

**The Vegan Society response to the Welsh Government consultation  
Brexit and our land: securing the future of Welsh farming.  
October 2018**

## **Question 1 of 20**

### ***From Chapter 4: Land Management Programme***

We propose a new Land Management Programme consisting of an Economic Resilience scheme and a Public Goods scheme. Do you agree these schemes are the best way to deliver against the principles?

1. Yes
2. No ✓
3. Unsure

If NO, what alternatives would be best?

Wales needs a future for life and land that challenges current economic dogma, “and truly integrates land use with our broader ambitions in the Wellbeing of Future Generations and Environment Acts<sup>1</sup>.”

The CAP BPS as a ‘payment for holding land’ is so inappropriate – ‘targetted’ to the wealthiest farmers – that it fails to even give all farmers a real living income.

It’s vital that measures are in place to ensure that land managers receive all the support which they need during in crises, no matter what happens to Common Market Organisation. This is because the land is irreplaceable, easy to damage, slow to repair, and the foundation of all life in Wales.

We support moving to financial investment in land-based, plant-based food, fibre, fuel and other activities, that is at least as generous as Governments give to non-food, non-land businesses. There are extensive social and community benefits in supporting land managers, which are a foundation to very significant environmental benefits, that will be felt from the remotest rural areas of Wales to the densest urban areas.

We support bringing forestry and other land managers into the Welsh Land Management programme, as part of a holistic vision of the relationships between land and life in Wales. Specific environmental priorities such as biodiversity, water quality, or carbon sequestration can *neither* be imposed by bureaucrats, *nor* left solely to the discretion of individual land managers. Rather, the whole community of people in Wales need to be involved in exploring and enacting the new land-life balance.

This must include urban life and land, and non-humans too. Advice and enabling support is needed by all the people who in turn give critical support to

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<sup>1</sup> p20 “Brexit and our land: Securing the future of Welsh farming” 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf) accessed ACB 2018/10/18)

land managers, both 'upstream and downstream' in society. There is no economy without a vibrant natural ecology.

The Wellbeing of Future Generations is not determined by current or future 'income per hectare'. A more reliable indicator is the wellbeing of current generations: Are young people secure within their communities, supported to become the land managers of tomorrow? Are our communities equitably supporting the older generations as well? Are we avoiding harm to the non-human animals sharing the land? Are we protecting and restoring the water, the soil, the networks of plant life, and all the other elements which make up the Welsh land and natural environment?

Land management as stewardship, as a vocation, as part of sustainable living cannot be reduced to 'businesses' which politicians expect to 'stand on their own two feet'. Life and the land are intimately co-dependent. It is right for those in society most able to give back to the land, to give back abundantly. What the land can do for us, is only one aspect of this question. What can we do for the land? Just as important, what can we do *differently* that is better for all? The vision must be, to enable all the residents of Wales – people, free-living animals, and currently farmed and domesticated animals – as well as the ecosystems within which we all live, to flourish for all time.

We urge Wales to build a new balance between respecting the natural activities of free-living animals, and all other aspects of land management. For example, fences can be used to discourage or encourage free-living grazing animals to stay out of new tree plantings, or visit and maintain permanent grassland habitats – rather than fences being used to exploit (farm) grazing animals.

A simply 'Organic' approach is not sufficient. For example, more is needed to protect water catchments – manure and slaughterhouse run-off from 'Organic' animal farming can still be highly polluting. We support minimising the use of 'pesticides', which aim to kill free-living animals, and herbicides, which damage the ecological balance. We call for the end of artificial breeding and farming of animals, for true protection of animals and their natural habitats.

Ending the farming of artificially bred ruminant animals, such as domesticated cattle and sheep, will allow for naturally breeding free-living grazing ruminants such as deer. This will improve animal welfare, reduce potential zoonotic disease hazards and help Wales to significantly reduce several major greenhouse gas emission levels and thus, reduce the national Carbon Footprint.

These are goals which 'world-leading' standards of 'animal health and welfare' need to include.

Good land management has no exploitative relationships. There needs to be environmentally, economically and ethically sustainable relationships between urban and rural people, people and non-human animals, and between people and the natural environment. In particular, Wales can lead the way in ethical relationships between land managers, other people, and the animals – including free-living, currently farmed, and other ‘domesticated’ animals - who share the land with us. ‘Farming’ animals should no longer be acceptable – the land managers can be supported to transition to plant-based, stock-free farming, forestry and other livelihoods through the Public Goods scheme. This plant-strong land management is another way for ‘*Cymru Wales*’ to demonstrate enduring shared values of wellbeing, environmental protection, avoiding harm to animals, and more.

## **Question 2 of 20**

### ***From Chapter 4: Land Management Programme***

Does the Welsh Government need to take action to ensure tenants can access new schemes?

1. Yes ✓
2. No
3. Unsure

If YES, what action would be best?

Tenant farmers, growers, foresters and other land-based workers are telling us, that it is vital to recognise tenants as land managers in their own right.

Full recognition of the work and support needs of tenants, and full access to new schemes for tenants, needs to be part of wider measures. Often, new land managers have not got the capital to buy land, so support for tenants can help new entrants to land management to get started.

Secure access to suitable land, and training in sustainable, equitable land management are vital too. These should be available to all communities and all people willing to be appropriate land managers.

### **Question 3 of 20**

#### ***From Chapter 5: Economic Resilience***

From your experience of current programmes, what do you feel would work well for the future?

The EU is currently a significant trading partner for Welsh land-based businesses. The economic resilience of land managers in Wales can be increased by supporting them to supply more of what Wales and the rest of the UK needs.

There is a clear need for more sustainable, healthy plant-based food for Wales and the UK. The British Dietetic Association and others recommend whole-foods plant centred diets for health and environmental sustainability, rich in pulses, grains, vegetables and fruits. Specialist crops such as mushrooms, traditional and new herbs and spices – such as garlic, chillis & Szechuan peppers – can potentially give higher margins than current common commodity crops.

Other plant-based fuel, pharmaceutical, construction and other products and raw materials are also fundamental to an environmentally sustainable UK economy.

Land managers in Wales need full support to make a secure transition to growing much more of the plant-based products which are best suited to Welsh conditions. Based upon the values of co-operation, collaboration and fairness between land managers and the rest of society, a new land and plant-based economy can be a vital part in economic resiliency for land managers in Wales. Improved stewardship of the Welsh natural environment will ensure that harvests are sustainable. Farming without farmed animals, known as 'stockless' and 'stock-free' farming, is an important area of development for a sustainable future for Wales.

An increasingly circular economy is needed, where we properly value those things we previously discarded as 'waste'. A circular economy is a truly regenerative system. Resource input and waste, emission, and energy leakage are all minimized by slowing, closing, and narrowing energy and material loops. Long-lasting design, proper maintenance, and repair, reuse, re-manufacturing, refurbishing, recycling, and upcycling are all important. Some land managers in the UK are already demonstrating these principles on plant-based, stock-free<sup>2</sup>, permaculture<sup>3</sup> and other farms<sup>4</sup>, market gardens<sup>5</sup> and agro-forestry projects<sup>6</sup>.

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<sup>2</sup> Stockfree Organic Services (<https://stockfreeorganic.net/stockfree-grower-to-grower-certification-facebook-scheme/> accessed ACB 2018/10/25)

<sup>3</sup> Aranya, Designed Visions (<https://www.designedvisions.co.uk/index.php/design-topmenu-78> accessed ACB 2018/10/25)

<sup>4</sup> Tolhurst Organic (<http://www.tolhurstorganic.co.uk/> accessed ACB 2018/10/25)

<sup>5</sup> Hall, J & Tolhurst, I (2010) *Growing Green – Organic Techniques for a Sustainable Future – Revised Edition* ISBN-13 978-0-9552225-1-1

<sup>6</sup> Crawford, M (various) The Agroforestry Research Trust <https://www.agroforestry.co.uk/product-category/publications/> (accessed ACB 2018/10/25)

## **Question 4 of 20**

### ***From Chapter 5: Economic Resilience***

Do you agree with the focus of the Economic Resilience scheme being on growing the market opportunities for products from the land throughout the supply chain, rather than restricting support to land management businesses only?

Yes.

## **Question 5 of 20**

### ***From Chapter 5: Economic Resilience***

Are the five proposed areas of support the right ones to improve economic resilience?

1. Yes
2. No ✓
3. Unsure

Are there any areas which should be included but currently are not?

The five proposed areas do not make clear the most important priorities. A Welsh Universal Basic Living Income would ensure economic resilience quickly, and through the transition to a fully sustainable Welsh land management system. The Welsh Government could reach every land manager through a Welsh Universal Basic Living Income<sup>7</sup> (WUBLI) scheme. Some important effects of this would be, to help keep land managers on the land, to encourage innovation and diversification, help new people to become land managers, and to support rural communities. WUBLI also has the potential to reduce the complexity of the Land Management Schemes, as well as simplifying and improving all social security and benefits delivery in Wales

We believe the following clarifications are also needed.

**Areas 2 & 5:** “Support will be given for the adoption of technology, tools and techniques that reduce the business’ carbon footprint and impact on natural resources as part of improvements in productivity.”<sup>8</sup>

To this end, the Welsh Government should urgently and pro-actively consult the experts in stockless and stock-free farming in Wales, and in those parts of the UK with similar resources and challenges to those in Wales. For example, Iain Tolhurst<sup>9</sup> is an expert advisor the Soil Association on stock-free horticulture, based on 20+ years working on 18 acres.

<sup>7</sup> Universal Basic Income (2018) <https://www.thersa.org/action-and-research/rsa-projects/economy-enterprise-manufacturing-folder/basic-income> (accessed ACB 2018/10/25)

<sup>8</sup> p 32 “Brexit and our land: Securing the future of Welsh farming” 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf) accessed ACB 2018/10/18)

<sup>9</sup> Iain Tolhurst, stock-free horticulturist <http://www.tolhurstorganic.co.uk/>

**Area 3:** “We expect many land managers will need to consider strengthening their income through diversification and as such we intend to prioritise support to achieve this.”<sup>10</sup>

Creating demand in Wales for major diversification of plant crops must be a priority. For example, where are the Welsh oat milk products, to rival the range of Oatly<sup>11</sup> from Sweden? Hodmedod<sup>12</sup> in England are pioneering the modern plant protein food chain, which Wales could build upon. Harlech was once the ‘hemp capital’ of the UK, and could lead a modern UK hemp food, oil and fibre industry alongside Good Hemp<sup>13</sup>. The potential market for Welsh grown hops and barley for Welsh brewed beer is another small example of this principle. The Welsh Government should specifically give financial support for a wider range of crop growing for modern uses. This would also support import substitution.

**Area 4:** The Welsh Government must take full responsibility for reducing the contributions of Welsh land management to climate change risks. This will include extending woodlands through fencing, natural succession and careful plantings on uplands to reduce catastrophic flooding. This will also mean transitioning away from the high greenhouse gas emissions which animal farming always causes.

## **Question 6 of 20**

### ***From Chapter 5: Economic Resilience***

Of the five proposed areas for support, which are the priorities, both in terms of funding, and the sequence of delivery? For example, are certain measures needed in advance of others?

Yes, measures stopping current serious harm should come first.

A Welsh Universal Basic Living Income would give land managers time and resources to adapt to future changes. It would also enable Welsh people to buy more of what Welsh land managers are selling. Economists have been making this case for decades, including Hayek<sup>14</sup> (1944).

Then, the transition away from the many harms of farming animals, toward innovative, sustainable plant-based land management should be prioritized. The policy recommendations of the New Economic Foundation<sup>15</sup> for the UK are to focus on plant protein crops (pulses such as split peas, grains such as oats, seeds such as hemp) to make this transition. These specific recommendations can be expanded to

<sup>10</sup> p 33 “Brexit and our land: Securing the future of Welsh farming” 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf) accessed ACB 2018/10/18)

<sup>11</sup> Oatly oat drinks, yoghurts and spreads <https://www.oatly.com/int/>

<sup>12</sup> Hodmedod British pulse & grain foods <https://hodmedods.co.uk/>

<sup>13</sup> Good Hemp drinks & foods <https://www.goodhempfood.com/>

<sup>14</sup> Hayek, F (1944) *The Road to Serfdom* Routledge (London) (2001 re-issue ISBN-13 978-0-415-25389-5)

<sup>15</sup> New Economics Foundation and The Vegan Society (2017) *Grow Green: Solutions for the Farm of the Future* <https://www.vegansociety.com/take-action/campaigns/grow-green> (accessed ACB 2018/10/23)

a wide range of desirable but currently under-used food and non-food crops:

**Subsidies:** Create a Protein Crops Aid Scheme.

**Entry:** Make protein crops a focus of a new farm entry scheme.

**Research:** Designate funding for the research and development of protein crops.

**Taxes:** Deduct farm subsidies to account for externalities in animal farming.

**Public procurement:** Increase the serving of plant proteins in public canteens.

**Decision-making processes:** Give a voice to a wider range of stakeholders.



## **Question 7 of 20**

### ***From Chapter 5: Economic Resilience***

Should we be investing in people, for example to bring in new ideas, skills and people into land management and the supply chain in Wales?

1. Yes ✓
2. No
3. Unsure

If YES, how should we look to do this?

A Welsh Universal Basic Living Income scheme will ensure people can support their local economy by purchasing their basic necessities of life. People who want to do so, will then be able to choose to move into land management and related supply chain work. For example, Welsh Government was advised in The Community Grown Food Action Plan (2010)<sup>16</sup> that many people in Wales are keen to be more involved in food growing, but need extra support to do so.

The Transition Network explored sustainable land management in the South West of England in “Can Totnes Feed Itself?”<sup>17</sup>. They concluded that far more people than currently will need live and work on the land to achieve a sustainable, healthy food supply and sustainable land management.

The UK has significant expertise in climate-friendly, sustainable stockless and stock-free growing. For example the Organic Research Centre<sup>18</sup>, and the Stock-Free Organic Services<sup>19</sup> organisation are working with farmers and researchers across the UK and beyond. The Welsh Government must invest in the land managers who can develop this set of techniques and skills for all the particular needs of Wales.

## **Question 8 of 20**

### ***From Chapter 6: Public Goods***

We have set out our proposed parameters for the public goods scheme. Are they appropriate?

1. Yes
2. No

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<sup>16</sup> Community Grown Food Action Plan (2010) <https://beta.gov.wales/sites/default/files/publications/2018-05/community-grown-food-action-plan.pdf> (accessed ACB 2018/10/23)

<sup>17</sup> Hopkins R, Thurstain-Goodwin M. and Fairlie S. (2009) *Can Totnes and District Feed Itself? Exploring the practicalities of food localisation*. <https://transitionculture.org/wp-content/uploads/cantotnesfeeditself1.pdf> (accessed ACB 2018/10/23)

<sup>18</sup> Preston, K *Management & sustainability of stockless organic arable and horticultural systems* (2008) [http://organicresearchcentre.com/manage/authincludes/article\\_uploads/iota/research-reviews/management-and-sustainability-of-stockless-organic-arable-and-horticultural-systems.pdf](http://organicresearchcentre.com/manage/authincludes/article_uploads/iota/research-reviews/management-and-sustainability-of-stockless-organic-arable-and-horticultural-systems.pdf)

<sup>19</sup> Hall, J & Tolhurst, I (2010) *Growing Green – Organic Techniques for a Sustainable Future – Revised Edition* ISBN-13 978-0-9552225-1-1

3. Unsure

Would you change anything?

1. Yes ✓

2. No

3. Unsure

If YES, what?

**Parameter 1: Scope of the scheme** Public health clearly should be within the scope. The market for sustainable, healthy food is not yet functioning. Many people who desire such food, cannot access it. Many land managers who wish to grow such food, cannot practically make the transition in their farming and other land management techniques. The Public Goods Scheme must support land managers to take all the steps to provide horticultural, arable, agro-forestry and other food crops in sustainable ways to support public health in Wales.

Moving toward plant-based farming, away from farming animals, can also support many other public goods such as the reduction of flood risks, climate change risks and soil erosion through allowing tree cover to return where saplings are currently grazed away. This too should be eligible for funding under Public Goods Scheme.

Creating sanctuaries for sheep, cattle and other previously farmed animals will fulfil public support for avoiding harm for animals, and support education about Welsh land management heritage and why it is evolving. Farmed animal sanctuaries should also be eligible for funding under Public Goods Scheme

The New Economic Foundation<sup>20</sup> policy recommendations for supporting land managers to specifically adopt plant protein crops (e.g. split peas & other pulses, oats & other grains, hemp & other seeds):

**Subsidies:** Create a Protein Crops Aid Scheme.

**Entry:** Make protein crops a focus of a new farm entry scheme.

**Research:** Designate funding for the research and development of protein crops.

**Taxes:** Deduct farm subsidies to account for externalities in animal farming.

**Public procurement:** Increase the serving of plant proteins in public canteens.

**Decision-making processes:** Give a voice to a wider range of stakeholders.

can be expanded to a wide range of desirable but underused food crops, to contribute to all these goals.

**Parameter 2: Open to all** The Public Goods Scheme should make clear that new entrants to land management are welcome. Fair access to land is also key.

**Parameter 3: Opportunities for action** Spatial mapping of public goods opportunities so far is certainly incomplete. This is because “the range public goods outcomes .. that arise as a consequence of existing natural features within the farm

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<sup>20</sup> New Economics Foundation and The Vegan Society (2017) Grow Green: Solutions for the Farm of the Future <https://www.vegansociety.com/take-action/campaigns/grow-green> (accessed ACB 2018/10/23)

boundary (for example, watercourses or habitat features)<sup>21</sup> is too narrowly defined, to current common practices only. The proposed principle, “that existing options must be taken up while potential options may be included at the land manager’s discretion.” needs to be re-visited – because the current common practices may not be the best options. Land managers must be able to choose alternative ways to provide public goods. One example may be, urgent restoration the former extensive natural woodland cover of Wales, in agro-forestry<sup>22</sup> schemes.

**Parameter 4: Evidence-based public goods** Some land managers have already been able to start exploring land management techniques, which are generally considered ‘innovative’ today. The public goods scheme must be flexible enough to include this kind of ‘action research’ from existing innovative land managers. Many vital public goods outcomes, such as restoring habitat for free-living animals, are intrinsically hard to ‘put a price on’. The scheme needs to recognize diverse forms of evidence, and give full financial support to ‘hard to price’ public goods.

**Parameter 5: Additionality** “An example of management additionality might be where open habitats will need to be intermittently grazed by animals to maintain or improve habitat resilience<sup>23</sup>.” The grazing animals mentioned should be free-living animals, who will periodically choose to visit the area, or rescued animals, who are enabled to graze by fence movement in their sanctuaries.

**Parameter 6:** The people who are Advisors for the Public Goods scheme must be equitably analyze all the relevant evidence. Therefore many of the Advisors must be people whose relevant expertise has, in the past, been unreasonably or unjustifiably ignored or excluded by land management policy makers. Laws, policies and practices tend to implicitly assume that what is ‘common’ is right. Land management laws, policies and practices must respect the ethical and legal public good of freedom<sup>24</sup> - for human and non-human beings alike. Two examples of common land management practices which it is vital to re-analyse are ‘animal farming’ and ‘pest control’.

We support the goal of this scheme to restore, protect and enhance the natural environment. This should include new, restored and conserved appropriate habitats for all the free-living animals of Wales. The concept of a ‘market solution’ is often not relevant. Ecological balance is life or death for free-living animals. So, the financial support available for land managers should not be limited by ‘the value society places upon’ such outcomes.

One significant factor in reducing greenhouse gas emissions will be, ceasing the

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<sup>21</sup> p 46 “Brexit and our land: Securing the future of Welsh farming” 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf) (accessed ACB 2018/10/25)

<sup>22</sup> Woodcock, H Learning from agroforestry experts (2016) <https://veganorganic.net/learning-from-agroforestry-experts/> (accessed ACB 2018/10/25)

<sup>23</sup> p 47 “Brexit and our land: Securing the future of Welsh farming” 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf) (accessed ACB 2018/10/25)

<sup>24</sup> Rowley, J and Baker, A C (2018) We reject human supremacy <https://www.vegansociety.com/whats-new/blog/we-reject-human-supremacy> (accessed ACB 2018/10/25)

artificial breeding of animals for farming. It is practical for methane, nitrous oxide and carbon dioxide emissions associated with ruminant digestive processes, manure management, and fossil fuels use to all be significantly reduced. Methane is particularly important as it can be around 20 times more powerful for greenhouse effects, but can cycle out of the atmosphere 10 times more quickly, than carbon dioxide<sup>25</sup>. So for the outcome, 'reduction of climate change risk', an output proxy could be tonnes of carbon dioxide equivalent emissions avoided, based upon average emissions per animal not bred.

Working in line with the Welsh Natural Resources Policy<sup>26</sup>, especially the national priority on nature-based solutions, is extremely important. Animals are not 'resources', and artificially breeding animals in farming is against 'nature-based solutions'. Instead, allowing free-living grazing animals to live in their natural grassland habitats, is a nature-based solution.

There are about 1200 registered commons in Wales<sup>27</sup>. The Public Goods Scheme must consider a wide range of uses for Commons, as agreed in the local community. These may range from allowing tree cover to re-establish, to ensuring access from free-living and rescued grazing animals, to enabling access to woodland for gathering timber.

We agree that the Public Goods and Economic Resilience Schemes must provide meaningful funding to land managers.

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<sup>25</sup> Garnett, T, Godde, C et al. (2017) Grazed and Confused <https://www.fcrn.org.uk/projects/grazed-and-confused> (accessed 2018/10/25)

<sup>26</sup> Natural Resources Policy (2017) The Welsh Government <https://gov.wales/topics/environmentcountryside/consmanagement/natural-resources-management/natural-resources-policy/?lang=en> (accessed ACB 2018/10/25)

<sup>27</sup> Welsh Commons, the Foundation for Common Land <http://www.foundationforcommonland.org.uk/commons/associations/wales> (accessed 2018/10/25)

## **Question 9 of 20**

### ***From Chapter 6: Public Goods***

This scheme is meant to offer land managers the opportunity to access a significant new income stream as the BPS comes to an end. How could we improve what is being proposed to attract land managers whilst still achieving our vision and objectives?

Create a Protein Aid Scheme, or a 'Sustainable, Healthy Plant Foods' Aid Scheme, to help greatly expand plant food based techniques for Welsh land managers.

The New Economic Foundation<sup>28</sup> policy recommendations for supporting land managers to specifically adopt plant protein crops (e.g. split peas & other pulses, oats & other grains, hemp & other seeds):

**Subsidies:** Create a Protein Crops Aid Scheme.

**Entry:** Make protein crops a focus of a new farm entry scheme.

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**Taxes:** Deduct farm subsidies to account for externalities in animal farming.

**Public procurement:** Increase the serving of plant proteins in public canteens.

**Decision-making processes:** Give a voice to a wider range of stakeholders.

can be expanded to a wide range of desirable but underused food crops.

The Community Grown Food Action Plan (2010)<sup>29</sup> advised The Welsh Government that many people in Wales are keen to be more involved in food growing, but need extra support to do so.

## **Question 10 of 20**

### ***From Chapter 6: Public Goods***

Are there any other Public Goods which you think should be supported?

1. Yes ✓
2. No
3. Unsure

If YES, why?

The vast majority of people, in Wales and beyond, believe that it is wrong to harm animals unnecessarily. It is both possible and practicable to transition to a more plant-based diet, supported by plant protein agriculture – thus, to move away from harming animals through farming them. The Welsh Government must support the public goods of 1) Public Health; and 2) Less and no harm to non-human beings.

## **Question 11 of 20**

<sup>28</sup> New Economics Foundation and The Vegan Society (2017) Grow Green: Solutions for the Farm of the Future <https://www.vegansociety.com/take-action/campaigns/grow-green> (accessed ACB 2018/10/23)

<sup>29</sup> Community Grown Food Action Plan (2010) <https://beta.gov.wales/sites/default/files/publications/2018-05/community-grown-food-action-plan.pdf> (accessed ACB 2018/10/23)

### ***From Chapter 6: Public Goods***

A number of public goods could potentially take several years, sometimes decades, to be fully realised. E.g. carbon sequestration through broad leaf trees. To deliver on these, land managers may need to enter into a long term contract. How do you see such agreements working? What do you see as the benefits or disadvantages to such agreements?

Agreements must be reliable, yet flexible. The Agreements will need to explicitly include shared underlying values. We also need to improve our shared understanding of the principles and specifics of what exactly are public goods.

### **Question 12 of 20**

#### ***From Chapter 6: Public Goods***

A collaborative approach to delivering public goods may in some instances provide better value for money than isolated activity. How could the scheme facilitate this approach? How could public and private bodies contribute to such partnerships?

We believe the evidence shows that collaborative approaches will almost always be best. There is always a geographically local community, and also, numerous communities of interest, including non-human beings.

Therefore, members of all these communities will need to be involved to bring ethical values, skills, knowledge, resources and support to the land managers. What The New Economics Foundation Grow Green: Solutions for the Farm of the Future<sup>30</sup> report calls 'Giv[ing] a voice to a wider range of stakeholders [in] decision-making processes' is one part of collaboration.

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<sup>30</sup> New Economics Foundation and The Vegan Society (2017) Grow Green: Solutions for the Farm of the Future <https://www.vegansociety.com/take-action/campaigns/grow-green> (accessed ACB 2018/10/23)

### **Question 13 of 20**

#### ***From Chapter 6: Public Goods***

Some actions can deliver multiple public goods in the same location. For example, peat bog restoration can have benefits for carbon sequestration and flood risk reduction. However, some locations could be suitable for multiple public goods from different activities. For example, one location may be suitable to either plant trees for carbon sequestration, or to revert to wetland for biodiversity. How could locations for single, multiple or competing benefits be prioritised?

Firstly, a robust ethical basis of 'benefit' needs to be developed and adopted. Then, the key questions - exactly who benefits, and how, and who has the greatest and most urgent needs - can be fully analysed for each option.

Also, complex solutions may be necessary – perhaps the location could be allowed to become a semi-natural boggy woodland for both carbon sequestration and biodiversity?

### **Question 14 of 20**

#### ***From Chapter 6: Public Goods***

Given that support for the delivery of public goods will be a new approach in Wales, there will be a requirement for a significant amount of training and advice for the sector. How best could this training and advice be delivered? Which areas of the sector need the most attention?

Land managers who are currently locked into farming animals will urgently need training and advice. The New Economic Foundation<sup>31</sup> report, 'Grow Green: Solutions for the Farm of the Future' reviews the motivations for the transition toward plant-base land management, and makes policy suggestions.

The Welsh Government could reach every land manager through a Welsh Universal Basic Living Income<sup>32</sup> (WUBLI) scheme. This would help keep land managers on the land whilst they re-train and review their techniques, and help them to innovate and diversify. WUBLI would also help new people to become land managers, and to support rural communities during the Welsh Land Management transition.

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<sup>31</sup> New Economics Foundation and The Vegan Society (2017) Grow Green: Solutions for the Farm of the Future <https://www.vegansociety.com/take-action/campaigns/grow-green> (accessed ACB 2018/10/23)

<sup>32</sup> Universal Basic Income (2018) <https://www.thersa.org/action-and-research/rsa-projects/economy-enterprise-manufacturing-folder/basic-income> (accessed ACB 2018/10/25)

### **Question 15 of 20**

#### ***From Chapter 6: Public Goods***

Private investment in the purchase of public goods is already happening, but at a relatively small scale. How could the new scheme promote greater involvement from the private sector? What are the barriers to this type of investment?

Private investment will distort the market, because it cannot meet the most urgent needs. People with the most urgent needs also tend to be those with the least access to capital.

### **Question 16 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

What are your comments on the phased transition period and our ambition to complete the changes by 2025?

Overly ambitious – there will certainly be a longer transition period needed by some.

### **Question 17 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

What is the most appropriate way to phase out the Basic Payment Scheme to start implementation of the new schemes?

It is a priority to end the separation between forestry and farming, and other forms of land management. Removing the restrictions on eligibility for woodland areas included in BPS will help to encourage extensive new tree planting both in woodlands and other agro-forestry schemes.

### **Question 18 of 20**

#### ***From Chapter 8: Transition, delivery and legislation***

How can we simplify the current administration and delivery of the Basic Payment Scheme during the phased transition period?



The Welsh Government could reach every land manager through a Welsh Universal Basic Living Income<sup>33</sup> (WUBLI) scheme. This would help keep land managers, help them to innovate and diversify, help new people to become land managers, and help to support rural communities during the Welsh Land Management transition. This would not only simplify BPS, but all Welsh benefits administration.

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<sup>33</sup> Universal Basic Income (2018) <https://www.thersa.org/action-and-research/rsa-projects/economy-enterprise-manufacturing-folder/basic-income> (accessed ACB 2018/10/25)

## Question 19 of 20

### **Welsh Language standards**

Will the proposed land management programme have any effects (either positive or adverse) on:

- opportunities for persons to use the Welsh language;
- treating the Welsh language no less favourably than the English language?

Revitalizing Welsh rural communities and improving public health in Wales, should increase the opportunities for people to study and use Welsh in their daily lives.

Tir gwyrdd i bobl Cymru. Cymraeg i ffermwyr, Cymraeg i bawb.

## Question 20 of 20

Do you wish to make any further comments?

We support the concepts of fairer, simpler and more coherent regulation of land management, and better support for land managers.

However, land management is about far more than protecting and enhancing 'natural resources'. The land is home, for both the human and non-human residents of Wales. Home is where we thrive, or perhaps, just survive, but never simply a 'resource'.

We suggest that (p7) "A holistic approach is therefore vital, as reflected in the Environment Act – finding ways to enhance our natural resources while building livelihoods around them." would better read, "A holistic approach is therefore vital, as sketched in the Environment Act – finding ways to enhance **all life in Wales**, whilst building **sustainable, healthy livelihoods for the people of Wales**."

The Welsh Government claims (p5) "[Wales has] .. world-class tourism sites, a growing food and drink reputation, some of the best grass-fed livestock production in the world and a thriving timber industry – all underpinned by Welsh natural resources." **We reject the classification of non-human animals as 'resources'**.

Also, the 'natural' state of much of Wales would be ancient woodland. We submit that expert plant-based agro-forestry has great potential for enhancing natural Wales. Such agro-forestry based land management can help in providing renewable resources for Welsh businesses, creating suitable habitats for a much wider range of the free-living animals who naturally live in Wales, supporting a sustainable flow of tourism, providing land managers with good livelihoods, and supplying a sustainable, healthy food system for Wales. **We believe that Wales has the potential to lead the UK in agroforestry.**

A further claim is that (p7) "Land managers also benefit society through managing animal health and welfare." The vast majority of farmed animals are killed after a very short lifespan – less than one year for a young sheep, with a natural lifespan of

perhaps 10 or more years, for example, and ewes are also usually slaughtered at half that age. **Artificial breeding, and killing, is not animal welfare.**

Regarding animal welfare, the Welsh Government must plan for a shortage of veterinarians if the UK leaves the European Union (p9).

Also, “around 90% of Welsh food and drink exports are sold to countries within the single market.” Leaving the EU could realistically lead to farmed animal welfare crisis. **An immediate moratorium on the breeding of farmed animals would seem a wise precaution.**

“Anything that changes the economics of farming may lead to land use change and such change can have significant environmental and social impacts.” (p17) The quality of life for Welsh people, for the animals of Wales, and of the natural living environment of Wales is paramount. **We have a collective and individual ethical duty to enable all life in Wales to thrive, free from harm – de-coupled from uncaring market forces.**

“.. Wales needs to continue to fund programmes that tackle Bovine TB rigorously.” (p18) Bovine TB is an epidemic, fundamentally, because cows are being farmed for their milk. Killing badgers makes the situation even worse, as up to 70% of these protected animals are at risk of being slaughtered for political, not scientific, reasons. **The only way to stop bovine TB causing wide-spread death and suffering is by ending the artificial breeding of cattle.**

“The UK is a net importer of forest products with a 2014 net trade deficit in timber, wood pulp and wood based panels of over £3 billion at today’s rates.” (p18) **There is huge potential for expanding UK agro-forestry, including into new methods and products.**

**Chapter 7: New regulatory framework** We believe that the Welsh Government has made a start in this area, but much more needs to be done. The evidence, principles and needs outlined in the report all require new examination by people whose relevant expertise has been or unjustifiably ignored by land management policy makers.: “The Environment Act (Wales) 2016, clearly outlines the principles of sustainable management .. an evidence-based approach to address short, medium and long term issues to enhance resilience in ecosystems and the services that derive from them, designed and delivered through a collaborative approach ..The tripartite foundation .. [of] standards of product quality, animal health and environmental stewardship. .. societal needs are not being underpinned by existing regulation; <sup>34</sup>”

**Chapter 8: Transition, delivery and legislation** We oppose the use of EU Transition funding in propping up animal farming. As the Food Climate Research Network’s Dr Garnett has set out, ‘eating grass-fed beef isn’t going to help fight

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<sup>34</sup> p 51 – 52 “Brexit and our land: Securing the future of Welsh farming” 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf) (accessed ACB 2018/1025)

climate change<sup>35</sup>. Nor will it achieve the other social, ethical and environmental goals of Wales. Farming animals is the opposite of a 'public good'. Yet, currently the intention is that "the Welsh Government's sector-wide EU Transition Fund of £50m. .. will fund a red meat benchmarking project which will work with 2,000 farmers<sup>36</sup>"

**Chapter 9: Working across the United Kingdom** Wales needs to be ready to lead the UK in new ethical, social, environmental and economic principles, with or without support from the UK Government. We hope that Wales will seek and find allies outside of Westminster across England, Scotland and Northern Ireland and beyond.

**Chapter 10: Next steps** When "a formal, detailed white paper with specific proposals for consultation in Spring 2019."<sup>37</sup> is published, we hope to see our vision included – we will respond further at that time.

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<sup>35</sup> Garnett, T, Godde, C et al. (2017) Grazed and Confused <https://www.fcrn.org.uk/projects/grazed-and-confused> (accessed 2018/10/25)

<sup>36</sup> p 55 "Brexit and our land: Securing the future of Welsh farming" 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf)) (accessed ACB 2018/1025)

<sup>37</sup> p 60 "Brexit and our land: Securing the future of Welsh farming" 2018 Llywodraeth Cymru / Welsh Government ([https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document\\_0.pdf](https://beta.gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf)) (accessed ACB 2018/1025)