

Feedback Form - Sustainable Farming Scheme: Outline Proposals for 2025

To use this form; please type your answers in the boxes provided, or add a tick, or type 'yes' next to the appropriate choices where a list has been included. Once you have completed your form please email it to sfs-codesign@gov.wales

About you

Name	Dyfan Sion
Are you responding as an individual or on behalf of an organisation or group?	Organisation

Individual Response

Email Address	
Postcode	
Age	18 to 28 29 to 40 41 to 54 55 to 64 65+

Occupation	Farmer
	Other (please specify)

Farming Sector (Select all that apply)	Sheep	
	Suckler beef	
	Beef	
	Dairy	
	Arable	
	Horticulture	
	Poultry	
	Pigs	
	Not applicable	
	Other (please specify)	

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Do you currently have rights which you exercise to graze stock on a common?

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Please indicate the land ownership of your farm:

- **Wholly owned**
- **Mostly owned**
- **Wholly tenanted**
- **Mostly tenanted**

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Organisational or Group Response

Organisation or Group Name	Welsh Language Commissioner
Is your organisation based/operated in Wales?	Based in Wales Operated in Wales Both Not operating or based in Wales
Contact Email Address	post@cyg-wlc.cymru

Please indicate which of these best represent your organisation (select all that apply)	Farming	
	Forestry	
	Environment	
	Veterinary	
	Tourism/Hospitality	
	Food and timber supply chains	
	Public Sector	X
	Private Sector	
	Third Sector	
	Trade Union/Representative	
	Research/Academia	
	Other (please state)	

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Thank you for the opportunity to respond to this consultation. Our comments will focus on the implications of the Scheme for the Welsh language in farming. We are pleased to see recognition by the Minister in her Foreword that “agriculture plays a key role in supporting the Welsh language to thrive in our rural communities”.

Please provide your views on Chapter 2: Introduction

You may wish to consider in particular:

- **Sustainable Land Management Objectives**
- **Sustainable Land Management Outcomes**
- **Scheme Design**

Chapter 2 notes that the “Scheme will support farmers to undertake actions which contribute to the objectives of Sustainable Land Management” and those objectives are listed (2.1). The first three objectives in the list mirror the first three objectives presented in the Agriculture (Wales) Bill. However, the fourth objective does not include the following important clause which appears in the fourth objective of the Bill, “and to sustain the Welsh language and promote and facilitate its use” (Part 1, Section 1(5)). The Scheme should include that clause and, more importantly, the clause should influence the entire contents of the Scheme.

Chapter 2 contains a statement on maintaining rural communities and supporting the Welsh language: “Keeping farmers on the land will also support our rural communities [...] supporting the continued use of the Welsh language in our farming communities” (2.3.1). We support this aim, but it is unclear how the Scheme will ensure strong support for the Welsh language and its speakers or how it will measure the outcomes of this support. We believe that needs to be clarified and highlighted in the final policy.

Please provide your views on Chapter 3: The Sustainable Farming Scheme Structure

You may wish to consider in particular:

- **National Minimum Standards**
- **Scheme Structure**

Chapter 3 explains that the Scheme will be underpinned by the National Minimum Standards and that the intention is to implement them in time for the Scheme’s introduction. We ask the Government to ensure that the standards and enforcement measures will be reasonable in the context of their requirements of smaller, family farms, which are important to maintaining the viability of the Welsh language. According to the Government’s Explanatory Memorandum for the Agriculture (Wales) Bill, “Research shows almost two-thirds (65%) of Welsh speakers on Small and Very Small farms in Wales speak the language daily” (8.54).

Please provide your views on Chapter 4: The Sustainable Farming Scheme Framework

You may wish to consider in particular:

- **Scheme Characteristics**
- **Farming Connect**
- **Proposed Actions**

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Chapter 4 discusses Farming Connect (4.2), which will provide training, an advisory service, knowledge sharing and innovation. It will also provide a Continuing Professional Development (CPD) programme. Farmers will be referred to advisors, contractors and mentors and providing promotional and marketing material to farmers will be considered. It should be ensured that the Welsh language is central to all this provision and that the advisers, contractors and mentors are all able to provide a service in Welsh. Farmers should be encouraged to develop professionally through the medium of Welsh, and it should be ensured that it is easy for them to access the provision in Welsh. The provision should include opportunities to develop Welsh language skills. The availability of the provision in Welsh should be promoted.

The intention is to adopt one set of Key Performance Indicators for each farming sector, as well as another for the whole industry. It is noted that they will focus on business, production and environmental factors (4.3.1). In the context of business factors, recognition should be given to farmers who promote the Welsh language through their business.

Another objective of the Scheme is to help farm businesses understand the market and respond to opportunities within it, as well as to support local food. Farmers should be supported to use the Welsh language as a unique marketing tool that can increase market potential. There is much evidence about the value of the Welsh language for promotion, branding and marketing purposes in the food and drink production and marketing sector. Research by the Welsh Language Commissioner in 2014 found that using the Welsh language makes products stand out, reinforces the brand image and local origin of products, offers opportunities to sell in new markets and is seen as a sign of quality. (See *The value of the Welsh language to the food and drink sector in Wales: Research report – bwyd-a-diod-food-and-drink.pdf (comisiynyddygydraeg.cymru).)*

We note that the Scheme's actions have five characteristics, including "reduce on farm emissions and maximise carbon sequestration" (4.1). The relevant Universal Actions include the expectation that farmers will "have at least 10% tree cover on their farm". We understand, of course, the importance of storing carbon. However, we are concerned about the impact of this requirement on smaller, family farms, as it may be impossible for the farmers to set aside that portion of their land for tree planting without it adversely affecting their business. Because of the importance of these farms to the viability of the Welsh language, as noted above, we are concerned about the potential impact of this Universal Action on the survival of the traditional, Welsh-speaking agricultural community, and on the viability of rural communities more generally.

Another characteristic is "benefit people, animals, and place". One of the aims under this characteristic is "Enabling people to engage with and access the natural environment" (4.3.5). The relevant Optional Actions include "hosting educational and care farm visits". Welsh-speaking farmers who choose this option should be encouraged to provide visits through the medium of Welsh and given practical support to do so. A special aspect of the Welsh-language farming community are its "dialects and sector-specific terminology of the Welsh language used by farmers and their families", referred to in the Explanatory Memorandum for the Agriculture (Wales) Bill in the context of the aim to "preserve the culture and heritage that comes from farming in Wales" (8.13). Place names and landscape features could also be included in the valuable linguistic information farmers have. Farmers should be supported to share that information and recognised for doing so, and farmers who are unable to speak Welsh helped to become aware of the wealth of knowledge about their farm derived from the landscape names associated with it.

Under the aim “Invest in people providing fair work and creating a valued workforce”, it is explained that farms will be supported to “empower their staff, [where workers are] heard and represented [...] in a healthy, inclusive environment where rights are respected”. This support should include raising farmers’ awareness of the Welsh language in the workplace and respecting the right of workforce members to speak Welsh together and receive training through the medium of Welsh if they so choose.

Under the aim “Be proficient to practice safely and efficiently”, reference is made to the variety of ways offered to farmers to learn. The relevant Universal Action requires farmers “to complete a minimum level of learning” and the Optional Action proposes that farmers “will be supported for completing more complex or higher level CPD [and] rewarded for supporting transferring knowledge to other farmers”. As noted above, all learning and training offers should be available through the medium of Welsh. Welsh-speaking farmers should also be encouraged to transfer knowledge through the medium of Welsh to their colleagues who speak the language.

Please provide your views on Chapter 5: The Sustainable Farming Scheme Process

You may wish to consider in particular:

- **Farmer Registration and Eligibility Criteria**
- **Sustainability Review**
- **Action Selection**
- **The Contract**
- **Scheme Rules**
- **Payment**
- **Monitoring and Checking**
- **Inspection Regime**
- **Penalties**
- **Reporting and Evaluating of the Sustainable Farming Scheme**

Chapter 5 explains that payment rates will recognise “the social value provided by the outcomes” (5.6). The Government should consider how it might recognise the value of positive outcomes for the Welsh language.

It is noted that different ways will be used to monitor farms and collect data, and that there will be an annual report on how the farms in the Scheme are progressing (5.7). It is noted that the information gathered can be used to improve the Scheme (5.10). It should be ensured that that information will include data about the Welsh language, for example the number and percentage of Welsh speakers in agricultural communities and information about the use of the language in those communities. This is essential to establish an evidence base for measuring development in the context of Welsh language use and supporting it in the farming sector in future.

Please provide your views on Chapter 6: The Sustainable Farming Scheme: Transition Plan

You may wish to consider in particular:

- **Prepare and Pilot Phase (2022-2024)**
- **Transition Period (2025-2029)**

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Chapter 6 explains that many projects are being run to ensure that SLM outcomes are achieved and that they will continue during the Prepare and Pilot phase (6.1). It is not stated whether there is an element of using or supporting the Welsh language as part of these projects. As noted above, we are pleased that the Minister recognises the importance of agriculture to the sustainability of the Welsh language and its prosperity, and that the Welsh language is part of the fourth sustainable land management objective announced in the Agriculture (Wales) Bill. We would like clarity on how this will be implemented in practice through the Sustainable Farming Scheme. For example, what is the Scheme's vision in the context of the language and the Government's strategy, *Cymraeg 2050*? How could the Scheme support agricultural communities to contribute to meeting the strategy's targets? The aim by 2050 is for the number of Welsh speakers to reach one million and for the percentage of the population who speak Welsh every day, and who can speak more than a few words of Welsh, to increase from 10 per cent to 20 per cent. The Government should consider how to operate in the context of the *Cymraeg 2050* targets through projects or initiatives that could be undertaken during the Prepare and Pilot phase.

If you have any other views or evidence you wish to share, please use this box to do so.

We hope you find these comments helpful as you continue to work on the Sustainable Farming Scheme and look forward to participating in the discussion about your final proposals.

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