

BVA Welsh Branch and BCVA response to Welsh Government's Sustainable Farming Scheme consultation

March 2024

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.
3. The British Cattle Veterinary Association (BCVA) represents circa 1,700 veterinary professionals, principally working with livestock in the UK. Most members are in farm and mixed practices. BCVA also represents those studying and working in industry and academia.

Key points

- We support the Sustainable Land Management (SLM) approach as a means to incentivise public goods. However, we have several concerns and greater clarity on financial details and animal health and welfare aspects are needed to adequately support farmers.
- The weight given to animal health and welfare within the framework is insufficient and disappointing given the high proportion of livestock farming in Wales.
- We are concerned that the expectation on livestock farmers to complete, document and evidence the universal actions across the board will mean they lose focus on the essential health and welfare sections, which will take more time and effort than the proposals suggest. This could lead to poor welfare outcomes for both the farmed animals and wildlife.

Framework (chapter 2)

Support for the agricultural sector to adapt to challenges (Question 1)

4. We support the Sustainable Land Management approach (SLM) as a means to incentivise public goods. However, greater clarity on financial details and animal health and welfare aspects are needed to adequately support farmers.
5. Welsh Government must urgently provide more detail on the payment rates and level of funding available to farmers for the universal baseline payment and the stability payments to allow for necessary financial planning. In order for the scheme to provide long term support for the agricultural sector in Wales, it must provide certainty and security to farmers to allow for short, medium and long term planning to take place as they move from the Basic Payments Scheme (BPS) to the Sustainable Farming Scheme (SFS). Without knowledge of farm income over the coming years many farmers are under stress, unable to plan the future of their farms even in the short term. This has inevitable negative consequences on farmer wellbeing, animal health and welfare and numerous other key issues.
6. We have strong concerns that the economic modelling states that “*As modelled, farmers are being asked to deliver more (e.g. in terms of environmental delivery) for approximately the same level of support funding*”, and that the modelling suggests an 11% decline in on-farm labour, both of which could impact animal health and welfare.

7. Whilst we recognise the improvement since previous consultations, we continue to be disappointed that animal health and welfare is not prominent enough in the proposed scheme, and not sufficiently recognised as an important public good/SLM outcome. Although animal health and welfare is included, the emphasis and detail of these proposals is overwhelmingly focused on environmental aspects. We are concerned that the expectation on livestock farmers to complete, document and evidence the universal actions across the board will mean they lose focus on the health and welfare sections, which will take more time and effort than the proposals suggest.
8. We recognise that the proposals need to cover a wide range of farmers, however permanent pasture grassland accounts for more than 75% of the land used for agriculture in Wales¹, so we believe that a greater focus on management of animals is necessary.
9. Sustainable animal agriculture can be defined as animal agriculture² carried out in a way that meets the needs of the present without compromising the ability to meet the needs of the future. Sustainable animal agriculture should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers, producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need and in order to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them. We support the [Farm Animal Welfare Committee \(FAWC\)'s principles for sustainable agriculture and animal welfare](#).
10. To be considered sustainable, agricultural systems must provide for the five animal welfare needs, positive health outcomes and adhere to [World Organisation for Animal Health \(WOAH\) standards for animal health and welfare](#), offering stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest and confidence; and excellent health outcomes. The BVA position on [Sustainable animal agriculture](#) provides more information. We believe that, as a minimum, evidence of compliance with baseline legislative requirements should be included in the entry requirements for all farmers with animals applying for the scheme. Improved animal health and welfare, beyond the legal minimum, should also be recognised as an outcome with ongoing financial support being provided for good practice above the statutory requirements and where improvements are made.
11. Specifically recognising the importance of animal health and welfare as SLM outcomes would reflect the Welsh government's belief that animal sentience should be enshrined in law³, their commitment to the concept of One Health and keeping the people of Wales safe by protecting them from disease, and their recognition that high animal welfare and food safety standards are the foundations underpinning consumer confidence in Welsh produce, both at home and abroad. We are disappointed that this is not sufficiently reflected in these proposals, in contrast to the plans for environmental actions within this document, and the ambitious system of public money for public goods that has been taken forward in England which explicitly lists animal health and animal welfare to receive financial support. We therefore believe that animal health and welfare must be explicitly recognised as an important outcome by any new agricultural payments scheme.
12. The scheme must recognise that animal health and welfare is interwoven with many social, economic and environmental outcomes, for example:
 - **Environmental:** There is a large body of evidence supporting the environmental benefits of various aspects of livestock farming in Wales^{4,5,6,7,8}. These include carbon sequestration in grazing pastures, particularly leguminous pastures, reduction of methane emissions through disease eradication, increased productivity, reduced losses and increased feeding efficiency,

¹ The Farming Sector in Wales Research Briefing (2018) <https://www.assembly.wales/Research%20Documents/18-057%20-%20Farming%20in%20Wales/Farming%20in%20Wales-Web-English.pdf>

² Where animal agriculture includes aquaculture and gamebirds

³ Lesley Griffiths, Cabinet Secretary for Energy, Planning and Rural Affairs, Written Statement - Animal Sentience, <https://gov.wales/about/cabinet/cabinetstatements/2018/animalsentience/?lang=en>

⁴ Skuce et al. 2016. Livestock Health & Greenhouse Gas Emissions. ClimateXchange, Scotland's Centre of Expertise on Climate Change. https://www.climatechange.org.uk/media/2031/livestock_health_and_ghg.pdf

⁵ Llonch et al. 2017. Current available strategies to mitigate greenhouse gas emissions in livestock systems: an animal welfare perspective. *Animal*. 2017 Feb;11(2):274-284. doi: 10.1017/S1751731116001440

⁶ Patra, A.K. 2016. Recent advances in measurement and dietary mitigation of enteric methane emissions in ruminants. *Frontiers in veterinary science*, 3: 39. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4873495/X>

⁷ Statham, J. et al. 2017. Climate change and cattle farming. *In Practice* 39.1: 10-19.

⁸ Pol-van Dasselaar, A. 2017. EIP-AGRI Focus Group Grazing for carbon, Starting Paper. https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdfX

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and reduced food miles from consuming locally produced food. Recent research⁹ published by Oxford University suggests that the contributions towards global warming from methane emissions may not be accurately represented using current metrics and that alternative methods have been proposed that could impact mitigation strategies. A recent report commissioned by Ruminant Health and Welfare also demonstrated that improving animal health and welfare is an important way to reduce associated methane emissions and support new methane mitigation measures¹⁰.

- **Social:** Ensuring the health and welfare of sentient animals is important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives. Disease outbreaks and the measures to control them can carry costly consequences for both public health and rural communities. For example, the Foot and Mouth outbreak in 2001 damaged the lives of farmers and rural communities across the UK and caused a general election to be postponed. Another example is Bovine TB, which continues to be one of the UK's most difficult animal health issues, with control measures costing the livestock industry and government millions of pounds a year, The vital role of farmers in protecting the public health of the nation and overseas consumers has been under-emphasised within the scheme.
 - **Economic:** The proposals currently recognise the importance of animal health and welfare with regard to competitiveness and productivity. High standards of animal health and welfare also help to reduce the economic risks associated with disease outbreaks. Disease outbreaks and the measures to control them can carry wide and costly consequences for the economy. These impacts are substantial; across the UK, the Foot and Mouth outbreak in 2001 is estimated to have cost £5 billion to the private sector and £3 billion to the public sector. High and improving animal health and welfare standards can also have other economic benefits, such as adding value to 'Brand Wales'. There are concerns that, since high standards of animal health and welfare may reduce competitiveness against cheaper imported foreign meat products, its economic benefits may not be recognised. The scheme must support farmers and put greater value on the local supply chain to avoid reliance on imported foods from countries with lower welfare and environmental standards.
13. We have consistently recommended that animal health and welfare should feature more prominently within the SLM framework. We would welcome further detail from Welsh Government on how the proposals will ensure animal health and welfare is prioritised by all livestock farmers benefiting from the scheme.

Universal actions

Requirements for woodland cover and biodiversity management

14. As a health-centred profession and key stakeholder in the One Health agenda, the veterinary profession recognises that policies relating to sustainable animal agriculture must address the use of natural resources, protection and conservation of wild species, habitats and biodiversity in order to better protect the environment which both humans and animals share and reduce the ecological footprint of animal agriculture as a whole. We therefore understand and support the need to increase tree cover and improve wildlife habitats in Wales.
15. However, we are concerned that the loss of 10% of farm land to woodland could lead to increased stocking density on some farms, which could have negative implications for animal health and welfare. This is likely to be particularly difficult for cattle farmers under restrictions from TB. Stocking density should be monitored as part of the Animal Health Improvement Cycle (AHIC) to ensure it is not adversely affected by these proposals, and Welsh Government should allow flexibility on this requirement on a case by case basis.
16. Diversification can sometimes have negative consequences for animal health and animal welfare, and diversification schemes may compete with current animal health and welfare outcomes (for

⁹ Allen, MR, Shine, KP, Fuglestedt, JS, Millar, RJ, Cain, M, Frame, DJ, and Macey, AH (2018): A solution to the misrepresentations of CO₂-equivalent emissions of short-lived climate pollutants under ambitious mitigation. *npj Climate and Atmospheric Science*, 1(1), 16. <https://doi.org/10.1038/s41612-018-0026-8>

¹⁰ Ruminant Health & Welfare 2022, Acting on methane: opportunities for the UK cattle and sheep sectors. Available at: <https://ruminanthealth.org.uk/wp-content/uploads/2022/04/SO-634-Ruminant-Report-Methane-April-2022-web.pdf>

example, improved access for dog walkers also creates an increased biosecurity risk and could increase the transmission of diseases such as bovine TB, sheep scab, fascioliasis, hydatid disease and neosporosis). It is also essential to recognise the evidence indicating that wildlife control still makes up part of TB control¹¹. Whilst the SFS has a focus on maintaining wildlife, it cannot be ignored that current TB policy is leading to inefficient livestock production which impacts hugely on sustainability. Farm vets recognise that biosecurity and risk-based trading has huge implications for TB control, but the role wildlife play in transmission cannot be ignored. We support a holistic approach to tackling TB that makes use of all the available tools in the toolbox, and are concerned that this issue could be exacerbated by the scheme's requirements to increase wildlife habitats on farms. More information can be found in the [BVA](#) and [BCVA](#) policies on Bovine TB. All these consequences should always be considered carefully, especially as the biosecurity measures in UA17 will be monitored only by self-assessment. Where outcomes are competing with each other, it is important that no outcome should be rewarded that decreases animal health or welfare standards on a farm from the existing situation.

17. As highlighted by the Food and Agriculture Organization of the United Nations: "*If managed sustainably, agricultural sectors can contribute to important ecosystem functions. These include maintenance of water quality, nutrient cycling, soil formation and rehabilitation, erosion control, carbon sequestration, resilience, habitat provision for wild species, biological pest control and pollination.*"¹²
18. It may be that some environmental outcomes, e.g. carbon sequestration, can be achieved more quickly by some methods than others. For example, livestock grazing pasture has enormous potential as a valuable carbon sink and that can be realised much faster than the planting of broad-leaved trees. Which of these methods are used should be based on scientific evidence with full impact assessment performed including consequences to animal health and welfare¹³.

Other requirements in the universal actions

19. We support the principle of the universal actions, and recognise the positive impact many of these could make. It is difficult to assess how beneficial these payments will be without financial details. Each action has a cost implication for farmers which payments must sufficiently cover before they become worthwhile.
20. Whilst we recognise the improvement since previous consultations, we continue to be disappointed that animal health and welfare is not prominent enough in the proposed scheme, and not sufficiently recognised as an important public good/SLM outcome. Although animal health and welfare is included, the emphasis and detail of these proposals is overwhelmingly focused on environmental aspects. We support incentivising measures which improve environmental sustainability and protect wildlife, some of which we recognise will also have benefits for animal health and welfare. For example, we support the Nutrient Management Plan (included in Universal Action 3), which could improve slurry management and other practices that may impact the spread of disease on farms.
21. We are concerned that there could be unintended consequences for livestock disease control from 'rewilding' farm land, that does not appear to have been fully acknowledged by the scheme. For example, the requirements for ponds and scrapes (UA10) could lead to an increase in presence of the mud snails (*Galba truncatula*) associated with liver fluke, leading to negative animal health outcomes and, potentially, increased carbon emissions. Liver fluke has both welfare and economic impact in the cattle and sheep sectors in Wales. Additionally, actions designed to encourage wild birds onto farms could result in a greater spread of avian influenza and other pathogens (eg Salmonella, Campylobacter), so must be carefully thought through. Thorough impact assessments for animal welfare should be conducted ahead of the scheme's launch.
22. The proposal does not sufficiently recognise the positive environmental outcomes that can be achieved through good animal health and welfare. There is a large body of evidence showing that improving animal health and animal welfare concurrently benefits environmental public goods for

¹¹ Defra, 2018. Bovine TB Strategy Review October 2018 (known as 'The Godfray Report')

¹² FAO, 2017. Sustainable agriculture for biodiversity: Biodiversity for sustainable agriculture. Available at: <http://www.fao.org/3/a-i6602e.pdf>

¹³ Pol-van Dasselaar, A. 2017. EIP-AGRI Focus Group Grazing for carbon, Starting Paper.

https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdf

example by reduction of greenhouse house emissions through increased efficiency of production^{14,15,16,17,18}.

23. We are concerned that the expectation on livestock farmers to complete, document and evidence the universal actions across the board will mean they lose focus on the essential health and welfare sections, which will take more time and effort than the proposals suggest. This could lead to poor welfare outcomes for both the farmed animals and wildlife, so it is essential that farmers have the time and resources for their core husbandry work.
24. BVA members have been involved in workshops developing the SFS and AHIC, providing a greater insight to the expectations than most farmers or vets currently have. This consultation does not adequately explain the incoming requirements for animal health and welfare, and we are concerned that farmers will not be prepared for the time and effort the proposals will require.
25. This consultation does not make it sufficiently clear that ensuring the health and welfare of sentient animals is important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives such as reducing antimicrobial resistance (AMR) as an environmental benefit. An environmental benefit scheme on land where livestock is kept must include animal health and welfare. For example, a farm with serious sheep scab infection in the flock should not be receiving funding for an environmental scheme in the absence of a parallel programme to eradicate sheep scab.
26. Prioritising evidence-based disease control is essential to avoid poor animal health and welfare, as well as the associated economic costs, and contributions to climate change as low productivity is not sustainable. Endemic diseases such as Bovine Viral Diarrhoea (BVD) and sheep scab can only be eradicated through partnership working between farmers, vets and government. We are concerned that legislation to follow the end of the voluntary Gwaredu BVD scheme has not yet been introduced, as BVD has a big impact on farm efficiency and sustainability. BVD Persistently Infected animals should not be able to be kept on farm or traded unless direct to slaughter. We strongly supported the proposals Welsh Government previously consulted on and are concerned that the delay in implementation could cause BVD control to take a backwards step in Wales and therefore negatively impact sustainability.
27. The scheme must recognise that animal health and welfare is interwoven with many social, economic and environmental outcomes, as outlined in point 12.
28. We have consistently recommended that animal health and welfare should feature more prominently within the SLM framework. We would welcome further detail from Welsh Government on how the proposals will ensure animal health and welfare is prioritised by all livestock farmers benefiting from the scheme.

Reporting requirements

29. Self-reporting by farmers is likely to produce variable quality data, with some farmers skilled in reporting KPIs and others struggling to provide accurate data. It is known that providing data just for the sake of “ticking a box” will lead to poor quality data that farmers do not value or use. For these data to be valuable to farmers, vets and Welsh government, farmers must feel confident in their ability to input good quality data, and must also trust that the data will be useful to them, practically, as well as being something they are required to do by Welsh Government.
30. Where data has already been collected, including by automated monitoring systems, a mechanism should be in place to reduce the need for duplication. We would recommend recognising participation in a farm assurance schemes wherever possible, as part of an “earned recognition” system. Farm assurance schemes allow producers to demonstrate that their food products, both animal and non-animal derived, have met specific, independently certified standards at each stage of the supply chain from farm to fork. These standards include, but are not limited to, animal health and

¹⁴ Skuce et al. 2016. Livestock Health & Greenhouse Gas Emissions. ClimateXchange, Scotland's Centre of Expertise on Climate Change. https://www.climateexchange.org.uk/media/2031/livestock_health_and_ghg.pdf

¹⁵ Llonch et al. 2017. Current available strategies to mitigate greenhouse gas emissions in livestock systems: an animal welfare perspective. *Animal*. 2017 Feb;11(2):274-284. doi: 10.1017/S1751731116001440

¹⁶ Patra, A.K. 2016. Recent advances in measurement and dietary mitigation of enteric methane emissions in ruminants. *Frontiers in veterinary science*, 3: 39. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4873495/X>

¹⁷ Statham, J. et al. 2017. Climate change and cattle farming. *In Practice* 39.1: 10-19.

¹⁸ Pol-van Dassel, A. 2017. EIP-AGRI Focus Group Grazing for carbon, Starting Paper. https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdfX

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welfare, food safety, stockmanship training and competencies and environmental protection. Read more in our [position on farm assurance schemes](#). Recognising the importance of farm assurance schemes could help to reduce the time and expertise required to collect some of the required data.

31. From an animal health and welfare point of view, it is not sufficient to carry out a tick-box exercise in terms of inputs. We support welfare outcome assessment in assurance schemes as a tool to drive continuous improvement of animal management and husbandry practices (including welfare at slaughter and food hygiene), in turn promoting high animal health and welfare. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare. Indicators of positive welfare should be incorporated into welfare outcome assessments whenever possible, as promoted by the FAWC's "good life" framework¹⁹. Behavioural opportunity for animals can be a key differentiator between some production systems, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. A welfare outcomes approach also contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal's health and welfare needs.
32. Vets work closely with farmers and keep a range of records. Whilst they cannot be expected to assess or monitor farmers as part of the scheme, their expertise may be very helpful when collecting data and should be consulted as part of the assessment process.

Stability payment for common graziers

33. BVA and BCVA are supportive of the Welsh Government's plan to provide a phased transition period which aims to provide farmers with stability and confidence to invest in their businesses and thereby deliver public benefit. We believe the stability payments will be an appropriate way to support common graziers during this period, though this is difficult to assess without financial details.
34. Any transition period must ensure that there is no resultant decrease in animal health, animal welfare or public health standards due to changes in the financial support structure. For example, animal products imported from non-EU countries should have been produced under equivalent welfare standards to our own.
35. BVA and BCVA recognise that many of our members' roles in Wales are interlinked with the agricultural sector. The provision of 24 hour rural veterinary services for production animals is dependent on the viability of practices caring for these animals, which in turn depends on a thriving livestock production sector. It must be recognised that any measures which may result in a reduction of the number of livestock farmers in Wales may have resultant negative consequences for the provision of rural veterinary services.
36. Common Agricultural Policy (CAP) payments are an important part of farm incomes in Wales. Welsh agriculture, and livestock farms in particular, are far more dependent upon payments from the CAP than their English counterparts—in some cases this can account for 80% of farm income in Wales, as compared with an average of 55% for the whole of the UK. Wales currently receives 9% of the total UK CAP budget²⁰. Wales has four times the number of people employed directly within agriculture when compared with England, whose employment may be affected by the proposed changes. 88% of Wales' land area is agricultural land, mainly less favoured area (LFA) land, and Wales' main agricultural output is livestock (51%) and livestock products (35%)²¹. This change of financial support structure therefore comes at a time when the future of Wales' main livestock industry is uncertain, given our unknown future trading arrangements and export markets. Wales may also end up on an unlevel playing field in terms of financial support, with Scotland, who are also producing lambs for the same market, depending on what policies are adopted in Scotland. As with any new climate related policy, Welsh Government should aim to ensure a just transition, ensuring that no sector is disproportionately impacted.

Scheme Process

¹⁹ Farm Animal Welfare Committee (FAWC), 2009. "Farm Animal Welfare in Great Britain: Past, Present and Future". Available at: <https://www.gov.uk/government/publications/fawc-report-on-farm-animal-welfare-in-great-britain-past-present-and-future>

²⁰ UK Government Agricultural policy post-Brexit: <https://publications.parliament.uk/pa/cm201719/cmselect/cmwelaf/402/40207.htm>

²¹ Armstrong, E. 2016. The Farming Sector in Wales. National Assembly for Wales Research Briefing. <http://www.assembly.wales/research%20documents/16-053-farming-sector-in-wales/16-053-web-english2.pdf>

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Management responsibility period

37. Not within our remit to comment

Carbon calculator

38. This is not our area of expertise, but we are concerned that carbon calculators are known to be very context-specific, and a single carbon calculator may not suit all types of farms in the scheme. Care must be taken to ensure all farms are able to create an accurate and fair carbon footprint, and context must be taken into account when making comparisons.
39. The debate around CO₂ equivalence metrics is an area of active research and may impact mitigation planning in the future. Use of The Global Warming Potential Star (GWP*) metric should be considered, rather than the traditional GWP100, as this has been developed to allow comparisons of the global warming impacts of different gases to more accurately reflect the warming effect of methane in the atmosphere.

Controls and sanctions

40. This is not our area of expertise, but we support sanctions which are proportionate to the non-compliance or offence.
41. It will be important to recognise the impact the threat of sanctions, penalties and civil proceedings can have on a farmer's mental wellbeing, and the risks this poses to their health. This must be taken into account when deciding what is a proportionate response.

Appeals process

42. Not within our remit to comment

Payment methodology

SFS universal baseline payment

43. It is very difficult to provide a comment on the proposed approach to the SFS universal baseline payments without financial details. It is not clear what proportion of funding will be allocated to each of the four categories, including how much will be allocated to essential animal health and welfare actions.
44. We are concerned that payments currently only appear to cover costs or income forgone, and do not provide an incentive for further action. The impact assessments highlight the negative impact this could have on the number of viable farms and the level of labour on farms, which will also have an impact on the wider rural supply chain. Farming is the cornerstone of the £6.9 billion Welsh food and drink supply chain industry and represents over 58,000 jobs²², yet only 7% of Welsh land is defined as good or excellent quality²³, making it difficult to drive a profit from the land. It is vital that this scheme is used as an opportunity to support the economic resilience of Welsh agriculture by offering business support to farmers, thus supporting rural economies and rural communities whilst also rewarding public goods.
45. It is important that funding from the UK government is ring fenced for Welsh agriculture and is used for the benefit of Welsh farming. The ambition must be to enhance our already high standards of animal health and animal welfare, in order to increase productivity and efficiency and economic resilience. There is strong evidence that this will also provide environmental benefits.

SFS stability payment

46. As previously stated, BVA and BCVA are supportive of the Welsh Government's plan to provide a phased transition period which aims to provide farmers with stability and confidence to invest in their businesses and thereby deliver public benefit. We believe the stability payments will be an appropriate way to support farmers, though this is difficult to assess without financial details.
47. Any transition period must ensure that there is no resultant decrease in animal health, animal welfare or public health standards due to changes in the financial support structure. For example, animal

²² <https://www.nfu-cymru.org.uk/campaigns/back-welsh-farming/>

²³ <https://beta.gov.wales/agricultural-land-classification-predictive-map>

products imported from non-EU countries should have been produced under equivalent welfare standards to our own.

48. The transition period must take into account the need to adequately train sufficient numbers of advisers to undertake the farm sustainability review and farm sustainability plan needed to enter the scheme. Time must also be allowed to pilot this stage of the process to make sure there are no unintended negative consequences.
49. BVA and BCVA recognise that many of our members' roles in Wales are interlinked with the agricultural sector. The provision of 24 hour rural veterinary services for production animals is dependent on the viability of practices caring for these animals, which in turn depends on a thriving livestock production sector. It must be recognised that any measures which may result in a reduction of the number of livestock farmers in Wales may have resultant negative consequences for the provision of rural veterinary services.
50. Common Agricultural Policy (CAP) payments are an important part of farm incomes in Wales. Welsh agriculture, and livestock farms in particular, are far more dependent upon payments from the CAP than their English counterparts—in some cases this can account for 80% of farm income in Wales, as compared with an average of 55% for the whole of the UK. Wales currently receives 9% of the total UK CAP budget²⁴. Wales has four times the number of people employed directly within agriculture when compared with England, whose employment may be affected by the proposed changes. 88% of Wales' land area is agricultural land, mainly less favoured area (LFA) land, and Wales' main agricultural output is livestock (51%) and livestock products (35%)²⁵. This change of financial support structure therefore comes at a time when the future of Wales' main livestock industry is uncertain, given our unknown future trading arrangements and export markets. Wales may also end up on an unlevel playing field in terms of financial support, with Scotland, who are also producing lambs for the same market, depending on what policies are adopted in Scotland. As with any new climate related policy, Welsh Government should aim to ensure a just transition, ensuring that no sector is disproportionately impacted.

Transition period (chapter 5)

Access to support for farmers outside the scheme

51. Farmers outside the scheme should have equal chance of accessing the funding to complete optional and collaborative actions. Some farms may choose not to join the SFS if the universal actions do not work for them, but would be able to benefit from optional and collaborative actions since these are more context specific and targeted for specific land. Access to this support may enable a farm to reach the required standards for the universal actions. We also believe that there should not be barriers in place to farmers who wish to participate in collaborative actions, where the benefits are greater than the sum of their parts. The scheme should be collaborative, industry-led and cohesive across the UK.

Prioritising Optional and Collaborative actions

52. We are concerned that the AHIC is listed as an example of an optional or collaborative scheme on page 70, as well as a universal action UA15, which is confusing. Welsh Government must provide clarity on this to ensure farmers understand that the AHIC is not an optional element, and that there are minimum standards for animal health and welfare which must be attained to join the scheme.
53. Priority should be given to Optional Actions to improve animal health over and above the Good Farm Biosecurity and Good Animal Welfare Universal Actions. We are disappointed that animal health and welfare is not prominent enough in the proposed scheme, and not sufficiently recognised as an important public good or SLM outcome. Although animal health and welfare is included within the Universal Actions, the proposals do not sufficiently recognise its importance in sustainable farming.
54. Prioritising these Optional Actions would help to make it clear that ensuring the health and welfare of sentient animals is considered important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives such as reducing AMR as an environmental benefit. An environmental benefit scheme on land where livestock is kept must include animal health and

²⁴ UK Government Agricultural policy post-Brexit: <https://publications.parliament.uk/pa/cm201719/cmselect/cmwelaf/402/40207.htm>

²⁵ Armstrong, E. 2016. The Farming Sector in Wales. National Assembly for Wales Research Briefing. <http://www.assembly.wales/research%20documents/16-053-farming-sector-in-wales/16-053-web-english2.pdf>

welfare. For example, a farm with serious sheep scab infection in the flock should not be receiving funding for an environmental scheme in the absence of a parallel programme to eradicate sheep scab. Improved animal health and welfare, beyond the legal minimum, must be recognised as an outcome with ongoing financial support being provided for good practice above the statutory requirements and where improvements are made.

55. Specifically recognising the importance of animal health and animal welfare as SLM outcomes, for environmental, social, and economic benefits, would reflect the Welsh government's belief that animal sentience should be enshrined in law²⁶, their commitment to the concept of One Health and keeping the people of Wales safe by protecting them from disease, and their recognition that high animal welfare and food safety standards are the foundations underpinning consumer confidence in Welsh produce, both at home and abroad. We are disappointed that this is not sufficiently reflected in these proposals, in contrast to the plans for environmental actions within this document, and the ambitious system of public money for public goods that has been taken forward in England which explicitly lists animal health and animal welfare to receive financial support. We therefore believe that animal health and welfare must be recognised as an important outcome by any new agricultural payments scheme.
56. There is a large body of evidence supporting the environmental benefits of various aspects of livestock farming in Wales^{27,28,29,30,31}. These include carbon sequestration and improved soil quality in grazing pastures, particularly leguminous pastures, reduction of methane emissions through disease eradication, increased productivity, reduced losses and increased feeding efficiency, and reduced food miles from consuming locally produced food. Recent research³² published by Oxford University demonstrates that ruminants can offer a viable pathway to net zero emissions from UK agriculture, in keeping with the target date of 2030, which is a key consideration with respect to any decision on which outcomes will be rewarded via direct payments. This research provides further evidence that UK ruminant agriculture can create positive SLM outcomes.

BPS (chapter 6)

Changes to BPS from 2025

57. As previously stated BVA and BCVA are supportive of the Welsh Government's plan to provide a phased transition period which aims to provide farmers with stability and confidence to invest in their businesses and thereby deliver public benefit. Details on the value of payments will be needed to assess whether the transition is adequate.
58. Any transition period must ensure that there is no resultant decrease in animal health, animal welfare or public health standards due to changes in the financial support structure. For example, animal products imported from non-EU countries should have been produced under equivalent welfare standards to our own.
59. The transition period must take into account the need to adequately train sufficient numbers of advisers to undertake the farm sustainability review and farm sustainability plan needed to enter the scheme. Time must also be allowed to pilot this stage of the process to make sure there are no unintended negative consequences.
60. BVA and BCVA recognise that many of our members' roles in Wales are interlinked with the agricultural sector. The provision of 24 hour rural veterinary services for production animals is dependent on the viability of practices caring for these animals, which in turn depends on a thriving livestock production sector. It must be recognised that any measures which may result in a reduction

²⁶ Lesley Griffiths, Cabinet Secretary for Energy, Planning and Rural Affairs, Written Statement - Animal Sentience, <https://gov.wales/about/cabinet/cabinetstatements/2018/animalsentience/?lang=en>

²⁷ Skuce et al. 2016. Livestock Health & Greenhouse Gas Emissions. ClimateXchange, Scotland's Centre of Expertise on Climate Change. https://www.climatechange.org.uk/media/2031/livestock_health_and_ghg.pdf

²⁸ Llonch et al. 2017. Current available strategies to mitigate greenhouse gas emissions in livestock systems: an animal welfare perspective. *Animal*. 2017 Feb;11(2):274-284. doi: 10.1017/S1751731116001440

²⁹ Patra, A.K. 2016. Recent advances in measurement and dietary mitigation of enteric methane emissions in ruminants. *Frontiers in veterinary science*, 3: 39. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4873495/X>

³⁰ Statham, J. et al. 2017. Climate change and cattle farming. *In Practice* 39.1: 10-19.

³¹ Pol-van Dasselaar, A. 2017. EIP-AGRI Focus Group Grazing for carbon, Starting Paper.

https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdfX

³² Allen, MR, Shine, KP, Fuglestvedt, JS, Millar, RJ, Cain, M, Frame, DJ, and Macey, AH (2018): A solution to the misrepresentations of CO2 -equivalent emissions of short-lived climate pollutants under ambitious mitigation. *npj Climate and Atmospheric Science*, 1(1), 16. <https://doi.org/10.1038/s41612-018-0026-8>

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of the number of livestock farmers in Wales may have resultant negative consequences for the provision of rural veterinary services.

61. Common Agricultural Policy (CAP) payments are an important part of farm incomes in Wales. Welsh agriculture, and livestock farms in particular, are far more dependent upon payments from the CAP than their English counterparts—in some cases this can account for 80% of farm income in Wales, as compared with an average of 55% for the whole of the UK. Wales currently receives 9% of the total UK CAP budget³³. Wales has four times the number of people employed directly within agriculture when compared with England, whose employment may be affected by the proposed changes. 88% of Wales' land area is agricultural land, mainly less favoured area (LFA) land, and Wales' main agricultural output is livestock (51%) and livestock products (35%)³⁴. This change of financial support structure therefore comes at a time when the future of Wales' main livestock industry is uncertain, given our unknown future trading arrangements and export markets. Wales may also end up on an unlevel playing field in terms of financial support, with Scotland, who are also producing lambs for the same market, depending on what policies are adopted in Scotland. As with any new climate related policy, Welsh Government should aim to ensure a just transition, ensuring that no sector is disproportionately impacted.
62. Any change in policy must be cognisant of these factors and properly examine any consequences, including performing detailed impact assessments. Any decision will also be made within a context of considerable uncertainty about future trading relationships with the EU and other countries. Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries. Any requirement for veterinary checks on animals and products of animal origin at ports could reduce the efficiency of produce moving to European markets and place additional administrative costs upon farmers. We also do not currently have the additional veterinary workforce capability necessary to meet increased demand for trade certification of animal products following potential changes to current trading arrangements.
63. This uncertainty means it will be difficult to assess the full impact of the withdrawal of direct payments to farm incomes. More challenging will be determining the impact on the wider rural economy that delivers goods and services to farms. None of Wales' agricultural output could be realised without the veterinary services of our members throughout production, processing and export, and we recognise that members' ability to provide livestock veterinary services may also be indirectly impacted upon by changes to CAP payments. Farm animal veterinary practices in the UK represent an important service sector to livestock farmers, and act as a means to detect disease and enforce animal health and welfare legislation. Ensuring the continued capability of farm animal practice as a means of achieving the public goods of animal health and welfare should be properly assessed by the Government.
64. Detailed impact assessments of any new support schemes are vital to identify potential unintended consequences, including to animal health, animal welfare, public health and environmental health. We welcome the assurance that Welsh Government is *“clear we cannot make changes until we can demonstrate a new system is adequately designed, we have undertaken the relevant impact assessments and we are confident it is administratively practicable.”* These must include assessments on the effect proposed changes could have on animal health and welfare, public health and food safety, as well as economic and community effects.
65. It will not be possible to simultaneously transition all claimant farms in Wales onto a new scheme of such complexity. Therefore, some farms will still be on the old scheme whilst others have entered the new scheme. Due consideration needs to be given to how any new scheme can be rolled out gradually, whilst ensuring that all farms receive their due share of funding throughout the transition period. Any delay in payment could lead to negative consequences for animal welfare. CAP could be simplified whilst it is still in operation by introducing a Single Farm Payment (SFP) threshold above which payments will be capped, avoiding a large amount of funding going to inactive claimants who own large areas of land.

Regulations (chapter 7)

³³ UK Government Agricultural policy post-Brexit: <https://publications.parliament.uk/pa/cm201719/cmselect/cmwelaf/402/40207.htm>

³⁴ Armstrong, E. 2016. The Farming Sector in Wales. National Assembly for Wales Research Briefing. <http://www.assembly.wales/research%20documents/16-053-farming-sector-in-wales/16-053-web-english2.pdf>

Proposed approach to secondary legislation

66. We support the proposal to make regulations clearer since this will improve understanding, accessibility and compliance.
67. It is important that any new regulations do not reduce standards, and take care to avoid any loopholes which may result in lower standards of animal health and welfare. Any changes must be soundly evidence based and there should be a commitment to review in the light of new scientific information. Any change must also be considered in line with those proposed by other administrations in the UK so that legislative loopholes do not appear, and that Welsh farming is not disadvantaged in the market place.
68. Animal health and welfare must be an integral part of the new regulatory framework. As animal health and welfare specialists and advocates from farm to fork, the veterinary profession is well-placed to advise and influence sustainable animal husbandry practices at whole system levels; safeguarding animal health and welfare whilst at the same time facilitating production efficiency and environmental protection. They should therefore be involved in the development of any new framework. We would welcome the opportunity to work with the Welsh Government on this.
69. Wales must consider how best to utilise agricultural support to incentivise animal health and welfare within the rules of the World Trade Organisation (WTO), as well as any ongoing agreements that we may have with the EU. The WTO Agreement on Agriculture provides a framework for agricultural support. If Wales wishes to reduce the likelihood of any challenge in the WTO to a new agricultural support regime, it may seek to minimise both trade distortion and direct impact on production. To achieve this farm payments should be through a government-funded scheme which does not provide price support to farmers linked to market value. The ambition must be to raise standards of animal health and welfare, and under no circumstances should our existing high standards be compromised by any future agreements with trading partners. Any new schemes must recognise the uncertainty of future trading arrangements, and potential changes in Wales' agricultural productivity, imports and exports following our departure from the EU, and should not put us at an economic disadvantage whilst navigating a new trading landscape.
70. As now, there will be a requirement to comply with the animal health and public health (including food safety) standards set by the World Organisation for Animal Health (WOAH); World Health Organisation (WHO) and Food and Agriculture Organization of the United Nations (FAO). WTO rules for trade in animals and animal products function on this basis.

Evidence (chapter 8)

Existing analysis and evidence required

71. The Universal Payment is intended to reflect the social value of outcomes realised by sustainable land management. It is essential this payment recognises that the health and welfare of sentient animals is important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives such as reducing AMR as an environmental benefit. An environmental benefit scheme on land where livestock is kept must include animal health and welfare. For example, a farm with serious sheep scab infection in the flock should not be receiving funding for an environmental scheme in the absence of a parallel programme to eradicate sheep scab.
72. We are concerned that existing analysis published in the economic modelling shows that the SFS will have a negative impact on sheep farms:
“Overall output losses of £125m and livestock reductions of 122k GLUs are estimated, being proportionately highest for dairy farms but also for specialist sheep farms (because of stocking limits to maintain and retain the semi-natural habitats)”
73. This is concerning since the SFS aims to keep farmers on their land, and many of these sheep farms are known to already be operating at the limits of their viability. For those farmers remaining on the land, the negative financial impact could mean they are required to make savings which result in poorer animal health and welfare conditions.

Monitoring and evaluation (chapter 9)

Information and evidence to monitor and evaluate the scheme

74. Animal health and welfare metrics must be monitored to ensure the scheme is not adversely affecting this essential aspect of sustainable farming. Results of welfare outcomes assessments

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should be used to monitor progress, as it is not sufficient to carry out a tick-box exercise in terms of inputs when monitoring animal health and welfare.

75. We support welfare outcome assessment in assurance schemes as a tool to drive continuous improvement of animal management and husbandry practices (including welfare at slaughter and food hygiene), in turn promoting high animal health and welfare. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare. Indicators of positive welfare should be incorporated into welfare outcome assessments whenever possible, as promoted by the FAWC's "good life" framework³⁵. Behavioural opportunity for animals can be a key differentiator between some production systems, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. A welfare outcomes approach also contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal's health and welfare needs.
76. We would welcome the further development of animal welfare metrics across species and sectors where they do not currently exist so that indicators of positive welfare, emotional and behavioural states are incorporated into welfare outcomes assessment and lifetime welfare assessment where possible. In the context of sustainable intensification^{36,37}, it is important to avoid oversimplification when considering how different production systems address animal health and welfare needs and recognise that welfare outcomes are not solely dependent on the type or size of different production systems. As such, animal health and welfare outcome assessments should form part of production system key performance indicators and the Government should utilise public money to incentivise and support animal health and welfare outcomes as public goods.

Other

Effects on Welsh language

77. BVA and BCVA are aware of the Welsh Language Act and the importance of the Welsh language in Welsh communities, particularly in rural areas likely to be most affected by agricultural policy.
78. Our high animal health and animal welfare standards rely on effective communication between farmers, their own vets and government vets, for example to enable effective disease surveillance to be carried out. Welsh language is an essential aspect of this communication and it is important for animal health and welfare that farmers in all parts of Wales are able to access schemes and veterinary services in their chosen first language. It is not in our remit to discuss the impact of these proposals on the Welsh language.

Additional comments

79. As agricultural policy in the UK is devolved, administrations have been able to shape agricultural policy to the needs of their respective jurisdictions. At the same time, the EU has ensured a degree of coherence to agricultural policy amongst all four administrations. Brexit presented an opportunity to tailor agricultural policy to suit the countries of the UK, however coordination and oversight on matters of animal health and welfare is crucial. There will therefore need to be consideration where decisions on agricultural policy are taken, and how best to coordinate efforts across the nations of the UK. Any measures introduced must be considered in line with those proposed by other administrations in the UK so that legislative loopholes do not appear, and that Welsh farming is not disadvantaged in the market place.

³⁵ Farm Animal Welfare Committee (FAWC), 2009. "Farm Animal Welfare in Great Britain: Past, Present and Future". Available at: <https://www.gov.uk/government/publications/fawc-report-on-farm-animal-welfare-in-great-britain-past-present-and-future>

³⁶ Sustainable intensification is defined in the Government Office for Science (2011) The Future of Food and Farming: Challenges and choices for global sustainability report as "...simultaneously raising yields, increasing the efficiency with which inputs are used and reducing the negative environmental effects of food production. It requires economic and social changes to recognise the multiple outputs required of land managers, farmers and other food producers, and a redirection of research to address a more complex set of goals than just increasing yield."

³⁷ Farm Animal Welfare Committee (FAWC), 2012. FAWC advice on sustainable intensification of livestock agriculture. Available at: <https://www.gov.uk/government/publications/fawc-advice-on-sustainable-intensification-of-livestock-agriculture>

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80. In particular, the four governments of the United Kingdom should establish structures to ensure ongoing cooperation and collaboration on TB. Infectious diseases such as TB do not respect borders, so co-ordination, collaboration, and consistency across the devolved nations is vital to reduce animal health and welfare harms and their impacts on sustainability. Policies across the devolved nations should be consistent, and ideally there would be Welsh representation in the [Bovine TB Partnership](#). More information can be found in the [BVA](#) and [BCVA](#) policies on Bovine TB.
81. To facilitate this, we would welcome the establishment of a UK wide body to oversee and coordinate animal health and welfare policy across the four administrations of the UK and facilitate partnership working between industry and government to tackle endemic disease and animal health and welfare challenges.
82. We would welcome the further development of animal welfare metrics across species and sectors where they do not currently exist so that indicators of positive welfare, emotional and behavioural states are incorporated into welfare outcomes assessment and lifetime welfare assessment where possible.
83. Government should also promote the benefits of properly valuing quality animal-derived products, where quality encompasses good animal health and welfare, food safety, environmental protection and fair returns for producers.
84. We would welcome the opportunity to work closely with the Welsh Government to expand upon these proposals.