

# Minutes

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<b>Title of meeting:</b>	Wales Land Management Forum (WLMF) Sub Group on Agricultural Pollution
<b>Location:</b>	Microsoft Teams Meeting
<b>Date of meeting:</b>	18 <sup>th</sup> November 2024
<b>Members present:</b>	Professor Rhys A. Jones, NRW Board Member (Chair) Michelle Griffiths, NRW Dennis Matheson, TFA Sarah Jones, Dwr Cymru Welsh Water Sarah Hetherington, NRW David Ball, AHDB Nichola Salter, NRW Chris Mills, Afonydd Cymru Einir Williams, Farming Connect Creighton Harvey, CFF Matt Walters, Welsh Government Andrew Chambers, Welsh Government Betsan John, Welsh Government Cat Osborne, Welsh Government Gemma Haines, FUW Rachel Lewis-Davies, NFU Cymru Marc Williams, NRW
<b>Additional attendees:</b>	Dr Susannah Bolton
<b>Apologies:</b>	Fraser McAuley, CLA Gareth Parry, FUW
<b>Secretariat:</b>	Bronwen Martin, NRW

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## Item 1. Introductions, Apologies and Declaration of Interest

1. Professor Rhys A. Jones (NRW Board Member and WLMF Sub Group Chair) welcomed all to the Microsoft Teams meeting and noted apologies.
2. The meeting is being recorded for the purpose of capturing the minutes and the digital file will be deleted once the meeting minutes have been approved.
3. No declarations of interest were raised in respect of agenda items.
  - NB: All members of the group have completed declaration of interest forms already but should also declare if they have an interest in anything on the agenda.

## Item 2. Review of Minutes and Actions

4. Rhys confirmed that once the meeting minutes have been reviewed and formally agreed by the group, they will be published on the NRW website for the public to access. Therefore, it is important that the minutes are an accurate record of the meetings.
5. The group reviewed the draft minutes from the meeting held on 21<sup>st</sup> October 2024. Crieghton Harvey, CFF requested that some of the statistics and comments from the meeting are stated within the minutes. Bronwen will review the recording and amend the document accordingly. Notwithstanding this, the minutes were accepted by the group as a true record.
6. Bronwen shared the outstanding actions log and verbal updates were provided where possible. Particular discussions include:
  - AP June 03: Professor Rhys Jones and Bronwen Martin to draw together the group responses to each of the recommendations within the SAC Rivers Agricultural Technical Group report and circulate it to the group.
    - In June, the group reflected on the recommendations within the report. The discussion has been summarised and we're working out the next steps regarding drafting a letter. Rhys mentioned that there are some challenges such as uncertainty around whom a letter should be sent to. We should have more to say on this at the December meeting. Chris Mills, WEL pointed out that the action was from the June meeting and questioned whether it would be still relevant in December. Rhys said it will still be relevant because the report is still relevant and live. David Ball, AHDB confirmed that there hasn't been a response or any direct feedback from anyone regarding the report or recommendations, therefore it would be beneficial for the WLMF Sub Group to respond to the commissioning group to acknowledge the report and ask if next steps can be addressed. Marc Williams, NRW mentioned that the Oversight Group no longer exists. The SAC Rivers Agricultural Technical Group was a result of previous sector discussions in 2021-2022 around the SAC Rivers, subsequent SAGIS modelling and a suggestion from the previous WLMF Sub Group Chair noting that it was worth setting up a technical group to identify and to understand the issues in SAC rivers. Cat Osborne, Welsh Government said it was not clear who owned the report, and it was not clear who had signed it off and who hadn't. It would need a clear lead, and that owner should send it directly to the Minister. Cat shared some of the actions from the Phosphate Summit Action Plan. Chris suggested that there is some learning from this experience for future initiatives, for example making sure there is a clear commission, identifying the target audience, where it should be sent etc.
  - AP Oct 02: Andrew Chambers, Welsh Government to feedback to RPW the comments made by Gareth Parry, FUW regarding the revised cross compliance verifiable standards.
    - Andrew confirmed that he has fed this to RPW and there is nothing to report back. Action closed.

- AP Oct 03: Rachel Lewis-Davies, NFU Cymru to provide more information about officers going to farms prior to visits taking place so that Nicola Mills, NRW can look into it.
  - Rachel said the NFU Cymru members concerned are very reluctant to provide any details because there's a trust issue, they don't want to make things worse for themselves and they don't want to draw any more attention to it. Rachel suggested that this issue needs to be resolved at a policy level – it's important that it's clear that letters are sent in advance rather than Officers turning up on the yard to tell farmers that inspections are happening. Action closed.
- AP Oct 04: Andrew Chambers, Welsh Government to provide information regarding a breakdown of all the schemes and the windows to which that £52 million was allocated.
  - Andrew is seeking this information and will hopefully have an update to share in the December meeting.

### Item 3. The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021: 4-year review

7. Dr Susannah Bolton (Independent Chair for the Review) was grateful for another opportunity to engage with the group regarding the 4-year review process within the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021.
8. The Terms of Reference for the review has recently been published by Welsh Government and a link was circulated ahead of the meeting - [Statutory review of the Control of Agricultural Pollution Regulations: terms of reference | GOV.WALES](#).
9. Susannah posed a series of questions for the group to consider and discuss.
10. **Question 1a:** Focusing on the regulatory limit of the 170kg/ha for any farm business, the group were asked how many businesses and what sorts of businesses will this limitation effect.
11. David Ball, AHDB recalled that the Enhanced Nutrient Management Approach (ENMA) had resulted in 9 farms notifying their intention of using that approach. However, it is generally recognised that many more farms would have been impacted by that limit. Although it's very difficult to say how many others would have been affected as this is just anecdotal evidence. Perhaps some farmers have managed to meet the 170kg/ha requirement by having arrangements with other local farms for example, either exporting manure or getting access to extra land. Nonetheless, the 9 farms are not a safe indicator of how many were affected.
12. **Question 1b:** Susannah asked about the nature of those businesses and the challenges associated with the 170kg/ha limit.
13. Eimir Williams, Farming Connect said there are 19 Farming Connect Development Officers that cover Wales. Currently quite a high percentage of the calls they receive are from farmers who are concerned with the Control of Agricultural Pollution Regulations. The farms are cross-sector, no particular size or specific enterprises, there is a general concern within the industry. In summary it is difficult to narrow it down

to a particular type of farm and there seems to be concerns from across a range of sectors and farm sizes.

14. Rachel Lewis-Davies, NFU Cymru said the first point to clarify is that the 170kg/ha limit is from livestock manure. Perversely, this regulation is driving farmers away from using their own nutrients and recycling them in line with the circular economy, to using manufactured fertiliser. Therefore, there are unintended consequences with the 170kg/ha limit. Rachel mentioned modelling that AHDB has done around the potential impacts specifically on the dairy sector. Additionally, Welsh Government committed to undertake a Regulatory Impact Assessment of the impact of the 170kg/ha limit. NFU Cymru anecdotal evidence suggests that the impact goes beyond the dairy sector, there are other businesses that are also affected. The NFU recently closed its survey of farmers and there might be some useful insights within the responses, this information will be shared with Susannah as soon as possible.
15. Chris Mills, WEL recalled Einir's comments and questioned whether the phone calls received from farmers were actually specific to this 170kg/ha measure within the Regulations or whether they were more about the regulations as a whole. Einir said both, Development Officers are spending a lot of time supporting farmers that are affected by the 170kg/ha rule – although this generally affects the dairy sector more.
16. **Question 1c:** Susannah said there is obviously a challenge around the amount of organic manure that certain businesses might have to apply in order to dispose of it but there is also the challenge of addressing crop need. Susannah asked what farm businesses are currently doing to make sure that the applications match crop need most effectively.
17. Rachel said the 170kg/ha limit leaves people with three options:
  1. to export
  2. to take more land or
  3. to reduce their stocking level

Rachel reminded the group that these challenges cause problems for farmers with Bovine TB because of limitations and movement restrictions. It's not a small number of businesses that are affected by TB at any one time and these farmers are unable to export their cattle. Rachel discussed the 170 kg/ha and the context of crop need particularly in grass-based systems. The regulations themselves recognise that you can apply to grassland depending on how many cuts you're taking and then farmers are using manufactured instead of using their own nutrients in a much more circular way.

18. David said this limit is the average across the holding. Given that a lot of farms would be covered by reasonably intensive grassland which would have a higher demand of nitrogen than 170kg/ha, by retaining the limit, it limits the output of the crop unless you use manufactured fertiliser. Therefore, the waste disposal element does not really come into it because they're not meeting crop need anyway. David suggested that the background of the 170 kg/ha rule is a stocking rate control which attempts reduce the grazing density. David discussed the elements which are under the farmer's control in the context of the 170kg/ha rule, crop need, extended grazing and slurry storage.
19. In terms of the 170kg/ha not meeting crop need, Chris asked about the residual nitrogen and phosphorus within the soil, does that not also need to be taken into

account. David said this should be considered in the Nutrient Management Plan, or in this case a Nitrogen Management Plan. But even so, it wouldn't make up the difference between 170kg/ha and the crop need.

20. **Question 2:** Susannah reflected on the fact that there were only 9 notifications to use the ENMA. Susannah asked the group why so few notified, given the factors that have been raised in relation to constraints that farm businesses are dealing with regarding the 170 kg/ha.
21. David suggested the complexity of what was required under the ENMA put a lot of farmers off notifying. The process was far too complicated for them to go down that route. Farmers would have made legitimate alternative arrangements, which meant they were compliant with the regulations.
22. Einir agreed with David and said Farming Connect have heard this was the reason that farmers did not notify. However, there is no evidence to support this, just feedback from farmers. Some farmers were probably hesitant to show themselves as needing to go above 170kg/ha in case they were flagged as being a 'problem farm'.
23. Rachel said farmers don't think of it as 'disposing' of manure because the 170 kg/ha doesn't meet the crop need for their grassland. Rachel agreed that the ENMA was a hugely complex process and there was a reluctance from farmers to participate in that. NFU have conducted their survey and this should be a useful insight to this specific question. Rachel said there is a key question around how workable it was as a solution, because the process was very complex.
24. **Question 3:** Susannah said farm businesses also have a focus on production and there have been various incentives to increase productivity. However, there are challenges to this. Susannah asked if it is likely or possible that there are certain types of businesses where the business model really doesn't work but still manage to be compliant with the regulations (e.g. producing too much slurry to manage effectively).
25. Rachel said the different parts of the regulation pull farmers in different directions. There are requirements around slurry storage, which in some cases will require farmers to make huge investments. There is some grant support available, but that covers only 40% and the farmers have still got to make the business case to the bank for the remaining 60%. How can farmers make that case to the bank when another part of the regulation requires livestock numbers to be cut – these are conflicting parts of the regulations. Where investment is required, it often requires investment support from the bank and farmers cannot make that investment on the basis of reducing livestock numbers. Talking in general terms, these are the tensions that farmers are having to resolve. This is without bringing in the tenanted sector who are likely to face more challenges in leveraging the necessary funding. They are sometimes faced with a landlord who's unable to make that investment in the farm infrastructure. This is a really complex issue, and farmers have been placed in an invidious position of trying to meet the requirements of different parts of the regulation.
26. Dennis Matheson, TFA mentioned that the regulations do not make it clear the difference between organic manures which are stackable (e.g. farmyard manure) and those that are not stackable (e.g. slurry). There is a small paragraph, but the definition should be right at the beginning to make that clear because there are different rules for

the material. Dennis commented on how confusing these regulations are and whether you are allowed to spread farmyard manure throughout the winter.

27. Regarding storage, Dennis mentioned that NRW have taken a very sensible approach, if a farmer is unable to satisfy the storage requirements due to barriers in their tenancy agreement, they will not be immediately be penalised, provided they are not causing any pollution, and NRW will work with them to try and resolve the problem. Originally, RPW would have automatically imposed a penalty under cross compliance if a farmer didn't have proper storage, but they have now aligned with NRW thanks to the intervention of Welsh Government.
28. Dennis mentioned the recent Westminster budget, which is likely to have a disastrous effect on tenancies. Landlords will take land back in hand in order to meet future death duty charges. TFA have already seen cases of this before the budget where landlords refuse permission for a tenant to put up a new slurry store, as this might increase the value of the holding and impact inheritance tax. The situation will now be much, much worse. This is a disastrous budget for tenant farmers and TFA have since been lobbying with Daniel Zeichner and the Treasury Team.
29. David said we tend to focus quite heavily on dairy sector because it tends to have the larger stocking densities. But the poultry sector is also affected and often have high numbers of birds, and therefore produce lots of nitrogen on fairly small land areas. Managing the resultant manure from that is often quite a challenge. However, many of these businesses are very large integrated businesses and they'll have procedures in place, but it invariably encompasses exporting the material to other farms or locations.
30. **Question 4:** Susannah mentioned intensive poultry and pig production and asked whether the group had any comments regarding these specific sectors.
31. Chris suggested farmers need to look closely at what the EPR regime requirements are for intensive pig and poultry because they are under a completely different regime. As part of their permits, there will be a whole host of requirements and the disposal of the manure from poultry farms will be one of those requirements and it should be monitored as part of the EPR regime. Chris suggested that if it's falling down, it'll be as a result of inadequate inspection and enforcement. David said some farms will be under the head count limit (e.g. 40,000 birds and 2,000 production pigs). Michelle Griffiths, NRW clarified that there are EPR intensive pig and poultry permits, but the export of manures from those sites won't be covered by those permits.
32. Dennis confirmed that a tenant is not allowed to export any manure off their farm without landlord permission. Outdoor pigs and poultry cause a problem but the manure from indoor production also causes a challenge. Dennis mentioned a case in Powys waiting for approval for more than 2 years. Dennis also discussed the challenges and issues of storing poultry manure. David said it might be incumbent on that farmer to demonstrate that the manure is going somewhere and being used in a way that doesn't exceed the regulations.
33. **Question 5:** Susannah raised the challenge around the need for investment in storage capacities and the potential for mixed messages in relation to productivity, incentives and compliance penalties. Incentives aren't just from government, but also the supply chain and the market drivers for productivity. The group were asked for feedback.

34. Dennis said Powys County Council are looking at a plan to not re-let some of their short-term tenancies and split them up into market gardens for growing fruit and vegetables. Vegetable farming is highly intensive with very high levels of nutrients needed. The Council believe there's a huge demand for home grown fruit and vegetables and the land isn't being used to its full potential. However, it is understood that Welsh Government want an extensive use of land.
35. David said its not just the supply chain requirements that might be driving an intensification of farming, but also the business needs of the farm business. For example, succession planning when offspring return from college and the need to derive more than one income from the business. Those pressures also have a social and economic impact on the rural community. If a farm is unable to increase its output in order to support other members of the family, then those people go elsewhere.
36. Rachel suggested that Susannah should look at the statistics for dairy businesses in particular and how the number of businesses has probably reduced over the years. Numbers are probably reducing, whilst maintaining the overall Welsh milk production. These are businesses that employ a significant number of staff and are important businesses in their communities for that reason. Many businesses have been faced with the decision that they either make the very significant investment needed in new parlours, new infrastructure and to grow the business or to make that decision to leave the industry. These are the harsh realities, the marketplace doesn't always deliver the margin that's needed, and it can be extremely volatile.
37. Chris said he didn't think the supply chain imposes productivity; it operates through price. This is a symptom of society not being prepared to pay enough for what is produced. Therefore, economics is the primary driver.
38. **Question 6a:** Susannah asked about the impact that the supply chain might have in terms of managing contractual requirements within the constraints of the regulations.
39. Rachel offered to arrange a separate conversation with the NFU Cymru Dairy lead. Milk in particular is driven by milk contracts, and you are contractually bound to deliver that contract which can place significant pressures on farmers. That doesn't always reconcile with a piece of regulation that requires a farmer to cut 50 cows out of their herd and the corresponding production from that, so farmers are in a very invidious position. Rachel mentioned farm assurance and subsequent requirements. If you're found in breach of a farm assurance inspection and that could be quite a minor breach, the supply chain contract is automatically suspended. This adds to existing pressures on those farm businesses. It can be very difficult and can really affect the mental health and well-being of the farmer, their family and staff.
40. **Question 6b:** Susannah asked if supply chain businesses are aware of these challenges and potential conflicts in delivering against those contracts in certain instances.
41. Rachel said the supply chain is aware. When the regulations were being introduced, the supply chain were very concerned.
42. **Question 7:** Susannah asked the group for feedback regarding the potential issues with nutrient management planning.

43. David believed that one of the issues is knowledge amongst farmers, particularly the nutrient management process and calculations to work out what is needed by various crops under particular regimes, particularly how much nitrogen is needed or available. It is a complex process for a lot of people. Obviously there is an option of a consultant or an agronomist to do this work but there's a cost involved. David said it is important for farmers to have support – both from a knowledge point and financial help. David pointed out that The Control of Agricultural Pollution Regulations require a Nitrogen Management Plan, there's no mention of a Nutrient Management Plan, which would probably be beneficial from an environmental point of view. Even a nitrogen plan is complex for a farmer to do. Farmers are very busy people and work long hours, and spending a few hours sat down working this out is difficult, especially when there are other things which they would likely consider a priority, like looking after animals. More help for farmers in this area would be very useful.
44. Einir said Farming Connect have just run a series of pollution open events across Wales. A lot of farmers aren't aware that they're meant to be keeping the nitrogen management workbook, which is quite concerning. Some farmers still don't know what record keeping they should be doing and how to use the workbook. Farmers are busy and although they've got three quarters of the information that's needed in the workbook, they don't use spreadsheets every day and many don't have the skill set to confidently input that information onto the workbook. Farmers do have the option to fill it in by hand as it doesn't have to be in that format. This element is causing a lot of concern to the industry as it is complex. A lot of people are contacting Farming Connect asking for help with this. Farming Connect are not allowed to fund the process of filling in the workbook, but there is a lot of support available on the web page. Feedback from farmers is that it's a heavy workload filling that actual spreadsheet in.
45. Sarah Jones said as a water company and particularly from the drinking water catchment perspective, it needs to be a whole farm nutrient management plan. We would support farmers doing it from a whole farm approach. Sarah acknowledged that there is probably a whole spectrum of farmers where some really understand the regulations and others will need much more support. Any support provided needs to be ongoing to help people learn and embed that into their business as usual. Farming Connect do really good work, and it's important that it continues. Some people might go to a session and pick things up easily, but others will perhaps need more regular ongoing support. Sarah suggested looking at the capacity and availability of skilled and technical experts to provide this support going forward. For example, are there enough advisors to help with the scale of support required. Some of the well-known advisors are brilliant but they're heading towards retirement age, perhaps we need to look at whether there are people coming through to support the industry going forward.
46. **Question 8:** Susannah asked the group to comment on the advisory capacity of contractors and other organisations and whether it is sufficient to support the needs of the industry.
47. Creighton recalled information shared with the group at the last WLMF Sub Group meeting on the 21<sup>st</sup> October, that one of the main reasons for non compliance was either the unavailability of a Nitrogen Management Plan or inaccuracies within it. This is a very important issue. Regarding the Enhanced Nutrient Management Approach, farmers are supposed to supply details of their soil analysis, which includes phosphate. The ENMA specifically requires details of phosphate levels, not just nitrogen. Bearing in mind the number of farms that are non-compliant because of this issue, it's pretty



obvious that there is a lack of evidence out there. It's very important that farmers are supported to make sure they have accurate Nitrogen Management Plans.

48. David reminded Susannah of the recommendations within the SAC Rivers Agricultural Technical Group Report – one was regarding ensuring funding, advice and support was available for farmers.
49. Rachel suggested the issue of the Nitrogen Management Plans is wrapped up in the overall record keeping requirements and the general burden of record keeping associated with the regulations. This is more about a process and not necessarily outcomes. Just because you do or don't do the process, does not mean you are polluting, and it does not mean that you're improving water quality. There are huge opportunities to improve the record keeping requirements and make them easier for farmers to do. Rachel provided examples of farmers who are paying consultants to help them with the paperwork. However, the minute those consultants leave the farm, those records are out of date. Farmers are really grappling with this because it is so complicated, and they need to be continually reviewed and updated. Rachel was not sure about the capacity of consultants to support the industry. It feels like the support is there, but it's not the ongoing type of support that farmers need to be compliant with the record keeping requirements. Rachel said this should be about looking for solutions, the outline proposals for the Sustainable Farming Scheme (SFS) were published earlier in the year which mentioned soil health planning and the requirement to sample field parcels for N, P, K and soil organic carbon. Perhaps the review should consider where this regulation fits in with the overall context. Susannah said the way in which this regulation interfaces with other aspects of the regulatory environment is really important.
50. Dennis agreed with Rachel's points around the SFS and soil sampling. Dennis mentioned that he has often questioned the paperwork requirements, in theory it looks very good but in practise it's more of a tick box exercise.
51. **Question 9:** Susannah wanted to come back to the requirement for slurry storage, particularly the challenges around the investment required to deliver the required level of slurry storage and the potential benefits for slurry storage.
52. Dennis reminded the group that he had already flagged some of the issues for tenants around the storage requirements. Dennis mentioned the proposal for a new National Park in north east Wales. There was a NRW roadshow held last Saturday, which Dennis attended. Dennis had raised the question of the National Park Authority becoming the planning authority and overriding decisions made by the County Council with regards to new slurry stores etc. Dennis said he was assured this isn't a policy, but it could be a specific issue. Dennis said having a bigger slurry store isn't solving the problem, it's just postponing it. Perhaps it would be far better to put the resources into finding means of reducing the amount of slurry and not by reducing your stock, but by converting it into something which can be transported. This group has previously received presentations from organisations who are already looking into this – the main barrier is cost. Dennis recalled a previous visit to a company called Free Energy located outside Wrexham. Perhaps investing in technology is better than just increasing the size of slurry stores.
53. Rachel said it is important to recognise that farmers see it as valuable nutrients and want to keep them for themselves so that they don't have to buy fertilisers. Anecdotally,

farmers who have been able to invest in slurry storage do see the potential benefits because they're able to optimise when those nutrients are applied, and it also reduces their reliance on manufactured fertilisers. However, there are often significant hurdles which need to be overcome, for example challenges with the planning system and delays, local opposition, funding etc. When Northern Ireland went whole territory NVZ around 15 years ago, that was matched by government funding of around £140 million and a 60% grant intervention rate to help farmers get there. In Wales, it feels that for too many farmers it's been too much of a financial challenge and is just too difficult to get all of this done and to get it done in time.

54. Creighton mentioned Project Slurry which started at Gelli Aur College in 2018. This group has had a number of presentations from John Owen regarding the project. It has since finished and the expectation was that a system would have been developed whereby the solid fraction was taken from the liquid in slurry and then it would remove the nutrients from the liquid. Unfortunately, that wasn't achieved in an economic way, and it was too expensive both in terms of manpower and capital investment. During the last presentation, John Owen was asked about the current status and he said they were waiting for commercial partners. This is one of the biggest issues that faces the industry worldwide, yet alone in this country. Research should continue because it is important to find solutions.
55. David said there are numerous projects around the UK looking at slurry management in particular and there are solutions that are coming to the market. However, they all require capital investment probably over and above the investment required for increasing storage capacity. Solutions are coming forward, but the adoption rate could well be hampered by the capital investment required.
56. Sarah Jones suggested that if a farmer is thinking of investing in technology, they would want reassurance from the regulator that it is going to be an acceptable way of dealing with their slurry. Therefore, the regulators to be engaged in the innovation process and have thought about the next steps, for example is a permit required.
57. Creighton mentioned that NRW are often criticised, sometimes fairly, sometimes unfairly. In this case, NRW are involved in the development of various processes for dealing with slurry and where there are problems with the final product, then NRW say so. NRW actually do very well on occasions, and this is a case where a potential solution was not just being rubber stamped – they have critically and scientifically reviewed it throughout the development process.
58. Regarding investment in innovation, Andrew said there needs to be a certainty of markets for the end product, as well as the available landbank for those nutrients to be applied to land.
59. Matt Walters, Welsh Government recalled earlier points around the economic assessment of the 170kg/ha. Welsh Government are close to finalising the work and this will support the review. We may potentially be in position to share some of that work at the next meeting in December. Rachel said it's really important that this group sees the Regulatory Impact Assessment, especially for transparency.
60. Chris asked if we actually have the data for the current status of slurry storage capacity in Wales, for example how many farms are actually currently meeting the requirement. Matt said the current available data is from Dairy Project, outcomes of NRW

inspections etc. We do not have a definitive list of every farm and every slurry store and whether they are or aren't meeting the requirement. Chris suggested that this would seem to be a fairly basic bit of knowledge needed before assessing the effectiveness of the regulations. Susannah said she would certainly look at the data to see what can be extrapolated from that. Obviously collecting extensive data at this stage is not going to fit in with the review time frame. However, we can look at where there are data gaps and make recommendations associated with those.

61. Creighton suggested the closed period could be a suitable topic for a further discussion, particularly regarding compliance.
62. Dennis said the Tenant Farmers Association has not had a specific face to face discussion with Susannah yet, but they would very much welcome one – particularly a specific discussion on tenancy matters. Andrew said he would be in touch shortly to arrange something.
63. Susannah said she is attending the Winter Fair on Monday 25<sup>th</sup> November and would really enjoy seeing members there.
64. Rhys thanked the group for contributing to this discussion. Hopefully we've shared some useful information for those specific points. Rhys asked for a reminder of the timeframes for the review. Susannah will be preparing the draft report for January 2025. The report will need to be published by the end of March 2025, which is a hard deadline. The evidence gathering and collection of input will hopefully be done by the end of November. Preparing the draft report will be undertaken throughout December.

#### **Item 4. Any Other Business**

65. Winter Fair is 25<sup>th</sup>-26<sup>th</sup> November – both Welsh Government and NRW will have stands at the Fair. Many of the members will also be attending.
66. Rachel mentioned that the CoAPR 4-year review is a really important issue for farmers, but there are lots of other concerns for the industry at the moment. Many farmers are worried, and we should consider this when dealing with the farming community. There's an awful lot of pressure on the industry and some very real and significant concerns around mental health issues. Rhys thanked Rachel for this important reminder.
67. The next WLMF Sub Group meeting will be held on Monday 16<sup>th</sup> December 2024.
68. No other business was raised.