



Sustainable Farming Branch,
Countryside Policy Division,
Department for Rural Affairs,
Welsh Assembly Government,
Cathays Park,
Cardiff,
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By email: 08th September 2008

To: Edward.rees@wales.gsi.gov.uk

Dear Mr Rees

FARMING, FOOD AND COUNTRYSIDE - BUILDING A SECURE FUTURE

The three Welsh National Park Authorities - Brecon Beacons, Pembrokeshire Coast, and Snowdonia - are grateful for the opportunity to comment upon the above consultation.

The three independent Authorities collaborate under the name of the Welsh Association of National Park Authorities (WANPA). They work in partnership with each other and other external organisations to promote the interests of Wales' three National Parks.

The National Parks have two statutory purposes in the 1995 Environment Act:-

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- Promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

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In fulfilling these purposes, the National Park Authority has a duty to:-

- Seek to foster the economic and social well being of the local communities within the National Parks.

The 3 NPA of Wales agrees with the context and challenges set out in the consultation paper.

However, we draw your attention to a dilemma faced by Wales' NPs. The 2007 Welsh Assembly Government policy statement states, "*They are places that experiment with new approaches in sustainable development and environmental conservation, providing exemplars of best practice for wider Wales, and helping to shape and lead future rural policy and practice.*"¹

To this end we believe that farms and farm businesses within the NPs are crucial to the fulfilment of this policy direction and to the evolving conservation of these protected landscapes, i.e, that they are among Wales' most important farms. Yet the consultation states somewhat cryptically that there will be a "*likely withdrawal of farming from valued landscapes,*" which we interpret as a reduction in farm businesses within NPs. If this unwelcome eventuality occurs, it will place an increasing burden on the public purse to replace the conservation role played by the farming community.

We wish to offer comments on certain proposed actions, detailed arguments will be made when the relevant opportunities arise.

Stronger Connection to Markets

- Collaborative marketing – linkages need to be made to wider economic benefits of collaboration e.g. purchasing.
- Collaborative understanding is required between local communities and food producers, to develop local markets that are supportive of their local industries.
- Encouraging and supporting local food growing initiatives, such as the Powys Growers Group, increasing participation in allotments, market gardens and horticultural employment, all add to the community understanding of food production, easing the burden on farmers to 'produce everything' whilst supporting and consuming what they do provide.
- Scope to support and encourage village/community partnerships with farms, to buy a proportion of their produce each year.
- More business support for farm and food growers' supermarkets, providing a stable outlet for producers.
- Supply chain forum –environmental production standards be an inclusive part of that forum.

¹ <http://new.wales.gov.uk/depc/ecm/countryside-coastal-access/national-parks/NPpolicystatement-e.pdf?lang=en>

- Food tourism – wider linkages could be made with destinations and activities, we believe there is a mutually beneficial role for National Park Authorities to play in such a concept – the National Parks’ “Breathing Spaces” brand could be utilised in this regard.
- Food exports – all international trade will be affected by rising fuel costs, with buyers seeking the cheapest deal, which might have an adverse effect on Wales’ place in the overseas market, especially as Wales inevitably moves to higher quality, environmentally sustainable products. Therefore very strong home markets are essential.
- Local sourcing strategy – environmental standards of production should be integrated into an Action Plan and food from environmentally beneficial production systems needs to be differentiated e.g. Tir Gofal farms.
- Meat hygiene service charges. We concur that the charging regime disadvantages small abattoirs. We would argue that there are elements of public benefit in such a service and therefore a public private funding package could provide wider benefits and assists smaller abattoirs.
- Education – to include environmental production standards.

Sustaining Rural Communities

- We welcome the emphasis on rural development but suggest that the link between farming and rural communities has been weakened by modern, intensive and machine-reliant agriculture rather than people-reliant agriculture, i.e, farm-based employment and in return the contribution that farming makes to rural economies has declined. Higher costs of fuel, petro-chemicals and plastics will persuade farmers to re-examine what their land can produce with fewer inputs and more intensification and to limit production accordingly. Diversification and mixed farming appears likely to increase, with a requirement for more farm skills than livestock monocultures have required, so this may lead to more farm-based employment in future..

Sustainable and Profitable Production

- Emphasis is placed on Farming Connect – it needs to be defined how this service is to address local delivery and how it will integrate environmental management e.g National Park and NATURA 2000 designations in its delivery.
- Greater linkages will be required with Rural Inspectorate Wales and other statutory regulators for Farming Connect.
- With refinements and improvements to production methods, this could lead to an overall reduction in the area of land that is actively farmed. These areas will increase in importance for biodiversity as a consequence and can therefore be added to the areas that provide buffer zones and connectivity or biodiversity conservation in the wider countryside. Alternatively they might be planted as deciduous woodland or allowed to revert to this, to serve various purposes.

- The economic benefits from economies of scale (larger farms over several units) could undermine the role of National Parks to manage the interplay between people and their environment.
- Rising oil prices will reduce a farmer's profit margins through rising costs of fuel, petro-chemicals and plastics (e.g., silage wrap). Therefore advice provided might also incorporate energy audits, e.g. a ratio of energy consumed to energy produced per unit of product, with the aim of reducing the energy consumed.

Animal Health

- Animal health will also be affected by the longer, drier summers forecast as a consequence of climate change. For example livestock might require additional drinking water during periods of water shortage; who has priority, livestock or people? Prolonged droughts or heat waves might increase the incidence of heat stress or influence a farmer's desire for more indoor reared, air-conditioned stock, thereby undermining the value of extensive, grass-fed meat production and increasing energy consumption. Heat stress might also increase the incidence of aborted or underweight foetuses, leading to changes in the annual breeding and pasture cycles.

Sustainable Land Management

- We welcome the approach taken and the zones identified; water storage is also achievable in the uplands and moorland blanket bogs, likely on a larger scale than in the lowland floodplains.
- Catchment scale – we agree with proposals, however care should be taken to ensure that a proper holistic overview is taken of land management issues e.g. past management of riparian zones or woodland has allowed certain invasive species to establish and spread. Additional matters such as feral populations of goats, ponies and sheep need to be addressed.
- The targeted approach of future agri-environment schemes is welcomed but this will meet the massive, landscape scale expenditure required to address water conservation and soil carbon management. Has this been costed?
- Current scheme structure/delivery guidelines frustrate outputs e.g. £10k ceiling for invasive weed control.
- Strategic improvements to access routes - strategic routes which have economic significance should be considered for Axes II funding – both maintenance and investment.
- Organic farming – We agree in principle, however, where there is a local established invasive weed issue, it proves problematic, not only to that production unit but to adjoining land when non-organic control/eradication projects may be implemented.
- No acknowledgement of the potential of National Park Authorities in delivery. This is despite local empowerment being acknowledged as

one of the three tools to be developed to achieve the key objectives (page 3 of the consultation paper).

Innovation

- Renewable energy production – Welsh Assembly Government to consider the appropriateness/capacity of the current National Grid to enable the export of electricity from rural Wales.
- National Park Authorities are innovating – strong links are being developed in the Brecon Beacons National Park between a shift in uplands land management from offsetting reduced sheep production with water conservation, used to supply more profitable and reliable farm and village-scale hydro-electric power generation.

Thank you again for this opportunity to comment. If you have any queries please do not hesitate to contact me in the first instance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Greg Pycroft', with a long horizontal flourish extending to the right.

Greg Pycroft
Welsh Policy Officer

On behalf of:

Brecon Beacons National Park Authority
Pembrokeshire Coast National Park Authority
Snowdonia National Park Authority