

**Response to Defra's consultation: *Health and Harmony: the future for food, farming and the environment in a Green Brexit***

**The Wildlife Trusts**

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**Executive Summary**

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# Executive Summary

## Introduction

- The Wildlife Trusts protects, champions and acts for wildlife and wild places on land and at sea. We believe that people are part of nature; everything we value ultimately comes from it and everything we do has an impact on it.
- Nature needs to recover. To make this happen, we need to change the way we look after our land - we need spatial planning for nature's recovery – we need a Nature Recovery Network.
- We welcome the direction of travel suggested in the consultation document on paying farmers and land managers for delivering the benefits they cannot sell but that society needs, i.e. 'public money for public goods'.

## Section 2: Reform within the CAP

- Rather than introduce changes to Countryside Stewardship, we encourage Defra to put their resources into tackling the issues which are putting people off applying to Countryside Stewardship.
- The majority of England's wildlife depends on the remaining areas of semi-natural habitat that are less intensively farmed within the countryside. Small sites such as Local Wildlife Sites and commons, of high ecological value, are disadvantaged in Countryside Stewardship. A future ELMS must rectify this issue.
- Payment levels can be too low to make entering Countryside Stewardship worthwhile. Farmers and land managers in a future ELMS must be better rewarded for the natural capital assets they maintain and the ecosystems services they provide.
- Ongoing issues with implementation, including issues with mapping and payment delays, are preventing farmers from applying to Countryside Stewardship.

## Section 3: An 'agricultural transition'

- The Wildlife Trusts support a move to a system based on rewarding farmers and land managers for the public benefits and environmental outcomes they provide for society.
- The government must conduct a comprehensive impact assessment of phasing out Direct Payments to understand the impact of options on different recipients.
- The transition should dovetail with the introduction of a new ELMS and sufficient payment levels must be set which cover the full costs of ELM.
- Cross compliance and new rules such as Farming Rules for Water must be effectively enforced.
- We suggest a transition period of five years from 2020 to generate momentum amongst farmers and land managers for the significant change that a break from the CAP brings.

## Section 4: A successful future for farming

### 4.1 Farming excellence and profitability

- Wildlife Trusts provide extensive advice to farmers and land managers across England, advising more than 5,000 landowners each year. Advisors help farmers and land managers get the best outcomes for wildlife and the wider environment,

and provide value for money. In a future policy, of which the ELMS will be the cornerstone, advice will be critical.

- Advisors will need knowledge of ecology and wildlife habitats which are locally relevant, and in agronomy to facilitate groups of farmers and advise landowners across all elements of the ELMS.
- Understanding the contribution of individual and groups of farms to a national ecological network is a key skill in a future ELMS – especially given the government’s ambitions for a nature recovery network in England, set out in the 25 Year Plan for the Environment.
- Traditional subsidy regimes have been a major element in creating skewed land values making farming inaccessible for many new entrants. Re-designing land payments so that they reward investment in natural capital and the provision of public goods would help address this.
- There needs to be greater integration of holistic land management through the school curriculum and through higher learning.

#### **4.2 Agricultural technology and research**

- The Wildlife Trusts believe that the way in which productivity is currently assessed is flawed. We need to move towards a system whereby environmentally-adjusted total factor productivity is measured.
- Research and development (R&D) on improving environmental performance, including soil health, must be the priority for future policy. This will support a sustainable and resilient farming and land management sector for future generations. R&D on Integrated Pest Management (IPM) should also be prioritised. Agri-Tech should be widened out to include R&D that improves both environmental performance and productivity.
- The wide-scale absence of farm accounts is a barrier to increasing sustainable production and resource efficiency.
- A future policy should support an efficient, productive set of knowledgeable farmers supported by strong farm accounts and environmental advisors who are able to be economically profitable and enhance the environment.

#### **4.3 Labour: a skilled workforce**

- There is a major gap in environmental land management skills which are not being provided for adequately in further and higher education courses – this needs addressing in a future policy.
- Training to assess natural capital will also be important given the government’s ambition to make natural capital a basis for future payments.

### **Section 5: Public money for public goods**

- Public money should be invested in providing public goods which the conventional market will not pay for.
- There is an economic as well as a social and moral imperative to improve and maintain our country’s natural infrastructure – our rivers, woodlands, peat bogs and meadows – our natural capital.
- We propose that farmers and land managers should be paid to provide eight public goods: (1) More, bigger and better natural habitats; (2) Thriving wildlife everywhere; (3) Abundant pollinators; (4) Healthy soils; (5) Clean water; (6)

Clean air and climate change mitigation; (7) Flood risk management, and (8) Access to wild spaces.

- Habitat expansion and connectivity should be included in a future ELMS and are missing from the list of environmental public goods in the consultation document.
- Environmental land management often results in multiple benefits – ranking and separating benefits is unhelpful.
- The government must include targets and milestones and design the ELMS to deliver these. The ELMS should be linked to creating a Nature Recovery Network and delivering the 25 Year Plan for the Environment.
- Productivity and competitiveness is not a public good as the primary beneficiary is the producer. Food security, in this sense of increasing UK production, should not be the basis for public policy or public payments.

### **Section 6: Enhancing our environment**

- The Wildlife Trusts believe that the following public benefits should be incentivised across different spatial scales in a future ELMS: (1) More, bigger and better natural habitats; (2) Thriving wildlife everywhere; (3) Abundant pollinators; (4) Healthy soils; (5) Clean water; (6) Clean air and climate change mitigation; (7) Flood risk management, and (8) Access to wild spaces.
- A Nature Recovery Network which puts space for nature at the heart of our farming system is critical to realising these public benefits and outcomes.
- Public payments for land management should be targeted and allocated at a local level through a Local Nature Recovery Map – a spatial approach to identify societal and environmental needs.
- A powerful independent body should oversee progress towards outcomes and hold the Government to account.
- Contracts could be offered to deliver the strategic outcomes at the locations identified on the Map – i.e. where society needs them.
- The government needs to recognise the importance of specialist advice in caring for the environment in a future ELMS.
- To help our wildlife and environment recover we need to invest in our land and countryside, at a higher level than we currently are.
- A future ELMS will need to resolve questions associated with paying for public goods, e.g. where public goods provision is divided between landowner and commoner, and where environmental measures may reduce the capital value of land (e.g. by re-wetting).

### **Section 8: Supporting rural communities and remote farming**

- The natural capital of the uplands is in poor condition and they are not providing society with the wider benefits they could.
- Hill farmers are dependent on payments and the tax payer is subsidising continuing decline and environmental degradation.
- The Wildlife Trusts believe the uplands need a new vision. Central to this vision is that if upland habitats can function as relatively natural biological systems, they can revitalise local economies.
- Our lowland landscapes in South West England face similar challenges to those of the uplands.

### **Section 9: Changing regulatory culture**

- The Wildlife Trusts believe that it should be easy for farmers and land managers to help nature, without being weighed down by unnecessary bureaucracy and paperwork.
- Some agricultural practices cause diffuse water pollution. Farming Rules for Water (FRFW) have been set as the new regulatory baseline to address the basic causes of agricultural diffuse water pollution.
- There are two main issues with FRFW: enforcement and their narrow focus on diffuse water pollution.
- Defra should conduct a full consultation on the proposed new regulatory baseline so that the risks and opportunities of moving away from the current system can be fully explored.

### **Section 13: Devolution: maintaining cohesion and flexibility**

- Future farming and land management policies will facilitate the UK to meet international obligations associated with biodiversity, climate change and sustainable development.
- Common approaches must be co-developed jointly by the UK Government and devolved governments via a shared and transparent process.
- Three elements should be common across the UK: the regulatory baseline, some objectives (e.g. environmental) and accountability mechanisms.

### **Section 14: International trade**

- We welcome the commitment to maintaining and enhancing our high standards - new trade agreements must not lead to a race to the bottom.
- New trade agreements must help us meet international environmental commitments and obligations.
- Environmental impact assessments should be carried out as part of any trade negotiations.
- A sustainable, thriving agricultural sector is vital for the environment, and we believe that continued tariff-free trade with the EU will be essential to achieve this.

### **Section 15: Legislation: the Agriculture Bill**

- The proposals in the consultation document for legislation do not meet the ambitions set out elsewhere in the consultation document, the 25 Year Plan for the Environment, or the ambitions we feel should be set out in a future Environment Act.
- In addition to the powers set out in the Bill, we suggest the following are included:
  - A title for the Bill that reflects the ambitions of the consultation document, for example a Sustainable Land Management and Agriculture Bill.
  - A broad purpose which sets out parameters for future policies on the face of the Bill.
  - Targets and milestones for the new Agriculture Bill which link to a new Environment Bill that legislates for Nature Recovery Networks and are linked to the 25 Year Environment Plan.
  - A review of funding every five years, clarity on the regulatory baseline and clarity on accountability mechanisms.