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Demographic questions:

Name	Elaine Harrison	
Are you responding as an individual or as an organisation?	Confederation of Forest Industries (Confor)	
Are you or your organisation based in Wales?	Yes	X
	No, but I or my organisation operates in Wales	
	No - not based in Wales and does not operate in Wales	
If you are answering as an individual, do you identify as Welsh speaking?	Yes	
	No	
First half of postcode (4 digits)	SY23	
Please indicate which of these best represent you or your organisation (please select only one)	Farming	
	Forestry	X
	Environmental	
	Veterinary	
	Tourism/Hospitality	
	Food and timber supply chains	
	Public Sector	
	Private Sector	
	Third Sector	
	Trade Union/Representative	
	Research/Academia	
	Other	

The Sustainable Farming Scheme Consultation – Confor Reply

Confederation of Forest Industries (Confor) welcomes the opportunity to provide feedback to this consultation. Confor is a member-based organisation which represents the forestry sector from seed to sawn. Our members span the whole country and between them employ the majority of the approx. 88,000 people that work in the forest industry in the UK. We actively support an increase in woodland cover as well as the active management of woodlands and trees in Wales. We believe that our forestry industry needs to be a support mechanism in the sustainable farming scheme and creating a good working relationship with the agricultural sector is essential.

Q1. The Scheme will provide a long-term approach to support for our agricultural sector to respond to evolving challenges and changing needs, contributing to the Sustainable Land Management objectives. In your view, what may strengthen this support?

Support: Clear signposting for support with industry professionals. Professional foresters are available to support the agricultural sector in undergoing this transition, managing their portfolio of woodlands and trees, while seeking economic opportunities for them. A larger pool of advisors is needed to meet demand from this scheme. The Institute of Chartered Foresters have a member directory with a recognised endorsement process. With the size of the woodlands needed to be managed this is marginal scale, meaning many larger arboriculturalist firms may have the equipment to manage these smaller woodlands, the Arb association have a list of approved workers.

Confor could host case studies of ways to manage woodland and trees or signpost to other organisations such as the Royal Forestry Society that may already have this information, along with Farming Connect.

Ensuring the **CPD** element of the SFS encompasses a core element or mandatory in the first year to recognise the long-term scale of woodland management, as it is possible to improve profitability, improvement of habitats, water, air quality and soil management with trees. Understanding how best to utilise this, with options of cooperatives on managing woodlands on a landscape scale ensuring future economic viability. Access to case studies and clear sign posting for support from the forestry industry should be given in the guidance and support documentation.

In the **10% Habitat** management area of the farm this includes wood pasture and in field trees, it says not to plant trees in the restrictions of managing habitat, how does this work with managing or creating wood pasture? It has been noted in the text: that *wooded habitats are multi layered and where good ground flora and tree canopy reside the 10% habitat and 10% tree cover can co-exist*, this makes good sense. It has been noted that *coniferous woodlands do not count towards to 10% threshold*, Scots pine, Norway Spruce and Douglas Fir are a vital food source for red squirrels and important passerines, this should be an exception to the rule. As coniferous forests do play an important role in conservation, and by planting broadleaves this can have a detrimental effect on red squirrels by creating an ideal grey squirrel habitat.

Designated site management plans should be completed by 2029: is this just for the farm or does it include habitats, hedgerows and woodlands? It is important to include the management plan for the woodland, woodland management plans are long term and are often written by forestry professionals who can marry up the site conditions with the owners' objectives for the site. A long-term management plan creates a 10-year felling licence for the land. Consideration for a grant to help

develop these plans would help ensure these woodlands are managed considering there is a very small profit margin.

Hedgerow management although it is not woodland, Confor sees the benefit of the expansion, and active management of the hedgerows and this creates wildlife corridors for the woodlands. Does it allow for planting of fruit trees in hedges, such as, heritage varieties of apple, pear, plums which can be used by humans, stock and wildlife.

Q2. There will be Universal requirements in the SFS to have woodland cover at least 10% of suitable land, and to manage a minimum of 10% of your farm for biodiversity.

a) **What are your views on these requirements?**

b) **What support might you need to achieve them?**

In order to meet Welsh Government's sustainable land management outcomes 10% for each category seems fair. It is important that productive agricultural land is not pushed into woodland cover where marginal land is more appropriate. Could there be a mechanism for offsetting or renting woodland to others?

The **woodland maintenance** universal outcome is welcomed by Confor as this is currently an underutilised resource in Wales with many farm woodlands under managed. Confor does recognize that the scale, production and accessibility are key influencing factors in the woodlands being economically viable for management, and this needs to be acknowledged as accessibility to manage and harvest is crucial and needs to be viable. Access grants would be welcomed here to support farmers towards the cost of machinery including log trailers to ensure woodland management, along with subsidised costs of creating long term management plans for the woodlands to ensure these woodlands are getting managed.

Scheme Rule: At least 10% tree cover as woodland or individual trees, this needs to be met by 2030 in each farm. It is welcomed that this is varied as it allows a range of management practices including orchards, single trees as well as coniferous and broadleaf woodlands. Unplantable areas are removed from the calculation, Confor welcomes this decision along with consideration in high altitude and coastal locations. As these areas can result in higher unplantable areas. With regards to this statement in the consultation "*where the farm already meets its 10% habitat threshold and has more semi natural habitats, it is possible that these areas will be considered for planting*", It is important that these areas of lesser quality habitat are identified so that they are allowed to be planted and not prevented by indecisions. It is possible there is room for error here if personnel are not empowered to make a decision and follow unclear guidance. This statement currently contradicts the woodland creation guidance that NRW uses to assess sites: this will need to be revised to not conflict and if this is retracted as a result this may push woodland creation onto favourable agricultural land which will be seen as a poor decision from many citizens and farmers.

Create new woodland and agro-forestry, Confor welcomes the statement: block planting being deemed suitable for investing in a future timber crop. Confor would like to ensure appropriate guidance and sign posting is available to aid farmers to make an informed decision with regards to this. Farming Connect (or similar) have an important role to play in the education of landowners/farmers. It is important to recognize that although regeneration is allowed within established woodland, the 10% of farm woodland needs to be established by 2030 and there is a significant risk to farmers of this not being successful, it is important farmers are given the right advice to make an informed decision

and not jeopardise their scheme payments. Welsh government wants to support farmers through knowledge transfer and advisory activities, Confor welcomes this and will support the implementation of these events. It has been recognized that the woodlands need to be managed and created under UKFS's standards and woodland planners can develop plans for planting large areas or sensitive areas where expertise is needed, Confor invites the Welsh government to ensure efficient signposting is given to helping each farm gets the right advice for their business needs.

Guidance is needed on species choice versus productivity and economic return to ensure farmers are well informed to make to right decisions for their business. This advice should be given by professional foresters, but the service should be supported by Welsh Government.

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?

Q4. On-farm data reporting allows the Welsh Government to confirm actions are being undertaken and help you to make decisions about your farm. In your view, is the reporting requirement for the Universal Actions appropriate?

Q5. 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?

Q6. 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?

Provision for tenant farmers needs to be considered. The option of investigating and exploring the “permanency” of the woodland areas created should be considered as this can be a recognised barrier to woodlands being created for either the tenant or the landlord. This is a recognised barrier for farmers to want to plant trees. Consideration of short rotation forestry, a 15–20-year rotation, where it is treated as a crop and time limited and can go back to agricultural land if needed after that rotation. It is advised that WG could set up a working group to explore this.

Q7. We are proposing the use of a single carbon calculator for everyone in the Scheme. Do you agree and how might we best support you to complete this?

If the carbon calculator relates to carbon being stored in the trees through sequestration, then we would feel it is imperative for any carbon calculation to also account for the carbon benefits derived from the harvested wood products storing carbon in long-life products (construction) and substituting high embodied energy construction materials such as concrete. Consideration is also needed to the management of the trees to ensure established high quality woodlands. Consideration needs to be given to ensure that existing systems are not duplicated. The carbon cycle of woodlands are different to open land. Woodlands can score high for many years then drop when harvested. The risk is that woodlands are not managed for fear of dropping the carbon value of the land.

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



Q9. Adopting the Welsh Government appeals process will provide an effective and efficient mechanism. Is there any reason we should deviate from this?

Q10. We would like to know your views on the proposed approach to:

- a) the SFS universal baseline payment
- b) the SFS stability payment

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?

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

Q13. 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 entitlements.

Q14. 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.

Q15. 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.

Woodland can generate income; income revenues can include:

Cricket bat willow, timber, firewood, fencing, biomass, and now new avenues such as aviation fuel. These can support the farm economy as well as the wider Welsh economy in years to come with potentially producing timber for housing.

To ensure success adequate support is needed this includes grant support for woodland management plans, and access grants to allow the woodlands to be managed.

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

Good indicators of how effective the scheme is going on site could include:

- Having a value of the forestry and timber sector in Wales and how this adds to the GDP.
- Area of woodlands into management
- Quantity of trees sold to Wales
- Water quality indicators
- Soil quality monitoring as indicated in the consultation.
- Carbon Store monitoring
- In woodland areas: stocking density, species, management objectives
- The use of UKFS –
- This does not apply to agro-forestry so how will this be monitored?
- Social science modelling on how farmers and public feel about this process over the 5 year process

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

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

There is the opportunity to use successful case studies once the SFS is started. The SFS effects the whole of Wales including rural, urban and peri urban farms, in prominent Welsh speaking areas and not. Diversifying the farm businesses will have the potential to create stronger business models keeping farms in business for the future. Confor supports the forestry industry with many of its Welsh members being Welsh speakers or having an appreciation of the Welsh language and culture. It is important to keep the language and culture in the Welsh forestry and where possible Confor produces material to support this.

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

There is a skills shortage and an ageing population on land-based occupations, to ensure mitigation there needs to be clear signposting in careers Wales to all the land-based professions to ensure Welsh speakers can work in these professions and are aware of them. Career opportunities need to be shared with schools. We as Confor can offer together with others to promote the opportunities along with discussions/collaboration with Careers Wales. Good funding into training and upskilling a future workforce is needed. There needs to be apprenticeships and help with starting businesses in Wales to support the scale of the SFS, this could include contractors, nurseries, foresters, and ecologists. Farm woodland management is different for contractors often due to the timing of when they can access the woodland, they need to avoid winter due to water, avoid summer due to harvesting. So, farmers will be looking to hire contractors at the same time and there isn't enough of them. Focus on Forestry First were funding courses that helped create a diverse work force that could undertake a range of operations, this needs to be reviewed and supported.

Additionally, it is important to continue to support microbusinesses(contractors) source and finance technical training as they do not have the resources to do this on their own without affecting their operational viability and many of these businesses are Welsh speaking.

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

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

The name of the scheme is known in English, SFS, that could be seen as negative?

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

The 10% woodland is not going to meet the reforestation targets or meet Wales's future timber demands. Farmers and landowners should be encouraged to grow and look after their trees, a lot of consideration from Welsh Government needs to happen to ensure there is sufficient support for farmers on changing the way they manage their land. This could include subsidised trainings, management planning and a greater understanding on how trees can benefit them. The type of forestry Wales needs is to produce timber to feed the mills and the wider supply chain.

Farmers who already are net zero should not be penalised for their business model not fitting into the SFS and this should be reviewed, to reward them where necessary as a blanket approach may not be appropriate in all cases.

If farms do need to dedicate a proportion of their land to woodland, a landscape scale needs to be taken into consideration. The option for collaboration on a landscape scale should to be explored, as woodlands of a certain size are only commercially viable to manage effectively. Small areas of woodlands would not be managed or maintained: creating poor woodlands of no real value to Wales. This will cost more money and be a waste of money. If farmers could enter a joint woodland creation package with neighbours, this could include informal agreements to management of the woodland together based on long term plans. This would hold a higher value as there is financial incentive to manage and maintain these larger plans.

If Welsh Government are serious about meeting their planting targets a Sustainable Forestry Scheme needs to be implemented. A strategic map of Wales needs to be completed clearly demonstrating where in Wales each strategy can be implemented: creating a positive way forward instead of each stakeholder fighting over scraps of land for their objectives e.g.

- Habitat management and low intensive agriculture, restoration of the Welsh rainforest: National Parks
- Commercial forestry: the mid Wales belt,
- Intensive agriculture on high grade agricultural land: south Wales.

To help incentivise this TANs (technical advice notes: local authorities take these into account when preparing development plans) should support this strategic map such as when TAN 8's were used when developing strategic plans for windfarms in Wales. Missed opportunities include farms that are on the market and common land areas in Wales, these could be prioritized as areas for afforestation.

The need for biomass is missing from the plans, there are opportunities for farmers to grow willow, miscanthus and other fast-growing crops to supply the biomass plants that many farms use, creating a circular economy within their business models. As mentioned above short rotation coppice and short rotation forestry (15-20 years rotation) is an option for management and could especially help tenant farmers and those who want an early return.

Agroforestry, if this is going to be utilised further support is needed as there is limited guidance and support for this. Successful case study farms need to be showcased.

The planting of marginal land and priority habitats in less favourable conditions is in contradiction to NRW's current assessment of land for woodland creation. This will not happen in the SFS unless a radical re-training programme within NRW occurred with clear instruction from WG that this is the process now. This is a current major set back with woodland creation in Wales.

Conclusion

As Confor we have given evidence on how Farming Connect can support the implementation of the SFS, to the Economy, Trade and Rural Affairs Committee. It's important to avoid silo thinking, farmers and farmland could support rural fuel via firewood production, supplying fencing suppliers, to selling into the ever-increasing biomass market. We should be growing fibre for uses that we have not thought of yet as this is a growing area of industry and innovation.