



The Vegan Society response to (Wales) White Paper Consultation

Regulatory Reform

1. What are your views on:

(a) The proposed approach to the creation of the National Minimum Standards?

(b) The need for flexibility to amend the National Minimum Standards where necessary? Are there any further considerations which are needed?

Please provide comments to support your view e.g. potential benefits and impacts.

Wales urgently needs to clearly set out an evidence-based, fully supported, specific timeline to get from unsustainable now, to sustainable by 2030. The longer we delay, the more radical the actions which will be required to protect our people, animals and planet. Meaningful action is needed on the ground in Wales during 2021.

Therefore, National Minimum Standards and Sustainable Land Management must be rapidly developed within that context. The scientific consensus is strong that we must be transitioning away from farming animals because of climate change. This great challenge is also a great opportunity. We can transition to healthier, more sustainable rural and urban communities, and food & other industry systems, rooted in plant-based land management.

Wales needs a level playing field for all land-owners, land managers and land-based workers. All rural and urban land, habitats and soils in Wales need to be carefully and sustainably stewarded.

This sustainable land stewardship doesn't simply require flexibility in law: flexibility in thinking, in ways of working, in daily life are also vital. (S2.10, p17) "There are a number of reasons we believe flexibility will be important, including to: ..

- "Respond to changes and fulfil our existing or future statutory and international obligations on climate change and the environment in Wales.
- "Respond to changes in agricultural practices;
- "Tackle new and emerging issues, such as disease risks and outbreaks;"

Pandemic Zoonotic Disease

There is great pandemic potential in emerging zoonotic diseases. The habitat destruction and increased proximity of humans with animals caused by our farming of animals is a key driver for zoonotic diseases. The straightforward and comprehensive way to minimize disease risks associated with land management – both to non-human animals themselves, and through zoonotic diseases in humans – is to rapidly phase out the farming of animals entirely.

Water and Nitrates

We believe that it is (S2.11, p17) "... appropriate to consider further consolidation of other existing agricultural legislation under the National Minimum Standards.. e.g. Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2020 .. designed to tackle agricultural pollution in a way which also fulfils our obligations under the Nitrates Directive .."

A major source of nitrate pollution is the farming of animals, and the use of their manures in crop



growing. Agrochemical nitrate fertilizers are also a significant problem. As part of the shift to a sustainable food system, Wales needs to be investing in plant proteins from leguminous crops. These legumes can help replace both dietary proteins from animals, and agrochemical nitrate fertilizers for crops. Nitrogen-fixing trees and shrubs such as alder, laburnum and gorse will also be vital in windbreaks and as nurse crops for agroforestry in so-called 'less favourable' areas.

Therefore, the proposed creation of Welsh National Minimum Standards by consolidation of existing legislation (S2.1, p15) "which currently underpins the Cross Compliance requirements into secondary legislation with limited modifications and additions where necessary." does not go fast enough, nor far enough.

2. What are your views on:

- (a) How advice and guidance can effectively support farmers to understand the National Minimum Standards; and**
- (b) The further considerations needed for advice and guidance? For example, what form guidance should take, who should provide it, the scope of guidance and how farm advisory services may support farmers.**

Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

Peer-to-Peer Advice and Guidance

Wales must avoid 're-inventing the wheel' on Sustainable Land Management, when much of the knowledge, skills and resources are not new. For example, the Permaculture Movement has been sharing knowledge on sustainable land stewardship – much of it observed from surviving (post-colonial) Indigenous cultures – for almost 50 years. Globally Indigenous people currently steward some 80% of the surviving biodiversity of Earth.

Wales needs to make peer-to-peer learning a top priority for Sustainable Land Management. Many of the most qualified people to give advice and guidance on SLM to land managers, are those already practicing SLM. Existing SLM innovators need support to record and share their knowledge, experience and advice. This peer-to-peer knowledge and skill sharing should also be financially rewarded, as with Public Goods. The current SARS-CoV-2 pandemic has greatly increased our understanding of remote learning. Therefore, land managers also need to be equipped with remote teaching & learning skills and infrastructure, including reliable fast broadband. Then, experts in sustainable land stewardship can more quickly and effectively share their knowledge, skills and best practice without always needing to travel.

Some of the key information which land managers need will also come from the oldest surviving Welsh farmers. This is because some of the necessary techniques – such as how to tend orchards – has largely been lost in the past few decades.

There are already a significant number of people practicing innovative sustainable land stewardship in Wales, Scotland and other temperate countries. For example, Jenny Hall and Iain Tolhurst are two such experts based in England, co-authors of the handbook, Growing Green – Organic Techniques for a Sustainable Future (<https://veganorganic.net/product/growing-green/>). All these existing practitioners have vital advice and guidance to share. Researchers at institutions such as the Institute of Biological, Environmental & Rural Sciences (IBERS), Aberystwyth University and expert practitioners at Paramaethu Cymru (Permaculture Wales) are in contact with many of these people.



Farm Advisory Services staff, and others, need to learn from these sustainable land stewardship practitioners. The practitioners need administrative and legal support to establish and use best practice in delivering their expert knowledge and skills training. In these ways, policy and practice can improve to meet the needs of current and future land stewards.

3. What are your views on the proposals for civil sanctions to enable proportionate enforcement of regulations? Are there any further considerations which are needed?

Please provide comments to support your view, e.g. potential benefits and impacts associated with the considerations.

We are focused upon positive outcomes for people, animals and environment. Therefore, avoiding damage in the first place, and rapidly restoring any damage which takes place, are high priorities for us. Thus, we wish to see processes that focus upon support for stopping harm, pro-active compliance with guidelines for avoiding harm, and rapid, careful restoration where harm has already been done. We broadly agree that, (S2.33, p23) “[I]ssuing a compliance or restoration notice .. as the cost of taking action to restore damage caused or to return to compliance could be higher than the cost of a monetary penalty .. could therefore act as a greater deterrent.”

We also support the proposed Enforcement Undertaking (EUT) for similar reasons, (S2.34-35, p23) “An alternative approach .. would be for a regulator to be able to accept an EUT from a farmer or land manager. ..EUTs are widely regarded by regulators and offenders as one of the most effective enforcement mechanisms.”

Unnecessary Harms of Animal Farming

All artificially breeding of animals for human purposes is harmful to the welfare of the individual animal involved. We now know that artificially breeding sheep, cattle and other ruminants also harms the global environment through greenhouse gas emissions. A small number of animal farmers have felt able to publicly admit the harms to their mental health involved in sending the animals in their care to slaughterhouses. Jay Wilde, former cattle (‘dairy’ and ‘beef’) farmer says, “You knew that you were taking them to what must be a terrifying experience. It was soul destroying, that’s how it felt. It was very difficult to do. But wanting to keep the farm working as a farm...”

We want to support land managers to develop land stewardship techniques which are good for them, their communities, the animals who share their land, and the planet. The evidence for plant-based land management techniques for climate change mitigation, local environmental improvements, our own health, and for resilient land management enterprises, is well-established. Therefore, we advocate a transition towards plant-based techniques. A key step is the end to our artificial breeding of animals including for farming, and to our slaughter of farmed animals.

As the white paper says, (S2.41 p25) “Some activities are already prohibited under existing regulation. We need to consider whether it would be appropriate to prohibit other activities which are known to be detrimental or have the potential for harm to the environment and animal health and welfare, under the proposed regulations;”

SLM – Future support

4. What are your views on the proposed purposes for funding in support of the delivery of SLM? Are there other purposes which you feel should be considered?



Please provide comments to support your view e.g. potential benefits and impacts.

For the delivery of Sustainable Land Management:

- Your current definition of SLM is in error. Animals are not ‘land resources’. Animals are sentient beings, and have a right to exist purely for their own purposes.
- Transitioning towards plant-based methods must be an explicit purpose of SLM funding. This is required to bring SLM in line with scientific consensus on the damaging climate impact of animal farming.
- Farmers who reduce their GHG emissions by moving away from animal farming into more climate friendly land-use will reduce their short-term and long-term carbon, methane and nitrous oxide footprints. It must be explicit that land managers will get financial returns and other tangible benefits in return for these forms and methods of GHG reductions.
- Increased land area for sustainable agroforestry and woodland restoration needs to be an explicit purpose of funding.

We reject the proposed definition (S2.52, p28) of Sustainable Land Management (SLM) because it classifies sentient beings capable of suffering – animals – as ‘land resources’:

“The use of land resources, including soils, water, animals and plants, for the production of goods to meet changing human needs, while simultaneously ensuring the long-term potential of these resources and the maintenance and enhancement of their environmental benefits”.

We fundamentally disagree with the Welsh Govt assertion, (S2.56, p29) “We have concluded that our adoption of SLM and its delivery as the goal of future agricultural policy and support will enable us collectively to respond to these challenges.”

Whilst animals are still being artificially bred for farming, Wales will neither be able to fulfill the letter nor the intent of the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. Research recently published in the Lancet suggests that Wales has also used up our cumulative, global fair share of carbon dioxide (CO₂) emissions, overshooting by perhaps c. 3 thousand million tonnes (GT).

Animals have the right to exist and live purely for their own purposes. We have no ethical right to treat them as ‘resources’, nor to use animals for ‘production of goods to meet .. human needs’.

The damaging impacts upon animal welfare, and upon animal as well as human and planetary health, must finally be recognized – in the light of the SARS-CoV-2 pandemic if for no other reason. Yet these harms are omitted (S2.44 p27) “The impacts of some intensification practices on farmland biodiversity, air and water quality, public health and the climate are increasingly recognised as issues that must be urgently addressed.”

The well-being of animals is also a ‘non-market’ and public good. It is a basic ethical principle in our society that it is wrong to cause harm unnecessarily. Harm to sentient beings is particularly recognized as unethical, through the concept of ‘suffering’. The cognitive dissonance of the harms inherent in artificially breeding animals and farming them and sending them to slaughterhouses is utterly opposed to human well-being.

The Sustainable Farming Scheme (SFS) must be ethically sustainable. None of the positive aims of this work can be fully achieved without ensuring a decent quality of life for land and farm managers and workers, and everyone in the rural and urban communities around them. Robust social ‘safety



nets' are vital. "The best way to incentivize farmers" (S2.63) is to ensure they are free to focus on their land stewardship work, and on peer-to-peer learning. Land managers, and their families & communities need to know that their fundamental life needs will be met.

Wales urgently needs to embrace the full potential of the transition to plant-based land management methods. (S2.62. pp29-30) "We expect these outcomes can be delivered by a combination of changes to farming practice, infrastructure improvement and some changes to current land use". To "enable the agriculture sector to decarbonize" (S2.64) (and de-methane-ize, and de-nitrous oxide-ize) means returning a significant portion of the Welsh landscape to woodland or forest. Wales also needs a much smaller number of total ruminant animals. Most of the ruminant animals in Wales will need to be those which can live free in appropriate habitats natural or semi-natural habitats, not farmed.

We therefore support the purpose of SLM funding: (S2.74, p32) "To increase levels of carbon sequestration through land management, (including woodland creation and management, the introduction of agroforestry, the restoration of peat bog functionality, salt marsh restoration and increasing levels of soil organic matter in improved agricultural land) to help achieve the requirements of Welsh Ministers with regard to the delivery of Welsh Governments 'net zero by 2050' ambition"

However, the role of habitat restoration and restoration of tree cover needs greater prominence. Restoring habitats is a key part of sustainable land stewardship.

Continuing to farm large numbers of sheep, cattle and other ruminant animals is not tenable in Wales. This is due to the significant greenhouse gas emissions we create by farming ruminant animals. Also, Wales cannot afford the huge opportunity cost of failing to sequester more carbon in the Welsh landscape by taking land out of commercial grazing. Much of that currently grazed land is urgently needed to have diverse former habitats restored, and to be brought under sustainable forestry management.

We must finally be honest about the true impacts of the 'domestication' of animals. Artificially breeding animals into farming is fundamentally incompatible with the health and welfare of those animals, ourselves and our shared natural environment. This is in line with your statement (S2.74, p32) "One of the key principles underpinning the Wales Animal Health and Welfare Framework is "prevention is better than cure" to minimise animal disease and associated welfare impacts."

One explicit purpose of SLM is (S2.74, p32) "To significantly reduce or eliminate ammonia and any other losses from farms to air and water which are harmful to public health and/or injurious to riparian and other sensitive habitats;". A primary agricultural source of ammonia is farmed animal manures (<https://www.aber.ac.uk/en/media/departmental/ibers/pdf/innovations/99/99ch8.pdf>). The straightforward way to eliminate Welsh agricultural ammonia, is to end the farming of animals.

Another explicit aim of these policies is (S2.78, p33). "reducing emissions from red meat production". Again, the straightforward way to eliminate Welsh greenhouse gas emissions from red meat production is to transition to plant-based farming and diets, away from farming cattle and sheep. This approach would also reflect the fact that consumption on 'red meat' is declining, both in the UK and globally, and many factors point to a continuation or acceleration in this decline.

Industry and Supply Chain

5. What are your views on the proposed priorities for industry and supply chain support?



Please provide comments to support your view e.g. potential benefits and impacts.

All aspects of Welsh land management, food, and industry need full support to rapidly adapt to the new realities. The priorities for industry and supply chain support should fully reflect our climate emergency, as well as changing public attitudes and developing public policy objectives.

The priorities should include:

- Support for supply chain in renewable plant-based construction materials, locking carbon in buildings and displacing high emission materials such as concrete.
- Support for development of more plant-based alternatives to animal products, ensuring Welsh food and farming is not left behind.
- Support for other industries to use the products of agroforestry and other plant-based land management techniques.

Industry and supply chain support must be robust and thorough. This is particularly urgent for our 'agri-food' system. However, the majority of other industries also need to be moving to Welsh-grown plant-based raw materials as far as possible. Extensive use of locally grown plant-based construction materials, industrial feedstocks, fibres, pharmaceutical raw materials, where appropriate, fuels etc. are all integral to Sustainable Land Management in practice.

As the fastest growing segment of the UK food sector, plant-based food alternatives to animal protein should be a priority for industry and supply chain support in Wales. Plant proteins can reduce the GHG footprint of Welsh diets, and create valuable new opportunities for land managers. Plant proteins grow for food should mean higher returns for those farmers growing legumes in rotation. Annual and perennial legume crops can reduce the need for agrochemical nitrate fertilizer inputs, and improve soil health. Support for plant-based alternatives is essential for the environmental and economic sustainability of Welsh food and farming.

Changing complex systems is a so-called 'wicked problem'. People throughout the food system must co-ordinate complex and challenging changes with one another, to co-create new sustainable food system. Land managers, farmers, farm workers and rural communities need extensive specialist support. But this must be in collaboration with food manufacturers, retailers, and the whole of society: we all eat.

The same is true in other industries and supply chains transitioning to using plant-based feedstocks. Therefore, support must be co-ordinated throughout supply chains. Sustainable Land Management only works as part of a whole Sustainable Society Management system.

Collection and sharing of data

6. What are your views on the proposed purposes for collecting, sharing and linking data?

Please provide comments to support your view e.g. potential benefits and impacts.

Data collection should be progressively more wide-ranging. All supply chains using agricultural crops should be included, to build up a picture of non-food uses. The impacts upon land and habitats through non-agricultural activities should also be tracked e.g. mining, building, recreation etc.

Data should also be collected on the total carbon sequestration rate and carbon storage capacity of the Welsh landscape. This should be monitored and measured against an estimate of the maximum carbon sequestration potential of land in Wales as a reference point. A recent estimate of the sequestration potential of land in Wales currently used for farming animals is up to 0.7 thousand



million tonne (GT) of CO₂ (<http://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93Harwatt-Hayek.pdf>). That is a significant contribution to drawing down what Wales owes due to historical CO₂ emissions overshoot compared to global fair shares, of c. 3 thousand million tonnes (GT, estimate based upon [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(20\)30196-0/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(20)30196-0/fulltext)).

Careful provision for people who cannot comfortably, quickly or accessibly use these data systems is also vital.

7. What are your views on the establishment of a national database for farms and livestock?

Please provide comments to support your view e.g. potential benefits and impacts.

The data on farmed animals should primarily be used to help bring about the end of farming animals. The straightforward way to promote the health and welfare of animals currently in farming, is to end our farming of animals: (S2.102, p40) “The primary purposes for the collection, sharing and linking of data are to .. Promote the health, welfare or traceability of animals;”

Bradley Nook Farm, run by Jay Wilde & Katja Wilde, is an example of a land manager prioritizing the health and welfare of formerly farmed animals, and sustainable land management. Their 71 cattle were all moved to sanctuary environments, 12 at Bradley Nook itself. (<https://farmtransformers.org/bradley-nook-farm/>). This is the best outcome for the cattle, for the local and global environment, and for the mental health of the farmers themselves.

Thinking about the SFS:

8. In terms of the future scheme, what are your views on the proposals to enable the data we collect on a farm to be used by farmers to track progress and demonstrate their sustainability credentials?

Please provide comments to support your view e.g. potential benefits and impacts.

The processes must be flexibly co-created with land managers, farmers, farm workers and local communities to be useful in practice. Peer assessment will be a key factor in determining the progress and sustainability of each land management enterprise.

Peer-to-peer sharing of information is also important. The best way for land managers to find and adopt beneficial innovative techniques is peer-to-peer, learning from someone who has already practiced these techniques.

9. What do you think needs to be considered in future to enable regulators to effectively monitor regulations?

Meaningful collaboration with land managers, farmers, farm workers and local communities. That is the only way to ensure that the regulations are meeting the practical needs of the people on the ground. The regulations will need to be regularly updated, for example as more land managers use plant-based techniques such as natural regeneration of woodland, planting orchards, and green manuring.

Forestry and woodland

10. What are your views on the proposed amendments to forestry legislation?



Please provide comments to support your view e.g. potential benefits and impacts.

We support the aims set out in the future funding for woodland creation section (2.134 to 2.139) but note that these are not yet developed or included in the current proposals. When detailed proposals are brought forward, we would like to see:

- Productive agro-forestry incentivised heavily to reflect its dual value of carbon capture and production of sustainable food and materials.
- Support for naturally regenerated woodland where this is suitable and possible.

We must plan for productive trees and shrubs for food and other non-destructive products, both in orchards and interplanted in other land management systems. Increasing the prevalence of agroforestry across Wales should be a priority.

We must carefully study how, where and when natural woodland regeneration is the most appropriate land management approach. It is essential that natural regeneration is included alongside tree planting in any future funding for woodlands. Natural regeneration brings a number of ecological benefits when compared with planting and its inclusion would allow for more woodland creation.

11. What are your views on how the Welsh Government can support landowners in Wales to benefit from carbon markets for planting trees?

We look forward to the 2022 Consultation (S2.139, p48) on trees: “We will consult next year on how we can support all types of landowners in Wales to benefit from carbon markets for planting trees, including how to address the upfront capital costs and advisory support which might be required.”

At this point, we emphasize that planting and nurturing trees is a slow and skillful task. Natural woodland regeneration is at least as important. The wide potential of regenerated and planted trees for food, other non-destructive raw materials and habitat creation must be in proper balance to the market for the carbon which planted trees can sequester.

A recent estimate of the sequestration potential of land in Wales currently used for farming animals is up to 0.7 thousand million tonne (GT) of CO₂ (<http://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93Harwatt-Hayek.pdf>). That is a significant contribution to drawing down what Wales owes due to historical CO₂ emissions overshoot compared to global fair shares, of c. 3 thousand million tonnes (GT, estimate based upon [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(20\)30196-0/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(20)30196-0/fulltext)).

12. Do you think it would be appropriate to allow joint landlord/tenant SLM scheme agreements?

Please provide evidence to support your views e.g. the extent of the need, the likely benefits, drawbacks and impacts.

There is a significant number of people who wish to enter land management but do not currently have access to land. Land-owners should be required to involve tenants in their SLM scheme agreements. Tenant farmers will often have complementary understanding of the land under their care, compared to the named land-owner.

Animal Health and Welfare



- 13. What are your views on the proposals for additional powers for Welsh Ministers to:**
- (a) Establish Movement Control Zones to control the movement of animals, semen, embryos, animal products, animal by-products and/or other things that can spread infection e.g. equipment and utensils, in the event of a significant, new animal disease threat, where there is currently no or limited power to do this?**
 - (b) Specify 'animal', 'farmed animal', 'livestock', 'pet animal' and 'animals intended for agricultural purposes', beyond the current rigid traditional definitions to ensure animal disease control measures can be applied appropriately and flexibly to any species of kept animal where there is a potential disease risk?**

Please provide comments to support your view e.g. potential benefits and impacts.

There are significant numbers of emerging infectious diseases with pandemic potential which are zoonotic, that is crossing into humans from non-human animal species (<https://www.bmj.com/content/372/bmj.n485>). Farming of animals is significant in many of these zoonotic potential pandemic diseases. Increased contact between humans and animals, and between animals of different species is a hallmark of animal farming. Also, the farming of animals is still one of the main causes of the habitats of free-living animal being destroyed or damaged. Those animals which survive are more likely to be forced into closer proximity with humans.

The straightforward and comprehensive way to minimize disease risks, both to non-human animals and through zoonotic diseases in humans, is to rapidly phase out the farming of animals entirely. We also need to end the trade in animals and their body parts. We should cease classifying animals as 'kept' or as 'property'. Instead, we must recognize that animals are sentient beings whose lives belong to themselves. When we stop interfering in their lives, we will dramatically decrease disease risks to ourselves, and to them.

Snares

- 14. What are your views on the proposal for a power to enable increased controls covering such matters as the manufacture, sale and use of snares? Do you think such a power is required? If not, why not? If so, what matters do you think the power should be used to address?**

Snares should be banned entirely. Non-harmful methods of trapping animals for their own benefit, such as for medical care and/or relocation away from harm, should be the only use for traps.

Integrated Impact Assessment

- 15. What are your views on the impacts we have identified in the integrated impact assessments? Are there any further impacts that should be considered?**

Draft Climate Change Impact Assessment

Wales urgently needs to become a net absorber of greenhouse gas emissions. This is both to do our part to avert ongoing climate catastrophe, and also, to be a 'good neighbour' to the Global Majority World who are still repairing European colonial damage to their societies. The current proposals are too little, and too slow.

In the Integrated Impact Assessment (IIA) you say (p3), "Taking Wales Forward 2016 – 2021 sets out



the Welsh Government's objectives in response to its obligations under the Well-being of Future Generations (Wales) Act 2015. The objectives contained within the document of direct relevance to this policy area are: .. "Make progress towards our goal of reducing our greenhouse emissions by at least 80% by 2050."

Yet, Welsh Government has already accepted that this target is outdated, and seriously insufficient. In the Consultation document (S1.19, p8) you state, "In 2019, we accepted the UK Committee on Climate Change (UKCCC) recommendation for Wales to increase its 2050 emissions reduction target from 80% to 95%, and declared an ambition to reach net zero." This is in line with the Committee on Climate Change Sixth Report (<https://www.theccc.org.uk/publication/sixth-carbon-budget/>) states, "Our recommended pathway requires a **78%** reduction in UK territorial emissions between 1990 and **2035**. In effect, bringing forward the UK's previous 80% target by nearly 15 years."

Furthermore, as part of The Global North, Wales must take responsibility for our fair share of the UK's total persisting historical greenhouse gas emissions. Overall, The Global North is responsible for an estimated 92% of historical CO2 emissions. The UK National fair share of a safe global carbon budget consistent with the planetary boundary of 350 ppm of atmospheric CO2 must account for this. This UK fair share of CO2 has recently been estimated ([https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(20\)30196-0/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(20)30196-0/fulltext)) as 13 GT (thousand million metric tonnes). But robust estimates of UK territorial emissions (1850 – 1969) and consumption-based emissions (1970 - 2015) suggest that the UK has already emitted over 80 GT of CO2. Therefore, the UK has already overshoot our total fair share by over 66 GT. This means that Wales has also used up our global fair share of CO2 emissions, overshooting by perhaps c. 3 thousand million tonnes (GT).

IIA p3 "The proposed policy supports the delivery of a number of outcomes which promote societal long-term needs such as climate change mitigation and the reversal of biodiversity decline whilst enabling farmers to continue to make a living from agriculture."

Wales need to be acting in THIS farming year with great urgency. The time for 'promoting' climate change mitigation and biodiversity recovery was the 1990s. Now we need urgent, decisive action. The necessary transitions for land managers are if anything more demanding than the conversion to Organic. Now, land managers need to be rapidly moving toward sustainable plant-based methods. To avoid climate catastrophe, absolute reductions of 10+% in methane, nitrous oxide and carbon dioxide emissions each year are now imperative. Like all countries in the Global North, therefore, Wales should be going further, faster towards net zero GHG overshoot, NOT just net zero current emissions

The Agriculture (Wales) White Paper & associated IIA must explicitly incorporate this urgency of action in 2021.

Therefore, moving away from land management based upon farming animals, towards agroforestry and other plant-based land management techniques is vital for Wales climate change obligations. Land managers need to be explicitly guaranteed immediate, complete support from the Welsh Government and wider society, to be able achieve these vital, urgent, dramatic transitions and GHG reductions. The impact of further delays is likely to be disaster.

Draft Well-Being Impact Assessment

Current Government policies are causing ongoing harm to everyone who lives in Wales. We know we are harming ourselves, one another, our planet and the animals with whom we share our planet.



But our politicians are failing to take decisive practical and policy action to help end those harms.

It is a basic shared ethical principle in our society that it is wrong to do harm unnecessarily. Ongoing forms of harm which can be done to sentient beings, such as animals, are called 'suffering'. The UK Government have confirmed that it is impossible to avoid harm to animals which are farmed. Knowing that you are causing harm and suffering to animals causes harm to our own mental health. These harms and suffering are made worse when you are expected to ignore, deny and stay silent about them. All land managers, farmers and farm workers who are expected to cause harm to animals in their jobs, are subject to these mental health issues.

It is also well-established that our farming of animals is at the root of much harm and suffering through environmental damage, and unhealthy diets.

Therefore, we can see that in this white paper, the negative impacts of continuing to farm animals, and the positive impacts of moving away from the farming of animals, have not been comprehensively explored.

16. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Support existing experts in temperate agroforestry and stock-free growing to translate their guides and advice into Welsh e.g. Plants for a Future. Paramaethu Cymru (Permaculture Wales) has already begun this task, and has extensive contacts with relevant experts.

17. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We agree with Lesley Griffiths that 'it is possible to farm sustainably in a way that produces food, addresses climate change and restores biodiversity at the same time'. But this Agriculture white paper does not go far enough, fast enough to achieve those goals.

Wales urgently needs to clearly set out robust, supported, specific timeline to get to sustainable land stewardship by 2030. Meaningful action is needed in 2021. Wales has already overshoot our cumulative, global fair share of carbon dioxide (CO₂) emissions by c. 3 thousand million tonnes (GT). We urgently need to become a net absorber of carbon dioxide, methane and nitrous oxide.

Our farming of animals is a key driver for zoonotic disease pandemics. The straightforward to minimize these risks is to rapidly phase out the farming of animals.

Wales does not have time to 're-invent the wheel' on Sustainable Land Management. We presume Welsh policy makers are carefully studying Scotland. Many of the most qualified people to give advice and guidance are existing SLM practitioners & innovators. The pandemic means we've rapidly developed remote learning. We need to equip land managers with remote teaching & learning skills and infrastructure, so they can share their knowledge, skills and best practice rapidly without travelling. Policy makers, advisors & administrators can then much more effectively learn from and support practitioners.



Land management in Wales needs to achieve net zero greenhouse emissions, not just carbon dioxide (CO₂), but also methane (CH₄) and nitrous oxide (N₂O). Methane and nitrous oxide are powerful greenhouse gases with different behaviours in the environment to carbon dioxide. Because methane has a short (~10 yr) lifetime in the atmosphere, reducing methane sources shows climate change benefits quickly. Because nitrous oxide is such a powerful greenhouse gas (c. 290 times the warming potential of carbon dioxide) relatively small reductions in nitrous oxide production can bring significant climate change benefits.

Therefore, methane and nitrous oxide need different and specific policy, practice, measuring and monitoring than carbon dioxide. For example, ruminant animals naturally produce significant methane emissions. Before we started increasing their numbers by artificially breeding them, ruminant animal methane emissions were in balance with the wider environment. Therefore, we need to incorporate the natural methane budget of free-living ruminant animals (e.g. deer) into our accounting. We can reduce atmospheric methane concentrations – and fully ‘repay’ historic methane emissions from animal farming in Wales – by not artificially breeding any more generations of farmed animals.

Many land managers have diverse GHG management opportunities such as agroforestry to improve carbon sequestration on a farm, grow nitrogen-fixing trees & shrubs, and supply renewable fuels. For example, Wales needs to be investing in leguminous annual and perennial crops, to transition towards plant protein foods, improve soils and in agroforestry. It is possible in principle for land managers to become net GHG sinks, and thus be drawing down emissions from other industries, and historical emissions. So, the full carbon dioxide and methane and nitrous oxide emission reductions which these land stewardship techniques achieve must all be fairly and fully rewarded.

We seek land stewardship techniques which are good for land managers, their communities, the animals who share our land, and the planet. Therefore, we advocate transitions towards plant-based techniques. A key step is the end to our artificial breeding of animals including for farming, and to our slaughter of farmed animals.

As the white paper says, (S2.41 p25) “Some activities are already prohibited under existing regulation. We need to consider whether it would be appropriate to prohibit other activities which are known to be detrimental or have the potential for harm to the environment and animal health and welfare, under the proposed regulations;”

The transition to a sustainable Wales must be a just transition. Sustainability includes social sustainability. Everyone should be empowered to access a healthy, sustainable, varied plant-based diet, including agricultural workers, their families and communities. It is straightforward to meet these criteria with predominantly locally grown plant-based diets centred on whole grains, legumes, vegetables, fruits and nuts, supplemented by a small proportion of ethically traded imports. Therefore, everyone in the food system in Wales needs to be empowered to move toward plant-based solutions. So, we support sustainable remuneration for everyone working in land management.

It is becoming clear that Henry Dimbleby in his ‘National Food Strategy for England Part 2’ (due to be launched this year) will also call for reduced production and consumption of meat in view of the Climate Emergency. In a recent presentation to the Food & Drink Sector Council, “Dimbleby is said to have reserved some of his biggest criticism for intensive farming methods and the UK’s excessive consumption of meat, linking it to climate change.” (<https://www.thegrocer.co.uk/health/henry-dimbleby-set-to-call-for-radical-overhaul-of-food-system/654330.article>). The situation in Wales is different to some extent, but Wales is not free from these criticisms.



We reject the proposed definition (S2.52, p28) of Sustainable Land Management (SLM) because it falsely classifies sentient beings capable of suffering – animals – as ‘land resources’. Whilst animals are still being artificially bred for farming, Wales cannot fulfill the intent of the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016. Our society has a basic ethical principle, that it is wrong to cause harm unnecessarily. Sending animals to slaughterhouses is utterly opposed to both their own and to human well-being. Meanwhile, we’re eating less ‘red meat’ and many factors point to this decline continuing. The straightforward way to eliminate Welsh GHGs from ‘red meat production’ is to transition to plant-based farming and diets, away from farming cattle and sheep.

Welsh land management, food, and industry need coordinated, extensive support to rapidly adapt to our climate emergency, changing public attitudes and developing public policy objectives. Extensive use of locally grown plant-based construction materials, industrial feedstocks, fibres, pharmaceutical raw materials, fuels etc. as well as food are all important to support Sustainable Land Management. Changing complex systems is so-called ‘wicked problems’. People throughout the system must co-ordinate complex changes with one another, to co-create new sustainable systems. Land managers, farmers, farm workers and rural communities need extensive specialist support. Sustainable Land Management only works as part of a whole Sustainable Society Management system.

The transition to sustainability is now a critically urgent project. Land managers in Wales therefore urgently need support for specific, practical action. They quickly need to see support for successful pilot projects and demonstration sites at whole farm scale in farms similar to their own. More must be done this year (2021).

Therefore, we call upon the Welsh Government to now take urgent, decisive and comprehensive action. Wales must lead the way, proactively giving land managers all the support which they need to transition toward the plant-based methods that a healthy, sustainable, climate-resilient Wales needs.