

National Assembly for Wales
Environment and Sustainability Committee

Inquiry into Glastir

October 2012



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National Assembly for Wales
Environment and Sustainability Committee

Inquiry into Glastir

October 2012



Environment and Sustainability Committee

The Committee was established on 22 June 2011 with a remit to examine legislation and hold the Welsh Government to account by scrutinising expenditure, administration and policy matters encompassing: the maintenance, development and planning of Wales's natural environment and energy resources.

Current Committee membership



Dafydd Elis-Thomas (Chair)

Plaid Cymru
Dwyfor Meirionnydd



Mick Antoniw

Welsh Labour
Pontypridd



Keith Davies

Welsh Labour
Llanelli



Russell George

Welsh Conservatives
Montgomeryshire



Vaughan Gething

Welsh Labour
Cardiff South and Penarth



Llyr Huws Gruffydd

Plaid Cymru
North Wales



Julie James

Welsh Labour
Swansea West



William Powell

Welsh Liberal Democrats
Mid and West Wales



David Rees

Welsh Labour
Aberavon



Antoinette Sandbach

Welsh Conservatives
North Wales

The following Member was also a member of the committee during this inquiry.



Rebecca Evans

Welsh Labour
Mid and West Wales

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The Committee's Recommendations

The Committee's recommendations to the Welsh Government are listed below, in the order that they appear in this report. Please refer to the relevant pages of the report to see the supporting evidence and conclusions:

Recommendation 1. The Welsh Government to develop and publish an initial strategic communications plan for Glastir by January 2013. Within its communication plan the Welsh Government should identify the actions it will undertake to communicate with those farmers who have already entered Glastir, and to ensure that prospective entrants to Glastir are communicated with appropriately. If this communications work is to be undertaken by different agencies the plan should clearly identify those with lead responsibility for the different actions. (Page 10)

Recommendation 2. The Welsh Government to provide the Committee with an update on progress with implementation of its strategic communications plan for Glastir, and in particular on actions to inform farmers about capital works payment mechanisms and Glastir 'Advanced' (previously the 'Targeted Element'). It would be helpful for the Committee to receive this update in advance of the Government's annual report on Glastir in 2013. (Page 11)

Recommendation 3. The Welsh Government to investigate whether the uptake of some options under Glastir Entry has been negatively affected by a lack of on-farm support and publish the results of such a review by January 2013. (Page 12)

Recommendation 4. The Welsh Government to provide an update on progress with provision of front-end support to farmers, by January 2013, identifying how much of this support was provided on-farm. (Page 12)

Recommendation 5. The Welsh Government to report the outcome of its review of record-keeping requirements for Glastir, and any changes it proposes as a result, to the Environment and Sustainability Committee by the end of November 2012. (Page 14)

Recommendation 6. The Welsh Government to ensure as part of its communication plan that changes to the way in which capital payments are made under Glastir are clearly explained to all stakeholders. (Page 15)

Recommendation 7. The Welsh Government to provide further clarity on the timetable for the periodic review of payment rates, and to set out clearly what criteria it will use in deciding whether or not to undertake a review. (Page 16)

Recommendation 8. The Welsh Government to consider the scope for reviewing the overall design of payment mechanisms within Glastir, taking account of the EU and World Trade Organisation rules applying to the scheme but also of the work of CCW and other UK countryside agencies in this area. (Page 16)

Recommendation 9. The Welsh Government should work with the forestry sector to assess the impact of Glastir on that sector and determine how support measures for the commercial forestry sector will be integrated into the work of the new Natural Resources body. The Committee believes that measures should be in place within one year of the Natural Resources body being operational. (Page 18)

Recommendation 10. The Welsh Government to undertake to fully consult stakeholders about amending the options within Glastir when it reviews the scheme following the introduction of the new Common Agricultural Policy. (Page 20)

Introduction

1. On 6 March 2012 the Deputy Minister for Agriculture, Fisheries, Food and European Programmes announced a stocktake of the Glastir agri-environment scheme.¹ The Environment and Sustainability Committee subsequently agreed terms of reference² for a short inquiry to listen to the views of key stakeholders.
2. On 17 May the Committee took evidence from farming unions; representatives of organic farmers; Countryside Council for Wales (CCW) and Wales Environment Link (WEL). The Committee then wrote to the Deputy Minister,³ highlighting a number of concerns raised by stakeholders about the scheme and suggestions as to how it could be improved.
3. On 3 July the Deputy Minister published a report on the findings of the stocktake exercise⁴ and gave an oral statement to plenary⁵ on how the scheme would be taken forward. Some changes to the scheme were announced, including removing the application window and re-naming elements of the scheme. The 'All Wales Element' of Glastir is now named Glastir 'Entry', and the 'Targeted Element' is Glastir 'Advanced'.
4. The Deputy Minister's statement addressed some points raised by the Committee, and he then attended a Committee scrutiny session on 25 July at the Royal Welsh Show. This report summarises the Committee's key conclusions about the implementation and future delivery of Glastir, and outstanding recommendations to the Welsh Government, following the Deputy Minister's response to date.
5. The Committee notes that the Deputy Minister will publish an annual report on Glastir, listing "not only the numbers of people and businesses taking part in the scheme but also what the scheme is achieving and how the taxpayer is benefiting from the considerable investment." The Committee's regular Ministerial scrutiny sessions also provide an opportunity to consider the impact of changes

¹ Welsh Government, Alun Davies (Deputy Minister AFFE), Glastir-Taking the Scheme Forward Cabinet Oral Statement, 6 March 2012

² Annex A - inquiry terms of reference.

³ Annex B - Letter to the Deputy Minister for AFFEP, 21 June 2012.

⁴ Welsh Government, The Glastir Stocktake - A report on the findings, June 2012.

⁵ Welsh Government, Alun Davies, Outcome of the Glastir Stocktake, (Oral Statement), 3 July 2012.

announced in July. Meanwhile the Committee is grateful to all those who provided evidence to its inquiry.

Communication

6. Communications issues were identified as a major concern, both in communicating the scheme's objectives and how to access it, and also in terms of addressing misperceptions about the scheme amongst farmers. Stakeholders highlighted that there was a continued perception that Glastir was difficult to access and that many farmers were still not aware of changes made following the Rees Roberts review.⁶

7. All stakeholders emphasised the importance of ensuring that those currently in the All Wales Element of Glastir (now re-named Glastir Entry) had a good experience and were in a position to communicate the benefits to other farmers. Both CCW and the Soil Association suggested that they could act as mentors for those yet to join the scheme, referencing the Agrisgop model to encourage groups of farmers to come together to develop skills and knowledge, facilitated by trained leaders with a farming background. The Welsh Government report on the stocktake rejected contracting mentoring services from Glastir contract holders due to a lack of resources, but recommended that partners and farming unions may be able to develop mentoring.

8. The Committee heard that confusion had been created by the way in which changes to the scheme following the Rees Roberts review had been communicated to farmers who entered the first round of Glastir. The Welsh Organic Group noted that farmers were having to operate from two different guidance booklets, and there was concern that agents advising farmers on Glastir were not necessarily aware of all the changes. The Deputy Minister has made clear his intention to move towards having a single Glastir Entry scheme with a single contract for everyone. However he stressed that no current members of Glastir who were happy with their existing contract would be compelled to change them.

9. The Glastir stocktake report recognised many of the communication issues raised by stakeholders. In particular the report describes the problems with miscommunication of changes to the

⁶ Welsh Government, Elin Jones, Minister for Rural Affairs, Written Statement - Response to the Glastir Independent Review Group report, 22 March 2011.

scheme - in documentation, online information and staff advice - as being 'wholly unacceptable'.

10. The Deputy Minister announced the development of a new communications strategy for Glastir, with case studies of current Glastir contracts forming part of the strategy to promote the scheme. Increased training for staff will also be undertaken. The Committee welcomes the appointment of a full-time person to manage communications on Glastir and develop and roll-out a strategic communications plan but remains concerned that there is not yet a clear deadline for the development of such a plan. In addition, the lead Welsh Government official told the Committee that the Government's 'communication efforts' will be focussed on those farmers who have had no previous engagement with Glastir. Whilst the Committee understands this rationale it is keen to ensure that communication with farmers already in the scheme is also of the highest standard. This is of particular concern in light of the Welsh Government's decision not to support care and maintenance visits. The Committee was told that various existing resources will be used to communicate with farmers already signed up to the scheme.

11. The Committee raised concerns about an inappropriate and officious tone sometimes being taken in written communication with farmers. The Deputy Minister apologised for any previous instances of this, noting that all standard letters were being reviewed as part of implementing the 'Working Smarter' report recommendations,⁷ and Assembly Members should report any such experiences to him directly to be dealt with as a management and policy issue.

Recommendation 1: The Welsh Government to develop and publish an initial strategic communications plan for Glastir by January 2013. Within its communication plan the Welsh Government should identify the actions it will undertake to communicate with those farmers who have already entered Glastir, and to ensure that prospective entrants to Glastir are communicated with appropriately. If this communications work is to be undertaken by different agencies the plan should clearly identify those with lead responsibility for the different actions.

⁷ Working Smarter independent report by Gareth Williams, 31 January 2012.

Recommendation 2: The Welsh Government to provide the Committee with an update on progress with implementation of its strategic communications plan for Glastir, and in particular on actions to inform farmers about capital works payment mechanisms and Glastir 'Advanced' (previously the 'Targeted Element'). It would be helpful for the Committee to receive this update in advance of the Government's annual report on Glastir in 2013.

Project Officer Support

12. The absence of project officers to support the All Wales Element was raised and several respondents suggested to the Committee that the increased use of project officers could help to increase participation in the scheme. The importance of providing on-going 'care and maintenance' support to contract holders was also raised with the Deputy Minister.

13. The Deputy Minister stated that although he recognised the value of project officer support, and 10 more officers were being appointed to join the 25 already supporting the Advanced level of Glastir, the resources were simply not available to expand project officer support beyond that. The Welsh Government position is that farmers making use of existing services such as Farming Connect is a better solution than using the Rural Development Plan to pay for dedicated Glastir officers.

14. The Deputy Minister acknowledged that it is important to ensure that the various resources available to provide 'front end support' – the farm liaison service, Farming Connect and frontline staff in Welsh Government divisional offices – are working together closely to get important messages across to farmers.

15. The Committee heard concerns from stakeholders during its inquiry that some options available to farmers under the Glastir Entry scheme, such as pond creation, have become unworkable because of a lack of on-farm advice about the location of such options.

Recommendation 3: The Welsh Government to investigate whether the uptake of some options under Glastir Entry has been negatively affected by a lack of on-farm support and publish the results of such a review by January 2013.

Recommendation 4: The Welsh Government to provide an update on progress with provision of front-end support to farmers, by January 2013, identifying how much of this support was provided on-farm.

Record-keeping requirements

16. Questions were raised by stakeholders about the necessity of some of the record keeping requirements, in particular the requirement to keep a stocking diary and field records for parcels of land that are not subject to Glastir requirements or not of habitat interest. Serious concern was expressed about the bureaucracy that the requirements generated, and that they could be acting as a barrier to farmers choosing to join Glastir. The Committee was told that the scheme was not meant to be 'so complex that it puts people off', and that a 'root-and-branch review' of the recordkeeping requirements was needed, which would be in line with 'Working Smarter'.

17. These stakeholder concerns were recognised in the stocktake report findings. Although he noted that there was a payment element within the scheme for farmers to provide the information, the Deputy Minister did recognise the importance of reviewing record-keeping requirements, giving the Committee an undertaking that this review would be completed by the end of October 2012.

18. The Deputy Minister also stated that the purpose of the recordkeeping was as part of an audit process for the Welsh Government, to be able to demonstrate that the scheme was being delivered and payments made in compliance with the rules. This led to the issue of risk:

"The Welsh Government largely takes the risk on behalf of the farming community because, if there is an issue with the delivery of a scheme, we have the disallowance and we are fined as a Government for that. It might well be that people will want to change the balance of that and that the farmers unions will say, 'We'll take on more of the risk', which means that people within the community would take more of the risk. We can have the conversation; I can see people looking shocked. I am happy to have the conversation; I am not saying that I want to lead that conversation or that I want it to arrive at a particular point. I am certainly not saying that the Government is changing its approach to this. However it might well be that

if people wish, we can have that debate about where risk lies in this audit process.”⁸

Recommendation 5: The Welsh Government to report the outcome of its review of record-keeping requirements for Glastir, and any changes it proposes as a result, to the Environment and Sustainability Committee by the end of November 2012.

⁸ Meeting Transcript 25 July 2012 [154].

Payment mechanisms and rates

Payment for capital works

19. Concerns were raised about the payment mechanisms for capital works having changed, and the need to better explain these new mechanisms to farmers. Under Tir Gofal, farmers would receive payment on completion of capital works, whereas under Glastir payment is incorporated into the annual payment received for being part of the scheme. This change of approach and how it has been communicated was identified as creating uncertainty for farmers. CCW suggested that in future the scheme could be revised for options that include capital works, so that farmers receive a higher rate per hectare in the first few years than in the last so that capital costs can be recovered sooner.

20. The Committee notes that the Welsh Government has rejected making any change to the way that capital works are paid for, although there is a commitment for the next Rural Development Plan to extend the capital works programme by 3 months, i.e. over two winters, to make financing easier for farmers.

Recommendation 6: The Welsh Government to ensure as part of its communication plan that changes to the way in which capital payments are made under Glastir are clearly explained to all stakeholders.

Payment rates

21. Stakeholders also commented that Glastir payment rates needed to be updated to reflect buoyant market conditions, with WEL stating that some payment rates were being calculated on information that was 3-4 years old. It argued that income foregone rates could appear unattractive to farmers and reduce interest in the scheme. The Country Land and Business Association (CLA) expressed similar concerns that the capital works element of payments was not inflation proof and therefore did not reflect the increased costs faced by farmers. In its response to the stocktake exercise the Welsh Government said it would continue to monitor rates periodically, but that annual review would be “very costly administratively and potentially detrimental to farmers”.

Recommendation 7: The Welsh Government to provide further clarity on the timetable for the periodic review of payment rates, and to set out clearly what criteria it will use in deciding whether or not to undertake a review.

Existing Habitat and Income Foregone

22. Under agri-environment scheme rules, payments are made to farmers only on an income foregone and costs incurred basis. Whilst recognising this, it was the view of CLA, CCW and WEL that the design of Glastir payment rates could be more creative. Greater emphasis could be placed on costs incurred, and CCW cited examples of work with agencies in other parts of the UK showing how this could be achieved, although it recognised that increasing payment rates would have implications when operating within a fixed budget.

23. CLA and NFU Cymru were concerned that current calculations placed emphasis on creation of new habitat, rather than maintaining existing habitat created under previous agri-environment schemes. The CLA felt this could reduce the attractiveness of the scheme to farmers who will be unwilling to reduce the capital value of land by converting productive land into habitat land when it is difficult to return the land to production at the end of the scheme. CCW stated that while it was true that many existing habitats could not be entered into Glastir under the original scheme design, subsequent changes meant that this was no longer necessarily true for all habitats. CCW told the Committee that there might be a perception amongst farmers that they got greater payments for habitat land under Tir Gofal than they would get under Glastir because of the confusion over how capital works are funded under Glastir.

Recommendation 8: The Welsh Government to consider the scope for reviewing the overall design of payment mechanisms within Glastir, taking account of the EU and World Trade Organisation rules applying to the scheme but also of the work of CCW and other UK countryside agencies in this area.

Relationship between the ‘All Wales Element’ (Entry) and ‘Targeted Element’ (Advanced)

24. Issues were raised in relation to the lack of information available on Glastir Advanced, and the disconnect between the application processes for that element of the scheme and for Glastir Entry. The Soil Association and CCW pointed to a lack of transparency about the Advanced level. Farmers had been required to join the Entry scheme without knowing whether they would also be able to participate in the Advanced level. It was argued that allowing farmers to apply for both elements of the scheme simultaneously could make the scheme more attractive to farmers. The CLA suggested that the Welsh Government could adopt a pro-active approach to recruiting farmers to join Glastir by contacting all farmers within the relevant targeted areas to offer them contracts for both elements at the same time.

25. Both CCW and WEL emphasised the importance of ensuring that at the end of the transition period in 2013, farmers with Tir Gofal contracts are able to enter Glastir Advanced.

26. The Committee welcomes the steps being taken by the Welsh Government to streamline entry to the Advanced level of Glastir and where possible take forward applications for Entry and Advanced levels of the scheme simultaneously. The Committee is particularly pleased that this will be piloted in the first instance with Tir Gofal farmers.

While these actions are to be welcomed they will not wholly address the wider issue of providing sufficient information on Glastir Advanced to all farmers. It is important farmers receive this information to enable them to make informed business-decisions about joining the Scheme. In his stocktake report the Deputy Minister stated that this will be addressed by the new communications plan. The Committee welcomes this commitment and will scrutinise progress on this element of the communications plan closely.

Woodland Creation and Management schemes

27. Concerns were raised by representatives of the commercial forestry sector about whether their views had been adequately taken into account in the design and implementation of the Woodland Creation and Management Schemes. Concerns were also expressed about the consistency and clarity of advice provided to applicants to these schemes during the first application window particularly with regard to the accuracy of the planting maps used. Stakeholders stated that the planting maps outlining areas where tree planting could take place were drawn up using inaccurate and old data. The Committee took up these concerns with the Deputy Minister on 25 July.

28. The Deputy Minister had ‘enormous sympathy’ with comments made by the forestry sector about the need for support for commercial woodland and had tried to make woodland elements of Glastir as flexible as possible. However he stated that it was important to be clear that the primary purpose of Glastir was to support environmental measures as a pillar 2 funded agri-environment scheme, not to provide public support to the commercial sector. The Committee accepts the Deputy Minister’s conclusion that Glastir should not be the primary vehicle for the delivery of commercial forestry support in Wales. However, it believes the concerns expressed by that sector reflect a wider environmental policy issue and that the Welsh Government needs to establish quickly how support for the commercial sector in Wales will be delivered in the coming years.

29. The Committee welcomes the commitment made by the Welsh Government in the outcomes of the Glastir stocktake to revisit some elements of the planting maps.

Recommendation 9: The Welsh Government should work with the forestry sector to assess the impact of Glastir on that sector and determine how support measures for the commercial forestry sector will be integrated into the work of the new Natural Resources body. The Committee believes that measures should be in place within one year of the Natural Resources body being operational.

Other scheme options

30. Some specific issues were also raised with the Committee about individual options and elements contained within Glastir.

Regional Packages

31. The NFU Cymru stated that regional packages added complexity to the scheme, and though the principle of regional packages was supported by CCW and WEL they conceded that they were complex and needed further revision.

High Sugar Grasses

32. Both NFU Cymru and the Soil Association called for inclusion of this option in Glastir Entry. The Soil Association stated that it would help farmers reduce greenhouse gas emissions, but WEL questioned whether this could be funded from public money given the economic benefits it provided to farmers. CCW believed this option was not adopted because it would be difficult to justify on an income foregone basis as the economic benefit would outweigh the costs incurred.

Nitrogen Application

33. Both CCW and WEL expressed concern about Options 15B and 15D due to concerns about high levels of nitrogen being applied to semi-improved species-rich grassland which could lead to considerable botanical change. They recommended amending this option to only apply to improved land. CCW highlighted that allowing application of 50kg/ha of inorganic fertiliser and 50kg/ha organic fertiliser per annum was higher than the UK average of 89kg/ha per annum of fertiliser. WEL echoed these concerns and did not believe public money should be used to fund options with little environmental benefit.

Habitat Options

34. CCW supported allowing upland farmers to join Glastir Entry by selecting one habitat option where they had the appropriate land to do so. At present farmers are required to select at least three different options, which can prove difficult for upland farmers with only a small amount of improved land. The CLA also supported this proposal and WEL would support it provided safeguards were put in place to ensure that it only applied to important habitats.

35. The report of the stocktake exercise states that current scheme options will remain unchanged until 2015 when the Deputy Minister can ensure that the scheme complies fully with the new Common Agricultural Policy. At this point there is an undertaking to consider recommendations for proposed removal or restriction of some options and amendments to some existing options. If changes are made to the scheme in 2015 the Committee would expect to see a comprehensive communications plan put in place to ensure that all farmers, both those already in the scheme and those yet to join, have a clear understanding of any changes made and the implications of these changes for their farm businesses.

Recommendation 10: The Welsh Government to undertake to fully consult stakeholders about amending the options within Glastir when it reviews the scheme following the introduction of the new Common Agricultural Policy.

Annex A - Terms of reference

The Environment and Sustainability Committee has decided to undertake an inquiry on the Welsh Government's agri-environment scheme, Glastir.

The purpose of the inquiry is:

- to assess the progress made by the Welsh Government on the delivery of the scheme;
- to gather stakeholder views on the scheme and how it could be improved;
- to make recommendations to the Welsh Government on the delivery of the scheme.

The Committee will consider:

- what progress had been made by the Welsh Government to implement the recommendations made by the Rees Roberts independent review of Glastir and whether these have been effective?
- what progress has been made by the Welsh Government to implement the recommendations made in the 'Working Smarter' report, as it relates to Glastir?
- whether there remain any barriers to entry to the scheme for the industry and how these could be addressed?
- what the views of stakeholders are on the different elements of the scheme?
- the funding arrangements for the scheme and in particular:
 - whether there is sufficient flexibility between the funding of different elements of the scheme?
 - whether the costings for different options available under the All Wales Element and Targeted Element are reflective of market conditions?
 - the funding available for farmers in less favoured areas entering the scheme.

Annex B – Letter to the Deputy Minister for Agriculture, Fisheries Food and European Programmes

Alun Davies AM
Deputy Minister for Agriculture, Fisheries, Food and European
Programmes
Welsh Government

21 June 2012

Dear Alun,

Glastir

At its meeting today the Committee considered key issues arising from its inquiry into Glastir. It was agreed that it would be helpful to bring your attention to those issues, in advance of Members having the opportunity to question you further at the Royal Welsh Show on 25 July.

In evidence, stakeholders have highlighted a number of areas of concern, but also made suggestions as to how the scheme could be improved. The key issues raised have been in relation to:

- Communication of the scheme's objectives and suggestions as to how the perceptions of the scheme could be improved - Stakeholders highlighted that there is a continued perception amongst farmers that the scheme is difficult to access and that many farmers are still not aware of the changes made to the scheme following the Rees Roberts review. All stakeholders emphasised the importance of ensuring that those currently in the All Wales Element have a good experience;
- The absence of project officers to support the All Wales Element
 - several respondents suggested to the Committee that the increased use of project officers could help to increase participation in the scheme;
- The record and information keeping requirements of the All Wales Element and suggestions for how these could be simplified – questions were raised about the necessity of some of record keeping requirements and serious concern was

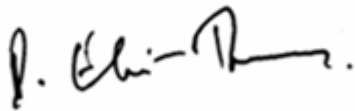
expressed about the subsequent bureaucracy that these requirements generated;

- Concern about the payment mechanisms for capital works and the need to better explain these new mechanisms to farmers – the change of approach and how it has been communicated was identified as creating uncertainty for farmers;
- The Targeted Element and its relationship to the All Wales Element – issues were raised in relation to the lack of information available on the Targeted Element and the disconnect between the application processes of the two elements; and
- Concern about the implementation of the Woodland Creation and Management Schemes – including whether they adequately take account of the views of commercial forestry stakeholders.

In addition, specific issues were raised in relation to individual options and elements contained within the scheme, such as the regional packages, high sugar grasses and the application of nitrogen on semi-natural habitats.

The transcript and papers considered by the Committee on 17 May set out these matters in more detail, and the Committee looks forward to exploring them with you at our meeting at the Royal Welsh Show.

Yours sincerely



Dafydd Elis-Thomas
Cadeirydd / Chair

Annex C - Witnesses

The following witnesses gave evidence to the Committee. Transcripts of the meetings can be viewed at:

<http://www.senedd.assemblywales.org/mgIssueHistoryHome.aspx?Ild=1308>

17 MAY 2012	
Session 1	
Bernard Llewellyn	NFU Cymru
Dafydd Jarrett	NFU Cymru
Emyr Jones	Farmers' Union of Wales (FUW)
Rhian Nowell-Phillips	Farmers' Union of Wales (FUW)
Sue Evans	Country Land and Business Association (CLA)
Ant Griffith	Country Land and Business Association (CLA)
Session 2	
Brian Pawson	Countryside Council for Wales (CCW)
Ieuan Joyce	Countryside Council for Wales (CCW)
Session 3	
Arfon Williams	Wales Environment Link (RSPB Cymru)
Session 4	
Emma Hockridge	The Soil Association
Keri Davies	Welsh Organic Group

25 JULY 2012

Alun Davies AM

Deputy Minister for Agriculture, Fisheries,
Food and European Programmes

Gary Haggaty

Welsh Government

Annex D - Written Evidence

The following written evidence was received. All written evidence can be viewed in full at:

<http://www.senedd.assemblywales.org/mgIssueHistoryHome.aspx?Ild=3511>

<i>Organisation</i>	<i>Reference</i>
NFU Cymru	E&S(4)-15-12: paper 1
Farmers' Union of Wales	E&S(4)-15-12: paper 2
Country Land and Business Association	E&S(4)-15-12: paper 3
Countryside Council for Wales	E&S(4)-15-12: paper 4
Wales Environment Link	E&S(4)-15-12: paper 5
The Soil Association	E&S(4)-15-12: paper 6
Welsh Government	E&S(4)-22-12: paper 2
Wales Forest Business Partnership and Confor	Additional evidence 1
Llais y Goedwig – The voice of community woodlands in Wales	Additional evidence 2
Welsh Organic Group	Additional evidence 3
NFU Cymru	Additional evidence 4