent views on geotagging. Many of those responses described geotagging as inaccessible, although some suggested it would help streamline monitoring and the “administrative burden” on farmers. While some responses suggested that monitoring should make use of data that already exists, a small number also felt that if additional data is required, a financial incentive could be provided to farmers for uploading information and photographic evidence.

4.207 Some responses suggested the Scheme will require a governing body to monitor it. Among these responses were suggestions for ongoing steering and feedback from farming unions and farmers. Many responses suggested that diverse stakeholder involvement should support any ongoing monitoring framework. Some responses urged that monitoring proposals should be practical and take a tailorable approach, noting that each farm has different attributes which need to be recognised.

#### Environmental indicators

4.208 Some responses suggested evidence that would be required under the SFS to show progress in improving biodiversity and establishing habitats to assess the Scheme's success. These include (listed in order of frequency):

- water quality
- air quality
- soil health
- fertiliser and chemical use
- increased numbers of existing species
- impact of the badger population and TB.
- species re-introduced.

4.209 Many responses discussed carbon calculation with mixed views on its effectiveness in monitoring the impacts of the Scheme.

#### Economic indicators

4.210 Many responses suggested that, due to concerns about the effect of the Scheme on farm viability, the ongoing monitoring activities should include economic indicators. These include, in order of frequency:

- yield data on food production
- food import data
- food prices

- farm business profitability
- Welsh agricultural output
- expenditure by farmers in the rural economy
- employment statistics
- economic sustainability assessment
- livestock numbers.

### Social indicators

4.211 Many responses expressed concerns about the potential effect of the Scheme on the wellbeing of farmers and farming communities. These responses suggested that the Scheme monitoring should include social and health indicators including, in order of frequency:

- farmer wellbeing and mental health
- average farmer age (in relation to understanding the success of support for young farmers/new entrants)
- wider impact on the Welsh language
- community cohesion and cultural preservation
- poverty and deprivation.

### Overall evaluation

4.212 For an effective evaluation of the Scheme, many responses suggested a baseline assessment of the current farming landscape related to food provision, land management, and existing habitat. They suggested that this would allow the evaluation to clearly demonstrate the impact of the Scheme.

4.213 Many responses also recommended the use of robust and established evaluation methods including Value for Money assessment, counterfactual assessment, Economic Impact Assessment, rural impact assessment, and SMART targets.



4.214 Further, some responses suggested the evaluation should focus on tracking environmental changes to capture whether the Scheme is delivering for biodiversity, and the ability of farmers to continue growing local food. Some responses stated that any evaluation of the SFS should look at the wider industry and the health of rural communities, monitoring changes in the number and size of farms, rural depopulation, and the effects on other community services with links to the agricultural sector.

### Organisation responses

- 4.215 Themes emerging in the organisation responses to Question 16 broadly aligned with the individual responses. These included:
- recommendations to include ecological surveys from many environmental organisations, to build an evidence base that can be used to evaluate the effectiveness of the Scheme. This was to address the suggestion that existing habitat maps and data was outdated, a sentiment supported by some farming sector responses
  - calls for robust and scientific monitoring and evaluation of the Scheme from many public, environmental and third sector organisations. One environmental organisation stated that “the framework of the Integrated Impact Assessment provides a comprehensive backdrop to specific monitoring and evaluation methodologies that would provide useful evidence”
  - concerns around data privacy, and the need for a tailored approach depending on farm type and action from many farming sector, food and timber supply chain organisations.

**Question 17 (i): 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.**

#### Qualitative analysis

4.216 The majority of responses suggested that the Scheme would have an adverse effect on the Welsh language. Many responses stated the Scheme had the potential to cause a decline in the number of Welsh speakers. This was linked by some responses to the close relationship between farming and the Welsh language:

“The Welsh language thrives in farming simply because we speak it naturally. If farming is allowed to decline not only traditional skills but also age old terms and words, communities and an [sic] unique culture will disappear.” [Sheep farmer]

4.217 Another link expressed by a few responses was the potential impact of the Scheme on young people in rural areas and the concern that this may have a knock-on effect on the future of the Welsh language. This was closely related to the potential economic impact of the Scheme, with a few responses concerned more widely about the future of rural communities and the Welsh language:

“[T]he language will never recover from this scheme as it affects the population in rural [W]ales where [W]elsh is spoken.” [Sheep farmer]

4.218 Very few responses felt that the SFS would have no impact on the language, with these responses not giving a justification for this view.

## Organisation responses

- 4.219 Themes emerging in the organisation responses to Question 17(i) aligned with the diverse views expressed in the individual responses. This included the view that the Scheme will have a detrimental effect on the Welsh language, which was expressed by many responses from the farming sector due to the perception that small scale farming and agricultural communities act as Welsh speaking hubs that could be negatively affected by the Scheme. One third sector response stated: “Given the very strong link between farming and the Welsh language in some parts of the country, any reduction in the number of people working in the agricultural sector could have an impact on the use of the language and related rural services”.

**Question 17 (ii): Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?**

Qualitative analysis

4.220 The majority of responses did not answer this question having addressed the issue in the previous question. Of those who did the majority of responses emphasised that the SFS needed to be delivered bilingually.

Organisation responses

- 4.221 Themes emerging in the organisation responses aligned with the individual responses. These included:
- the need for the Scheme to be delivered bilingually which was expressed by many responses from all sectors. One third sector response said: “The availability of advisory services and guidance in Welsh is crucial. Welsh is particularly necessary for face-to-face contact, and increasing dependence on on-line information and communication should not be allowed to erode the use of Welsh”.
  - the opportunity to further the traditional link between the Welsh language and nature was suggested by some environmental sector responses. One response argued that: “we could see the language expand beyond the farming sector where it is currently marginalised, and appeal to new learners of all backgrounds.”

**Question 18: 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?**

#### Qualitative analysis

- 4.222 The most common point raised in many responses was a recommendation that all support and information be made available bilingually. While most of these stated the principle in abstract that both languages be made available, some specified that “resources,” “information,” and “communications” be in both English and Welsh.
- 4.223 Many responses centred on the need to change the proposed SFS to better support farmers and therefore avoid negative effects on the Welsh language. The majority of these points referred specifically to the need to maintain rural economies and farming businesses, and the responses set out their belief that the SFS was not able to do this:
- “It’s simple – design a SFS that enables farming businesses and, in turn, rural communities to survive and thrive, and so too will the Welsh language!” [Individual in food and timber]

#### Organisation responses

- 4.224 Themes emerging in the organisation responses to Question 18 aligned with the individual responses. These included:
- Suggested amendments, such as the removal of the woodland requirement, were raised by many farming sector responses who felt that this would support small scale farmers who often are Welsh speaking.

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

Qualitative analysis

4.225 Many responses to this question focused on themes which have been raised throughout the consultation, these include:

- the complexity of the Scheme and need for clarity and guidance
- calls for a focus on food security and food production
- the Scheme as a perceived threat to rural life
- opposition to the woodland and habitat requirements
- the need to accommodate the diversity of farms.

4.226 The only theme raised in this question that was not covered extensively elsewhere was concerns about the consultation process itself. Many responses suggested that the consultation process and the consultation document were not accessibly written or easily understood, making it hard to complete. Some responses expressed support for engaging directly with farmers through their unions to develop a “more suitable” scheme.

Organisation responses

4.227 Themes emerging in the organisation responses to Question 19 broadly aligned with diverse and varied views expressed in the individual responses and throughout the consultation. These included:

- improved communication of the woodland and habitat requirements including additional information was suggested by some environmental and forestry responses. They suggested that farmers were unaware of the benefits and opportunities these proposals would provide

- concern over a perceived lack of focus on SSSI land management from some environmental sector organisations who felt SSSI owners/occupiers and common graziers needed access to support
- prioritisation of collaboration generally, and the Optional and Collaborative Actions was stressed by many environmental, third and farming sector responses who suggested that prompt roll out of these parts of the Scheme was essential for supporting the sector and the delivery of environmental goods.

## 5. Non-standard responses

### Individuals

5.1 This section presents the analysis of the 463 unstructured or partially structured responses submitted by individuals, which did not follow the consultation questionnaire format. The themes that emerged in these responses are broadly aligned with those presented throughout the summary of the standard responses. The most prominent themes were as follows:

- many responses identified a perceived increase in bureaucracy in the Scheme generally, as well as duplication of administration between the SFS and existing accreditation schemes
- many responses were concerned about the potential for a disproportionate impact of Universal Actions on specific farm types, particularly small dairy farms and organic farms, as well as small farms generally
- many responses expressed opposition to the woodland and habitat requirements as they are perceived to be a barrier to entry to the Scheme. However, some responses supported these requirements due to perceived benefits to biodiversity and addressing climate change
- in addition to support for the woodland and habitat requirements, some responses were supportive of the Scheme proposals, as they thought it would support farmers to improve the sustainability of the agriculture sector
- many responses expressed concerns around the payment rates and a perceived lack of detail in the consultation. Some responses also suggested that there was a lack of transparency around payment rate calculations. One response stated: “WG should have announced payment rates sooner so businesses can properly prepare”



- many responses suggested there was a disconnect between the Welsh Government's policy and the reality of farming. Some responses were concerned that Welsh Government policy, including the Scheme proposals, was negatively affecting farmers' mental health. One response summarised this disconnect stating: "The generational knowledge of Welsh land, agriculture and nature have been ignored in this consultation. Farmers and their expertise should have been central to the SFS proposal to ensure its successes for the rural communities, food security and the environment."

## Organisations

5.2 This section presents the analysis of the 104 unstructured or partially structured responses submitted by organisations that did not follow the consultation questionnaire format. The themes that emerged in these responses broadly aligned with those presented throughout the summary of the standard responses. These themes, and the sectors associated with them were as follows:

- support for the Scheme's aims and commitments to sustainability was expressed by many responses from the public sector, private sector, water sector, third sector and environmental sector. One environmental sector organisation welcomed "the proposals for the Sustainable Farming Scheme and its use of public money to support farmers to produce food sustainably and tackle the nature and climate emergencies"
- concerns about the potential for the Scheme to place additional administrative burdens on farmers was expressed by the majority of the farming sector organisations, and many responses from the veterinary sector as well. Farming Unions and veterinary representatives noted concerns about increase and duplication of reporting, with a veterinary sector organisation stating: "We are concerned that the expectation on

livestock farmers to complete, document and evidence the universal actions across the board will mean they lose focus on the essential health and welfare sections, which will take more time and effort than the proposals suggest. This could lead to poor welfare outcomes for both the farmed animals and wildlife”

- concerns about the potential economic impact of the SFS on farms and farm viability were highlighted by the majority of responses from the farming sector, private sector and the food and timber supply chain, as well as many public and third sector responses with the economic modelling and the woodland and habitat requirements frequently raised
- the importance of ensuring sufficient financial support to safeguard farm viability, reduce anxiety and compensate farmers sufficiently for completion of the Universal Actions was raised by many responses from the farming sector, water sector and environment sector
- the need for “farmers to be on board” was emphasised by many responses from the public sector, third sector and environment sector with suggestions that communication with farmers was crucial and could be improved. An environmental sector organisation stated “To be less than a year from launching the Scheme and for payment rates to be unavailable is highly concerning. We want to see this Scheme succeed, but farmers cannot plan to participate if they don’t know what their income under the Scheme will be. Recent rates under the Habitats Wales Scheme have not given farmers confidence that the Sustainable Farming Scheme will be economically viable for them, and this is a key driver of resistance to the Scheme’s requirements”
- disappointment at the perceived minor role of food production in the Scheme as well as concerns about the negative implications of the Scheme for the future of food production in Wales was

raised in the majority of responses from the farming sector and food and timber supply chain. A farming sector organisation stated “It is also clear that resource efficient and resilient domestic food production plays an important role in limiting our global ecological footprint and displacing the environmental and carbon leakage impacts of food supply to overseas, where environmental, animal health and welfare and social standards such as worker pay and conditions are often lower”

- support for the woodland and habitat requirements was expressed by many responses from the public sector, third sector and environmental sector. One response from the public sector suggested that the proposed increase in current levels of woodland and habitat would require a 3% change of land use, whilst another opposed it as they interpreted that the requirements would result in a 20% land use change
- opposition to the woodland and habitat requirements came from many of the responses from the private sector, food and timber supply chain and farming sector, who interpreted that the requirements would result in a 20% land use change
- disappointment at the delays to the launch of the Optional and Collaborative layers of the Scheme were expressed in responses from the environment and water sectors due to the perceived importance of these layers for conservation and environmental improvement
- support for the Animal Health and Welfare proposals was expressed by the majority of responses from the veterinary sector, the third sector and the farming sector. Nonetheless, many of these responses expressed concerns about the impact of other Universal Actions such as the inclusion of ponds and scrapes as well as a perceived insufficient level of attention Animal Health and Welfare proposals received in the Scheme as a whole

- emphasis on the importance of improving public rights of way was made in many responses from the third sector while many farming sector organisations expressed concern about the biosecurity implications of public rights of way
- the importance of ensuring that a wide variety of landscapes could be incorporated into the Scheme, as well as caution over the potential negative impacts of inappropriate habitat management and tree planting was expressed by the majority of environment sector responses.

## 6. Campaigns

- 6.1 This section provides a thematic analysis of the seven campaigns that the consultation received.

### Campaign for National Parks

- 6.2 The Campaign for National Parks facilitated a campaign response to the SFS consultation to enable individuals to provide their feedback on the SFS.

#### Campaign statistics

- 6.3 The Campaign for National Parks campaign obtained a total of 96 responses with 2 submitted in Welsh.

#### Campaign themes

- 6.4 Three of the consultation questions were answered as part of the campaign response (Questions 1, 2, and 12).
- 6.5 In answer to Question 1, the campaign response recommended the inclusion of a 'Sustainable Farming in Designated Landscapes' programme in conjunction with appropriate resourcing to help meet the target of conserving 30% of the land for nature by 2030.
- 6.6 In response to Question 2, the campaign responses supported the principle of the Scheme requirements but suggested the inclusion of dry-stone walls and hedgerows in the 10% wildlife habitat threshold.
- 6.7 In response to Question 12, the campaign response explained that it is difficult to prioritise any potential Optional or Collaborative Actions, asserting they all have the potential to make significant improvements to the landscape when applied in the right place.

### Individual contributions

- 6.8 Individuals responding through the campaign were given the opportunity to add their own contribution in addition to the campaign text. These responses expressed support for encouraging farmers to take positive action to tackle the “climate and nature crisis.”

### Farmers Union of Wales

- 6.9 Farmers Union of Wales (FUW) organised a formal campaign response to the SFS consultation to enable supporters to highlight their position on the SFS.

### Campaign statistics

- 6.10 The campaign obtained a total of 924 responses, 84% of which were in English and 16% were in Welsh.

### Campaign themes

#### Funding

- 6.11 The campaign noted that, following the UK leaving the European Union, Welsh agriculture now relies on replacement funds from the UK and Welsh governments. The campaign stated that this has resulted in around £250 million less in funding being available between 2019 and 2025.

#### Payments

- 6.12 The campaign stated that it is crucial to ensure the Universal Baseline Payment offers stability and meaningful income, while recognising environmental and social contributions of farming.

#### Food Production

- 6.13 The campaign stated that the SFS needs to prioritise ensuring a stable supply of high-quality food from Welsh family farms,

emphasising the importance of maintaining and strengthening food self-sufficiency.

### Accessibility

6.14 The campaign stated that Scheme rules must be feasible and not create barriers to entry. The 10% tree cover requirement was described as a potential entry barrier, which could also impact farm output and land value. It was suggested that the practicality and relevance of proposed actions, like mandatory CPD modules, need careful consideration to align with farming realities.

### Modelling

6.15 The FUW campaign highlighted the Welsh Government's modelling assessment on various payment rates which simulated significant reductions in Farm Business Income (FBI), livestock units and on-farm labour requirements.

### Individual contributions

6.16 Individuals responding through the campaign were given the opportunity to add their own contribution in addition to the campaign text. The themes emerging from these contributions were aligned with those present throughout the consultation, including:

- the majority of responses opposed the woodland and habitat requirements due to the perception that it will require farmers to use “high grade land” to plant trees, with one response stating that “taking 10% of good agriculture land for planting trees is not acceptable. Farmers are food producers making us stock less livestock means less food produced along with 10% for habitat. Totalling 20% you are taking out of food production, as farmers we can not make our business work”
- the majority of responses expressed concern about the potential impacts of the SFS on food production with responses suggesting the Scheme would result in a fall in food production

and a “reliance” on food imports rather than promoting domestic food production

- many responses were concerned with a perceived increase in “administrative burden” alongside the potential mental health impacts of the Scheme with one response stating that “This could well cause mental health issues and strain on families”
- many responses highlighted the need for adequate payment rates to avoid negative economic impacts
- many responses described the Scheme as a “one-size-fits-all” approach and were concerned the policy does not reflect the reality of farming across Wales.

6.17 In addition to these themes, three others emerged which were less common in the wider consultation response. These were:

- a perceived lack of specific provision of support for young farmers and new entrants into the sector which many responses linked to the long-term viability of the sector
- the importance of the agriculture sector in rural life, including economic, cultural, linguistic and social contributions made by the sector
- many responses highlighted the current environmental contributions of farmers and suggested that these were not being recognised.

### **National Farmers Union Cymru**

6.18 National Farmers Union Cymru (NFU) organised a formal campaign response to the SFS consultation to allow supporters to highlight their position on the SFS.



### Campaign statistics

- 6.19 The NFU campaign obtained a total of 6,066 responses, with 91% received in English and 9% in Welsh.

### Campaign themes

- 6.20 The NFU campaign emphasised four key themes: food production, stability, active farmer support, and funding.

#### Food production

- 6.21 The campaign advocated for a scheme that prioritises food production in Wales. The Union argued that a robust domestic agricultural policy is essential to counter the fragility of global food supply chains.

#### Stability

- 6.22 NFU Cymru argued for the inclusion of a long-term stability mechanism within the SFS to support the production of safe, high-quality food and to support rural communities and job security.

#### Active farmer support

- 6.23 The NFU highlighted the need to ensure the Universal Baseline Layer of the SFS allows equal access for all active farmers, including tenant farmers and those with common land rights. The campaign highlighted concern regarding the Universal Actions, viewing these as potential barriers to farmer participation due to their effect on reducing land available for food production.

#### Funding

- 6.24 The campaign argued that the Universal Baseline Payment, proposed by the Welsh Government, should extend beyond compensating costs incurred and income foregone.

## Individual contributions

6.25 Individuals responding through the campaign were given the opportunity to add their own contribution in addition to the campaign text. The themes emerging from these contributions were aligned with those present throughout the consultation, including:

- the majority of responses expressed concerns that the Scheme would have a negative impact on farm viability with references to the economic modelling conducted, and the perceived impact of “taking 20% of land out of production”
- many responses highlighted the importance of farms in rural communities due to their economic, social, and linguistic contribution, represented by this response “I believe that without agriculture most of our rural communities will vanish”. Responses particularly suggested that any negative effect the Scheme may have on farms will negatively impact the Welsh language
- many responses expressed the perception that small farms would be disproportionately affected due to their dependence on BPS as a form of income subsidy, the perceived benefits of economies of scale, and the interpretation that all farms will have the same additional administration which will impact farmers who do not have access to additional labour
- some responses highlighted the potential negative effects on farmer mental health with one response stating that “The mental strain all this has put on us is unbelievable but no one has yet calculated the strain it is putting on the generations to follow as they listen to all this uncertainty and the kitchen talks where families are wondering how they can survive without being able to plan for their own futures let alone their children”
- many responses highlighted the importance of food production for the Welsh economy and food security with the term “no farmers, no food” quoted repeatedly

- the majority of responses opposed the woodland and habitat requirements due to a number of reasons including expected land devaluation, loss of productive land, impracticability and perceived lack of suitable land. Responses stated their identification primarily as food producers as opposed to conservationists, with one response stating: “Farming to me means to produce food and to feed the people”
- many responses discussed farmers’ relationship with government, including dependence on government income streams, Welsh Government data collection and handling, and a perceived lack of transparency on payment structures
- a small number of responses supported a move towards more sustainable farming and emphasised the need for adequate incentives.

### **The Landworkers’ Alliance**

6.26 The Landworkers’ Alliance organised a campaign response to the SFS consultation.

#### Campaign statistics

6.27 The campaign obtained 24 responses, four of which were received in Welsh.

#### Campaign themes

6.28 Key points included advocating for amendments to the Universal Baseline Payment to ensure fairness for small farms, promoting specific support for horticulture, timely implementation of Optional and Collaborative Actions, and adequate funding for the transition to sustainable farming practices in Wales.

## **Tir Natur**

- 6.29 The charity Tir Natur organised a campaign response to the SFS consultation.

### Campaign statistics

- 6.30 The campaign obtained a total of 55 responses, one of which was received in Welsh.

### Campaign themes

- 6.31 The campaign highlighted that nature in Wales is in “crisis” and attributed much of the decline to unsustainable farming practices. It identified the SFS as a pivotal opportunity to reverse these trends, stressing the importance of reshaping farming practices to align with sustainability objectives. Central themes included the promotion of natural processes over traditional habitat management, the necessity of achieving SLM objectives, and the significance of collaboration between farmers for landscape-scale ecosystem restoration. Additionally, it underscored the role of the SFS in mitigating climate change and its potential to bring cultural and community benefits to Wales.

## **Wales Federation of Young Farmers Clubs**

- 6.32 The Wales Federation of Young Farmers Clubs (YFC) shared a survey with its members and submitted the results as a collective.

### Campaign statistics

- 6.33 The survey received 358 complete responses, of which 62% were received in English and 38% were in Welsh.

## Campaign themes

- 6.34 Responses perceived that wider economic activity is supported by farms and the products and services that are delivered beyond the farm gate in their local communities. The majority of responses conveyed a deep connection with farming as a way of life. They put forward the sense of belonging to a heritage and tradition of managing the land that has existed for centuries.
- 6.35 Question 5 of the YFC survey asked "Will the Sustainable Farming Scheme have a positive or negative effect on your business?"
- 6.36 Overall, 343 responses stated that the SFS would have a negative effect on their business and 15 stated that the SFS would have a positive effect on their business.
- 6.37 Question 6 of the YFC survey asked "Explain what effects will the proposed scheme have on your business?"
- 6.38 The YFC responses expressed concerns about losing grazing land due to Scheme requirements. Many responses to the survey suggested that:
- the Scheme will limit productivity
  - planting trees on their land will not be viable
  - they will need significant training to fulfil the requirements
  - the Scheme will lead to a loss of income
  - the proposals have led to an increase in stress.
- 6.39 Question 7 of the YFC survey asked "If the Scheme is approved in its current form, will you have to consider diversification?"
- 6.40 Overall, 208 responses indicated that they would have to consider further diversification and review their existing business model in light of the SFS.
- 6.41 Many responses that indicated they would explore further diversification claimed they would not have a choice but to diversify if the SFS proposals go ahead in their current form. These responses

stated they will have to scope out new options for diversification or risk losing their farm or leaving the sector altogether.

6.42 Many responses suggested they would need to diversify into tourism and hospitality or seek additional employment either within agriculture or in other sectors. Several responses mentioned renewable energy production or moving into the production of different produce as potential diversification opportunities.

6.43 Many responses noted that they had already made substantial movement towards diversification to manage the financial future of their farm, but would need to review their business model considering the potential financial implications of the SFS.

However, many responses raised barriers to diversification, including:

- limited capital
- the nature of the land making it unsuitable for alternative uses
- planning restrictions due to SSSI designation or National Park status
- tenancy restrictions on what the land can be used for and changes to existing buildings

Question 10 of the YFC survey gave the responses the opportunity to provide any further comments.

6.44 Themes emerging from this question were aligned with those present throughout the consultation, including:

- the importance of food production
- the need to support the next generation of farmers
- opposition to the woodland and habitat requirements
- additional costs of requirements
- impact on the mental health of farmers
- impact on rural communities and the Welsh Language.

## **Wildlife Trust Wales and the World Wide Fund for Nature Cymru**

6.45 The Wildlife Trust Wales and the World Wide Fund for Nature Cymru (referred to in this section as WTW-WWF) responses submitted responses under one campaign.

### Campaign statistics

6.46 The WTW-WWF campaign obtained a total of 362 responses, 2 of which were submitted in Welsh.

### Campaign themes

6.47 The campaign responses addressed the following five categories.

- In response to Question 1 of the consultation, the campaign emphasised the need to ensure farmers are supported through appropriate finance and guidance and urged the implementation of the Optional and Collaborative Actions
- the campaign response supported the woodland and habitat requirements, to address the climate and nature emergencies (Questions 2,4, and 5). However, the campaign was concerned about the reliance on self-assessment and suggested that a set of environmental standards is needed for farmers not in the scheme. The campaign supported phasing out BPS as soon as possible to increase the budget for the Collaborative and Optional actions
- in response to Question 8, the campaign response was critical of the absence of National Minimum Standards alongside the Scheme and raised the importance of ensuring farmers comply with existing regulatory standards. It believed that the Scheme does not go far enough to protect standards
- the response emphasised that farmers need to be paid enough to ensure they can fully implement the Universal Actions

(Question 10). The response stressed the importance of phasing out the BPS and using the additional budget to support the Optional and Collaborative tiers

- the campaign response highlighted the importance of providing farmers with enough funding to seek professional advice when making changes (Questions 11,12,13).

### Individual contributions

6.48 Individuals responding through the WTW-WWF campaign were given the opportunity to add their own contribution in addition to the campaign text. The themes emerging from these contributions were:

- the need for additional legislation to protect hedgerows and the importance of hedgerows as a habitat and carbon sink
- the importance of education on sustainability practices and the need for funding to allow farmers to access it
- that more effort needs to be made to protect rivers and bodies of water
- that the SFS needs to place more emphasis on biodiversity with the need to “incentivising less intensive farming and taking a more biodiverse approach to managing the land.”



## 7. Sustainable Farming Scheme roadshows

7.1 The Welsh Government hosted 10 SFS Roadshows around Wales between 17 January and 14 February 2024. Welsh Government endeavoured, where possible, to arrange the roadshows such that there was an event within one hour of every farmer in Wales. The Roadshows were publicised through Gwlad Online, RPW Online, Welsh Government social media channels and via stakeholder networks.

7.2 There were around 3,200 attendees in total attending the 10 events. Table 7.1 shows an approximate breakdown of numbers at each event.

**Table 7.1: Approximate attendance figures at SFS roadshow events**

Date	Location	Approximate attendance
17-Jan-24	Caernarfon	210
18-Jan-24	Llangollen	205
22-Jan-24	Llandovery	340
24-Jan-24	Welshpool	270
30-Jan-24	Gwbert	260
31-Jan-24	Narberth	360
05-Feb-24	Raglan	270
06-Feb-24	Bridgend	185
09-Feb-24	Builth Wells	800
14-Feb-24	Machynlleth	300
	Total attendance	3,200

7.3 The roadshows were an opportunity for Welsh Government officials to explain the consultation proposals and answer questions. The roadshows were split between standardised presentations accompanied by question and answer sessions, and also more informal opportunities for attendees to talk directly to Welsh Government staff on an individual basis.

- 7.4 Welsh Government officials have advised that themes raised by roadshow attendees were broadly aligned with those identified in the thematic analysis of responses covered in this report.

## 8. Correspondence

- 8.1 Eighty emails sent in relation to the SFS, addressed to the then Minister for Rural Affairs, North Wales and Trefnydd, were analysed as correspondence. Of the correspondence, 73 were written in English and seven in Welsh.

### Thematic analysis

- 8.2 The themes emerging from the correspondence were aligned with those present throughout the consultation, including the following:
- many responses expressed opposition to the 10% woodland and habitat requirements, due to questions around their suitability to the variety of farms in Wales, the benefits of trees to carbon sequestration, and an interpretation that the requirements impinged on farmers' rights to make decisions on their farms. In addition, these requirements were commonly interpreted to mean a loss of 20% of productive farmland for each farm
  - the desire for a more supportive approach from the Welsh Government through allowing greater flexibility, financially supporting investments to make farms more sustainable, and allowing for collaboration between farmers to meet the requirements was expressed by many responses. A small number suggested alternative approaches to the woodland and habitats requirements, such as a licensing scheme
  - an interpretation of the financial implications of the proposals was common in the majority of responses and led to concerns about the financial viability of farms, with suggestions that the requirements will lead to increased labour and training costs, as well as the use of external consultants. In addition, concern about the potential financial implications of the proposals extended to the perception that payments for the Scheme would

not be sufficient. Concern was also expressed about how payments will be determined

- concerns around wider issues in the sector such as TB and The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021, (which farmers occasionally referred to as “nitrate vulnerable zones”), the impact of policies in the tourist sector such as a “tourist tax”, and supply issues with tree production and soil testing services. These were all raised as factors that may affect a farmer’s ability to undertake SFS actions and comply with Scheme rules
- a small number of responses supported the Scheme due to the perceived environmental benefits
- in addition to these themes, correspondence re-iterated themes such as the importance of food production, concerns about additional administration and concerns about the impact on the mental health of farmers as a result of the Scheme.