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29 May 2014

Dear Gary

Consultation on Welsh CoGAP: review of documentation

Thank you for your letter dated 19 May 2014 with regards to your consultation on the Welsh CoGAP document review. We have reviewed this document within Natural Resources Wales and have collated our comments below.

1. The language used within the current document is not phrased for the average farmer where there is an underlying expectation for understanding of specific technical terms and practice (for example Eutrophication, Environment Management Planning, Sustainable Land Management Schemes). It would be helpful to use familiar terms (for example agri environment schemes) and structure the report to clearly state what farmers and land managers need to do. For example (1) what the rules are and (2) what expectations are (eg. as per the division of legal and good practice but emphasised more strongly).
2. Reference to legacy bodies CCW/ EA/ FCW needs to be updated to Natural Resources Wales. The following have been identified:

Pages 14, 59, 63 and 77 refer to CCW.

Pages 15, 18, 27, 28, 29, 30, 40, 42, 43, 45, 47, 53, 54, 58, 59, 61, 62, 69, 73, 76, 77, 79, 80, 83, 84, 85, 86, 89, 90, 92 refer to EA.

Page 23 refers to FCW.
3. It could be helpful to add context to the introduction with quotes from the Minister regarding the need to address both resource efficiency and the management of natural resources and food production as an integrated system.

Part of an integrated best practise approach would be improving farm resilience and sustainable production in an environment and economic context. This would included emphasis on better manure and slurry management; fit-for-purpose cattle housing; more resilient farm yard layouts and modern manure management machinery.

4. It would be beneficial to augment the text with diagrams and photos for illustration of key points and break up the text. Figures currently used in the document need to be updated. For example in the introduction the contributions of agriculture to Welsh GHG emissions.
5. It would be useful to make reference to the EIA Regs for requirements for uncultivated land, and Cross Compliance to include both habitat protection and water quality issues.
6. Consider including, or referring to, requirements for Greening of Direct Payments, where this could include details of what needs to be done under the new obligations in relation to permanent pasture, Ecological Focus Areas (EFA) and crop diversification.
7. To maintain the value in the soil and resource plans produced under older schemes consider retaining some reference to Tir Cynnal and Tir Gofal legacy schemes when updating reference to the Glastir agri environment scheme.
8. It would be valuable to identify opportunities for good practice in the wider context including simple actions that not only help to improve or maintain water quality but also conserve wildlife. For example such actions could include hedgerow trees, creating buffer strips next to wetlands, retaining grassy strips (especially with a range of herbs) next to hedges, retaining small patches of semi-improved grassland, where reference could also be made to the value of such habitats for pollinators.
9. Consider providing summary information for key legislation referenced in the report in an appendix to reduce text.

Yours sincerely



Isobel Moore
Head of Business, Regulation and Economics