



Cyngor Cefn Gwlad Cymru Countryside Council for Wales

Inquiry into the Future of the Uplands in Wales

The Countryside Council for Wales is the Government's statutory advisor on sustaining natural beauty, wildlife and the opportunity for outdoor enjoyment in Wales and its inshore waters. We champion the environment and landscapes of Wales and our coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity and as a place for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.

CCW welcomes the opportunity to contribute evidence to this inquiry and wishes to **highlight the following**:

1. In order to meet the challenges posed by climate change, food and energy security, changing EU priorities and continued globalisation, **CCW believes it is necessary to adopt an integrated approach (as embodied by the ecosystem approach) in which the full range of goods and services provided by the uplands are properly valued by society.** These services include water management and carbon sequestration as well as biodiversity and landscape. In managing these resources it is now even more necessary for all those involved to collaborate and work in partnership, so maximising the capacity of the Welsh pound to deliver shared outcomes within the current period of fiscal constraint.

2. The Commission's approach to using bio-physical criteria as part of LFA designation is still being tested. In addition, Member States may be allowed to set their own eligibility criteria (option 2) or the Commission may establish a common framework of eligibility criteria at EU level (option 3) which can be further refined in conjunction with maps of High Nature Value (HNV) farming (option 4). The latter two approaches would probably bring greater benefits at a European scale (by ensuring that LFA resources were consistently applied across the EU in furtherance of policy objectives) whilst the former approach would provide more flexibility at national level. **Ensuring a close fit between the objectives of Glastir and the application of EC Regulations relating to LFA policy at European level is likely to be a key issue.** This suggests that option 2 (which would allow Glastir funding to be applied to a wider range of farms) may be more appropriate, always provided such funds can be focussed on delivering specified environmental outcomes.

3. Sustainable land management should be at the heart of a new contract between land managers and wider society. This contract should cover the provision of a full range of environmental goods and services as well as food and other raw materials. **Current land management mechanisms (such as the section 15 agreements operated by CCW as well as the agri-environment programme operated by the Welsh Assembly Government) need to be sufficiently well resourced to enable widespread uptake as of the more demanding land management options likely to bring greatest public benefits.**

4. Since the bulk of the Welsh land management budget is currently devoted to the Single Payment Scheme, **CCW supports increased use of the modulation mechanism to transfer funds into rural development where these can be better targeted at specific policy objectives.** In the longer term, CCW wishes to see a fundamental re-orientation of the CAP budget that focuses to a much greater extent

on using public money to ensure the direct and proportionate purchase of environmental services of benefit to all of society.

5. The primary focus within the Welsh uplands should be to secure the existing carbon resource locked up within organic and organo-mineral soils. Welsh soils represent an enormous store of carbon, currently estimated at 410 million tonnes, of which approximately one third (121 Mt) is in the form of peat¹ despite the fact this only occupies 3% of Wales. Land management targeted at managing this small proportion of the Welsh land-surface could achieve disproportionate and highly cost-effective gains, especially where carbon conservation is integrated with the management of biodiversity and water.

6. More upland woodlands need to be brought into sustainable management whilst new woodland expansion needs to be carefully targeted to ensure maximum public benefit. The management of woodland needs to be incorporated to a much greater extent into the farm economy.

7. In order to safeguard the role of agriculture and associated industries in sustaining rural communities, Government will need to focus on providing the kinds of advice (underpinned by research) that will help individual farm businesses take action to secure greater profitability whilst reducing their ecological footprint. At the same time, Government needs to ensure that sufficient capacity is retained to ensure that valued upland habitats, carbon stores and water resources can be managed effectively. This action should include taking steps to facilitate the development of innovative approaches such as carbon trading schemes as well as continuing to promote the use of land management schemes under Axis 2 of the Wales Rural Development Plan (WRDP).

¹ Scottish Executive Environment and Rural Affairs Department (2007). ECOSSE Report – Estimating Carbon in Organic Soils, Sequestration and Emissions.

UPLANDS IN WALES

CCW understands that the aims of this inquiry are to:

- Examine the uplands in Wales in relation to their economic, social and environmental future;
- Seek to influence, through the Welsh Minister, the UK's negotiating position with the European Commission in anticipation of legislative proposals on the new criteria for determining less favoured areas;
- Make recommendations to the Welsh Assembly Government.

INTRODUCTION

The Welsh uplands are a major asset, helping to define the national character of Wales. They are important for biodiversity and landscape as well as being of value for agriculture, forestry, recreation, natural resources, culture and language. In particular, the uplands:

- Contain the largest tracts of un-fragmented semi-natural habitats and landscapes in the country. Much of the land has been designated as National Park and/or Special Areas of Conservation (SAC), Special Protection Area (SPA) or Sites of Special Scientific Interest (SSSI) and is of international importance for both landscape and biodiversity. Despite this, much of our upland biodiversity is also heavily degraded as a result of long periods of inappropriate management.
- Provide water supplies for major centres of population as well as having the potential to contribute to downstream flood management and improvements in water quality.
- Represent Wales' most important store of terrestrial carbon, providing both opportunities and risks in terms of greenhouse gas (GHG) mitigation. Peat soils are crucially important in this respect, storing some 121Mt of carbon across Wales.
- Support large numbers of businesses based on farming, forestry and tourism as well as providing opportunities for renewable energy generation.
- Contain communities and settlements with a high proportion of Welsh speakers.
- Contribute to the nation's health and well-being, through providing a huge resource for outdoor recreation.

The Committee will be aware of the work of the Commission for Rural Communities (CRC) in conducting an Uplands Inquiry in England. The draft report was due to be shared with DEFRA in September. The CRC have defined the upland areas of England as broadly coinciding with the designated Severely Disadvantaged Area (SDA). In responding to this inquiry, we have used data from the CCW Habitat Survey of Wales which covers some 400,000ha of land lying above the upper limit of enclosure (c.300m), but are mindful that the current Welsh SDA (covering c.800,000ha) may provide a more appropriate definition bearing in mind the need to include more intensively used land below the mountain wall. A robust definition of the uplands will also need to take account of the role of adjoining settlements given the social, economic and environmental linkages between the uplands and their hinterlands.

The CCW Habitat Survey of Wales, which was carried out over the period 1979-

1997, but remains the best available information source on the characteristics of the land lying above the upper limit of enclosure, provided the following evidence:

- Acid grasslands including semi-improved land and ffridd = 113,200 ha (of which 20,200ha is in the form of heath/grass mosaics)
- Heathland = 79,100 ha (including 21,200ha of heath/grass mosaics)
- Bogs and other mires = 68,800 ha (of which 29,200 ha is considered near natural, though not necessarily in good condition.)
- Molinia-dominated marshy grasslands = 21,700ha
- Other marshy grasslands = 7,500 ha.
- Conifer plantation = 43,700 ha
- Semi-natural broadleaved woodland = 2,300ha
- Bracken dominated = 32,600ha.
- Rock exposure = 8,300 ha
- Standing water (lakes) = 3000ha together with no less than 2000km of rivers and stream (latter figure sourced from Ordnance Survey and does not include the multitude of unmapped streams and ditches).
- Other land including limestone and neutral grassland, improved grassland, other woodland, buildings etc = c.20,700ha

Some 124,000 ha (c.30%) of the uplands has been designated as SSSI, of which 90,539 hectares have also been designated as Special Areas of Conservation (SAC) or Special Protection Areas (SPA) under the EU Habitats and Birds Directives respectively. The Environment Strategy for Wales² has set a target of ensuring that 95% of international sites are in favourable condition by 2010, with 95% of all SSSI's in favourable condition by 2015 and all sites in favourable condition by 2026.

CCW has produced an upland framework³ which attempts to convert the statutory conservation objectives for upland sites into a vision of the actual vegetation that would exist on these sites were the objectives fully realised. Rather than representing a set of prescribed outcomes which landowners and occupiers are required to achieve, the framework is designed to explain the intentions behind designation and act as a guide to inform ongoing decisions on land management. In particular, it should be noted that the framework envisages acid grassland as the primary 'source' for conversion to scrub, semi-natural broadleaved woodland and heath.

Many upland habitats in Wales are near the edge of their geographic range and so could be adversely affected by climate change. This particularly applies to the more montane habitats of which we have a small, but very important subset of the UK resource. Bringing upland sites into favourable conservation status is very important, since robust, resilient habitats can also help to reduce the effects of climate change by providing more efficient carbon and water storage.

In addressing all of the issues affecting the uplands, the future of common land will be a major consideration. Commons account for a large proportion of upland habitats, but their unique governance structure presents particular difficulties in terms of achieving agreement over the right approach to land management.

Responses to the Consultation Questions

² Environment Strategy for Wales. Welsh Assembly Government 2006, page 36

³ See: <http://www.ccw.gov.uk/landscape--wildlife/habitats--species/terrestrial/habitats/the-uplands-of-wales/future-vision-for-upland-sssis.aspx>

Question 1: What form should future public support for the uplands take (including a consideration of the European Commission's emerging proposals for the designation of Intermediate Less Favoured Areas)?

1.1 In common with similar regions across Europe, the uplands of Wales are changing in response to a range of economic, social and environmental pressures including:

- Economic restructuring, in particular the need for diversification of existing businesses in the light of CAP and Structural fund reform (with further uncertainty anticipated in the light of the EU budget review in 2013);
- Loss of rural services and the changing role of market towns;
- Demographic change, involving an ageing population, further loss of young people and hidden deprivation in many rural communities;
- Climate change, which is now increasingly recognised as an economic and social issue as well as an environmental challenge;

1.2 Communities in the uplands share the same aspirations as those elsewhere, namely a prosperous local economy, good public services and a high quality local environment. The challenge will be to deliver these aspirations in a manner that is sustainable in the widest sense of the word whilst ensuring we can respond positively to new and future drivers including climate change, food and energy security, changing EU priorities and continued globalisation.

1.3 In order to meet this challenge, CCW believes it is important to adopt an integrated approach to policy development and service delivery (as embodied by the ecosystem approach) in which the full range of goods and services provided by the natural environment are properly valued. These services include water management and carbon sequestration as well as biodiversity and landscape. In managing these resources it will be even more necessary for all those involved to collaborate and work in partnership to maximise the capacity of the Welsh pound to deliver shared outcomes especially in view of the current a period of fiscal constraint.

Less Favoured Areas

1.4 The European Commission's proposals for the designation of Intermediate LFA are not expected to be finalised until some time in 2010. The previous timetable has already been revised at the request of several Member States.

1.5 The most official recent communication from the Commission⁴ makes plain that the impetus for this work arises from previous strong criticism by the EU Court of Auditors regarding the wide range of approaches adopted by Member States when implementing LFA policy as well as the relevant sections of EC Regulation 1698/05 (the Rural Development Regulation) which require the Commission to bring forward proposals for a revised LFA payment and designation system to apply from 2010 onwards.

1.6. It is worth noting, however, that LFA policy has already undergone a significant change as part of the introduction of the new RDR in 2005. Socio-economic

⁴ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Towards a better targeting of aid to farmers in areas with natural handicaps. Com (2009) 161 final Brussels 21.4.2009.

objectives were removed from the Regulation (on the basis that more targeted measures such as the Single Payment Scheme were now available for supporting farm incomes) and the aims of the policy were re-stated as the provision of support for *“areas affected by significant natural handicaps, notably low soil productivity or poor climatic conditions, and where maintaining extensive farming activity is important for the management of the land”*.

1.7 One of the main difficulties faced by the Commission is how to ensure that the policy delivers against its objectives when Member States take such widely divergent approaches to the definition of LFA (or areas affected by Natural Handicaps as they are now known). In order to resolve this difficulty, the Commission tasked the European Joint Research Centre (JRC) with establishing a set of common soil and climatic criteria that could support a new definition of intermediate LFA. The JRC identified eight bio-physical criteria (such as length of growing season or presence of poorly drained soil) each of which indicates, above a certain threshold value, severe limitations for European agriculture.

1.8 In May 2008, the Commission consulted on four separate options for delivering LFA support as follows:

- Option 1 - Enhanced version of current approach (status quo+)
- Option 2 - Common criteria (use of suggested biophysical criteria, but with farm eligibility criteria to be decided by Member States)
- Option 3 - Eligibility criteria (use of suggested biophysical criteria, but with the EC legislation setting out the basic framework for farm eligibility, including the exclusion of intensive farming systems)
- Option 4 - High Nature Value (use of suggested biophysical criteria to define broad geographical areas that would then be refined to ensure only HNV farmland was eligible).

1.9 Examination of the Commission’s resulting impact assessment⁵ reveals that option 1 is unlikely to be adopted as it fails to address the main criticisms raised by the EU Court of Auditors. In addition, whilst option 4 would have the merit of targeting support on the most extensive farms, much more work is needed to determine whether HNV farmland can be meaningfully classified within all Member States. Either option 2 or option 3 seem most likely to be adopted - with option 3 having the greatest potential for ensuring that support is targeted on those farms making the greatest contribution to sustainable land management through the continuation of extensive farming practices. Before any legislative proposal can be tabled, however, Member States have been invited to test out the application of the proposed biophysical criteria and are now required to submit their resulting maps to the Commission by the end of January 2010.

1.10 Within Wales, the most important issue probably relates to the application of the new biophysical criteria. Some 80% of Welsh agricultural land is currently classified as LFA – either as Severely Disadvantaged (SDA) or Disadvantaged (DA). Following the outcome of the recent Axis 2 review, it is now proposed that all LFA farms accepted into the new Glastir scheme will be entitled to a 20% uplift in their entry-level payments from 2012 onwards. However, should the application of new biophysical criteria result in a significant change in the LFA map, this will plainly have an impact on the level of Glastir payment that can be claimed by many farmers. In some cases this may affect their ability to deliver the kinds of management practices required by the new scheme.

⁵ Op. cit.

1.11 The Commission's approach to the application of eligibility criteria at farm level could also have an impact within Wales. With the ending of Tir Mynydd in 2011, payments to LFA farmers within Wales will fall under the agri-environment heading. Nevertheless, the 20% LFA uplift within the new Glastir scheme will still have to be justified on the basis of the additional costs incurred when farming subject to natural handicaps. As a result there will still be a need to ensure consistency between the intention to increase Glastir payments within the LFA and the Commission's approach to eligibility criteria (which could possibly exclude certain types of farms altogether).

1.12 The Commission's proposals under Option 2 will allow Member States to set the eligibility criteria whilst under option 3 the Commission would have a much greater role in establishing a common framework at EU level. The latter approach seems likely to bring greater benefits at a European scale (by ensuring that LFA resources are consistently applied across the EU in furtherance of policy objectives) whilst the former approach would provide more flexibility at national level, enabling the Welsh Assembly Government to ensure a closer fit between Glastir and LFA policy as required.

Question 2: How can the uplands be valued for their contribution to the social and economic future of Wales as well as the environment?

2.1 The Welsh uplands support large numbers of businesses based on farming, forestry and tourism as well as providing opportunities for renewable energy generation. The uplands also contain numerous communities and settlements with a high proportion of Welsh speakers, whilst extensive tracts of open country (accessible under the Countryside and Rights of way Act, 2000) and a network of Public Rights of Way (PRoW) contribute to the overall health and well-being of the nation.

2.2. CCW believes that the environment is not an optional extra, to be considered once our basic needs for jobs, incomes and homes for instance have been fulfilled. Rather it is a key building block that underpins working towards a healthier, more prosperous Wales. The environment, community and economy are inseparable. We have to make sure that we achieve environmental, social and economic dividends from every pound we spend. To do this, we must better integrate environmental, social and economic objectives, so that we can protect the environment, rejuvenate the economy and improve the health and social well being of our nation.

2.3 In order to achieve these objectives, we need to focus on long-term solutions, not short-term fixes. If we make the wrong choices now, future generations will live with a changed climate, depleted resources and without the green space and biodiversity that contribute both to our standard of living and our quality of life. We have to make choices that let us secure a future that is fairer, where we can all live within our environmental limits. Investing in Wales' green infrastructure is as much about economic development as it is in environmental management. The environment not only contributes to our economic welfare directly through the generation of income (for instance, contributing £ 6billion to the GDP of Wales, with £205 million GDP generated by National Parks), it can also do so indirectly by preventing damage such as flooding.

2.4 Investing today in identifying positive solutions to challenges such as climate change will reduce the need for expensive solutions in the future. The Stern Review

on the economics of climate change ⁶ stated that 1% GDP invested in tackling climate change now will help avoid future expenditure of 3% GDP in tackling the resulting problems. So, we must work within the capacity of the environment to ensure that any changes do not have an adverse effect. The green infrastructure approach suggests that we should use the environment as the basis of all decision-making as our quality of life is dependent on the maintenance of viable ecosystems goods and services.

2.5 A new contract between the managers of the uplands and the nation would recognise the economic, social and environmental value of these special places, but also their potential to test out new and innovative solutions. Sustainable land management should lie at the heart of the new contract which is not just about food and other raw materials but also includes a wide range of environmental goods and services to society which the market cannot be expected to deliver on its own. Land managers are central to this new contract because of their role in delivering the following outputs:

- sustainable land management and use of soils, air, water and biodiversity;
- sustainable production of food, fibre, timber and energy in accordance with high environmental standards;
- management to enhance ecosystem services such as the storage of carbon and the regulation of water;
- action to mitigate and adapt to climate change;
- action to halt and reverse the loss of biodiversity;
- action to protect and enhance landscapes, historic and geological features;
- ensuring that benefits apply not only to communities located within Protected Landscapes, but also to adjoining communities such as those in the South Wales Valleys.

2.6 A number of existing and developing mechanisms allow us to start making progress on making sure the uplands provide economic and environmental services. The Wales Spatial Plan and the emerging Networked Environment Region concept provides an opportunity to ensure integration between the traditional land use planning process and land management programmes such as Glastir . Policy drivers like the Water Framework Directive have influenced the creation and development of Glastir through ensuring the scheme is capable of focussing on actions that improve water quality and provide the water levels needed for carbon storage and good wetland management.

2.7 In addition, the Catchment Flood Management Plans produced by the Environment Agency can direct effort towards land management in the uplands that controls the flow of water and contributes to reduction in flood risk.

2.8 Both WFD and CFMP's provide incentives to manage natural capital for the economic, social and environmental benefit of society, by providing good quality drinking water, reducing treatment costs and reducing the costs of flooding.

Note: The response to question 4 is also relevant to this question

Question 3: How can government policy work with land managers' needs to achieve the best use of Welsh uplands?

⁶ The Stern Review on the Economics of Climate Change, 30th October 2006:
http://www.hm-treasury.gov.uk/stern_review_report.htm

3.1 The nature and scale of environmental need across the Welsh uplands is both substantial and widespread. There is enormous scope for habitat restoration in order to meet WES objectives and this should be coupled with better management of water and carbon resources in ways that can ensure a sustainable future for those involved in managing the land. Current land management mechanisms include the section 15 agreements operated by CCW as well as the agri-environment programme (primarily Tir Gofal and Glastir) operated by the Welsh Assembly Government. Both of these mechanisms need to be sufficiently well resourced to enable widespread uptake as well as to ensure that the more demanding land management options (such as restoring formerly drained peatlands to a state in which carbon, water and biodiversity can be safeguarded) are sufficiently remunerative to be attractive.

3.2 As is the case across much of the EU, the bulk of the Welsh land management budget is currently devoted to the Single Payment Scheme. In responding to the ongoing debate about the future role of the CAP, CCW supports increased use of the modulation mechanism to transfer income and market support funding (Pillar 1 of the CAP) into rural development (Pillar 2). Such funds can be better targeted at specific policy objectives. In the longer term, CCW would support a fundamental re-orientation of the CAP budget that focuses to a much greater extent on using public money to ensure the direct and proportionate purchase of environmental services of benefit to all of society.

3.3. In seeking to ensure the best use of the Welsh uplands, Government policy needs to be based on an integrated approach in order to satisfy multiple objectives. In some circumstances this appears to be relatively simple to achieve, at least in principle. For instance, reducing or even preventing the loss of carbon from upland soils can represent a win-win-win opportunity for biodiversity, the reduction of GHG emissions and improvements in water quality. Water discoloration is largely caused by dissolved organic carbon (DOC) seeping into water from degraded peat, and its removal through treatment costs water companies millions of pounds every year. This is a growing problem in the UK, including Wales, with recent studies showing a 65% increase in levels of DOC over the last 12 years⁷. This pushes up the costs of water treatment, whilst increasing emissions of atmospheric CO₂ at the same time.

3.4 In tackling problems such as DOC loss, a range of solutions are possible, ranging from regulatory approaches (including cross compliance conditions attached to the SPS) through to the use of incentive schemes such as Glastir and section 15 Management Agreements. More innovative approaches could take a number of forms, including greater involvement by the private sector; incentive schemes for appropriate management which reflect the true environmental cost of failing to address habitat degradation, and the more widespread use of external funding sources (such as the EU's LIFE programme) on dedicated projects. Under the first approach, several water companies in England have developed major projects to reduce carbon losses from upland areas. For example, under the "Tees Water Colour Project", Northumbrian Water are investing significant resources to reduce their treatment costs, improve water colour and water quality and reduce carbon losses⁸. United Utilities have also invested significantly in this type of work and the Sustainable Catchment Management Programme (SCaMP) has been developed in association with the RSPB as part of applying an integrated approach to catchment

⁷ Moors for the Future. Research Note 12: Carbon Flux. Located at: http://www.moorsforthefuture.org.uk/mfff/downloads/publications/MFF_researchnote12_carbonflux.pdf

⁸ See: <http://www.nwl.co.uk/Teeswatercolourproject.aspx>

management within the Forest of Bowland and the Peak District. The project aims to enhance biodiversity and ensure a sustainable future for the company's agricultural tenants whilst protecting and improving water quality. The company is investing over £10M over the course of the project to protect carbon stored in upland fells, although the main focus is on biodiversity and water quality⁹. This kind of private-sector involvement is still in its infancy in Wales, but given the importance of upland peatlands within all of our main water catchment areas there is huge potential to adopt a similar approach here.

3.5 Large-scale peatland restoration projects such as the RSPB-led EU LIFE-funded project to restore drained blanket bog on part of the Berwyn offer the chance of achieving rapid conservation and wider ecosystem gains through public funding. Such projects also have enormous demonstration value – showing land managers that restoration for conservation purposes need not be detrimental to the farming enterprise. Unfortunately, there has so far been very limited use of external funding for major conservation and restoration management in Wales. Significant projects which could be addressed in this way include further large-scale ditch blocking projects in North Wales, as well as work to restore severely degraded bogs in mid and south Wales. The latter represent a key opportunity for delivering WES targets for blanket bog and heath, whilst also increasing the security of the significant carbon store contained within the underlying peatland. Areas such the Elenydd and Brecon Beacons represent national priorities for this kind of focused effort.

3.6 On some occasions, the trade-offs required in seeking to reconcile multiple objectives may be less problematical than are apparent at first sight. For instance, the methane emitted by livestock is 21 times more effective than carbon dioxide at trapping thermal infra-red radiation, but grazing is still the most cost effective means of maintaining many of the habitats characteristic of the Welsh uplands. The solution appears to lie in the timing and the numbers of animals used - with low levels of grazing ideally being used to maintain many habitats in optimum condition whilst at the same time preventing the build up of coarse grasses and scrub that would otherwise lead to drying out of the soil and oxidation of soil carbon.

3.7 CCW's "Upland Framework" attempts to convert the statutory conservation objectives for upland designated sites into a vision of the actual vegetation cover that would exist on these sites were statutory objectives fully realised. The process has been carried out a site-by-site basis with the final outcome representing a combination of what is physically possible and desirable on each site in the long term. Rather than representing a set of prescribed outcomes which landowners and occupiers are required to achieve, the framework is designed to explain the intentions behind designation and act as a guide to inform ongoing decisions on land management. More recently, the new Biodiversity Action Plan delivery process in Wales has extended the concept of the upland framework to the wider semi-natural resource outside of protected sites.

3.8 Reconciling the needs of land managers and the growing food security agenda with wider societal objectives for the uplands is an even more complex issue. Individual land managers need to secure reasonable returns if they are to remain in business and contribute effectively to wider objectives for managing carbon, water and biodiversity. At the same time a critical mass of livestock production needs to be maintained in order to ensure survival of the necessary infrastructure such as slaughterhouses, suppliers and contractors. CCW is currently co-operating with a range of partners as part of the Cambrian Mountains initiative in order to try and

⁹ See: <http://www.unitedutilities.com/?OBH=5410>

derive practical examples of how best to resolve some of these integration issues at the farm level

3.9 Since 2005, in line with the rest of the EU, the bulk of Welsh agricultural subsidies have been “decoupled” from production and provided in the form of the Single Farm Payment (SFP). Farmers no longer need to keep a specified number of animals in order to secure subsidy, but are free to farm in line with market requirements, subject to the cross compliance conditions. This change has led to a significant fall in livestock numbers (from a breeding flock of 4.7 million ewes in 2006 to 4.195 million in 2008), although much less information is available on the change in the kinds of livestock farming now being undertaken. It nevertheless appears that whilst the number of animals has fallen over recent years, the quality of those animals now being kept has improved - with these larger animals requiring significantly improved nutrition. As a result they are and spending less time on the open hill and rather more time on the better quality inbye land¹⁰ (which is in turn being managed more intensively) or under cover.

3.10 The scale of this change is such that evidence is now beginning to emerge of a change in grazing regimes on a number of upland SSSI/SAC such as Eryri, Berwyn and the Black Mountains. Prior to the 2003 CAP reforms, the most commonly reported problem on such sites was that of overgrazing. Whilst this is still very much an issue on large parts of many upland SSIs, some landholders are now reducing or even removing stock from all or part of their holding. This is a development which has the potential to help both land managers and Government achieve best use of the Welsh uplands, but which could also have detrimental effects. The key issue is how best to ensure that as agriculture continues to evolve, the necessary incentives are provided to ensure that the land above the limit of enclosure can be managed effectively. In particular, it will be necessary to take account of changes in the type of livestock being used; the changing nature of farming systems; the retirement of those with most experience in managing upland rough grazings and the ongoing pressure on businesses to make the best use of limited resources in order to remain viable.

3.11 Other key land-use sectors in Wales subject to government policy include forestry and energy generation (in particular wind-power). Both sectors make a significant positive economic contribution with each having an important role to play in the long-term, subject to the need to make land-use choices appropriate to the location. For example, extensive areas of conifer plantation are located on deep peat now degrading as a result of plantation drainage and loss of the original peat-forming vegetation. However, much of this could be restored as a valuable habitat protective of the underlying carbon resource in the peat and capable of renewed net carbon sequestration in the long-term. Similarly, many wind farm developments overlap with peat deposits, resulting in the loss of both habitats and carbon. Competing priorities need to be set in context. Peat deposits occupy just 3% of the Welsh land area and should thus, in theory, be relatively avoidable. Both cases illustrate the need for spatial planning measures designed to ensure avoidance of functionally critical areas coupled with restoration of such sites at the earliest opportunity.

Question 4: How can a value be put on the natural, ecosystem services provided by the uplands, such as carbon storage and flood management?

¹⁰ "inbye land" means that part of a farm not comprising the hill and rough grazings, the bulk of which is used for arable and grassland production;":
http://www.opsi.gov.uk/si/si1996/Uksi_19961969_en_1.htm

4.1 Human well-being is dependent upon "ecosystem services" freely provided by nature, such as water and air purification, fisheries, timber and nutrient cycling. These are predominantly public goods with no markets and no prices, so their loss often goes undetected by our current economic incentive system and thus continues unabated. A variety of pressures resulting from population growth, changing diets, urbanisation, climate change and many other factors is currently causing biodiversity and other ecosystem components to decline in quality. The world's poor are most at risk from the continuing loss of biodiversity, as they are the often heavily reliant on the ecosystem services that are being degraded.

4.2 One approach to the valuation of such services is demonstrated by the so-called Postdam initiative. In March 2007, the environment ministers of the G8 countries and the five major newly industrialising countries agreed to 'investigate the economic significance of the ongoing global loss of biological diversity. This global study aims to "initiate the process of analysing the global economic benefit of biological diversity, the costs of the loss of biodiversity and the failure to take protective measures versus the costs of effective conservation"¹¹

4.3 Following endorsement by the G8+5 leaders in June 2007, the German Federal Ministry for the Environment and the European Commission, together with other partners, jointly initiated work on "The Economics of Ecosystems & Biodiversity" (otherwise known as TEEB). Pavan Sukhdev, a senior banker at Deutsche Bank, was appointed as the independent Study Leader.

4.4 TEEB is being conducted in two phases. Preliminary findings from the first phase were presented at the 9th Conference of the Parties to the Convention on Biological Diversity (CBD COP-9) in Bonn, Germany, in May 2008. The second, more substantial, phase of the study is structured around a background report and several reports targeted towards specific groups of potential users of evaluation tools for biodiversity and ecosystem services. These reports will be consecutively between autumn 2009 and autumn 2010.

4.5 Within the UK, recent work carried out under the interdisciplinary RELU (Rural Environment and Land Use Programme) has highlighted the fact that the bulk of current valuation research is heavily dominated by quantitative methods developed by economists¹². Contributions from other disciplines such as behavioural sociologists are relatively limited, but these could help to develop a much improved understanding of qualitative issues and stakeholder values as well as suggesting ways of directly involving stakeholders in the decision making process and the allocation of scarce resources.

Question 5: How can climate change and the potential impacts of climate change be built into the planning for the future of the uplands?

5.1 CCW has previously presented evidence to the NAW Sustainability Committee enquiry into carbon and land use and is represented on the Land Use and Climate Change Sub-Group within the Climate Change Commission for Wales. The following

¹¹ Accessed at: <http://ec.europa.eu/environment/nature/biodiversity/economics>

¹² See for example: Posthumus, H., Morris, J., Angus, A. and Graves, A. (2009) Land Valuation and Decision Making. Report of Proceedings Foresight Land Use Futures and RELU Workshop, London, 22nd July 2009.

text summarises the key elements from a number of CCW papers already presented elsewhere¹³.

5.2 Upland habitats need to be in the best possible condition if they are to be buffered against the climate change impacts likely to arise in future. Many upland habitats in Wales are near the edge of their range and so could be adversely affected by climate change unless they are robust enough to cope with and adapt to at least some of the effects. This particularly applies to the more montane habitats of which we have a small but very important subset in the UK. Robust, resilient upland habitats will also reduce the effects of climate change through more efficient carbon and water storage. CCWs Upland Framework sets out our long term vision for habitat condition within the designated sites in upland Wales, whilst targets are also being developed for much of the semi-natural habitat resource that lies outside protected sites.

5.3 The primary concern within the Welsh uplands is to secure the existing carbon resource locked up within organic and organo-mineral soils. Welsh soils represent an enormous store of carbon, currently estimated at 410 million tonnes, of which approximately one third (121 Mt) is in the form of peat¹⁴ despite the fact that peat deposits occupy only 3% of Wales. This suggests that management targeted at a small proportion of the Welsh land-surface could achieve disproportionate and highly cost-effective gains, especially where carbon conservation is integrated with the management of biodiversity, water quality and water quantity.

5.4 Welsh soil holds nine times the amount of carbon that is stored in all vegetation (including forestry) with over 80% of this carbon associated with our upland and grassland soils¹⁵. Such an enormous carbon store needs to be well managed to ensure losses do not accelerate and that the processes adding to this soil carbon store (usually incomplete decomposition of organic material in nutrient-poor, acidic and or anaerobic/waterlogged conditions) are maintained. It has been calculated that a 1% per annum loss of stored soil carbon would increase Welsh net carbon emissions by 25%¹⁶.

5.5 The hotter, drier summers expected with climate change present high risks to organic soils, particularly given the stark warning offered by Holden et al (2006)¹⁷ that many upland peatlands in England and Wales may already be close to the tipping point between carbon source and carbon sink. Should these soils dry out, peat resources will be oxidised, dissolved organic carbon (DOC) losses to receiving rivers will increase and carbon dioxide emissions will accelerate. Anticipated increases in winter rainfall will herald other problems, notably increased peat erosion and increased rainwater runoff, leading to downstream flooding. Modelling of changes in the climatic envelope suitable for peatbogs is underway, but it seems likely that extensive areas of the Welsh upland landscape will remain suitable for carbon storage and ongoing sequestration in at least the medium term. Management of our finite and comparatively modest (in proportional land cover terms) peat resource is one area where low cost restoration work could make significant advances in terms

¹³ SC(3)-25-08 : Paper 1: Carbon Reduction via Land Use: Evidence from Countryside Council for Wales, 8th November 2008

¹⁴ Scottish Executive Environment and Rural Affairs Department (2007). ECOSSE Report – Estimating Carbon in Organic Soils, Sequestration and Emissions.

¹⁵ Farrar, Freeman and Jones (2003). Wales' Carbon - managing climate change.

¹⁶ Farrar et al., 2003. *Op cit*

¹⁷ Holden, J. et al (2006). *Vulnerability of Organic Soils in England and Wales*. DEFRA Project SPO532

of adapting to climate change. For example, some 36% (25,100 ha) of the Welsh peatland resource is composed of modified bogs within the uplands. Much of this resource is capable of being restored to a condition suitable for long-term protection of the underlying carbon store, whilst a significant subset of this area could also be restored to active peat growth and thus carbon sequestration¹⁸. Such restoration must also be accompanied by measures designed to ensure that existing high quality areas of bog are well managed and where possible actively growing - and are thus sufficiently buffered against the effects of climate change to continue to function as carbon sinks rather than as sources.

5.6 The ECOSSE project¹⁹ has provided a number of recommendations for the protection of soil organic matter and avoidance of carbon loss:

- Prevent conversion of grassland, forests and semi-natural vegetation to arable systems;
- Avoid deep ploughing, which causes rapid oxidation of organic matter and implement zero or low tillage agriculture;
- Manage grazing levels - excessive removal of above ground vegetation reduces the incorporation of litter in the soil, but a rapid build up of unincorporated biomass increases fire risks;
- Prevent soil erosion;
- Prevent burning where it results in destruction of soil organic matter;
- Maintain shallow (near-surface) water tables by reducing drainage;
- Minimise or avoid applications of fertiliser and lime.

5.7 Compared to active peatland, the level of organic matter accumulation in grassland soils is likely to be trivial at the level of the individual land unit. But, given the extent of acid and *Molinia* dominated marshy grasslands in the uplands, these may still contribute significant carbon storage potential in aggregate. The types of management practices suggested above will serve to optimise this function. By contrast, fertiliser applications, compaction (leading to increased rainwater runoff), drainage and even the poaching of wet ground associated with feeding sites and gates may all lead to emissions of carbon and other GHGs which exceed the capacity of vegetation-soil combinations to absorb and store carbon and may even cause them to act as sinks.

5.8 These comments apply equally to the lower-lying, agriculturally improved land on which many farmers now seem to be concentrating their grazing and forage conservation activity. It seems inevitable that a livestock system based heavily on intensive grassland and forage management, bought-in feedstuffs, and higher meat outputs, is more likely to create larger carbon emissions per enterprise than one based on the more 'traditional' hill farming system. Paradoxically, however, greater meat output per unit area may lead such intensive enterprises to be rather more efficient in terms of the amount of carbon emitted per kilogram of meat produced. This is a topic still under investigation.

5.9 The planting of woodlands to sequester carbon is widely perceived to be synonymous with good practice, but poorly located plantings may have adverse

¹⁸ CCW's own calculations suggest that Welsh peatlands may currently be sequestering an additional 5,588- 10,406tonnes of carbon per annum. Whilst a significant figure this is dwarfed by the 121 million tonnes currently sequestered as peat.

¹⁹ Op cit

environmental implications. In order to fully maximise the carbon sequestration benefits of forestry it is also necessary to consider the end use made of the product.

5.10 The ECOSSE work suggests that organo-mineral soils can be vulnerable to carbon losses during ground preparation and tree establishment. A second period of vulnerability occurs during forest harvesting as a result of physical disturbance and accelerated leaching of dissolved organic carbon.

5.11 The targeting of afforestation on low carbon or existing agricultural soils can reduce risks. Experimental work under ECOSSE (albeit on a very limited sample of only three sites) has shown for the first time a statistically significant overall loss of 13% in soil carbon following 25 years of birch growth on heather moorland.

5.12 Forestry absorbs and stores CO₂, but carbon balances in woodland are complicated by interactions with soil and of course the ultimate fate of the timber crop. Trees planted on peatland, (and within Wales there are some 12,000ha of such plantations) cause the soil to dry out, oxidising the peat and releasing carbon dioxide. Recent research has shown that whilst in the short-term the clearance of plantations on peat soils increases the level of GHG emissions, over several decades the subsequent carbon sequestration within newly restored bogs will offset losses within acceptable timescales²⁰.

5.13 The maximum rate of carbon accumulation during the most active growth period of trees in the UK is estimated to be 10tC ha/yr, although over a commercial rotation a realistic average may be no more than 3tC ha/yr. Stands managed for continuous cover, the system that WAG has committed to introducing on a significant proportion of its forest estate in Wales, are likely to show average figures similar to single age plantations²¹. The promotion of continuous cover forestry systems is unlikely to compromise carbon sequestration and should ensure that woodlands are more robust in the face of range of pressures arising from climate change such as increases in extreme weather events and greater risk of disease.

5.14 The benefits of carbon sequestration by trees are maximised when the timber is retained by long-term uses such as the construction of buildings, but this requires timber which meets the necessary strength grading. The burning of wood for fuel also provides a positive benefit if it replaces fossil fuels.

Question 6: What are the roles of farming and forestry in the future of the uplands?

6.1 The future role of farming has been extensively discussed within the Welsh Assembly Government's recently published strategy for Farming, Food and Countryside²² as well as in the previously produced report of the independent 2020 group²³. Both of these documents make the point that farming faces numerous challenges at both global and local levels. These challenges include trade liberalisation and CAP reform as well as climate change and resource costs. Food

²⁰ "The carbon consequences of habitat restoration and creation". Allison Colls, PhD Thesis, Tyndall Centre, April 2006.

²¹ Broadmeadow, M. & Matthews, R. (2003) Forests, Carbon and Climate Change: the UK contribution. Forestry Commission Information Note. See: <http://www.forestry.gov.uk/fr/INFD-62HCJH>

²² Farming, Food and Countryside – Building a Secure Future. A new strategy for farming. Welsh Assembly Government, May 2009

²³ Sustainable Farming and Environment; Action towards 2020. July 2007

security has also risen up the agenda owing to a range of factors, but it is worth remembering that recent rises in global food price occurred primarily as a result of inequalities in food distribution and purchasing power, both within and between countries.

6.2 In the longer term, however, continued increases in agricultural yields will be an essential part of meeting increased world demand. However, such increases in production cannot be achieved by continuing and intensifying the mechanisms used over the past 50 years²⁴. This would lead to unsustainable levels of damage to the ecosystem services underpinning production. As a result, CCW believes publicly funded research and development needs to focus on the challenge of enhancing agricultural production and efficiency whilst reducing environmental impacts and addressing climate change.

6.3 Within Wales, the strategy for Food, Farming and Countryside emphasises the need to improve efficiency and profitability whilst reducing the environmental footprint of agriculture. At the same time, farming and its associated industries remain at the heart of many Welsh rural communities as well as playing a key role in the provision of environmental services such as carbon and habitat management. Within the uplands, the challenge is how best to reconcile these various demands.

6.4 The UK Government has recently set out its view on food security²⁵ making the following statement in relation to the role of UK producers:

“Domestically, we want a thriving, competitive UK food sector to continue to play its part in keeping us food secure. It should produce as much food as possible, as long as that is driven by demand for our food, and that increases in production are achieved as sustainably as possible. Our ability to take advantage of growth in demand will depend primarily on the competitiveness of UK agricultural production, as well as the nature of the demand. So we need to create the conditions for competitive, sustainable, domestic production to thrive, including strong sector skills, fair supply chain relationships, access to raw materials and well-informed consumers”

6.5 In responding to the other questions raised by this inquiry, we have already referred to the changing nature of livestock production in the Welsh uplands. Recent CAP reforms and market demands seem to be bringing about a much greater emphasis on the use of quality animals coupled with a reduction in the use extensive of grazing. A focus on increased production within the UK does not necessarily mean, therefore, that more livestock need to be kept within the uplands. Neither does it mean that greater production is required within the Welsh uplands if such production can be more effectively carried out elsewhere. In particular we need to remember the values which make the uplands such special places for so many people as well as their role in providing a range of ecosystem services of benefit to wider society.

6.6 In view of the above, CCW believes that the focus should be on the role of Government in helping individual businesses to take the necessary action to secure greater efficiency and profitability. Such action should help to safeguard the role of

²⁴ *Synthesis Report of the International Assessment of Agricultural Science and Technology for Development (2008)*. Accessed via <http://www.agassessment.org/index.cfm?Page=IAASTD%20Reports&ItemID=2713>

²⁵ UK Food Security Assessment – Our Approach. Defra August 2009. Available at: <http://www.defra.gov.uk/foodfarm/food/pdf/food-assess-approach-0908.pdf>

agriculture and associated industries in sustaining rural communities. At the same time Government will also need to take action to ensure that sufficient capacity is retained to ensure that valued upland habitats, carbon stores and water resources can be managed effectively. This action should include taking steps to facilitate the development of innovative approaches such as carbon trading schemes as well as more traditional approaches based on land management schemes within Axis 2 of the WRDP.

6.7 Government will also need to consider the implications of 'traditional' agricultural management being withdrawn from some areas. The end result need not necessarily involve "re-wilding", but nevertheless the adoption of alternatives to the current pattern of management should be considered. In some cases this may mean minimal intervention with natural processes, whilst in others it may involve some use grazing animals, albeit not necessarily with food production as the primary purpose. The challenge will be to plan where such approaches would best be applied, taking into account market forces, the need to manage ecosystem services and the increasing demand for recreational access. Such work is currently being undertaken on a small scale on some upland sites, but in the near future we may need to be more proactive in planning where such approaches would be most suitable taking into account the full range of objectives at local level.

The role of forestry

6.8 The changing pattern of upland land use, with reductions in grazing intensity and potential withdrawal of agriculture, offers opportunities to look again at the role of trees and woodlands. To ensure that environmental and economic benefits can be fully realised, both location and design (including species choice) needs to be carefully considered. A number of key issues are set out below:

6.9 Existing woodlands in the uplands are often unmanaged or under-managed and it should be a high priority to bring these into sustainable management. This will provide biodiversity benefits whilst economic outputs will be achieved earlier. Woodland expansion is also an option, with the emphasis on creating more diverse woodlands (whether broadleaved or predominantly conifer). A range of species will help to combat pest and disease threats in the future and optimise the response to changing growing conditions. Guidance is already available indicating which species may be best suited to changing climate conditions in Wales.

6.10 New woodlands should be planned to provide a range of benefits, including shelter, flood alleviation (through increased infiltration rates) or flood storage, and to complement other land uses such as recreational access. New woodlands should also be designed to protect and enhance biodiversity, in particular helping to achieve improvements in habitat connectivity. Non-woodland habitats and species need to be considered as part of the planning process, so that woodlands are not located on priority open habitats or on land where they may be a potential barrier to species movement in response to climate change.

6.11 Woodland expansion should generally be targeted to sites with low biodiversity potential, such as improved grassland or acid grassland, as well as avoiding sites of historic or archaeological significance. Smaller areas of woodland, perhaps developed through natural regeneration, can prove valuable and can be integrated with continued livestock grazing. Recent changes in the interpretation of EC Regulations that allow farmers to retain SFP where new woodland is planted, as well as the option that allows for farmers to seek derogation from the cross compliance

requirements covering 'unwanted vegetation'), now provide considerable potential for allowing scrub and woodland development.

6.12 New opportunities for the production of fuel wood can increase the potential for economic return from upland woodlands, and these can operate at both domestic and local scales (heating the farmhouse; supplying community wood-fuelled boilers and firewood) as well as at the regional scale (feeding into larger scale renewable energy installations). A wider range of species may also provide timber for a range of uses, including construction. The use of continuous cover management techniques on existing and new woodlands will reduce potential adverse impacts from management by avoiding clear felling (which can result in sediment loss and has an impact on the landscape).

6.13 There are opportunities to consider new models for upland woodlands, especially for woodland expansion. One might be the incorporation of increased woodland into the farm economy, largely replacing hill livestock. A second option would be the transfer of land away from the farm to new owners (including communities) aiming to provide a range of products, including enhanced recreational opportunities. The development of new models of woodland ownership could be supported by recognition that woodlands provide a range of public services (improved water quality, flood reduction, carbon storage) which can attract payments under land management schemes.

Question 7: What role does common land have in the future of the uplands?

7.1 Common land occurs throughout the Welsh Uplands, representing some 7.5% (30,740 ha) of the total area of upland habitat, mainly concentrated as large upland blocs in the Brecon Beacons, Eppynt, Mallaen, Elenydd, Carneddau, Berwyn, and Migneint. These are important high nature value areas that include a significant proportion of Wales' national (SSSI) and European (SAC/SPA) designations. Upland commons are also important for their vast landscapes, for example large areas of common land in the Brecon Beacons are owned by Brecon Beacons National Park Authority contributing to public health and well being by providing areas of open access for recreation. Many upland commons are associated with peat soils, in particular the Elenydd, and these provide vital ecosystem services as carbon stores and water catchments. However, the condition of many of these commons means that in a number of cases these resources are not being managed sustainably with degraded peatlands characterised by eroding soils and a dominance of vegetation unpalatable to grazing stock.

7.2 Commons differ from other upland areas in their unique system of governance. In particular, grazing levels are determined by the number and usage of quantified registered livestock rights held by individuals. As most commons have many rights holders this often makes it difficult to secure environmental management agreements, especially where not all the individuals involved in grazing the common wish to be party to an agreement. As a consequence, addressing the 'unfavourable condition' of many upland commons is a significant problem. This has led to the situation where much of the land in poor environmental condition in the uplands is located on common land, with all the consequences this has for management of peat, water resources and biodiversity. WES targets to halt biodiversity loss in Wales and achieve favourable condition in upland designated sites are being severely hindered by the situation described above. The establishment of management agreements on common land is a long and difficult process, often deferred in favour of focussing on 'quick win' agreements on land not subject to common rights.

7.3 Whilst a few examples of sustainable management agreements on upland commons do exist (such as Tir Gofal's Garn Goch common) many more could benefit from the establishment of Commons Councils (Part 2 of the Commons Act 2006). These Councils would have powers to self regulate agricultural management on common land. Securing agri-environment agreements with established Commons Councils would help towards achieving 'favourable condition' on large upland commons. In addition, a more relaxed approach to particular issues such as facilitating the erection of temporary (or permanent) fencing on common land to secure suitable management will need to be taken if any significant progress is to be made and common land is to have a positive and functional role in the future of the uplands in Wales.

7.4 **Common land:** There are relatively few examples of sustainable land management agreements involving upland commons, yet common land accounts for c.7.5% of the Welsh upland and a disproportionate number of designated sites. The establishment of Commons Councils (under Part 2 of the Commons Act 2006) would make the process of reaching agreement on land management priorities more straightforward.

References

- [State of the Countryside Update: Uplands](#)

Full document:

<http://www.ruralcommunities.gov.uk/files/CRC%20Web40%20State%20of%20the%20Countryside.pdf>

- [Carbon Reduction from Land Use: 5th report of the Sustainability Committee's Inquiry into Carbon Reduction in Wales](#) (Sustainability Committee Report)

- CCW evidence to the Sustainability Committee Inquiry into Land Use and Carbon emission reduction: [http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-sc-home/bus-committees-third-sc-agendas/sc_3_-25-08_p1_-_evidence_from_ccw_c02_rural_land_use.pdf?langoption=3&ttl=SC%283%29-25-08%20%3A%20Paper%201%3A%20Carbon%20Reduction%20via%20Land%20Use%3A%20Evidence%20from%20Countryside%20Council%20for%20Wales%20%28p](http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-sc-home/bus-committees-third-sc-agendas/sc_3_-25-08_p1_-_evidence_from_ccw_c02_rural_land_use.pdf?langoption=3&ttl=SC%283%29-25-08%20%3A%20Paper%201%3A%20Carbon%20Reduction%20via%20Land%20Use%3A%20Evidence%20from%20Countryside%20Council%20for%20Wales%20%28pdf%2C%20191Kb%29)

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All submissions to this inquiry are available at: http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third1/bus-committees-third-sc-home/inquiries_sd/inquiries_-_carbon_reduction/sc_3_-carbon_energy-land_use.htm

- [State of the Countryside Update: Uplands](#)

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- Rural affairs committee inquiry on Poverty and deprivation in rural Wales:

http://www.assemblywales.org/poverty_and_deprivation_in_rural_wales.pdf

- House of Lords, European Committee: The Review of the Less Favoured Areas Scheme, Report with Evidence:

<http://www.publications.parliament.uk/pa/ld200809/ldselect/ldcom/98/98.pdf>

- Gwlad, Issue 72, April 2008:

<http://cymru.gov.uk/depc/publications/environmentandcountryside/farmingandcountryside/gwlad/gwlad72/gwlad72e.pdf?cr=1&lang=en>

Information of relevance to the Uplands Inquiry (from April 2009)

Less Favoured Areas: The European Commission has published [a communication on the new classification for agricultural areas with natural handicaps](#). The Commission has identified 8 soil and climate criteria for classification of less favoured areas but has asked member states for more data in order to test their feasibility.

Less Favoured Areas: The House of Lords European [sub-committee on agriculture and the environment has published its report into the Commission's review of Less Favoured Areas](#). The Committee welcomes the Commission's intention to introduce a common set of biophysical indicators and recommends the introduction of a common EU-level framework for eligibility criteria. The Committee also agrees with the findings of Court of Auditors that there is little past evidence of the schemes effectiveness in protecting the environment. The **report** is available at: <http://www.publications.parliament.uk/pa/ld200809/ldselect/ldcom/98/98.pdf>

Soils: DG Agriculture and Rural Development and the Joint Research Council have presented the findings [of a two-year study on 'Sustainable Agriculture and Soil Conservation'](#).

Call for greater policy emphasis on resource use levels: A [report by think tank the Sustainable Europe Research Institute](#) (SERI) states that resource use levels, not

just related environmental impacts, should be a key indicator when deciding policy to drive sustainable development. [UKNLO Briefing](#).

Land Use and GHG Emissions: [Land use, land-use change and forestry \(LULUCF\) activities "could have a significant influence on how future reduction targets can be achieved](#) in developed countries," according to a European Commission report presented to EU environment ministers on the 25th of July.

TEEB

A new climate issues update by The Economics of Ecosystems and Biodiversity (TEEB) was presented on September 2nd at a press conference in Berlin. This update

<http://www.teebweb.org/InformationMaterial/TEEBUpdates/tabid/1137/language/en-US/Default.aspx> addresses four domains which the authors believe need to be highlighted in the run-up to Copenhagen:

European Commission pages on TEEB:

<http://ec.europa.eu/environment/nature/biodiversity/economics/>