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Air Quality Team
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

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Dear Sir/Madam,

The FUW welcomes the opportunity to provide feedback on the White Paper on a Clean Air (Wales) Bill.

Following an internal consultation with its twelve County Branches, the Farmers' Union of Wales submits the following comments for your consideration.

General Comments:

Although noting that air pollution is applicable to everyone in Wales, members felt that the consultation was mostly relevant to urban areas and road transport as opposed to farming practices given the topics of the questions. Therefore FUW are responding to the consultation with general comments, rather than question by question.

Members did not want their contribution to tackling climate change, or reducing carbon and ammonia emissions on farms to be overlooked. For example, around 410 million tonnes of carbon is stored in Welsh soils and 75,700 hectares of Wales' woodland (25%) is on farmland, representing an important and growing carbon sink. Indeed members felt that farmers are very much part of the climate change solution through enhancing levels of carbon sequestration on Welsh farms.

FUW members agreed with the proposal to create a requirement within the Bill for a Welsh Clean Air Plan or Strategy to be reviewed and published at least every 5 years, in order to be able to stay aligned to emerging evidence and policies and to keep flexibility. Members felt that the proposed timescales for the review were appropriate.

FUW believes the proposed new air quality targets must be evidence based and developed in consultation with a range of stakeholders. This should help ensure they are practical and do not create unintended consequences, such as creating unnecessary work and administration. However members questioned who would be checking adherence to such targets and if Welsh Government had sufficient resource.

Members felt that to propose an air quality target framework would provide a comprehensive matrix from which to work from, though were sceptical at Welsh Government claims that this would lead to flexibility to take action when needed, to deliver the most effective and sustained outcomes for our communities and environment.

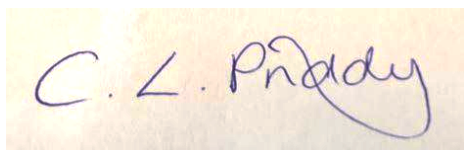
Any targets for monitoring which involve agriculture should be operated through the proposed Sustainable Farming Scheme and National Minimum Standards, as opposed to a separate process. Sufficient resource should be provided for these additional monitoring activities for Local Authorities, without diluting the agricultural budget.

Members acknowledged that everyone is affected by air pollution and felt that a holistic approach across all sectors is the best way to tackle the problem. Though had concerns about the Welsh Government proposals to extend and maximise the reach and impact of the health guidance so it applies to other parts of the public sector, including the private and voluntary sectors. In addition, the Welsh Government proposal to place the enhanced guidance on a statutory footing.

Any new clean air legislation should not follow the Water Resources (Control of Agricultural Pollution) (Wales) Regulations approach, which has introduced strict rules and regulation across every farming business in Wales, regardless of whether there is a pollution problem or not. Rather, practical support delivered through the new rural development programme should provide capital works, education and support to improve efficiency, funding over and above income foregone for habitat creation- as a multi-pronged approach to reducing ammonia and carbon emissions.

Agriculture needs to have suitable investment from Welsh Government to achieve these additional requirements. Furthermore, Welsh Government must recognise that implementing a higher regulatory baseline is likely to increase cost of production for farmers, and therefore make them less competitive in the marketplace.

Yours faithfully,



Charlotte Priddy
Policy Officer