



Department  
for Environment  
Food & Rural Affairs

# Health and Harmony: the future for food, farming and the environment in a Green Brexit

## Summary of responses

September 2018



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## Executive summary

1. From February to May 2018, the government consulted on a range of possible paths to a brighter future for food, farming and the environment in England. At the heart of *'Health of Harmony: the future for food, farming and the environment in a Green Brexit'* was a proposal to spend public money on public goods – principally, enhancing our environment and protecting our countryside.
2. The consultation generated a huge amount of interest, receiving 43,356 responses and 127,183 signatories across three petitions. This was accompanied by a series of regional events and policy roundtables around England, where we heard the views of over 1,250 land managers and other stakeholders. Our aim was to involve all those interested in farming and the environment: we want to make the right decisions to secure a bright future, producing high quality food from a high quality environment. The government welcomes this overwhelming interest and would like to thank all who contributed.
3. This document summarises the responses to the consultation.

### Reform within CAP

4. For 45 years agriculture policy in the UK has been determined by the EU's Common Agricultural Policy (CAP). However, whilst we are still in the CAP, the government can still improve applicants' experiences of the CAP and associated schemes.
5. The majority of respondents supported simplifying the current CAP during the last years of our membership. The current process was frequently described as being too complicated with excessive paperwork. Issues with scheme administration and delivery were also mentioned as reasons for wanting a simpler process.
6. On Countryside Stewardship, many respondents believed that making the application process simpler would improve the scheme and increase its appeal to farmers and land managers. Some wanted to see improvements in enforcement, regulation and delivery of payments. A more localised and flexible approach was favoured by several respondents, to allow a greater number of environmental benefits to be met.

### An 'agricultural transition'

7. More respondents preferred applying progressive reductions to Direct Payments through the agricultural transition period, than applying a payment cap. Many suggested that equal percentage reductions should be applied to all applicants.
8. The 'delinking' of Direct Payments from land was less popular amongst respondents than retaining and simplifying the existing schemes. Many also wanted to see the continuation of protections which maintain agricultural and environmental best practice. Respondents frequently asked for clarity on future measures.

9. There was a wide range of views on the length of the agricultural transition, with 5 years receiving the most support. Many respondents thought the length should be dependent on how and when funding would be made available through new environmental land management (ELM) system.

### **Successful future for farming**

#### **- Farming excellence and profitability**

10. Respondents offered a broad range of views on how we can support our farmers to improve productivity, profitability and performance. Respondents felt that farming businesses in all sectors need greater access to, and uptake of knowledge to be able to adapt to the challenges of the future. This included farmer-to-farmer learning, knowledge sharing initiatives, and a more joined-up skills framework.
11. Respondents told us that existing circumstances may be stopping the farming sector from achieving their full potential. The current tenancy law was thought to limit opportunities in the tenant sector, whilst it was suggested that the availability of land could make it difficult for new, dynamic farmers to get into the industry. Many farmers felt that a combination of uncertainty about the future, low farm profits, and expensive equipment created barriers to investment in their businesses.

#### **- Agricultural technology and research**

12. Respondents widely supported greater government involvement to boost collaborative and farmer-led research and develop innovative solutions to productivity problems. Key themes raised included environmental performance, soil health, and improved animal health and welfare.

#### **- Labour: a skilled workforce**

13. The majority of respondents wanted to see the government support the farming workforce by addressing skill gaps in business and financial knowledge. Some respondents wanted more agricultural research skills to be provided.
14. Many respondents supported appropriate immigration measures to make sure that there was adequate access to labour for the industry.

### **Public money for public goods**

15. This chapter set out a new direction based on the principles of public money for the provision of public goods. Many respondents thought all environmental outcomes proposed as public goods were linked, with soil and biodiversity forming the foundations. Important non-environmental public goods included: high animal welfare standards; protection of crops, tree, plant and bee health; and preserving rural resilience, traditional farming and landscapes in the uplands.

16. Public access was a popular topic of discussion. Many supported the benefits of access, such as improved public health and engagement, however farmers frequently raised concerns about potential damage to their businesses and property.
17. It was felt by many that food and public health should have been included in the list of public goods proposed by the government.

### **Enhancing our environment**

18. Respondents felt that any approach to improving the environment should take into account the links between environmental outcomes. The outcomes ranked as the most important included improved soil, water, biodiversity and habitats.
19. Many respondents felt that past and present agri-environment schemes had created barriers to uptake such as complex designs, difficulties with administration and delays to payments. Working together, with other farmers and local specialists, was seen as a necessary element of a new system. The importance of food production and how this should interact with a new ELM system was also a common theme.

### **Fulfilling our responsibility to animals**

20. Most respondents preferred more government action to strengthen standards. Respondents acknowledged that current welfare standards were already high and that measures to raise standards should not compromise industry competitiveness.
21. Many respondents highlighted the connection between animal health and animal welfare, requesting action on both. An approach covering all aspects of health, rather than isolated disease control schemes, was popular. Industry and government working together was also considered important. Many supported making it easier for retailers to recognise efforts to improve both animal health and welfare.

### **Supporting rural communities and remote farming**

22. The main theme to emerge was that rural areas should have a 'level playing field' with urban areas in the provision of services. A majority of respondents ranked broadband coverage as the major challenge facing rural communities. Affordable housing was also mentioned by many as a key issue facing rural communities.
23. Many respondents also highlighted the need for continued financial support for upland farming to provide the environmental, social and cultural benefits enjoyed.

### **Changing regulatory culture**

24. In general, respondents supported bringing in a more fair and focused enforcement system with greater use of earned recognition.

25. Many respondents also wanted to see greater data sharing between agencies to improve upon the current inspection regime and minimise duplications.

### **Risk management and resilience**

26. Concerns were raised on the cost and complicated nature of insurance, along with gaps in cover. Many respondents suggested that data access would be an important tool to tackle these problems, with many wanting to see better, more accessible and fair data at all levels (from farm practice to financial systems) to help manage risk.
27. There were concerns about crisis support, both with the levels of current support and with how comprehensive existing measures are. Many respondents wanted to see the government supporting farmers during exceptional circumstances such as a disease outbreak or catastrophic weather.

### **Protecting crop, tree, plant and bee health**

28. There was strong support for the government to protect biosecurity at the border to prevent pest and disease outbreaks.
29. Many respondents were in favour of the government continuing to protect the benefits provided to people and the wider environment by plants, trees and bees. There was also strong support for the government to maintain its leading and co-ordinating role and providing financial support in response to, and for recovery from, outbreaks.
30. Respondents frequently asked for the government to improve access to information and advice on managing pest and disease risks and outbreaks.
31. Some respondents raised concerns about the use of agro-chemical and their effects on public health and wildlife, particularly pollinators.

### **Ensuring fairness in the supply chain**

32. The majority of respondents to this chapter supported the promotion of Producer Organisations by the government, introducing statutory codes of conduct and improving the provision of data on volumes, stocks and prices.
33. Another key theme that emerged was the need for government intervention to strengthen the position of farmers in the supply chain and to support programmes for collaboration both between farmers and within supply chains.

### **Devolution**

34. Under the existing constitutional settlements, agriculture is devolved in Scotland, Wales and Northern Ireland. The devolved administrations and the UK government are working together to determine where common frameworks need to be established once we have left the CAP. For example, there are some areas that are currently governed by EU Law, which otherwise devolved administrations or legislatures are responsible for, but would benefit from a UK-wide approach to replace the EU-wide approach.

- 35. Many respondents were in support of common approaches, as presented in the Joint Ministerial Committee (JMC) principles agreed by the devolved administrations and the UK Government. There was a general view among respondents that common approaches were also needed in policy areas such as the environment, animal and plant health and welfare, production regulations, food standards and labelling.
- 36. A repeated concern was distortion in agricultural markets across the UK, which may result from different policies. Respondents felt that divergence in funding support and regulations would also cause unfairness and barriers within the internal UK market.

### **International trade**

- 37. Widespread concern was expressed about the impact of future trade deals on the domestic agricultural sector, particularly on the quality of imports from abroad undercutting domestic farmers.
- 38. Many respondents also wanted a proactive marketing strategy from industry and government with more research required into what products the domestic sector needs to produce to serve new markets.

### **Legislation: the Agriculture Bill**

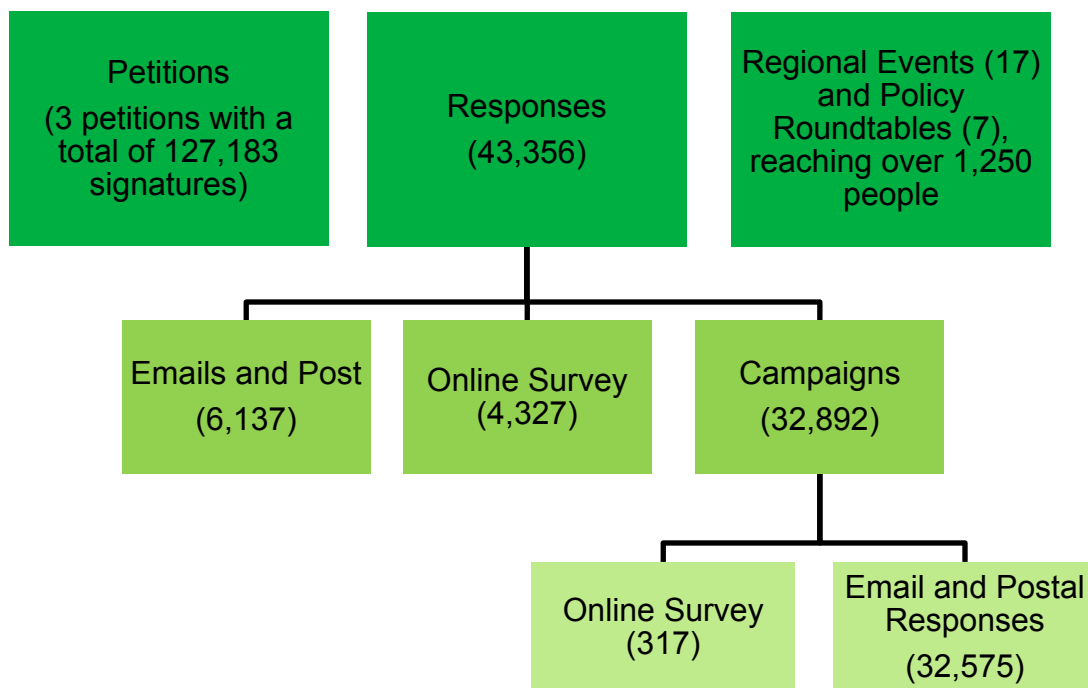
- 39. Most respondents agreed in principle with the basis for future legislation, some felt the outlined policy framework did not go far enough. Some echoed the concern that neither food nor public health was sufficiently addressed in the consultation paper or in the proposals for legislation.
- 40. Overall it was felt that the bill needed clarity and should set out the purpose of future policy more clearly. It was suggested that the bill should outline duties for ministers alongside providing objectives and targets for environmental improvement. Respondents felt this clarity in aims and duties would allow the public to hold the government to account.

## Introduction

The consultation ran for 10 weeks, from 27 February 2018 to 8 May 2018. As agriculture policy is devolved, the scope of this consultation was primarily the future of agricultural and environmental policy in England. We sought views however on devolution within future farming policy. This document provides a broad picture of all views and comments.

## Number of responses

In total 43,356 responses to the consultation were received, as well as 3 petitions with 127,183 signatures. In addition, 17 regional events and 7 policy roundtables were held, reaching over 1,250 people:

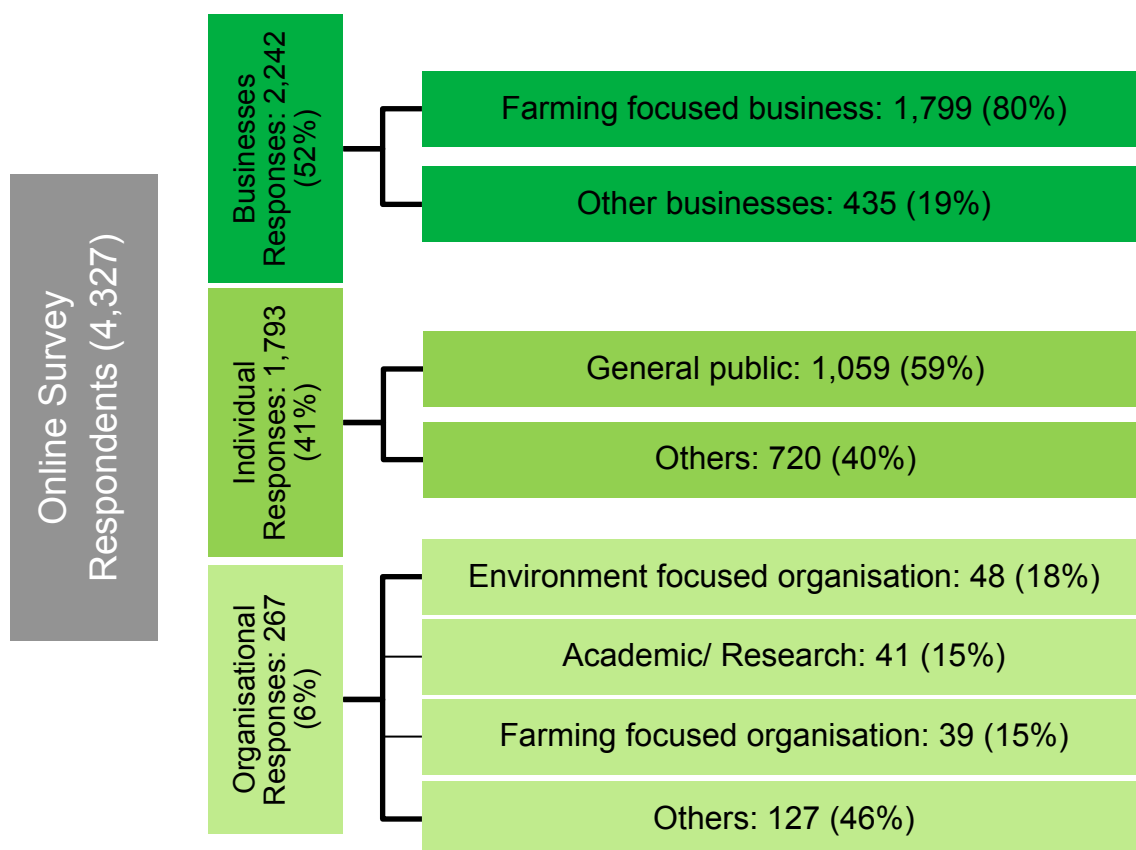


## About the respondents

Respondents were able to provide demographic information about themselves through the online survey on Citizen Space. The online survey responses represent only a small proportion of the overall responses to the consultation; therefore any conclusions drawn from this demographic information only represents some of our respondents.

### Types of respondent

The following chart shows the numbers of online survey respondents in each group. Figures may not sum to 100% as some respondents did not provide demographic information.



### Regions

Of the online survey respondents, 94% of those who responded as an individual stated that their region was England. 90% of people responding on behalf of businesses, and 87% of people responding on behalf of organisations, stated that their workplace was based in England. This was not a mandatory question, therefore some did not provide their location. A small proportion of respondents stated that they were based in either Northern Ireland, Scotland or Wales.

## Responses by chapter

The following chapters are in line with the original structure of the consultation paper.

Each chapter begins with a short summary of the key points raised, followed by a more detailed summary of responses to the questions asked in the consultation paper. Many questions in the online survey asked respondents to select their top three priorities/preferences out of a list of options. Unless otherwise stated, these preferences are combined to give a single measure of preference.

Since not all responses answered consultation questions directly, these contributions have been summarised under the most relevant questions. Key themes emerging from the regional events and policy roundtables are included separately, as are additional points that do not fit directly under any question.

## CHAPTER 2. Reform within CAP

### 2.1 Summary

For 45 years agriculture policy in the UK has been determined by the EU's Common Agricultural Policy (CAP). The CAP involves three main kinds of payments:

- **Direct Payments** under 'Pillar I', mainly comprises the Basic Payment Scheme (BPS) and a 'greening' component which is 30% of the Direct Payment total, as well as the Young Farmers Scheme;
- the **Common Market Organisation (CMO)** also under 'Pillar I', which is made up of predominantly market management measures. These provide price support for producers by combining with import tariffs to keep agricultural prices higher than they would otherwise be; encourage producer collaboration; and provide measures to manage crises; and
- **Rural Development** under, 'Pillar II', is for rural development schemes which include agri-environmental measures such as Countryside Stewardship.

During the period we are still participating in the CAP, the government can improve applicants' experiences. Respondents were asked to rank their preferences for simplification within the current CAP and how we could improve delivery of the Countryside Stewardship scheme.

Broadly, the majority of respondents were in favour of simplification of the current CAP but not all.

Key themes from the responses included:

- processing delays and errors were reasons for **wanting simplification**;
- of the few **against simplification**, concerns were raised relating to fraudulent claims and the reduction in evidence requirements, which they said was essential in order to measure the effectiveness of the scheme; and
- **expanding the online offer** was well received if it would speed up the process, although some felt their rural broadband was not reliable enough for them to benefit.

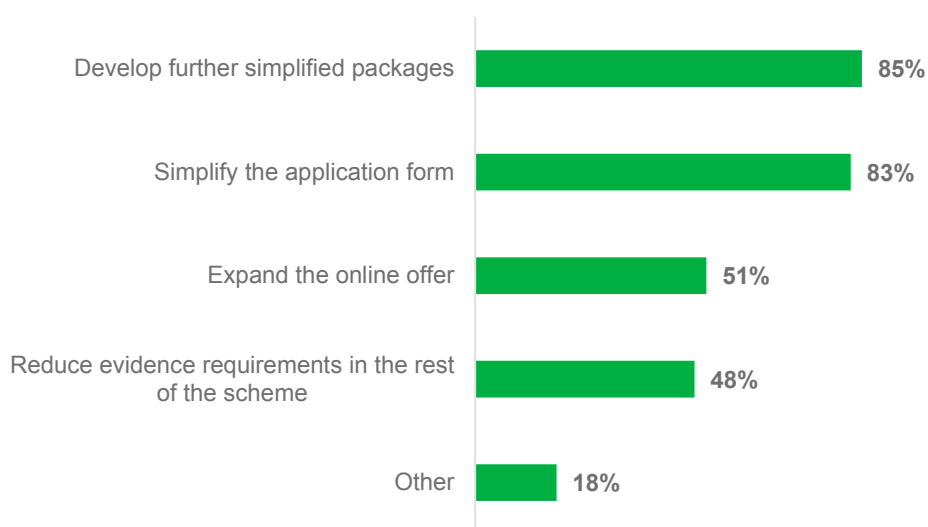
Respondents expressed similar views for the Countryside Stewardship scheme. They also made suggestions for improving the scheme which related to payments, enforcement and environmental impact. Respondents also suggested reforms draw on local knowledge and expertise to create schemes that take account of the individual needs of farmers and communities.

## 2.2 Consultation questions

Please rank the following ideas for simplification of the current CAP, indicating the three options which are most appealing to you:

- a) Develop further simplified packages
- b) Simplify the application form
- c) Expand the online offer
- d) Reduce evidence requirements in the rest of the scheme

Proportion of online respondents that selected each of the options as top ideas to simplify the current CAP



Just over 80% of online respondents answered this question on the simplification of the CAP.

Of those who selected at least one option, 85% of respondents selected 'develop further simplified packages' as a suggestion for simplifying the current CAP. 83% of respondents selected the option to simplify the application form and 51% preferred expanding the online offer. 'Reduce evidence requirements in the rest of the scheme' was chosen by just under half (48%) of respondents.

Of those respondents who responded 'other', many highlighted the **administration of the current CAP** being of concern, with delays in claim processing and payments being particularly frustrating. A small number highlighted that they were against simplification. The majority of other respondents favoured simplification to the current CAP. The current process was frequently described as being too complicated and bureaucratic. It was mentioned that simpler forms would mean more timely and accurate submissions from farmers, and reduce the burden on farmers and the pressure on the administration system. Applicants' reliance on the Basic Payment Scheme for capital investment and farming inputs was mentioned as a reason to simplify the current process.

Some respondents mentioned issues with the current scheme administration and delivery, specifically the way in which application errors are currently handled. The Anglia Farmers (AF) Group stated that both the application and the claim process should be simplified and reduced to remove complications and delays.

Many respondents felt that farmers' **payments need to be made on time** and without delay. It was thought that this was currently not being delivered by the Rural Payments Agency (RPA) due to administration errors such as re-mapping. Furthermore, a small number of respondents mentioned that they were owed payments from previous years.

More respondents were in favour of the **online offer** than against. Respondents said that applying online would be quicker and easier, seeing a reduction in the number of paper based forms. Those respondents not in favour of the online offer often felt that poor broadband coverage in rural areas would prevent farmers from benefiting from an online offer. Many of these respondents suggested that paper applications should therefore be continued.

A small number of respondents were explicitly **against simplification**. They said that requiring evidence is essential to measure the effectiveness of the schemes. A few respondents were concerned that simplification of CAP may increase the number of fraudulent applications, with a 'one size fits all' approach being cited as implausible.

While we were seeking views on how we could improve delivery of CAP whilst our agriculture policy is still governed by the EU, some responses proposed it be fully replaced with a simpler scheme more focussed on environment outcomes. For example, a scheme which would support positive environmental outcomes and reward productivity. Some respondents felt that farmers should be better rewarded for providing environmental benefits and said there was a need for more environmentally focussed schemes and schemes that benefit small, local farmers and not large scale operations.

**How can we improve the delivery of the current Countryside Stewardship scheme and increase uptake by farmers and land managers to help achieve valuable environmental outcomes?**

This question asked respondents for their views on ways to improve the Countryside Stewardship scheme and increase its appeal to farmers and land managers. Key themes that emerged were:

- simplification of the scheme and its application process
- improvement of financial aspects
- focus on environmental impact
- review of current enforcement and regulation
- scheme improvements to target specific farms, local areas and regions

Many respondents, mostly the farming focussed businesses, noted that the **application process** for the Countryside Stewardship scheme needed to be simplified. They said that the process is currently too complicated and therefore discourages farmers from applying. Many respondents highlighted what they perceived to be the time-consuming nature of the application process and burdensome evidence requirements. For example, both the National Trust and the Wildlife and Countryside Link stated that delays in responding to application pack requests, multiple requests for the same evidence and significant issues with mapping have made the application process a difficult experience. Sustain and Fera Science suggested that there should be more provision of advice and support throughout the application process in order to improve delivery. Others noted that the scheme itself should be simplified, by providing a menu of simple options with objectives that are achievable and easy to understand.

Some respondents commented on improving **financial aspects** of Countryside Stewardship. Many mentioned delays in payments as an issue which negatively impacts engagement in the scheme. National Parks England highlighted that farmers and landowners are having to wait for months, or even over a year in some cases, to receive their payments. They emphasised the importance of making sure that payments are made within agreed timeframes in order to improve scheme participation. Similarly, the Soil Association noted that making payments on time is essential to altering negative perceptions of the scheme.

Other respondents suggested that the scheme should be made more financially attractive, for example, by making payments greater than income foregone to incentivise participation. The Wildlife Trust stated that payments can be too low to make entering the scheme worthwhile. They suggested that, in a future scheme, farmers and land managers should receive greater rewards for their maintenance of natural capital assets and provision of ecosystems services. A small number of respondents thought payments should be based on successful delivery of environmental outcomes such as healthy soils and the creation and maintenance of habitats rather than work completed.

Similarly, some respondents focused on the **environmental impact** of the scheme and emphasised the importance of achieving environmental benefits. These respondents argued that key environmental features should be targeted such as: wildlife, water, organic farms, public access, soil health and forestry. For example, National Parks England suggested the introduction of a public access component, along with increased scheme flexibility in areas such as planting densities for woodland creation and in the use of options for woodland and scrub.

Repeated concerns were also raised in relation to **compliance and enforcement**. On one hand, many respondents viewed current monitoring and regulation as too bureaucratic with excessive penalties. They expressed concern about the lack of flexibility within the scheme and farmers being fined too harshly for what they thought to be simple and genuine mistakes. The Country Land and Business Association (CLA) argued that there should be a more flexible approach to audit and control, with the creation of new guidance for inspectors to encourage greater use of discretion. On the other hand, several respondents were in favour of increased penalties for carrying out activities which are detrimental to environmental stewardship.

Some respondents focused their comments on **specific farms, local areas and regions**. These respondents wanted bespoke packages for different areas. They highlighted that scheme flexibility was needed to realise different environmental benefits across different landscapes and areas. A small number of respondents argued that the scheme should be more appealing and accessible to all scales of farms. Most of these respondents believed that smaller farms are disadvantaged by current schemes as the options available are not suitable for these businesses, stating that they cannot compete with larger farms and they lack the time to complete the application paperwork by themselves.

## 2.3 Regional events and policy roundtables

Key themes mentioned at the regional events included: scheme simplicity, flexible entry dates, improved enforcement, payment options, and online claims.

Similar to the online survey findings, the majority of the workshops were in favour of **scheme simplification**. Many workshops wanted a simpler, more flexible system which is more farmer-focussed. Respondents mentioned that consistency should be an important consideration for the implementation of any new scheme. The current CAP was described as too prescriptive, with suggestions that there needs to be simplicity around the agreement of outcomes to allow the means of delivery to be more flexible.

Respondents also suggested that **issues with applications** should be addressed through discussion with the applicant and administration. Respondents felt that penalties are handed out far too quickly, instead of trying to resolve the issue in the first instance. With regards to administration, it was mentioned that flexibility would be helpful to farmers and land owners, avoiding an imposed calendar or a single date in relation to applications. Respondents also suggested that there should be multiple application windows within the year as sometimes the windows clash with busy periods in the farming season.

Workshops concluded that Defra, Rural Payments Agency (RPA) and Natural England need to resolve **outstanding payment issues** with some farmers, as those affected could be owed money due to previous mapping issues. Following on from this, respondents suggested that inspections should be advice based, fact finding experiences and inspectors should also allow for differences between fraudulent applications and honest mistakes.

## 2.4 Additional points

Many respondents made other recommendations to improve the **current CAP**. The most frequent recommendations were to:

- primarily focus farming policy on food production
- provide more generous payments for environmental work and food production
- improve the consistency of mapping

Other suggestions included the creation of an online system which allows farmers to adjust and tweak small items on their farm such as: storage areas, tracks and fence lines without being penalised. Some respondents suggested that smaller farms are disadvantaged, because of the economies of scale, by the current area based subsidies even though they are vital to the environment and the local communities which they serve. They wanted to make sure that government subsidies do not solely support larger scale operations.

## CHAPTER 3. An ‘agricultural transition’

### 3.1 Summary

This chapter discussed the best way of applying reductions to Direct Payments during the agricultural transition, what conditions should be attached to Direct Payments, the factors that should drive the profile of reductions during the transition and the length of the transition period.

Key themes from the responses are listed below:

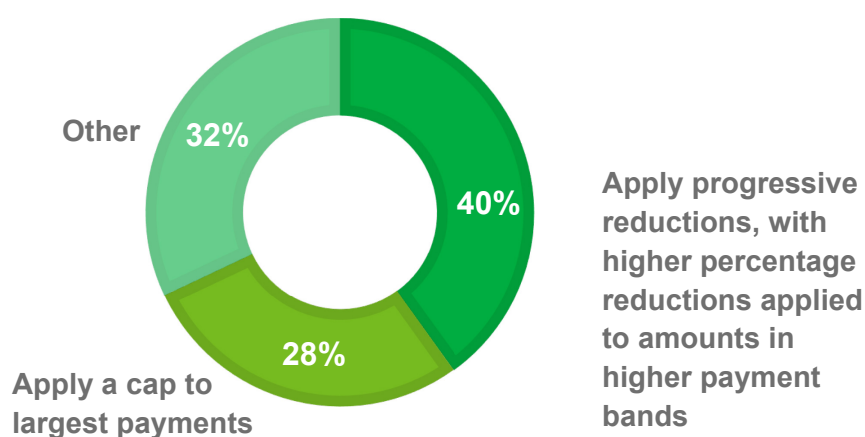
- a system of **progressive reductions** was the most popular option proposed in the consultation for reducing Direct Payments, with strong support for the same percentage reductions to be applied to all recipients;
- **simplifying conditions** attached to Direct Payments, cross compliance and greening was a priority for most respondents;
- **enabling a smooth transition by providing certainty to farmers and sufficient time for them to adapt** were factors that many respondents believed should be considered when reducing Direct Payments; and
- a **transition length** of five years was the most popular, although many others suggested periods of much longer or shorter duration.

### 3.2 Consultation questions

#### What is the best way of applying reductions to Direct Payments?

- a) Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands
- b) Apply a cap to the largest payments
- c) Other (please specify)

Proportion of online respondents who selected each option for applying reductions to Direct Payments



80% of online survey respondents answered this question. 40% of these respondents suggested that 'progressive reductions' should be applied to Direct Payments. 28% favoured 'a cap to the largest payments', making it the less popular of the two specified options offered for reducing Direct Payments. Many of the respondents who explained their objection to the method thought that it would incentivise larger recipients to split their businesses to avoid the cap. Others were concerned that a cap would reduce the efficiency of the sector, as profitable businesses would be disinclined to expand. Organisations such as the National Farmers' Union (NFU) (who supported equal percentage reductions) and Harper Adams University (who supported progressive reductions) objected to capping by disputing the idea that large businesses have a better capacity to absorb the impact of reducing Direct Payments.

Many respondents who supported capping felt that larger farms enjoy economies of scale so have a greater capacity to cope with the loss of Direct Payments. Some respondents said that smaller farms generally tend to produce better benefits for the local wildlife as compared with larger farms. The Tenant Farmers Association argued that capping would reduce the incentive for existing owner occupiers to acquire additional land; which in turn would reduce artificially high rent prices.

Of the two options offered, most respondents selected **progressive reductions** as their preferred method for reducing Direct Payments. Many thought that progressive reductions were appropriate because a greater number of recipients would share the burden of reductions than a capping method; and because they thought it would place the greatest burden of reductions on larger farms. Some considered larger farms would generally be able to adapt more easily to the loss of Direct Payments. Some respondents, including the Royal Society for the Protection of Birds (RSPB), thought progressive reductions would encourage more farmers to adjust earlier to the eventual loss of Direct Payments. Progressive reductions were supported by the Game and Wildlife Conservation Trust on the basis that it would spread the burden across more recipients.

Some of those who objected to progressive reductions stated that they would disproportionately affect larger farmers who are not necessarily better able to cope with the reduction in payments. Some thought that progressive reductions would affect large farmers whom they thought had been entrepreneurial, successful and taken the opportunity to expand.

Others considered that a **combination** of capping and progressive reductions should be used to phase out Direct Payments.

Many respondents suggested applying **equal percentage reductions** to Direct Payments for all recipients, as an alternative to the two methods proposed in the consultation. Respondents thought this was the fairest way to reduce payments, believing that there should be no discrimination between farm businesses based on size. Many stakeholder groups supported this method. The National Trust saw it as the simplest and fairest; and the Country Land and Business Association (CLA) thought that it would be the most effective way of signalling upcoming changes. Some respondents thought this mechanism would remove the problem of businesses splitting to minimise payment reductions, a practice which would be encouraged by progressive reductions or capping.

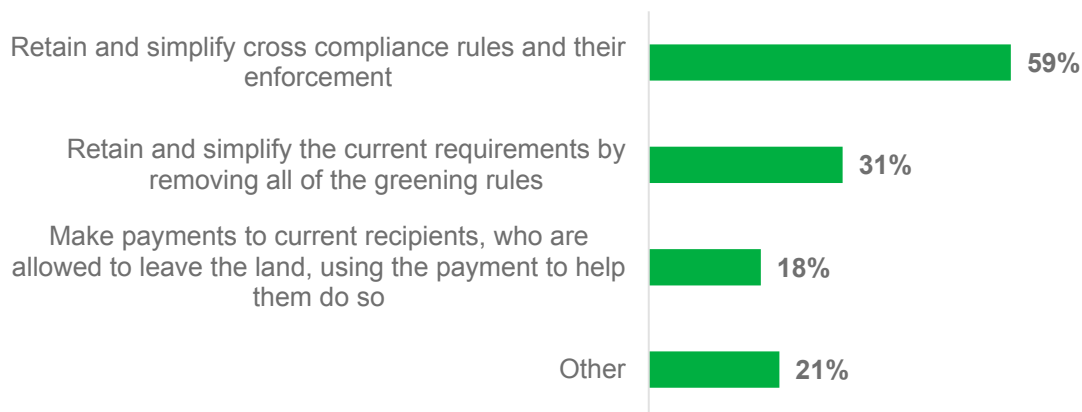
An unidentified campaign, submitted by respondents who mostly identified with the dairy industry, suggested that the dairy industry be exempt from reductions. They argued that the long term planning needed in the sector required an exemption to prevent a sudden drop in income.

A small number proposed raising the **minimum threshold** for the size of a claim. The NFU also reported in their response that some of its members had suggested this measure in their own consultation. They thought this would prevent unviable and inactive farmers receiving public money, whilst some reasoned this would also reduce the administrative burden on Defra and its delivery bodies.

**What conditions should be attached to Direct Payments during the 'agricultural transition'? Pick preferred options**

- a) Retain and simplify the current requirements by removing all of the greening rules
- b) Retain and simplify cross compliance rules and their enforcement
- c) Make payments to current recipients, who are allowed to leave the land, using the payment to help them do so
- d) Other (please specify)

**Proportion of online respondents who selected each option for conditions that should be attached to Direct Payments**



Around 77% of online respondents answered this question. Respondents were able to select multiple response options. Of those that selected their preferred options, over half (59%) opted to 'retain and simplify cross compliance rules and their enforcement'. Just under a third (31%) of respondents selected 'retain and simplify the current requirements by removing all of the greening rules'; and 18% selected 'to make payments to current recipients, who are allowed to leave the land, using the payment to help them do so' (also known as 'delinking' the payment from the land).

A majority of responses were in support of retaining and simplifying **cross compliance** throughout the transition. Most of these respondents felt that the rules provide important environmental benefits, and that at least a simplified version should be retained. Some respondents favoured retaining the rules on the basis that farmers receiving public money should be held to certain minimum standards.

Many respondents believed that the current cross compliance rules are excessive and should be simplified, and that the penalties were often disproportionate to the breach for which they were applied. The Royal Society for the Prevention of Cruelty to Animals (RSPCA), however, suggested tightening the cross compliance rules during the transition (see also Chapter 9).

Most respondents argued for the removal of the crop diversification rule (often referred to as the three crop rule), where **greening** was mentioned. The NFU felt the rule unnecessary, considering that diverse crop rotation was already integral to profitable farming, helping with pest management and the preservation of soil health. Some respondents stated that the

greening rules generally were too restrictive and reduced productivity, asking for simplification and greater flexibility during the agricultural transition period.

Some respondents believed that removal of the greening rules would compromise the environmental benefits they currently provide. A few respondents did not want to see significant changes to the cross compliance and greening rules during the transition in order to minimise the amount of change.

Some respondents were supportive of the option to allow recipients to leave their land while still receiving Direct Payments (**delinking**), seeing it as a chance to encourage a restructuring of the industry. The overall response, however, was limited in its support for delinking. Many of these respondents thought payments should instead continue to be made to those actively engaged in food production. Some, including the RSPB, thought that delinking may lead to a reduction in environmental protections compared to the current system of greening and cross compliance. Some were concerned it would damage farmers' public image if they received payments without regulatory assurances in return. Others were concerned about how delinked payments would be taxed.

Further ideas were proposed to improve other aspects of the schemes and enforcement during the agricultural transition. For example, the current **inspections regime** was seen by some as excessive and in need of better co-ordination. Some respondents thought that the **remapping** of farmers' land either needed to be lessened or stopped entirely. Some respondents argued for the removal of the current **entitlements usage rule**, which was seen as unnecessary and restrictive for farmers. Some respondents argued for farmers to be given the option of taking a **one-off lump sum payment** during the transition.

#### **What are the factors that should drive the profile for reducing Direct Payments during the 'agricultural transition'?**

A large number of respondents mentioned a '**smooth transition**' and the need for time, **certainty and clarity for farmers**. These respondents wanted sufficient time for farmers to adapt to the changes. Many felt it was important to set out the timing and length of the transition as early as possible to provide clarity for farmers, helping them plan for the future. Others felt that the start, duration and speed of transition should only be determined once there was clarity of what would occur post-transition, for example on trading agreements, labour arrangements and the new schemes. Many felt that farmers need to have certainty of income to invest in their businesses.

The NFU suggested that the government should be willing to adjust or change the transition dependent on emerging circumstances. Many respondents felt that the start and speed of the transition should depend on when and how much funding was available through a replacement environmental land management system, accounting for time for businesses to adapt to those new schemes. They stated that there should be no gap between reductions being applied to Direct Payments and payments being made through new schemes. This was supported by the Campaign to Protect Rural England (CPRE) and the Foundation for Common Land. Another

key concern for many was that the environment should not be put at risk through the effects of reductions in Direct Payments; for others, their main concern was what the effect of phasing out Direct Payments would have on the wider rural economy.

Another common factor given was that wider **market conditions** should be taken into account when designing the reduction profile. In particular, many felt that reductions in Direct Payments could be offset by making sure that farmers received a fairer share of the retail value of their produce than they receive now.

A few respondents felt that the profile should be designed in line with agricultural investment cycles and length of tenancies. Arla argued for a longer transition period specifically for the dairy sector, stating that the dairy industry relies on longer planning cycles than the broader economy. A few farmers wanted the profile to be designed and differentiated depending on the geography of the area, in particular for the benefit of farmers in the uplands.

**‘Value for money’** was a commonly used phrase. Of those who elaborated on this, many mentioned a lack of value for money of Direct Payments. They wanted money to be moved as quickly as possible to a new environmental land management (ELM) system in order to more rapidly deliver improved environmental benefit.

#### How long should the ‘agricultural transition’ period be?

The most common preference for the length of the agricultural transition was **five years**. Many felt that this was enough time for businesses to adjust to changes. The RSPB suggested that a five year transition period, defined early on, with the timescales and the method of reductions included, would provide confidence and early clarity. Sustain also preferred a transition period of no longer than five years, to allow farmers time to adapt to new policies and new trading arrangements. Other respondents (such as Tenant Farmers’ Association) wanted a minimum five year transition to provide the government with time to prepare its new schemes and to help to mitigate uncertainties, such as future trading arrangements.

A few respondents wanted **a shorter transition** to stop businesses becoming complacent. They saw the agricultural transition as an opportunity to create a sharp shock that would either encourage farmers to embrace change or to cause them to leave the industry, thereby freeing up land for more innovative entrants. A considerable number, however, stressed the need to avoid a financial cliff edge, referring to the time required for farmers to align themselves with the new policy landscape, which would mean new investments, training and access to capital. Clarity and certainty of approach was seen as essential in helping farmers to adapt.

Some people felt that a longer period for the agricultural transition was necessary. The National Pig Association wanted a **10 year transition** to give the industry enough time to adapt to new support schemes. They suggested that investment decisions have already been made by some farmers based on the assumptions that Direct Payments would continue and

so they wanted a longer transition into the new scheme. Others said that farmers need time to adapt to a system without Direct Payments, such as by establishing diversification projects.

### 3.3 Regional events and policy roundtables

The subject of phasing out Direct Payments was raised throughout all the regional events held across England.

The need for funding to be available elsewhere to **offset the reductions in Direct Payments** was raised in most discussions. Reductions were commonly linked to the introduction of the new ELM system. There were suggestions that no reductions should be made until Defra was confident that the new system could effectively support farmers. It was suggested in Cambridge that getting this synchronisation right would make the choice over method used to reduce the payments less important. A few groups felt that the new pilots should run alongside the Direct Payments, and should be open to everyone. In Lincolnshire it was felt that a lag between funding being technically available, and it being paid to businesses, should be factored in to the reduction profile.

The need for clarity over the nature of new ELM system, and the amount of funding available for participants was also a factor which was raised in a majority of sessions. It was commonly felt that, once farmers know future funding levels, and what is required of them to obtain support, it will be easier for them to make informed decisions. Once this was clear, they would know how to prepare for reductions to their Direct Payments, allowing them to adapt smoothly and invest appropriately. It was highlighted that changes would need to be clearly communicated to farmers. In one workshop, participants stated that Defra should use a variety of communication methods to engage with farmers who access information in different ways.

In a majority of conversations, the consensus was that targeting larger farmers for reductions of Direct Payments was unhelpful and unfair, as the whole industry needed to prepare for the future. The idea that larger farms enjoyed economies of scale was suggested to be a myth; and that size would not enable them to cope with the effects of capping or disproportionately high reductions. It was routinely mentioned that larger farmers' contribution to the wider rural economy, through jobs, and through supplying local food processors, would be threatened by capping. The risk of larger farmers splitting their businesses to avoid a cap or a disproportionate reduction was also raised on several occasions.

The preferred method of reduction was an equal percentage cut to all farmers. The main reason being that it was fairer, but also because it would help stimulate all farmers, rather than just some, to start adapting their businesses from the outset. It would also avoid a later, steeper reduction in payments for smaller farmers. A preference was occasionally stated for insulating smaller farmers from initial reductions, as these farm businesses were considered by some people to generally have more limited business planning capabilities. In these discussions a system of progressive reductions was more popular amongst participants.

On the subject of the **transition length**, the preference was relatively evenly split between medium and long, with 5 to 10 years being most often suggested. Such a length of time was required, it was said, to give time for farmers to adapt to the new ELM system and to new

trading environments, and to allow changes in business plans. A transition length of seven years was suggested at some events, as this would mirror the EU's usual CAP implementation cycle. Those who preferred a shorter period noted that farm businesses would take longer to adapt, and would put off necessary restructuring, if it were too extended a transition.

With regards to the **conditions attached to Direct Payments during the agricultural transition**, the predominant preference was for payments to continue being made to farmers who were actively farming the land and for the current schemes to be retained with some simplifications. The main reasons expressed for such continuity were that farmers currently knew what was expected of them; that some means of enforcement through cross compliance would be required; that significant changes during the transition phase would cause problems for farmers and government alike; and that it would be a waste of time and money to make significant change during the transition period.

A number of **simplifications** were, however, suggested: in particular in relation to greening, which was frequently felt to be ineffective in practice. Crop diversification was most frequently described as redundant, the permanent grassland requirement less so. It was felt that removing greening entirely could send out the 'wrong signal' to farmers and the public. On cross compliance, disproportionate penalties for missing cattle ear-tags were a common complaint, although on the whole, cross compliance was felt to be upholding basic and necessary farming practices.

## CHAPTER 4. A successful future for farming

### 4.1 Summary

This chapter presents an analysis of views on a successful future for farming. It is further split into three sections: 'farming excellence and profitability', 'agriculture technology and research', and 'labour: a skilled workforce'. These sections set out how we could enable a high-performing industry, and enable businesses to continue to innovate and develop; encourage efficiency and best practice, and to realise improvements in productivity and profitability.

Throughout almost all the sections of this chapter, the message came through strongly and consistently that farming businesses in all sectors need greater access to and uptake of **knowledge transfer**. This included farmer-to-farmer learning, knowledge sharing initiatives (often referred to as 'knowledge exchange' or 'knowledge transfer') and a better connected skills framework. While a number of respondents felt that there were businesses who already excelled in these areas, the majority said that these pockets of best practice were not reflected across the industry, sometimes because of cultural barriers to change. It was felt by the majority of respondents that government had a role to play in supporting improvements in these areas, which could then drive greater profitability and productivity whilst improving the skillsets of the farming workforce. A theme that recurred repeatedly, both within consultation responses and at events, was a call for the reinstatement of a national government advisory service for agriculture.

Many respondents also expressed their support for appropriate **immigration measures** to make sure that there was adequate access to labour for the industry. Suggestions included free movement of labour, open borders and more specific schemes similar to those already in practice in other countries. Other themes highlighted by respondents included the need for more research into innovation and automation to address reductions in the availability of staff, which could provide a positive way forward for many businesses. A number of respondents highlighted that many agricultural businesses were already highly automated and at the front line of innovation. Others however, indicated that there is scope for further research and funding for these opportunities would be welcomed.

Consistently strong support was given for **government intervention** to boost collaborative and farmer-led research aimed at developing innovative solutions to address specific productivity problems. Key themes included environmental performance, soil health and improved animal health and welfare.

Respondents also felt that the government had a role to play in improving opportunities for **new entrants** to farming, through the provision of targeted financial support to help with high start-up costs, support for County Council farms as a key route into farming and by improving the image of farming as a modern, viable and attractive career choice. Respondents frequently suggested that education on agriculture in schools should be improved and that industry and education providers should work together to deliver wider engagement and awareness through activities such as school visits to farms.

The need to encourage more agricultural **tenancy** opportunities and longer term tenancies were also frequently identified. Tenancies encouraged more opportunities for new entrants and provide tenants with security to invest in longer term activities such as improving soil health.

In terms of **profitability**, respondents suggested that key barriers to on-farm investment – including spending on new more efficient technology – stemmed from uncertainty about the future and the high cost of new equipment and buildings, coupled with a lack of awareness of the benefits of adopting new technologies – further emphasising the need for less fragmented knowledge exchange.

Each of the sections below presents a summary of respondents' views on the specific questions within this chapter.

## 4.2 Farming excellence and profitability

### 4.2.1 Consultation questions

**How can we improve the take-up of knowledge and advice by farmers and land managers? Please rank your top three options by order of preference:**

- a) Encouraging benchmarking and farmer-to-farmer learning
- b) Working with industry to improve standards and coordination
- c) Better access to skills providers and resources
- d) Developing formal incentives to encourage training and career development
- e) Making Continuing Professional Development (CPD) a condition of any future grants or loans
- f) Other (please specify)

**Proportion of online respondents that selected each option as a top priority to improve the take-up of knowledge and advice by farmers and land managers**



82% of the online survey respondents selected at least one priority. Of these, almost three quarters of respondents (72%) selected 'encouraging benchmarking and farmer-to-farmer learning' as a priority. Farmer-to-farmer learning was also cited by many in the 'other' option as a particularly effective way of sharing knowledge in the industry. 'Better access to skills providers and resources' was also frequently selected as a priority. A slightly smaller proportion (56%) ranked 'working with industry to improve standards and coordination' and 'developing formal incentives to encourage training and career development' (50%) as priorities.

Consultation responses from National Farmers Union (NFU), Linking Environment and Farming (LEAF), Agriculture and Horticulture Development Board (AHDB) and the National

Pig Association suggested that all options are important contributing factors to improving best practice on farm.

Respondents highlighted the importance of **benchmarking** and **farmer-to-farmer learning**. Respondents thought interactive benchmarking tools, such as those provided by LEAF and AHDB, offered good opportunities for positive behaviour change, particularly when used in conjunction with advice and discussion groups. Both LEAF and AHDB outlined the benefits of farmer to farmer learning through their demonstration and monitor farms, along with their discussion groups, which focus on positive, practical steps for farm businesses. The National Trust endorsed grassroots farmer-to-farmer research such as 'Field Labs' pioneered by the Innovative Farmers Network.

Making **Continuing Professional Development** (CPD) a condition of any future grants or loans received mixed responses. 29% of online respondents selected this as a priority. Many, including AHDB and LEAF encouraged this approach. Some others took opposing views, such as the National Federation of Young Farmers Clubs, who recognised the importance of CPD but were concerned that attaching CPD conditions to grants or loans could create unnecessary bureaucracy or even reduce productivity by limiting investment.

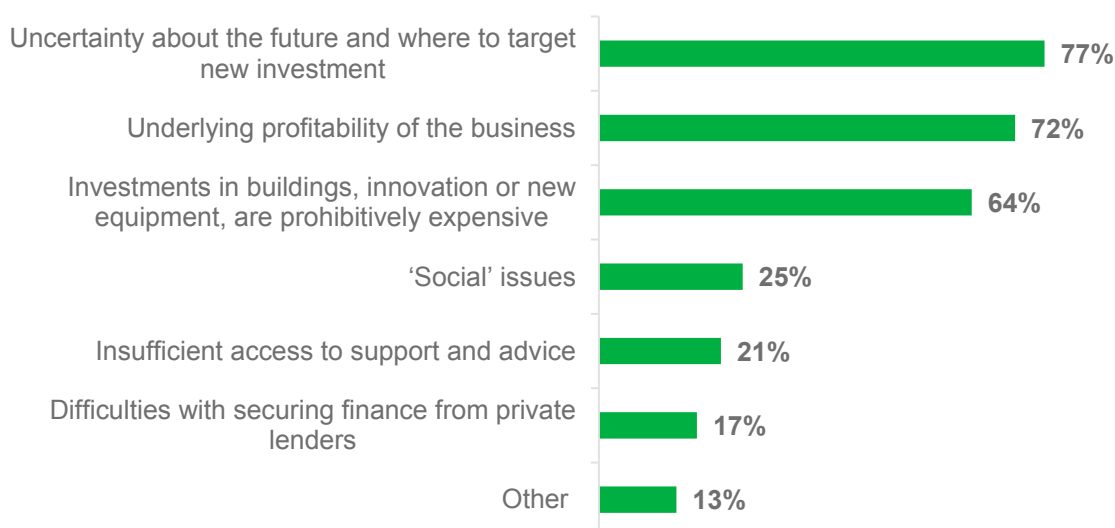
Of those selecting the 'other' option in their top three, some expressed a preference for the reintroduction of a **government sponsored advisory service**. For example, the Campaign for the Protection of Rural England (CPRE) thought that the loss of free, impartial advisory services in the past (for example, the previous Agricultural Development & Advisory Service – ADAS) had been particularly detrimental to smaller farm businesses and there was an urgent need for an enhanced advisory capacity. A few responses also covered a range of **educational strategies** including apprenticeships, fast-track learning programmes, professional development and government funding to run free courses.

A few respondents suggested that farmers were already doing everything necessary and therefore improving take-up of knowledge and advice was unnecessary. Similarly, a small number felt that there was no role for government in this.

**What are the main barriers to new capital investment that can boost profitability and improve animal and plant health on-farm? Please rank your top three options by order of the biggest issues:**

- a) Insufficient access to support and advice
- b) Uncertainty about the future and where to target new investment
- c) Difficulties with securing finance from private lenders
- d) Investments in buildings, innovation or new equipment are prohibitively expensive
- e) Underlying profitability of the business
- f) 'Social' issues (such as lack of succession or security of tenure)
- g) Other (please specify)

**Proportion of online respondents that selected each option as a barrier to new capital investment that could boost profitability and improve animal and plant health on-farm**



Over 3,000 responses were submitted to this question online (76% response rate). The three options most frequently selected as barriers were uncertainty about the future and where to target new investment (selected by 77% of respondents), underlying profitability of the business (72%) and investments in buildings, innovation or new equipment, are prohibitively expensive (64%)

Many respondents stated that **uncertainty about the future** was a significant reason for farmers not investing in their business. This view was supported by the NFU, who stated that the results of their latest Farmer Confidence Survey indicated that farmers' confidence for the medium term (three years) has decreased for the first time in eight years - with 20% of farmers saying they planned to reduce investment, compared to only 10% who said they planned to increase investment - because of uncertainty associated with leaving the EU<sup>1</sup>.

<sup>1</sup> Figures provided in the NFU formal Response to the Health and Harmony consultation, also available here: <https://www.nfuonline.com/news/press-centre/press-releases/farmer-confidence-falls-as-brex-it-uncertainty-loom/>

Many respondents commented that the **low profits generated through farming** mean it can be difficult for farmers to make investments, especially given the **high cost of buildings and equipment**. Some believed that support through tax relief (particularly for agricultural buildings) or government grants, loans, or loan guarantees could help make investments more affordable. Co-operatives UK (the network for Britain's co-operatives) thought that forming certain types of co-operative and collaborative ventures could be a means for farmers to pool capital to invest in new equipment and buildings. This would also provide a stronger negotiating basis for better prices on group purchases.

An unidentified campaign of 15 responses, submitted by respondents who mostly identified with the dairy industry, suggested that the cost of investment in buildings, innovation and new equipment is the biggest barrier to improving on-farm profitability and animal health.

Responses were also received through a campaign from the RSPCA. These respondents wanted to see improvements in UK animal welfare. They felt that the costs of investment in buildings, innovation and new equipment and the underlying profitability of businesses were barriers to improving on farm animal health. Many respondents supported financial incentives for welfare as some believed that, while there was a desire amongst livestock farmers to improve welfare, they may not be able to afford to do so.

The Soil Association noted that the extent to which barriers hamper on-farm investment depend, to a greater or lesser degree, on a farmer's individual situation, with significant differences between the tenanted sector and landowners.

Although **difficulties with securing finance from private lenders** was selected less frequently than other barriers, the Tenant Farmers Association noted that tenant farmers, in particular, may not be able to access loans because they lack sufficient capital to use as security against the borrowing. While agreeing that some sectors might have more difficulty than others, UK Finance stated that in the Small and Medium-size Enterprise (SME) sector last year, the net stock of loans to agricultural SMEs reported by UK Finance members rose by nearly £1 billion. Credit approvals to agricultural SMEs in 2017 was markedly higher, at 14%, than in the SME market as a whole (5%). UK Finance's analysis suggests that, on average, access to bank sourced debt finance in agriculture is at least as good as in other industries and is probably slightly better, most notably in the owner-occupied sector.

The Agricultural Law Association reported, via their own consultation, that their members had not found any discernible issues with lending to the farming sector. It was noted, however, that Direct Payments underpin serviceability of borrowing, and so in a future without Direct Payments there could be a risk to new capital investment, particularly in the tenanted sector. It was also suggested that the lending sector could promote more multi-generational mortgage models for longer-term loans, to reflect the long-term nature of farming.

Some respondents noted that farmers might be more willing to invest in new technology for their business if they had **better knowledge and awareness of the potential benefits** that could be achieved, and if they felt more confident that they had the skills to use the new equipment to the best of their ability. Respondents commented that for some farmers, a lack

of business planning skills might also mean that they are in a weaker position to understand the benefits of promising investments.

Respondents mentioned that some of the other barriers to investment included difficulties in securing appropriate planning permission for developments, the lack of available land for starting a new farm or expanding an existing business, short term tenancies which were thought to put farmers off making longer-term investments, and the availability of labour threatening the viability of future production.

#### 4.2.2 Regional consultation events and roundtables

Topics relevant to this chapter were raised at a number of regional events. Key themes emerging from these discussions included low profitability, high costs of machinery and equipment, and barriers to new tenants.

A common theme raised was that the combination of **low profitability** of farming and **high costs of machinery and equipment** made it difficult for farmers to invest in businesses. Uncertainty about the future and how leaving the EU would affect markets was also a common reason mentioned as a barrier to investment. Other sessions discussed how shorter term tenancies meant that farmers would not invest in infrastructure that would deliver a longer-term return; that securing planning permission for new structures could be difficult; and smaller farms in particular could struggle to secure finance from banks. There was also some discussion about how some farmers needed to have a stronger focus on their underlying profit and loss, so that they could make investments based on data and evidence, rather than instinct.

Several common themes emerged from the workshop discussions on tackling **barriers to entry for new farmers**, including the need for government grants or loans to help new entrants with high start-up costs, the need to improve the public image of farming as a high tech modern career, better careers advice and more education in schools on food and farming issues, recognition of agriculture as a Science, Technology, Engineering and Maths (STEM) subject, and support for more farming apprenticeships that are better suited to smaller businesses. Barriers to new entrants often mentioned included: Direct Payments and tax incentives that encourage people to stay in farming long past retirement, poor profitability in farming and very high start-up costs, as well as a perceived lack of affordable housing for younger people starting out and for older farmers wanting to retire from the holding. There was consistent support from the discussion groups for more accessible business advice and mentoring for new entrants – including calls to bring back a national agricultural advice service, such as ADAS in its previous form. Helping older farmers to retire, encouraging share farming and land matching between new entrants and older farmers wanting to take a step back was often mentioned.

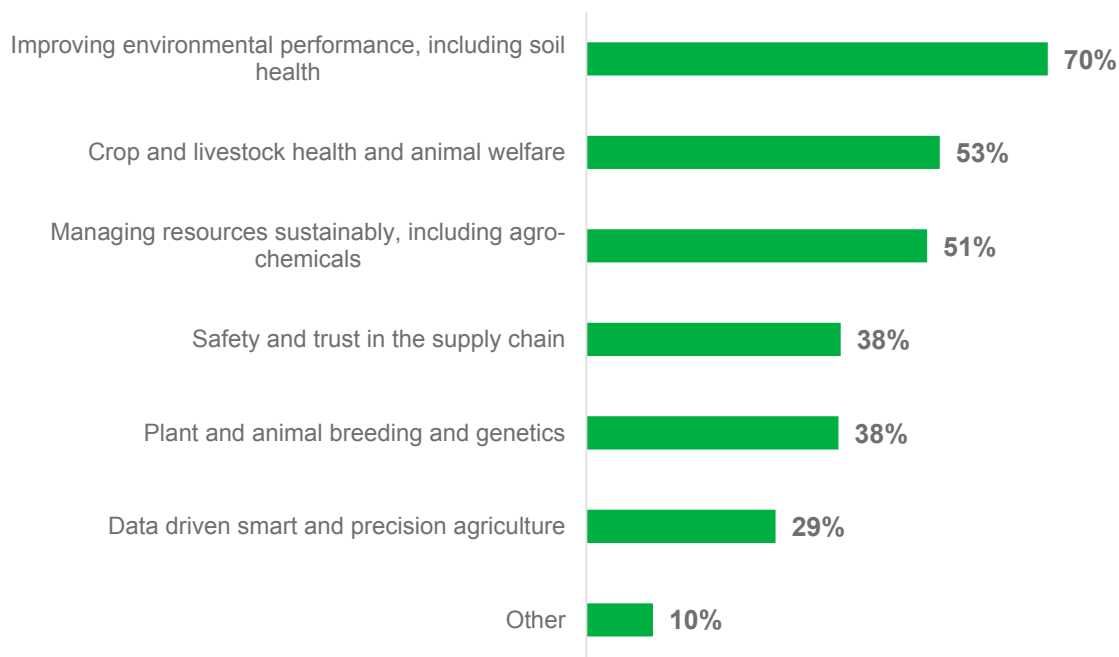
## 4.3 Agriculture technology and research

### 4.3.1 Consultation questions

**What are the priority research topics that industry and government should focus on to drive improvements in productivity and resource efficiency? Please rank your top three options by order of importance:**

- a) Plant and animal breeding and genetics
- b) Crop and livestock health and animal welfare
- c) Data driven smart and precision agriculture
- d) Managing resources sustainably, including agro-chemicals
- e) Improving environmental performance, including soil health
- f) Safety and trust in the supply chain
- g) Other (please specify)

**Proportion of respondents selecting each option as a top priority research topic that government and industry should focus on to drive improvements in productivity and resource efficiency**



Over 3,700 respondents selected at least one option (86%). The top three topics chosen by respondents were: 'improving environmental performance, including soils' (70%); 'crop and livestock health and animal welfare' (53%); and 'managing resources sustainably, including agro-chemicals' (51%). Many respondents, however, explained that all of the above research topics were important.

Improving **environmental performance, including soil health**, was seen by most respondents as a priority area where research was needed. Soil in particular was seen as an important research topic due to its importance in productivity and sustainability.

Some other respondents indicated that the **management of resources** should be the primary environmental objective. This was seen as a key area of research to enable farming to become more sustainable, efficient, and productive in the long-term.

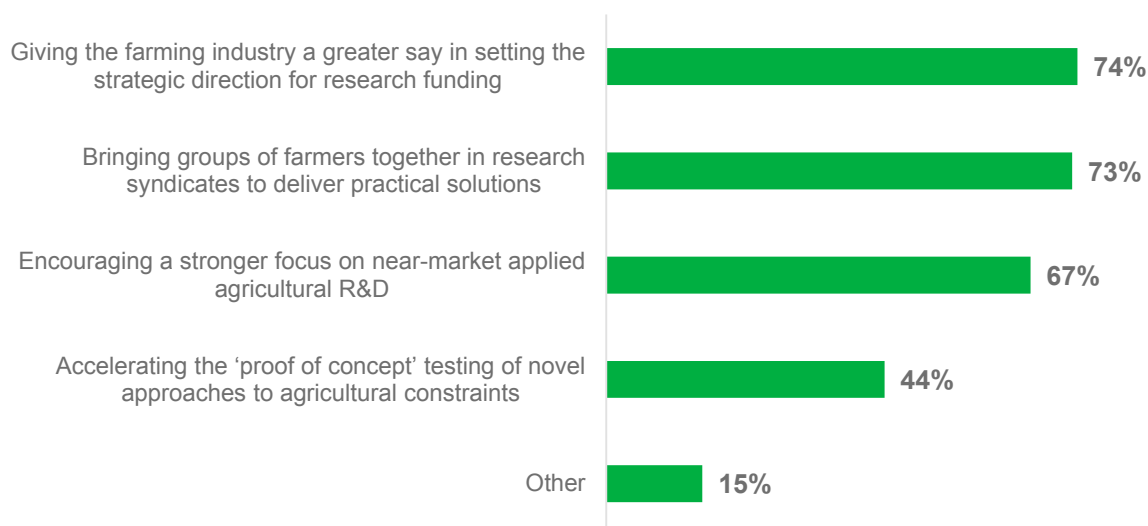
From email responses and additional 'other' comments provided via the online survey, many respondents highlighted the need for an integrated approach to carrying out research.

From email responses and additional 'other' comments provided via the online survey, many respondents highlighted the need for an integrated approach to carrying out research. Those who identified themselves as from a food and farming business, emphasised improving the sustainability of the whole food chain as a collective. Individuals highlighted the need to focus research on providing wider societal benefits, including long-term sustainable approaches.

**How can industry and government put farmers in the driving seat to ensure that agricultural Research and Development (R&D) delivers what they need?**

- a) Encouraging a stronger focus on near-market applied agricultural R&D
- b) Bringing groups of farmers together in research syndicates to deliver practical solutions
- c) Accelerating the 'proof of concept' testing of novel approaches to agricultural constraints
- d) Giving the farming industry a greater say in setting the strategic direction for research funding
- e) Other (please specify)

**Proportion of respondents selecting each option as one of their top preferences to ensure agricultural Research and Development (R&D) delivers what farmers need**



Over 3,200 online survey respondents (76%) selected at least one option. 'Giving the farming industry a greater say in setting the strategic direction for research funding' was selected most frequently by respondents (74%). While 'bringing groups of farms together to deliver practical solutions' (73%) and 'encouraging a stronger focus on applied agricultural R&D' (67%) were also popular options.

Giving farming industry a greater say in setting the **strategic direction for research funding** was highlighted as a key factor in order to empower farmers. This included the suggestion of enabling farmers to be involved in, and lead, more research – both individually and in collaborative efforts. Many of the respondents focussed on R&D itself and making sure that it is tailored to farmers' needs. Some respondents also highlighted the need to make sure farmers are involved in the setting of research objectives and conditions.

The campaign from the Landworkers' Alliance welcomed the government's support for greater agricultural productivity, but suggested that high-tech innovations might not be able to help small-scale farmers. They instead suggested that there should be a focus on ecological innovation and appropriate scale technology.

Many respondents highlighted the need for greater connectivity **and bringing groups of farmers together** to deliver practical solutions. The majority of these comments focussed on greater links between farmers and academics or peer-to-peer connections. The Soil Association highlighted the level of risk farmers take on when adopting new technology, due to the relatively large investment which can be required and uncertainty of results. They suggested that small, collaborative R&D projects would lower the risks involved with innovation and encourage farmers to carry out research which has practical on-farm applications.

Other respondents indicated that the government has an important role to play in **sharing the outcomes of existing research** and making sure that the existing evidence base is used. However, a small number of respondents said that there should be less government intervention in R&D, stating that research is a role for the market.

Where people had selected 'other', most respondents also highlighted the need to make sure that the government empowers farmers and that there is greater **investment into research** and development programmes which can be accessed by farm businesses.

#### **What are the main barriers to adopting new technology and ideas on-farm and how can we overcome them?**

Most respondents mentioned finance as a barrier to adopting new technology and ideas, particularly among those who responded from a food and farming business. The majority of those citing financial barriers suggested it was **the cost of technology** which was the biggest barrier to take up.

Many other respondents said that **profitability** was a determining factor when it comes to adopting technologies on farms. One reason given for this was that the benefits of investing in new technology were not always clear, especially in terms of whether or not new technology would make the business more profitable. Dairy UK highlighted the link between farm profitability and ability to mobilise capital for investment.

Respondents mentioned numerous non-financial barriers. Some said farmers needed to have the **right skills** to be able to use new technologies. Others said that a **lack of knowledge** of what technologies were already available and a lack of knowledge exchange between farmers can be a barrier to technology adoption.

Other non-financial barriers mentioned included a difficulty in integrating new technology into farming businesses. Respondents suggested that integrating new technology was difficult. Respondents thought this was due to a **lack of time** for farmers to carry out research and

apply technologies along with the **lack of rural digital infrastructure**. In addition, some respondents also mentioned the **high average age** of farmers in the UK. Respondents suggested that the status quo is often the preferred approach, so not to expose a business to risk.

Many respondents said that farm businesses act in **ways to reduce risk** to their business and therefore do not invest in untried and untested new technologies. Several respondents highlighted the risky nature of incomes from farming – and that if a farm business has narrow profit margins, with longer planning cycles than other businesses, it is natural to take a more risk-averse strategy. They stressed it is difficult to invest in new technology when future profit is uncertain.

#### **4.3.2 Regional consultation events and roundtables**

Attendees raised topics relevant to technology and research at a number of regional events and policy roundtables. Key themes that emerged from these discussions included **financial constraints** and **skills**.

Attendees suggested that there were significant **financial constraints** on farmers who may wish to be involved in research projects. They suggested that the high cost of research was off-putting to many potential participants.

Another main focus of the events was the **skills** of farmers and their ability to direct research themselves. Participants indicated that both academia and the farming industry should be engaged in the same R&D projects.

Other topics raised at the policy workshops included the use and availability of infrastructure (including digital infrastructure), the role of educating the public, supporting the environment, empowering farmers, and supporting new entrants.

Stakeholders from across the agri-tech sector attended a separate innovation policy workshop. This gave attendees the opportunity to discuss and comment on: priority research areas, increasing farming participation and collaboration in research through syndicates, making funding available for proof of concept testing of small scale research projects, and engaging the agricultural sector in research.

Key points which were raised in all the discussion groups included the importance of ensuring stability through making long-term commitments to funding, building on past activity; the need for simplicity, in terms of ease of accessing funding, and clarity in terms of aims/objectives; and the importance of engaging with farmers at all stages of the process - design, delivery and evaluation.

In a session looking at priority research areas, **soil** was identified as a key area. Soil was thought to encompass ecology and agroecology, whilst being a tangible area of focus for long term sustainability. Comments also included the need for a **whole systems approach**, where research should be seen as interconnected, with long term funding commitments and building on previous activity.

In a discussion covering the concept of collaborative research syndicates, participants emphasised the **need for simplicity, accessible funding, and clarity in terms of aims and objectives**. Some suggested that there should be clarity on what a syndicate is and how it would work. It was also suggested that the government should look at how the **adoption of existing technology** could be increased.

In a session which looked at the idea of making funding available for proof of concept testing of small scale research projects, there was consensus around the need to **build on what is happening already**, rather than assume that the best way is to start from scratch. Some examples of current initiatives, such as 'Innovative Farmers' by Soil Association, were highlighted as examples of good practice – though there was some debate over whether this could be 'scaled-up' adequately. Other points raised include the importance of **avoiding duplication** by encouraging coordination between similar projects.

When discussing how to engage the agricultural sector in research, participants highlighted the importance of **involving farmers in research funding decisions**. This included having farming specialists involved in assessing applications. The importance of **effective knowledge exchange**, such as building on existing networks was also raised as was the need to **upskill the future generation of farmers**. The Rural Economy and Land Use Programme (RELU) was cited as a successful example that the government should be building on.

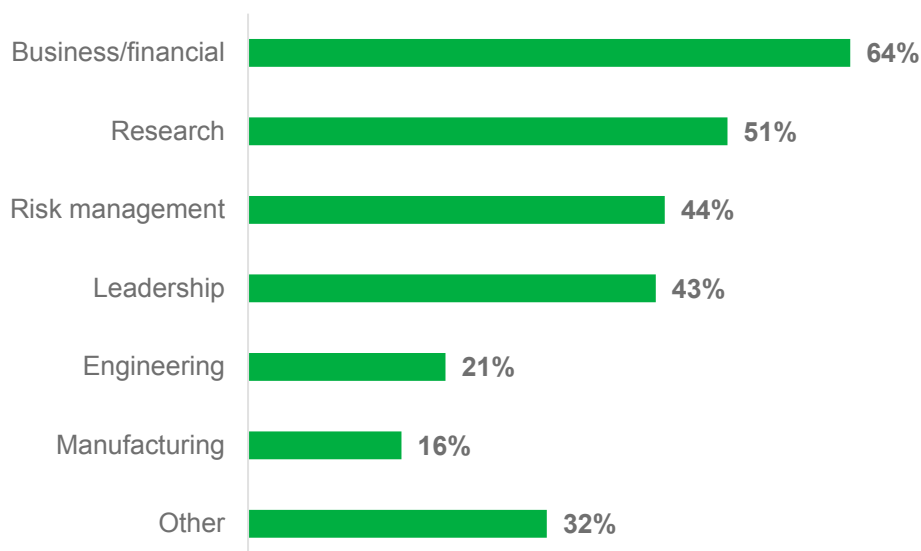
## 4.4 Labour: a Skilled Workforce

### 4.4.1 Consultation questions

**What are the priority skills gaps across UK agriculture? Please rank your top three options by order of importance:**

- a) Business / financial
- b) Risk management
- c) Leadership
- d) Engineering
- e) Manufacturing
- f) Research
- g) Other (please specify)

**Proportion of online respondents selecting each option as one of the top priority skills gaps across UK agriculture**



Just under three quarters (72%) of the online survey respondents selected at least one option for this question. A strong majority of all respondents (64%) selected 'business / financial' skills as a top priority skills gap across UK agriculture and around half (51%) selected 'research' skills. 'Engineering' and 'manufacturing' skills were selected less frequently as priorities and respondents offered a range of 'other' skills gaps, most notably environmental and manual skills.

**Business management / financial skills** was identified as the highest priority skills gap, especially by respondents identifying as from businesses, and many of those who chose to comment on 'other' skills also placed a recurring emphasis on business management. The wide range of business and financial skills gaps raised as part of 'other' related to whole or integrated farm management, entrepreneurial, IT and marketing skills. A few stated that

business management was rarely taught alongside agricultural skills and therefore formal business management was not seen as a priority when learning how to farm.

Business / financial skills were closely aligned with leadership skills: the Agriculture and Horticulture Development Board (AHDB) stated that there was a clear need for businesses to develop and implement business management skills, people and leadership skills. The CLA said that business skills and leadership/change management will need to be a focus given the changes in agricultural policy and the likely impacts on farming and other land-based businesses.

On **research**, the NFU said that scientific research, development of innovative tools, technologies and practices, and knowledge exchange were all critical to tackling the productivity and resource-efficiency challenges that British farmers face.

The volatility of markets, fluctuations in the weather and the uncertainty of Brexit were among the reasons given for the need to prioritise **risk management**. On **leadership**, Linking Environment and Farming (LEAF) was clear that strong leadership is essential to develop confidence in the industry and to build stability and vision.

Across all respondents, **engineering** and **manufacturing** were prioritised less than the other options and respondents made limited substantive comments on these skills.

Many respondents identified additional skills gaps not listed in the question. Environmental and manual skills were the two key areas raised by respondents using the 'other' option. Where respondents thought that **environmental skills** were a priority gap, a wide spectrum of topics were mentioned. Some stated that ecological and environmental knowledge was lacking while others mentioned the importance of integrated farm management, where they thought skills are required to ensure that farming is sustainable and in tune with the environment. A few thought that improvements in knowledge and best practice relating to soil, air and water quality were needed.

The majority stated that where **manual skills** were identified, practical farm labour was difficult to find and that there was greater demand for these skills than those needed for more managerial roles. Most recorded that good farm workers had to be technically skilled and capable of many different roles. The need for reliability was a strong theme running through the comments on manual skills.

### What can industry do to help make agriculture and land management a great career choice?

Many people suggested that the **visibility of the industry** among young people should be increased. LEAF suggested that developing a background knowledge of the industry was key to making a career in agriculture attractive. In order to achieve this, it was suggested that farming as a career should be promoted to students at every stage of their education.

Ideas put forward ranged from farmers delivering talks to students; educating teachers and careers advisors about farming as a career; facilitating school trips to farms; to offering work placements and part-time work to older students. Some respondents mentioned that industry should improve agricultural courses by teaching students more practical skills, while others said that industry should provide students with funding; offering grants, bursaries and scholarships. Further suggestions included industry improving agricultural apprenticeships by covering a broad range of topics and skills, including information technology, as well as focusing on specialist subsectors such as dairy. Some respondents suggested that industry could make apprenticeships more attractive by rewarding the highest achieving apprentices and offering a guaranteed job at the end of the apprenticeship.

Many respondents suggested that industry should promote agriculture as being a great career choice to a wider audience. This could be done using television, social media, agri-tourism and urban farming. Some respondents, identifying as individuals or from farm businesses, felt that industry should show that careers in farming are diverse, highly skilled, and play an essential role in society and the economy. Others suggested that industry could make itself more accessible to women, and could improve its image by prioritising high animal welfare, health and safety and sustainability standards. Some respondents suggested that the benefits of rural living should be emphasised, as well as farming success stories and the promotion of well-known people representing farming. Although many respondents called for industry to highlight its use of cutting-edge technology to show that it is modern and forward thinking, a small number disagreed and said that this could be counterproductive, as one of the most attractive parts of farming is being outdoors with nature.

Many respondents said that industry should invest in its workers by providing up-to-date **training** and **career development** opportunities for all staff. Of these, some said that CPD schemes should be developed, and that industry should provide funding to organisations offering training. Other respondents suggested that industry should invest in facilities and infrastructure, as well as in innovation and technology to create more skilled jobs.

A few respondents suggested that industry should adopt a more coordinated approach to **recruitment** so that workers can easily move between jobs. Similarly others suggested more coordinated careers promotion and training provision, potentially building on the work of the land based college membership organisation, Landex. Some respondents mentioned the idea of a mentoring scheme linking retired farmers with young farmers, or setting up more networks to reduce the isolated nature of farming which can make it a less attractive career choice. More specifically, the Ornamental Horticulture Roundtable Group suggested that, with

government support, industry should create an information portal on careers advice, as well as on local work experience, jobs and farm visits.

There were repeated calls for industry to improve the image of agriculture as a career choice through **improved productivity and profitability**. Examples included receiving a higher price from supermarkets, and diversifying businesses by offering recreation activities. Respondents argued that this would allow industry to increase wages and consequently be able to compete with other industries for skilled workers. Some respondents suggested that industry should offer other financial incentives to workers, including: bonuses, shares, more annual leave, fewer working hours, better pensions, private health cover, longer tenancies, and affordable accommodation.

Some respondents mentioned that industry could help young farmers begin their career by making smallholdings or start up farms available for new entrants, alongside small loans or grants to fund this. Other respondents suggested that this could also be achieved by share farming, the breaking up of large farms, or schemes to help older farmers retire easily.

The Association of Independent Meat Suppliers suggested that industry should assist new farmers to be more profitable by reducing the price of land, machinery, seed and marketing.

A small number of respondents expressed the view that farming is already a great career choice, while others said that government, rather than industry, should be primarily responsible for making it more attractive. Conversely, a few respondents suggested that farming cannot be regarded as a career due to the lack of opportunities it provides.

#### **How can government support industry to build the resilience of the agricultural sector to meet labour demand?**

Key themes raised in response to this question were education, focus on improving working and living conditions in rural areas, innovation and immigration policy. Similarly to the previous question on industry action, there was a strong support across different stakeholder groups for more **emphasis on food and agriculture in the national curriculum** to encourage more domestic workers into the industry. It was argued that this could help address negative perceptions about careers in agriculture as low-skilled and low-wage professions.

Some respondents commented that there are already many initiatives in place to attract new entrants, including apprenticeship routes, LEAF campaigns, 'FaceTime a Farmer', the AgriSkills Forum and educational campaigns by NFU. It was therefore suggested that, in partnership with industry, the government could bring different sectors together to address both the skills shortages and the perception of agriculture. Proposed measures included a marketing campaign to improve the image of the sector, recognising agriculture as a STEM subject, improving the training of career advisors to promote careers in the food supply chain, or tax credits and other kinds of financial support for farmers to invest in training.

A few respondents said that better working and living conditions on farms would improve **the image of the sector**. Suggestions for achieving this included government improving mandatory health and safety training, reviewing restrictions on planning for rural housing to make it more affordable, as well as developing rural facilities and infrastructure, including better public transport and internet availability. Sustain and the Landworkers' Alliance suggested that reinstating the Agricultural Wages Board in England would improve wages as well as working conditions on farms. Sustain suggested that it could do so by supporting the industry in protecting and rewarding its employees, and putting in place industry-wide standards and provisions for sector-wide bargaining. In line with the earlier question about industry action, many respondents referenced **profitability** as a key factor in attracting labour into agriculture. Several respondents argued that that profitability of farms, and the wages they are able to provide, is restricted by the retail industry trying to maintain a low cost for consumers. They suggested the need to co-ordinate the food supply chain to enable transparency across the different sectors, and to encourage a fair price for UK grown produce.

Some, however, suggested a greater need for investment into **research**, including uptake of **robotics and automation** to increase productivity and reduce reliance on labour. AHDB highlighted the necessity of a mechanism that showcases and demonstrates technology on farms and drives commercial demand. Whilst emphasising the emerging high-tech nature of agriculture may attract new entrants, a few respondents also noted that this would increase the need for technical skills and engineers to design, develop and maintain these systems, and therefore will not be an immediate solution.

Respondents identified training and attracting people into food and agriculture sector, alongside investment in automation and innovation, as long-term options. In the short term, there was a significant support for access to labour through an appropriate **future immigration policy**. Fruit pickers, vets, horticulture, dairy, poultry and meat processing were highlighted as benefitting particularly from a flexible immigration policy. Respondents suggested measures such as open borders, free movement of EU labour, and specific seasonal workers schemes. Some said that seasonal schemes, such as those in Australia or New Zealand where working holiday visas can be extended with farm work, could be implemented in the UK.

British Summer Fruits called for a permit system which would allow sufficient numbers of seasonal workers from outside the EU to work at defined locations for defined periods of time and then return to their country of origin.

#### **4.4.2 Regional consultation events and roundtables**

Although there were no workshops specifically relating to labour, relevant topics were raised at a number of regional events. The key points discussed broadly correspond with themes above, with a special emphasis on uncertainty around access to skilled labour along with the need for improved access to rural housing and better broadband to make farming an attractive career choice.

As above, many people emphasised that **education** was crucial to attracting new entrants. They noted that the role of career advisors should be strengthened, and agricultural colleges need to do better at making students 'farm ready', equipping them with both practical and business skills. At events in Manchester and Cambridge, there was a particular support for incorporating food and farming more into the national curriculum, including on farm visits. A few suggested that the connection between generations, and rural and urban areas, should be strengthened to help promote carers in farming.

Many felt that the **reputation of farming** as a whole needed to change to make it a more appealing career. A few suggested that the government should lead a public campaign and become a 'one-stop shop' for skills and fund training to overcome the challenges of fragmentation, for example to put in place a system of farmer credits for training and farm advice. Others said that the industry should better organise themselves to improve their image and to stress the modern nature of farming, highlighting the work of NFU and AHDB to date.

## CHAPTER 5. Public money for public goods

### 5.1 Summary

This chapter presents an analysis of respondents' views on a new system of public money for the provision of public goods.

Key themes from the responses are listed below:

- **all of the listed goods** were viewed as important: some people felt that none should be prioritised over the others;
- the **interlinked nature** of these goods was continually highlighted: for example, some outcomes, such as soil health, provide the foundations for other outcomes;
- soil health, improved water quality and increased biodiversity emerged as particularly important **environmental outcomes**;
- high animal welfare standards, protection of crops, tree, plant and bee health, and preserving rural resilience and traditional farming and landscapes in the uplands all emerged as important **public goods**.

In addition, a large amount of respondents felt that **food** was not sufficiently reflected within the consultation. It was considered that more needed to be done to provide resilience in the food chain, making sure that food was affordable and accessible to all.

Respondents also felt that **public health** was not covered in any detail in the consultation. With increasing levels of obesity, and the associated impacts on the NHS, respondents thought that more could be done by improving the health of the population through diet and education about the sources of food.

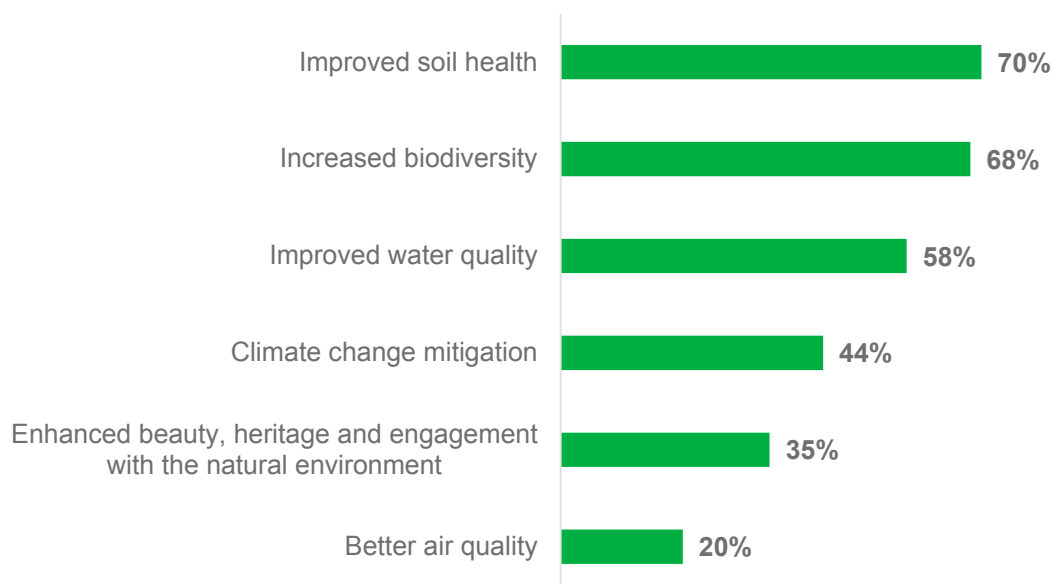
Each of the sections below presents respondents' views on public money for public goods. This is followed by the views raised at policy events and workshops.

## 5.2 Consultation questions

**Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:**

- a) Improved soil health
- b) Improved water quality
- c) Better air quality
- d) Increased biodiversity
- e) Climate change mitigation
- f) Enhanced beauty, heritage and engagement with the natural environment

**Proportion of online respondents that selected each of the options as the top public goods that government should support**



This question had a high response rate on the online survey, with around 90% of respondents selecting three options. 'Improved soil health' (70%), 'increased biodiversity' (68%), and 'improved water quality' (58%) were considered to be some of the most important outcomes that government should support as public goods.

While this question asked people to select priority outcomes, it became clear from the respondents' comments that all of the listed outcomes were viewed as important and interlinked. Indeed, some people felt that none of these outcomes should be prioritised over the others.

Respondents also suggested that, as priorities in environmental outcomes will vary between localities, any new ELM system should take the geography of an area into account. Some also

suggested that a variety of schemes should be made available to allow the most suitable options to be selected.

A majority of responses suggested **biodiversity** was an important environmental outcome. It was felt that by providing healthy wildlife habitats, improvements would arise in other areas—providing clean water, carbon sequestration, improved soil health and clean air. Biodiversity was, however, also seen by some as a key outcome of improvements in other public goods, leading a few respondents to suggest that it could be used as a proxy to measure environmental health generally.

Some respondents suggested that while agriculture had been the biggest driver of the reduction in biodiversity historically, agriculture could also be instrumental in its restoration. A small number of respondents said that biodiversity of crops and livestock should also be considered, to help protect crop varieties and rare breeds of animals.

**Soil health** was considered to be a public good that provided the foundation for other outcomes. The Institute of Agriculture Engineers felt that the delivery of all environmental outcomes hinged on good soil. They suggested that soil health could be improved by using engineering solutions, such as monitoring sensors, application of reduced tillage and reducing weight of machines. It was suggested by some respondents that improving our soil health would lead to improved water quality, increased biodiversity and ultimately contribute to climate mitigation through carbon sequestration.

Supporters of the Wildlife Trusts, including regional groups and individual members, responded to the consultation. Most respondents supported the idea of public money for public goods, wanting to see farmers being supported for delivering a number of environmental outcomes, including a greater number of habitats created, protection of pollinators and enhanced water quality. This included the suggestion that land management with a strong consideration for wildlife could deliver these environmental outcomes simultaneously. These respondents also raised concerns about the agricultural transition being too fast, with many asking for a ‘public money for public goods scheme’ to be put in place and bridge the gap.

A few respondents suggested that **climate change mitigation** was the most urgent outcome to support. These respondents believed that government should treat climate change as a priority because the potential scale of damage would render any advances in other areas meaningless.

A small number of respondents suggested that greater **public engagement** with rural environments would be key to gaining public support for any ‘public money for public goods’ scheme. These respondents suggested that if the public could see how public money can protect wildlife and cultural heritage, as well as create a better public understanding of farming, people would be more likely to get behind a new environmental system.

Regional groups of The Ramblers also responded to the consultation, suggesting that enhanced beauty, heritage and engagement with the natural environment are valuable public goods. They also suggested that these goods, along with public access, are important in their own right but could help maximise benefits to other public goods mentioned in the chapter.

**Air quality** was least commonly rated as an important environmental outcome for government to support. Some respondents believed that the causes and effects of air pollution are mostly found in towns and cities, so it would be beyond the reach of agricultural businesses to address this issue. A small number of respondents, however, linked air quality with other public goods, in particular biodiversity, as it was suggested that biodiversity and air quality mutually support each other.

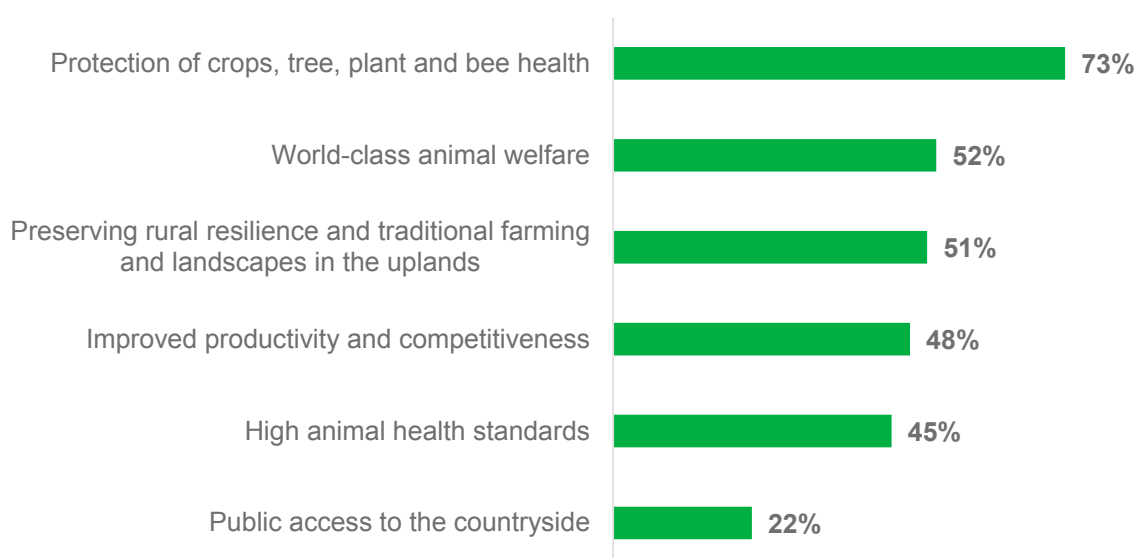
Organisations relating to woodland and forestry highlighted how well managed **woodlands** could deliver environmental outcomes. The Woodland Trust suggested planting woodland in key locations could provide stability of soil and lower erosion risk, absorb rainfall to help reduce the flooding, provide habitats for a variety of species and sequester carbon from the atmosphere. By protecting and creating new woodlands, introducing agro-forestry and planting trees outside of woodlands, it was suggested that all six environmental outcomes be delivered, as well as noticeable social and health benefits.

In addition, those who identified as being in the non-food horticulture sector felt they should have an equal footing to agriculture. Respondents suggested that plantings, gardens, parks and street trees had a far greater impact on the delivery of public goods to the wider public, whilst also attracting tourists to these areas.

**Of the other options listed below, which do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:**

- a) World-class animal welfare
- b) High animal health standards
- c) Protection of crops, tree, plant and bee health
- d) Improved productivity and competitiveness
- e) Preserving rural resilience and traditional farming and landscapes in the uplands
- f) Public access to the countryside

**Proportion of online respondents selecting each option as the most important public goods that government should support**



85% of the online survey respondents selected at least one option. Of these, almost three quarters (73%) selected the 'protection of crops, tree, plant and bee health' as an important public good that government should support. Around half of respondents selected either 'animal welfare', 'preserving rural resilience' or 'improved productivity and competitiveness' as a top option.

While all the above environmental outcomes were seen to be linked, respondents also identified some linkages within these other public goods. Some respondents made links between animal health and welfare, with each thought to contribute to the standard of the other. Many respondents also felt that animal welfare, animal health and protection of crop, tree plant and bee health underline farm productivity and competitiveness. Some suggested that profitability would enable farmers to reinvest in other public goods.

Of the respondents who valued **animal welfare** as an important public good, the majority believed that current welfare standards were already world-class and many thought that we should continue to support high welfare after exiting the EU. A small number of respondents, who identified as from the farming sector, highlighted concerns that the public would not be willing to pay extra for high welfare products. They suggested that this could threaten their businesses without support from the government. Some respondents also wanted to see greater regulation of imports, to make sure that British produce was not undercut by goods from outside the UK that may not meet the same welfare standards.

Many respondents identifying as from food and farming businesses believed that **animal health** was an important public good, because it contributes to greater productivity. Some respondents stated that animal health was also linked to public health, as healthy animals allow for the production of healthier food. The British Poultry Council also highlighted the importance of sustainable use of antibiotics to protect their effectiveness in maintaining the health of both livestock and humans.

Supporters of the RSPCA campaign responded to the consultation. These respondents valued animal health and welfare as the most important public goods for government to support. There were strong beliefs among respondents that animal lives matter, with some emphasising their sentience. Some of these responses wanted to see the extension of the definition of animal welfare to include wildlife.

Similar to animal health, **protection of crops, tree, plant and bee health** was also linked with greater productivity. Some respondents wanted to see the government do more to regulate trade, in order to prevent the import of invasive species and diseases. A few members of the public asked for greater government support for the health of all pollinators, rather than a particular focus on bees. There were also a small number of respondents who wanted to see an integrated approach to supporting crop, tree, plant and bee health. Respondents thought that managing one of these aspects in isolation could have a negative impact on another. Most of these respondents referred to a possible conflict between maintaining crop health through the use of pesticides, which may then have a negative impact on bee health.

38 Degrees conducted a survey of its members in response to this consultation. In the survey, respondents were asked to state how they would like farming and the countryside to be managed after we leave the EU. The results of the survey indicated a significant public interest in the proposed shift to a system underpinned by 'public money for public goods'. There was a strong preference for new legislation protecting crops, trees, plant and bee health, as well as animal health and welfare. There was also support for the provision of financial support to farmers who promote animal welfare.

**Productivity and competitiveness** was highlighted as an important public good by many who identified as food and farming businesses. Several respondents considered productivity and competitiveness to be an important public good because it would allow farmers to run profitable businesses that could, in turn, invest in the other public goods mentioned across this chapter. Alternatively, some individuals suggested that productivity was not a public good as it was believed to be linked to market gains. The Wildlife and Countryside Link stated that whilst government should support agricultural productivity through the enhancement of

environmental public goods alongside business support and advice, it is not a public good as farms profit directly from productivity.

Preserving rural resilience, traditional farming and landscapes in the **uplands** was identified by many respondents as an important public good. Several respondents wanted to see support for the uplands as they can be difficult to farm. They wanted government support for these farmers so they could continue their role as custodians of upland landscapes. Many respondents appreciated the uplands because of their heritage and tourism value which, as a result, brings business to these areas.

Some respondents wanted to see an extension of this definition of a public good to all **remote and difficult to farm areas** rather than a focus on only the uplands. National Parks England wanted lowland landscapes, which also rely on traditional farming methods, to be given the same level of protection as suggested for the uplands. There was however, some disagreement on the value of preserving traditional farming practices. A few respondents believed that these methods should be continued as they help to provide environmental goods, in particular the protection of biodiversity. Alternative views suggested that while upland landscapes should be supported, traditional techniques should be improved as it was suggested that these practices are harmful to the environment. A small number specifically wanted to see a reduction in over-grazing and greater reforestation in these areas.

Supporters of a campaign from the CPRE (Campaign to Protect Rural England) responded to the consultation, with the majority of respondents wanting to see a future agricultural policy that supported a resilient farming sector and rural communities. This would involve promoting the countryside, allowing it to be accessible to and valued by all.

Public access was a popular topic for discussion in several responses. Many recognised that public access can have a positive impact on public health. These respondents felt that rural areas provided space for physical activity, benefiting physical and mental health as well as allowing people to engage with their natural and cultural heritage. In addition to these benefits, some respondents suggested that better public access could provide a boost to rural communities, through increased revenue for hospitality and tourism businesses. These benefits led some respondents to express a preference for increased public access to the countryside and improvements for current routes. A few suggested they would like to see a 'Right to Roam' scheme, similar to the current access level in Scotland, extended throughout the UK.

Many respondents who identified as from food and farming businesses, however, were concerned about how increased access could damage their businesses, reduce on-farm animal welfare and be potentially dangerous to the public. Respondents wanted to minimise the risks of dog attacks on sheep, littering and the potential for accidents involving farming machinery. Some respondents also raised concerns that greater public access could be detrimental to efforts made towards wildlife conservation, as many of these sites are sensitive to disturbance.

Respondents suggested that any changes to current public access must be considerate of all involved groups. The Open Spaces Society suggested that public access should only be

increased in places where there is demand. The Country Land and Business Association (CLA) proposed that any new public access scheme should be voluntary and flexible, to give farmers the choice to give access where appropriate. This could mean that during important periods in the farming calendar, farmers would have the right to request that a route be moved. Respondents suggested that this would make sure that risks to health and safety to both farm animals and users were reduced. Respondents also felt that public access should not only be defined by footpaths through farms, but also including educational visits to farms. This could help the public learn more about farming and the origins of their food.

A number of campaign and petition responses on the subject of public access were submitted to the consultation. The Ramblers collaborated with Cycling UK, the British Horse Society, the British Mountaineering Council and the Open Spaces Society to petition for measures protecting and enhancing access to the countryside to be included in the Agriculture Bill. The petition's statement suggested that access to the countryside would be beneficial to physical health, mental health and wellbeing. Further to this, respondents suggested that the bill include measures to make sure farmers fulfil their existing legal responsibilities and reward them for improving and increasing access.

Supporters of Cycle UK also responded via a campaign asking for public access to countryside to be one of the public goods linked to farm subsidy payments. These respondents argued that maintaining and enhancing public rights of way improves public health and wellbeing through access to exercise and clean air. Respondents suggested that greater access also provided opportunities for recreation and tourism. One of the main concerns was the disconnected nature of the current cycling network. Respondents often suggested that any new subsidy system could be used to create coherent cycling networks, with clear signposting, that provided a safer alternative to road cycling.

A campaign from the Disabled Ramblers raised concerns that people with disabilities often have limited access to the countryside. They asked that farmers be incentivised to remove barriers (such as such as stiles, steps and narrow passages) and replace them with accessible solutions. This would improve access not only for people with disabilities, but also for others with limited mobility, including the elderly and families with pushchairs.

#### **Are there any other public goods which you think the government should support?**

Respondents identified public goods relating to food and public health as the primary key goods. Some respondents felt that **food** was not sufficiently reflected within the consultation. They viewed food production as the primary public good from agriculture and did not want government to prioritise the above public goods. The Sustainable Food trust for example did not want large areas of land being taken out of production for nature conservation purposes, as this could lead to further intensification in farmed areas or increased imports from countries where environmental and public health standards may be lower. Several respondents thought that more needed to be done to provide resilience in the food chain, making sure that food was affordable and accessible to all, while providing farmers with a fair income for what they have produced.

A few respondents also wanted to see greater government support for smaller farm businesses, as they believed that such businesses could provide a supply of local, fresh produce as well as reducing the need to transport food over long distances.

Supporters of the Royal Society for the Protection of Birds (RSPB) campaign responded to the consultation. Some of these respondents acknowledged the challenge of ensuring food security, in an environmentally sustainable way, within a changing climate and without negatively impacting farmers' livelihoods. Respondents suggested that collaborative work between farmers and specialist environmental bodies could further support sustainable agricultural practices.

Some respondents also wanted greater government consideration for **food waste**. Supporters of Feedback's Pig Idea campaign responded on this subject, with many believing that there was no need to increase agricultural productivity. They suggested the focus should instead be on reducing food waste, with most respondents asking for food waste to be halved by 2030. They suggested that unconsumed food should be fed to pigs, and that there should be a reduction in imported animal feed. Other respondents felt there was the need to prevent supermarkets from refusing produce based on how it looks. They thought that the sale of misshapen fruit and vegetables would support the reduction in food waste.

**Respondents felt that public health** was linked closely to food and that given the title of the document, more was needed to address the health of the public in the UK. Some suggested that, with increasing levels of obesity and the associated impacts on the NHS, more could be done by improving the health of the population through diet. The A Team Foundation suggested that the consideration of public health as a public good naturally followed from the supporting roles food and the environment play in public health. In turn, they suggested that healthy people were better placed to improve the environment.

Some respondents also wanted better **education** for consumers on where food comes from, including the benefits of healthy eating. Many of these respondents particularly wanted better engagement with children on nutrition and the origins of their food.

The Landworkers' Alliance campaign also asked for recognition of public health as a public good. These respondents suggested this could be delivered through a new food and farming policy which gave the public greater access to fresh, local produce.

Some respondents also wanted to see the support of certain public goods, in particular public access and air quality, because they were seen as vital in protecting public health. A small number of respondents also raised concerns about the effects of agro-chemical spraying on their health. Many of these respondents suggested that better regulation of spraying should be put in place to prevent dangerous levels of exposure to residents of rural areas.

Although food security and public health featured heavily, some respondents also wanted to see the recognition of **water management**, in addition to water quality, as a public good. Linked by some to climate mitigation, these respondents wanted better management of water,

particularly in the uplands and low-lying wetland areas, to improve water flow and retention rates. They stated that this would protect against both flooding and droughts.

### 5.3 Regional consultation events and roundtables

While none of the regional consultation events or roundtables focussed on this chapter specifically, it did feature as a theme throughout the workshops.

A key theme emerging was the emphasis on engaging farmers on what schemes would work in their area, and where farmers and communities can work together to identify local priorities.

The need to improve and maintain **public access** was emphasised, and the associated benefits to public health and wellbeing. While participants acknowledged the risks of access, it was suggested that a solution of permissive access be granted. Some participants specifically mentioned previous 'access payments' under Countryside Stewardship, suggesting that access payments should be included in the new scheme. It was also felt that there was an important role for educating the public about responsible access.

Suggestions emerged from some workshops that the definition of a public good should be broadened to include maintenance of landscape character and value, assisting rural communities, especially during adverse weather conditions and addressing other community needs.

A policy roundtable on creating a **new gold-standard metric** for food and farming quality suggested that such a metric could be beneficial, as it could create opportunities for continual improvement in farming practices. This could demonstrate that it was possible for welfare, biodiversity and environmental objectives to be met at the same time as productive farming. The consensus however, was that there was no need or desire to develop a new assurance scheme. Instead, participants thought that it would be helpful to deliver high standards through a combination of existing schemes. This would acknowledge how the existing schemes complement each other, how they interface with regulation and other official controls and understand where 'gaps' existed.

## CHAPTER 6. Enhancing our environment

### 6.1 Summary

This chapter discussed approaches and elements that a new environmental land management (ELM) system could involve. These included discussion of the natural capital approach and the priority aims of the 25 Year Environment Plan. The system's design was also covered: this included funding for collaborative projects, capital grants, user friendly design and different payment options, alongside incentives for participation.

This chapter asked for views on:

- what outcomes could be achieved in a future environmental land management system by incentivising action across farms or land parcels;
- the role of outcome-based payments in a future system;
- how a new system could balance local and national priorities; and
- how farmers and land managers could potentially work together or with third parties to deliver environmental outcomes.

Key themes from responses included:

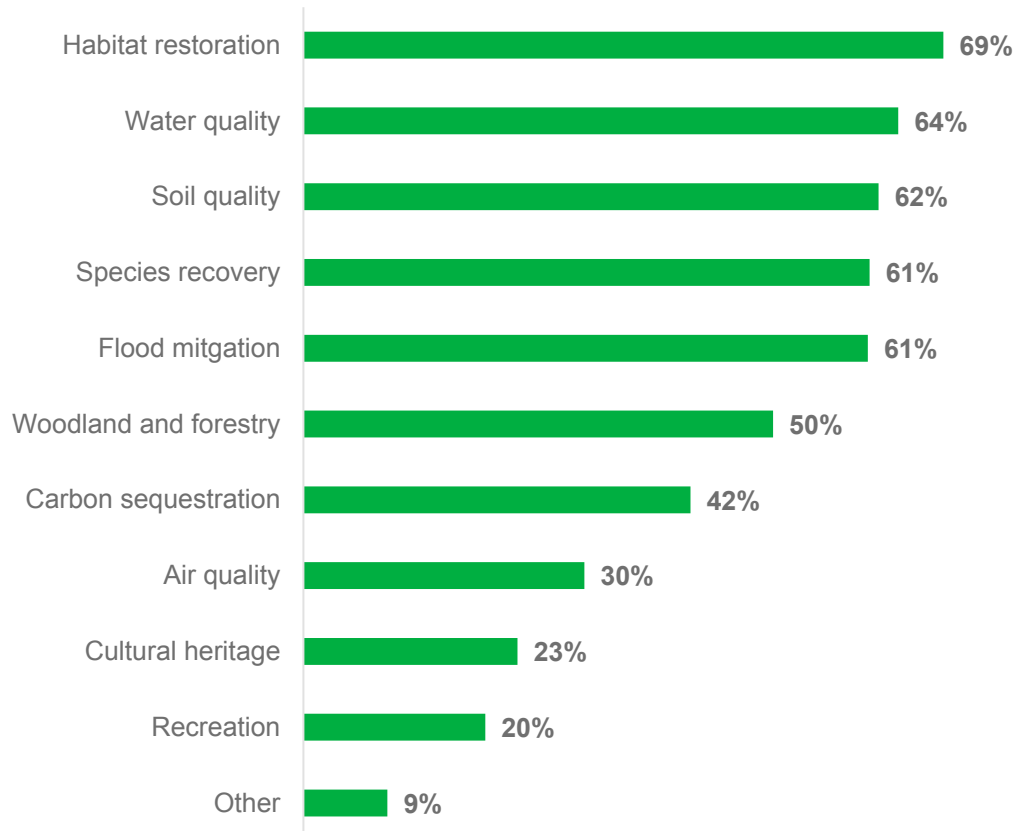
- the importance of recognising the **connections** between environmental outcomes;
- the importance of soil, water, biodiversity and habitats;
- straight-forward and reliable **administration, design** and **payments** for a future system, as well as opportunities for collaboration and cooperation; and
- the importance of **food production** and how this should interact with a new environmental land management system.

## 6.2 Consultation questions

**From the list below, please select which outcomes would be best achieved by incentivising action across a number of farms or other land parcels in a future environmental land management system:**

- a) Recreation
- b) Water quality
- c) Flood mitigation
- d) Habitat restoration
- e) Species recovery
- f) Soil quality
- g) Cultural heritage
- h) Carbon sequestration and greenhouse gas reduction
- i) Air quality
- j) Woodlands and forestry
- k) Other (please specify)

**Proportion of respondents that selected each outcome that would be best achieved by incentivising action in a future environmental land management system**



Over 3,800 respondents answered this question on the online survey (90% response rate). Overall the top three outcomes that respondents thought would be best achieved by incentivising action across a number of farms or other land parcels were 'habitat restoration' (selected by 69% of respondents), 'water quality' (64%) and 'soil quality' (62%).

When giving reasons for the options selected, respondents commented on the **interconnectivity** of the outcomes and that a positive result for one would lead to another. Most respondents identified water quality, soil quality and air quality, alongside habitats, as the most interlinked.

Of those who selected 'other' from the options list, many respondents mentioned **biodiversity** as a key environmental outcome. Biodiversity, habitat restoration and protection, and habitat connectivity were highlighted as being cross boundary or best delivered at landscape scale. Most respondents suggested that strong incentives would be key to achieving this outcome.

The multiple environmental benefits provided by **woodland and hedgerows** were also highlighted. This included comments on their value as habitats and nature corridors, as well as incentivising an increase in agro-forestry and creation of small parcels of woodland.

Some respondents highlighted the environmental benefits of **local food production** and distribution leading to shortened food chains. Respondents also discussed the role of the **local** rural community. Several respondents mentioned the importance of maintaining rural life through employment opportunities, alongside farmers' roles in keeping communities together. Some suggested that outcomes could be achieved through locally relevant priorities.

Overall respondents highlighted the benefits of **collaborative working** and commented that most or all of the outcomes require an element of co-operation. They recognised that farm boundaries do not reflect natural boundaries and therefore there was significant scope for smaller farms to work together to have a greater impact at landscape scale. The Wildlife Trust supported incentivising farmers and land managers to collaborate at both landscape and catchment level to secure environmental outcomes. Some respondents, however, expressed doubts on the capacity of farmers and land managers to work collaboratively.

### What role should outcome based payments have in a new environmental land management system?

There was widespread support for the use of **financial incentives** for land managers to deliver environmental outcomes. A significant number of respondents supported the idea of outcome-based payments playing a role in a new ELM system. The Country Land and Business Association (CLA) suggested that in some situations, outcome-based payments may be appropriate. They stated, however, that the inclusion of outcome based payments in a future system should be aspired to, but only implemented when the evidence and administrative processes are developed.

Respondents who supported outcome-based payments believed that they could provide an effective incentive for farmers and land managers to deliver environmental benefits. While some respondents thought this payments system should play a significant role, some of those supporting the idea had some concerns about how it would work in practice.

One concern was around the difficulty of measuring environmental outcomes, or the lack of established and assured mechanisms for measurement. Respondents mentioned, for example, that there were a large array of methods for measuring soil health, but that these processes could be expensive. Some respondents suggested that establishing, in advance, the measurement systems that would be used could mitigate these concerns and introduce some certainty.

Some respondents also expressed concerns around the potential subjectivity of monitors and inspectors, and the negative impact this could have on the measurement of achieved outcomes. Concerns were raised about the possible variables outside the control of farmers and land managers that could detrimentally affect environmental outcomes. Respondents suggested that variables, such as weather or soil types, would be particularly problematic if a new ELM system focused solely on an outcomes-based payments approach.

Some respondents questioned how outcome based payments would apply where collaboration was needed by farmers or land managers. This was particularly relevant in relation to habitat and biodiversity objectives. Respondents raised concerns about the amount of time it could take for outcomes to be achieved or measured and the impact this could have on payments.

Several respondents were concerned about the accuracy of the evidence base. They suggested that undertaking activities to achieve specific environmental outcomes may not actually result in the desired outcome due to a lack of evidence or testing on specific land types. Respondents expressed uncertainty about where specialist advice could be sourced.

**Action-based payments** were suggested as an alternative option by a smaller group of respondents. Respondents considered that this approach could mitigate some of the concerns expressed in relation to outcome-based payments, such as issues of measurability, land type and location, time and uncontrollable variables. A selection of respondents questioned this

approach as land managers may be unfairly rewarded for carrying out activities that were unlikely to achieve significant environmental benefits.

Some respondents suggested a **mixed or hybrid approach** by which a combination of outcomes-based and actions-based payments could be included in the design of a future ELM system. This would allow for variation depending on the environmental outcomes and measurement mechanisms in place or being pursued. Again, particularly in relation to biodiversity and habitat initiatives, some respondents noted that there was no guarantee that all actions would obtain the same outcomes for reasons that are uncontrollable, such as predator numbers.

There was a recurring critique of the current approach of basing payments on income foregone, and a suggestion that payments should extend beyond this in order to provide a sufficient incentive for land managers to enter into a new ELM system.

The Royal Society for the Protection of Birds (RSPB) campaign response to the consultation suggested there must be greater support and legislation for the protection and enhancement of the natural environment, with habitats such as hedgerows, field boundaries, meadowland and woodlands being a particular focus. The majority of respondents felt that there are currently too many agro-chemical and veterinary medical inputs in our farming system. By reducing such inputs, some hoped that the decline in pollinator species would be reversed, the quality of soil and water restored, and the risk of pollution reduced.

Supporters of the World Wide Fund for Nature (WWF) campaign also responded to the consultation. These respondents stated that they would like to see the Agriculture Bill 'pay farmers to restore nature'. Other topics mentioned included sustainable crop production, financial support, legislation for environmental protection, and engagement between specialists and farmers to equip farmers with the necessary knowledge and resources to protect and enhance nature. Some suggested that the government should make habitat corridors and connectivity a priority in order to make wildlife enhancement and protection a success.

The Garden Organic campaign were concerned at the absence of organic production in the consultation. They believed that these methods could protect food supplies, the environment and public health. Most respondents felt that organic practices could protect and improve our soils. Organic practices would have a positive impact on wildlife (including pollinators), biodiversity and help reduce the level of agro-chemical inputs in our agricultural system (such as herbicides and pesticides) to reduce diffuse pollution and improve wildlife and human health. Many respondents, therefore, wanted to see government recognition of organic growers as major contributors to a sustainable food production sector.

**How can an approach to a new environmental land management system be developed that balances national and local priorities for environmental outcomes?**

Most respondents saw that setting **local priorities** should help us achieve national priorities. A smaller number of respondents saw no difference between the environmental outcomes prioritised at a national and those at a local level.

The importance of **local knowledge** of farmers, non-government organisations (NGOs) and government agencies was frequently raised. Respondents often stressed the need for collaboration with these local groups to draw from their expertise.

Most respondents stressed the importance of local priorities being determined at a local level, given the varied environments in England. Some respondents highlighted the importance of landscape-based approaches and flagged these as ways of achieving regional priorities. Several respondents mentioned water catchment area plans as good examples of a range of environmental outcomes meeting local priorities, including water quality, flood management and riverine habitats.

A small number of respondents suggested that having prescriptive national priorities may disadvantage land managers whose land could not provide the same benefits as others. Some respondents were against a 'one size fits all approach', suggesting that a tailored regional approach to individual areas would better achieve environmental outcomes. The National Farmers Union (NFU) supported the idea that those applying to take part in a scheme should have the ability to develop and produce agreements suited to their specific local environment.

Several respondents suggested that a national framework of environmental outcomes should be created with the flexibility to apply this at a local level. This could build on the objectives in the 25 Year Environment Plan and reflect site specific needs; for example, Areas of Outstanding Natural Beauty, National Parks, Sites of Specific Scientific Interest.

Supporters of the Cumbria Wildlife Trust campaign asked that any new ELM system should focus on wildlife and habitat restoration, as this could subsequently provide a number of environmental outcomes such as flood mitigation, improved soil health and carbon sequestration. Supporters wanted the government to implement a clear system with measurable targets and accessible specialist advice to make the most of public money.

### How can farmers and land managers work together or with third parties to deliver environmental outcomes?

Most respondents agreed that the best way for farmers and land managers to work together with third parties to achieve outcomes was through the provision of **specialist advice**.

Several respondents thought there should be government funding for advice. Many respondents stressed that this advice should come from a local source. Some respondents also highlighted a need for government incentives for collaboration, such as in the Countryside Stewardship facilitation fund. Several respondents suggested the need for a facilitator to run local focus groups. Overall, respondents viewed collaboration between farmers and land managers and third parties positively. Many cited good collaboration already taking place drawing on expertise from environmental groups and government organisations.

Several respondents gave examples of current good practice in collaborative working, such as the farm cluster approach. Other respondents mentioned the positive outcomes of land managers working with water companies. Respondents suggested that these models of good practice should be replicated in any future ELM system.

A small number of respondents however, commented that farmers know their land the best and saw third party collaboration as interference. Other respondents asked for a balanced input from farmers and environmental groups into the delivery of environmental outcomes and highlighted the issue of lack of trust between these groups as a barrier to collaborative working.

Some respondents had the opinion that farmers might find it difficult or be unable to work collaboratively. Within this group some believed that collaboration should not be encouraged, whilst others saw this as a reason for greater funding and support for it. Another emerging theme was the need for greater enforcement and regulation for certain land managers who have not previously worked collaboratively.

Supporters of the People's Trust for Endangered Species (PTES) campaign responded to the consultation. These respondents emphasised the need for greater research into improved environmental performance, resource management (including agro-chemicals), crop and livestock health and animal welfare. They suggested that integrating a new ELM system with improved productivity would help create a sustainable agriculture sector. PTES supporters also suggested that outcome-based payments would be the best way to achieve environmental outcomes, alongside a regulatory culture that encouraged data sharing and increased self-reporting. They suggested that there should be sufficient funding provided in enforcement, as well as advice to make sure these regulations are effective.

### 6.3 Regional consultation events and roundtables

Discussions on enhancing our environment occurred at a number of regional events.

When discussing what the new ELM system could achieve, most groups suggested that numerous outcomes should be rewarded. Frequently mentioned outcomes included: soil health, water quality, air quality, landscape beauty, biodiversity and public access. Most respondents were reluctant to rank environmental outcomes as they were seen as connected; improving one outcome could not be achieved without working on other environmental goods at the same time.

An **integrated or 'landscape based' approach** was therefore suggested to deliver several, linked outcomes at once. A popular suggestion was for the system to have a broad portfolio of outcomes or packages for system members to customise. This would be complemented with support from an advisor with local knowledge, to help select the right portfolio of outcomes to meet local or regional aims.

Among groups that did choose to rank environmental outcomes, soil, plant health, water quality, air quality, landscape, biodiversity and public access were seen as most important. These environmental outcomes were thought to underpin the delivery of all other environmental benefits, with some also contributing to food production.

Many also felt that priorities will differ based on local character and opposed the idea of having national or 'top-down' prescriptions for outcomes.

Despite strong support for an outcomes focused approach, there were repeated concerns about how outcomes could be measured in practice and then linked to payments. Concerns were also raised that the ELM system placed too much emphasis upon environmental outcomes and not enough on wider public goods, such as preserving cultural heritage.

A large number of participants drew on their experiences of past and present agri-environment schemes, including the Entry Level Scheme, Higher Level Scheme and Countryside Stewardship. Many described issues such as: complicated online systems that were difficult to access for those with limited broadband connectivity; late payments and administrative errors; and extensive inspections and monitoring, with heavy penalties signalling a lack of trust. Rolling applications and start dates would contribute to a user friendly design, alongside a choice of various different agreement lengths. A few groups also raised the idea of removing the minimum area requirement that exists as an eligibility criteria for the Basic Payment Scheme (BPS), suggesting that this would allow smaller farms to contribute to delivering environmental outcomes. Numerous groups also suggested that payments for environmental outcomes needed to go beyond income foregone, and instead should enable farmers and land managers to make a profit from participation in the system.

Discussions on administration of the new system and local needs often focused on the provision and availability of **advice**. Several groups commented on the benefits of having personal relationships with staff and advisors, but that these were largely lost now. It was also suggested that a single point of contact for advice and guidance would be helpful. There were

repeated concerns that local, specialist advice was not easily available, and that there was discontinuity in advice being given, sometimes attributed to staff changeovers in delivery bodies.

In addition to access to local, knowledgeable advice services, a small number of groups discussed the development of more farmer-led networks which would enable peer to peer learning and advice sharing.

## 6.4 Additional points

The majority of respondents viewed the prioritisation of environmental protection and enhancement positively. Alongside this, several respondents commented that **food** security was equally important, in particular the balance between achieving environmental outcomes and food production. Some respondents were concerned that an ELM system might result in a reduction in national food production, which in turn might lead to imports of cheap food from countries with poor environmental practices. The need for farms to be productive and profitable in order to be able to continue to deliver environmental benefits on their land was also highlighted.

As with the 'public money for public goods' chapter there were mixed views on whether provision of **public access and recreation** opportunities should be supported through an ELM system, due to the benefits and drawbacks of access. It was suggested that significant financial compensation for farmers and land managers would be needed to offset potential damage to their property and businesses, if land were opened to more recreation.

## CHAPTER 7. Fulfilling our responsibility to animals

### 7.1 Summary

The chapter outlined the government proposal to promote excellent animal health and welfare standards in order to protect the nation from the environmental and economic impacts of disease, and build on our existing reputation for world leading welfare standards.

Key themes from the responses are listed below:

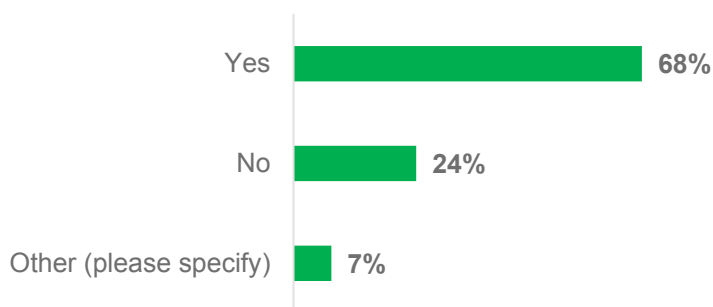
- most respondents were in favour of government funding **pilots** and other schemes to incentivise and deliver improved welfare, with some suggesting raising the legal baseline and providing more education for farmers;
- respondents were in favour of the government setting further standards to ensure greater consistency and understanding of **welfare information** at the point of purchase, which could include clearer labelling;
- there were some concerns on the potential financial burden of welfare initiatives on the farmer, and the negative impact of cheaper imported goods with lower standards;
- respondents considered **financial incentives** to be most important in improving animal health, and making it easier for retailers and other parts of the supply chain to recognise and **reward higher standards** of animal health; and
- **vets and advisors** were recognised for their important role in supporting the industry to develop plans to improve animal health.

## 7.2 Consultation questions

### 7.2.1 Animal welfare

**Do you think there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare?**

Proportion of respondents who thought there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare



Around 3,600 (83%) online survey respondents selected an option for this question. 68% of these respondents thought that there was a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare. Many respondents highlighted that welfare standards were already high, with a number of those respondents saying that there was a need to continue to improve welfare standards post EU Exit.

There was a range of views on **what high welfare entailed**, particularly between respondents who felt that the focus should be on welfare across all production systems, and those who argued that certain production systems automatically provided a higher welfare standard, such as free range or organic. A few respondents felt that indoor systems could have health and welfare benefits, due to the reduction in risk of disease incursion and protection from the weather and predation. Others argued that extensive systems have a higher 'welfare potential' than intensive systems, but also noted that any approach would have to take inputs and outcomes into account. Many respondents argued that animal welfare meant not only preventing suffering, but providing positive experiences and catering to their particular needs and preferences.

Many of these respondents argued that **payments** should be used to allow **long term improvements** in animal welfare. Examples included the use of capital grants for new buildings, new technology or new equipment. Others suggested greater dissemination of knowledge, for example in improved husbandry techniques. Others commented that pilots and payments for high welfare standards should be used in conjunction with raising the legislative baseline, rather than as an alternative, in order to allow the delivery of better animal welfare.

Some respondents suggested that payments should be used to improve the **current regulatory baseline**. Suggestions included incentivising increased membership of existing assurance schemes, or creating a new centralised assurance scheme. Some argued that

payments should raise standards by rewarding those with good and excellent animal welfare practice; and that this would provide an enhanced incentive to treat animals well.

Some respondents felt that particular production systems, such as free range and organic, should be incentivised. Others felt that the focus should be on improved welfare outcomes across these different systems, for example through changes to bedding or stocking density requirements.

Some supporters of the Royal Society for the Protection of Birds (RSPB) campaign mentioned that animal welfare standards should be raised, with a small number wanting wildlife to be considered in animal welfare efforts. Supporters of Compassion in World Farming campaign welcomed the inclusion of animal welfare in the document, with an overwhelming number of respondents expressing support for high animal welfare and payments for farmers who adopted these standards. Many suggested that they wanted a firmer commitment from government to do so. A significant number of respondents also mentioned that animal welfare should be a priority for the Agriculture Bill.

A few respondents suggested a two or three stage payments system. This could include an initial transitional payment (such as a capital grant) and a second type of payment for providing higher welfare standards, which could be tied to being a member of a higher welfare farm assurance scheme. The Farm Animal Welfare Committee (FAWC) suggested a tiered approach to provide a means of appraising, explaining and raising standards. FAWC added that there should be a desired 'higher' standard that farmers might wish to attain, rather than promoting a level already met by the majority. They suggested that these higher standards might form the basis for a welfare stewardship scheme.

Some respondents felt that **pilots** would allow farmers to try new methods without bearing all of the risk, allowing them to focus on the most effective measures. Several respondents raised the importance of the government working with farmers, academics and vets to develop schemes.

Many respondents felt that more **research** and **evidence** was needed on animal welfare, and that any areas of future intervention should be evidence-based. Suggestions for areas of research included animal behaviour, pig and poultry production systems, hill farming and consumer behaviour. FAWC suggested looking at best practice from other countries whilst others advocated the sharing of best practice across the industry, including through the use of demonstration farms.

Several respondents felt that schemes could be used to make new **technology**, such as robotic milking, more easily available. Others, however argued that there was too much of a focus on high tech farming, and particularly gene editing, as potential 'solutions'. They argued that rather than devoting resources to solving the problems created by farming intensively, farming should instead become less intensive to see improvements in welfare. They felt that traditional farming methods offered a range of added benefits, including improving the environment and strengthening rural communities.

In terms of improving standards, some respondents highlighted the **links between welfare and animal health**, with some describing high welfare schemes to eradicate endemic diseases and conditions, such as Bovine Viral Diarrhoea, Johne's disease, lameness and mastitis. Some also argued that healthy animals subject to higher welfare were more productive and more profitable. Respondents also raised the link between animal health and welfare and public health, particularly in relation to the potential for reduced use of antibiotics in higher welfare animals.

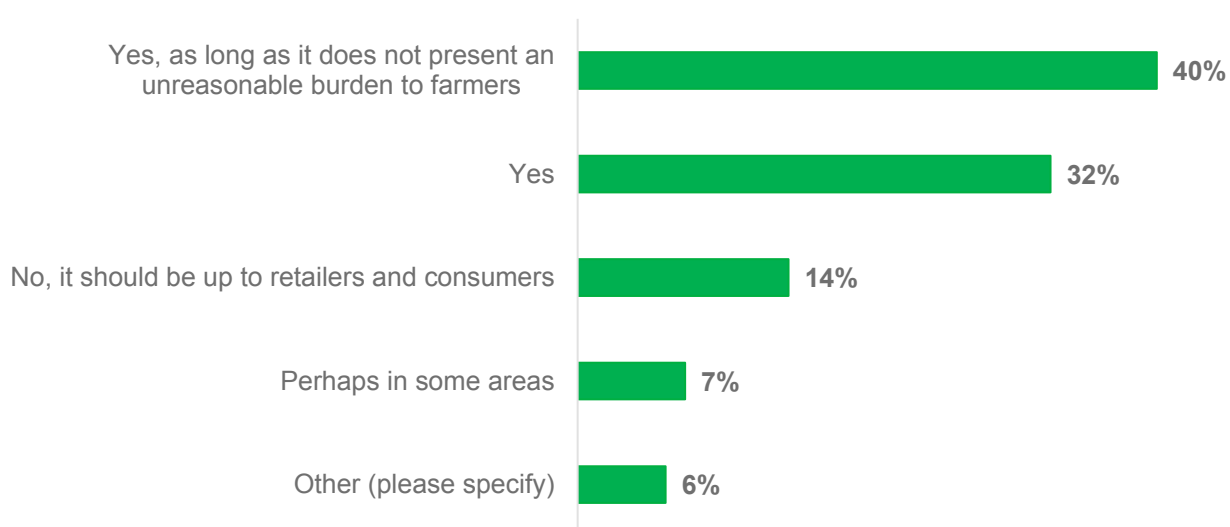
Some respondents felt that **consumers** were not willing to pay enough for higher welfare and argued that as citizens, people consider welfare to be important, but as consumers, welfare is only one of a number of priorities when deciding what to purchase. A number of respondents highlighted that higher costs could undermine the competitiveness of the UK farming industry if there were further increases in welfare standards. Other respondents suggested improving consumer awareness and understanding of the current standards and costs associated with high welfare, so that they could make better informed purchasing decisions.

Some respondents suggested that welfare standards in the UK were already high, and therefore there was **no need for additional pilots and schemes**. These respondents suggested that standards should be left to the market and farmers, or that there were other more pressing areas of investment. Some felt it would be better to focus first on developing animal health infrastructure or that people should not receive payments for something they should already be doing.

**Should government set further standards to ensure greater consistency and understanding of welfare information at the point of purchase? Please indicate a single preference of the below options:**

- a) Yes
- b) Yes, as long as it does not present an unreasonable burden to farmers
- c) Perhaps in some areas
- d) No, it should be up to retailers and consumers
- e) Other (please specify)

**Proportion of respondents selecting each option on whether government should set further standards to ensure greater consistency and understanding of welfare information at the point of purchase**



83% of respondents answered this question. Most respondents (72%) felt that government should set further standards to make sure greater consistency and understanding of welfare information at the point of purchase. Just over half of those who were supportive agreed only if it did not present an unreasonable burden to farmers.

In their additional comments, a number of respondents argued that there should be payments linked to meeting high welfare standards. Many respondents also highlighted the importance of customer education to increase understanding of current and any future welfare standards.

Many respondents felt that **labelling** should be clearer and should provide consumers with more information to allow them to make better informed purchasing decisions.

The Agriculture and Horticulture Development Board (AHDB) felt there was a lack of understanding of current food labelling and that the amount of information on labels can make them complicated. They suggested that there was a risk of creating further confusion if additional information was added to labels.

Accuracy of food information was questioned by a few respondents, citing the use of 'fake farms', pictures of chickens in fields for indoor raised meat, and the need for greater consistency and understanding of the terms currently used on labels, such as 'free range'. A few respondents also pointed out that retailers may already demand higher welfare standards from producers, but that labelling does not always highlight the difference from the legislative minimum.

Several respondents argued that labelling should cover the method of production. Others raised concerns about the inclusion of production system labelling, arguing that more extensive systems may not necessarily provide higher welfare protection. FAWC argued that the welfare of animals in all types of production systems should be examined. They raised concerns about the possibility of creating a marketing advantage for more extensive systems without showing a real difference in welfare. Others suggested additional information on the origin of products, length of travel time to slaughter and method of slaughter should also be included.

An alternative view was that the provision of welfare information **should be left up to the market**. AHDB argued that Red Tractor already shows that food produced in the UK has been reared to high standards of animal welfare. Some argued that current assurance schemes should receive greater government support. Some felt that the responsibility should be on retailers and food companies to communicate clearly to consumers about where their meat products were from and the welfare standards they were produced to, and to ensure that they sourced responsibly.

Some respondents felt that standards were high enough but there could be greater **consistency of labelling**. A couple of respondents suggested a traffic light system, for example, with green representing the highest level of welfare and red representing the legal minimum.

A few respondents argued egg production system labelling requirements, which gives information including whether an egg is free-range, should also apply to products containing eggs.

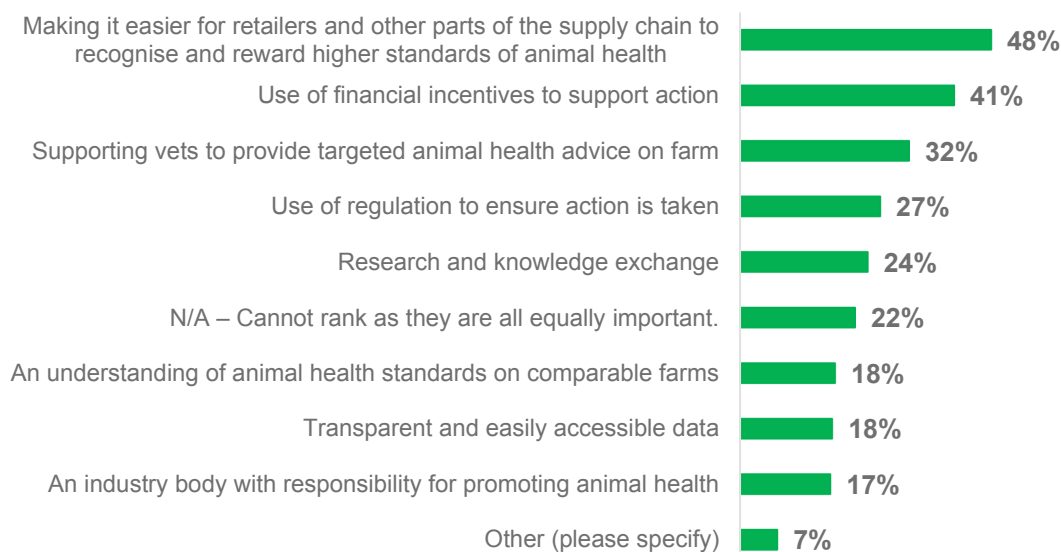
Many respondents raised **concerns about how standards and labelling apply to imports**. Respondents stated that standards and labelling should also be applied to imported goods to make sure that the competitiveness of British products was not undermined by increased UK legal standards. They were concerned that being labelled as an 'intensive' production system might be seen as negative compared with an unlabelled import that might have been produced to a lower welfare standard. Some respondents raised concerns about misleading labels, including a few who felt that labelling of 'British' meat could be misleading, if animals born and reared elsewhere, but processed in the UK, could be labelled as 'British'.

## 7.2.2 Animal Health

**What type of action do you feel is most likely to have the biggest impact on improving animal health on farms? Please rank your top three choices from the below list, in order of importance:**

- a) Use of regulation to ensure action is taken
- b) Use of financial incentives to support action
- c) Supporting vets to provide targeted animal health advice on farm
- d) Making it easier for retailers and other parts of the supply chain to recognise and reward higher standards of animal health
- e) An industry body with responsibility for promoting animal health
- f) Research and knowledge exchange
- g) Transparent and easily accessible data
- h) An understanding of animal health standards on comparable farms
- i) Other (please specify)
- j) N/A – Cannot rank as they are all equally important.

### Proportion of respondents who selected each option as most likely to have the biggest impact on improving animal health on farms



Over 80% of the online survey respondents answered this question. Overall, 'making it easier for retailers and other parts of the supply chain to recognise and reward higher standards of animal health' and 'use of financial incentives to support action' were the preferred options selected by 48% and 41% of respondents respectively. 'Supporting vets to provide targeted animal health advice on farm' was selected by a third (32%) of respondents.

The high number of respondents who could not rank the choices was notable, as one-fifth of respondents chose not to suggest one action was more important than all others, when there were nine to choose from. This was almost wholly explained by respondents stating that they were all equally important and should be part of a co-ordinated, holistic approach to animal health. Support for this view included the National Farmers Union (NFU), the Poultry Health and Welfare Group (PHWG) and the British Veterinary Association (BVA), who recommended holistic approaches to animal health as part of a partnership between government and the farming industry.

When looking at the explanations for these preferences, many respondents considered **financial incentives** and **regulation** together, often referring to the need for ‘carrot and stick’. They felt that regulation might sometimes be needed to make sure action was taken on certain diseases, alongside financial incentives. There were several respondents that were against the development of new regulation though, with some stating that extending existing regulations would unduly burden farmers. Respondents suggested that the use of grants to improve buildings, financial support for testing and vaccines, and funding for development of health plans, as particular types of financial incentive.

‘Making it easier for retailers and other parts of the **supply chain** to recognise and reward higher standards of animal health’ was preferred by many respondents. They felt that retailers have high levels of influence on changing practices on-farm. For example, asking producers to meet requirements above the legal baseline was thought to be an effective way to improve on-farm animal health. In conjunction, it was also suggested that improved standards were recognised in the price farmers were paid. Concern was expressed by some about the role of large retailers, suggesting that shorter, often localised supply chains could deliver more value to the farmer.

**An understanding of animal health standards on comparable farms (benchmarking)** was considered to be an important way to help farmers improve their performance on animal health. Improved data and knowledge exchange facilities were seen as important enablers of effective benchmarking and were often mentioned in conjunction with it.

#### **How can the government best support industry to develop an ambitious plan to tackle endemic diseases and drive up animal health standards?**

Many respondents echoed the options provided in response to question 3 of this chapter, citing similar themes, including financial incentives, regulation and the importance of vets to animal health.

**Financial incentives** were the predominant suggestion for government support. Specific ideas included: funding for vaccinations; proactive vet visits that focus on health planning and management; and support for improvements to infrastructure that would also improve animal health, such as upgraded ventilation in barns. Compensation for disease eradication at farm level was also a very popular suggestion. Sustain suggested that the government should place

conditions upon public funding for farms, so that any public funding requires action to be taken on animal health, and particularly herd health planning and participation in an 'animal health pathway'.

The role of **industry leadership and a body to help deliver animal health** was mentioned by some respondents, including the NFU and the National Office of Animal Health (NOAH). They favoured the setting up and funding of a partnership body between government and industry to coordinate, deliver and monitor animal health action at a national level. They pictured this body setting out a vision and goals for animal health via an 'animal health pathway'. The NFU supported an animal health collaborative body which it suggested could be called 'Animal Health England'. It stated that an animal health pathway concept could, if properly funded, deliver a future-proofed and resilient farmed livestock sector through a shared vision and action on animal health. The Cattle Health and Welfare Group also supported the setting up of a well-supported 'animal health pathway' to encourage farmers to take further action on animal health.

Many respondents saw **vets** and other **advisors** as very important to improving animal health. There was a feeling that vets could provide proactive advice on biosecurity and farm management that would help with health planning on farm to prevent disease, as well as provide medical treatment for animals. There was a view from a limited number of respondents that vets were sometimes constrained in their ability to deliver improved animal health in tandem with farmers, because of cost. For example, it was suggested that, in some cases, contact between vet and farmer was limited to only what was necessary to improve acute health problems as they arose.

Others suggested increased **registration requirements for livestock keepers**, linked to increased interaction with vets and understanding the disease status of farms as a better way to improve animal health status. Some respondents however, cautioned against the over-reliance on vets to deliver what might be seen as government messages or check compliance in schemes. It was suggested that if this happened trust would be lost as vets would run the risk of being seen as policing farmers, rather than as trusted advisors.

**Regulation** was often seen by respondents as the best means for the government to help industry deliver improved animal health standards. This included a suggestion of regulation for specific disease eradication (such as Bovine Viral Diarrhoea), instituting penalties for non-compliance with regulation and obligatory notification of disease. Where regulation was highlighted as having a bigger role than it has currently, it was often made clear that increased enforcement action would be needed to accompany regulation.

Alternative views suggested that regulation would be limited in what it could achieve as many respondents thought that regulation already gives the UK a reputation for high animal health. These respondents suggested that other methods, such as financial incentives and increased provision of advice, would be more effective in delivering long term behaviour change.

The role of **research, knowledge exchange and education** (of farmers and consumers primarily) were all mentioned regularly as ways to improve animal health. Respondents emphasised the value of peer to peer learning amongst farmers to improve farming practices,

and the potential for research into new vaccines and other treatments. The Pig Health and Welfare Council suggested that **research** was needed at all levels; basic, strategic and applied, and that better links should be made to academia to unlock new sources of research and funding. Education of producers was taken as way of improving husbandry on farm, and education of consumers related to better understanding of how animals had been treated on farm, with some respondents explicitly stating this should be linked to price premiums.

**Public education** was regularly mentioned as a means by which to increase understanding and engagement with food, with food production methods, children's education and food provenance particularly emphasised. It was suggested that government could take a role in making sure people understand what better-produced food was, helping them to identify it and connect to local producers.

The **importance of data in improving animal health** was mentioned by a small number of respondents, who typically highlighted the potential for government to play a role in data gathering and dissemination for benchmarking purposes in particular. Many respondents who identified as from farming-focused organisations supported data gathering and dissemination. They sometimes went further and suggested the use of animal health data within a unified, effective livestock tracking system.

### 7.3 Regional consultation events and roundtables

Participants agreed it was **important to acknowledge our current, already high legal standards** and were glad to see welfare considered as a public good. The need to clearly define any new standards and requirements was also mentioned. Many participants highlighted the **importance of acknowledging high quality, nutritious food as a public good** and its connection to animal health and welfare, emphasising the link between farming and food production.

The key themes that emerged during the regional animal health and welfare workshops focused on the positive influence of **research and financial support** on any potential health and welfare strategy. Participants thought that initiatives addressing animal health and welfare should be co-ordinated, farmer led, and flexible in their delivery to allow for changing circumstances. They thought any strategy should be long term, and properly resourced by government.

There were a range of viewpoints expressed regarding the best way to support industry to improve health and welfare. These included the development of an advisory structure similar to the previous Agricultural Development Advisory Service (ADAS), when it was part of government.

Those who favoured an **emphasis on research and technology** considered a joint approach between the government, farmers and industry was needed, facilitated by improved connectivity (broadband) and accessibility. They mentioned key areas of research which included antimicrobials, biosecurity, bovine tuberculosis and the link between welfare and

productivity. Suggested initiatives focused on disease prevention measures, with vaccinations and nutrient intake increases also viewed favourably.

There was also a range of viewpoints expressed across the workshops favouring different forms of **knowledge sharing and education** in support of improved animal health and welfare standards. These included the facilitation of farm knowledge exchange and peer to peer learning, childhood education (school farm projects and food farming education), public education, support for training for farmers, apprenticeship schemes and farming qualifications.

Alternative ideas included the need for improving **engagement of harder-to-reach farmers** and the importance of **extended support** and **independent advice for farmers**. Cluster farming networks were suggested in terms of their ability to improve engagement and keep communities connected. It was argued that this could produce higher welfare standards in hard to reach communities, by sharing knowledge of best practice.

Some workshops argued that **financial support** should be simple, easy to access and flexible. This would provide a support system that gives farmers confidence to invest to increase farm profitability. Improved profitability was said by many to be the key to enabling farmers to improve animal health and welfare on-farm. Some respondents favoured capital grants to aid building improvements and creating new farmer schemes.

**Disease advisory services** for farmers were mentioned as a powerful tool to help farmers improve their welfare and health status. Some respondents proposed similar schemes to those successfully implemented in Scandinavia, New Zealand, Scotland and Ireland.

The importance of encouraging **succession planning** was raised. Respondents saw the current lack of succession planning as a barrier to knowledge transfer. This was thought to have a detrimental impact on health and welfare standards, due to knowledge and practices being lost after the retirement of experienced farmers.

Alternative points raised included concerns about the negative impact **of lower welfare imports** coming into the UK. It was thought that raising the baseline of either legislation or current certification schemes to improve animal welfare could potentially contribute to an uneven market, which would position higher welfare products at a price disadvantage. It was argued that this strengthened the case for requiring clearer labelling for the consumer.

## 7.4 Additional points

Some respondents raised **animal sentience**. They argued that animals were sentient beings that have the capacity to love, build relationships and care for their young, as well as experience pain and impoverishment. They felt there must be a statutory requirement recognising animals as sentient beings in the Agriculture Bill or other legislation. This viewpoint was supported by Farmwel who felt that the recognition of animal sentience was a central pillar for progress on animal welfare.

Several respondents argued for increased enforcement of the current legal minimum standards, for example through higher **penalties for non-compliance**, and increased monitoring and robust inspections to identify those not complying with existing legislation.

A few respondents highlighted the need to consider the impact of any changes to welfare standards on the continued availability of **affordable food**. On the other hand, some felt that higher welfare products would command a higher price. A small number argued that consumers should be encouraged to eat less, better quality meat.

Many respondents were concerned that **imports of cheaper meat**, produced to lower welfare standards, would create an uneven playing field. A few respondents also raised concerns about the competitiveness of exports in the event of an increased welfare baseline. Others felt that high welfare standards could be used as a way to market British goods both in supermarkets and overseas. A few respondents mentioned other issues such as the need for more information for purchasers of livestock.

**Bovine tuberculosis** (bTB) was mentioned in some responses with some highlighting its impact on animal health. Some respondents suggested that the culling of badgers is necessary for the protection of cattle health. Other responses gave views on different methods of control that could be deployed. Some campaign responses from the RSPCA, for example, expressed opposition to the culling of badgers in bTB eradication initiatives, with the suggestion that vaccination would be a more compassionate and effective alternative.

The importance of **local slaughterhouses** and **local markets** in connection with supply chains, provenance, profitability and food miles was also mentioned by respondents. Some considered a potential link between quality and locally slaughtered and manufactured products.

**The analysis and diagnosis of diseases** was also discussed. Concerns were raised regarding the UK laboratory capacity, particularly in relation to capacity for undertaking tests. Further government funded rapid diagnostics for real time disease detection was proposed to be key to identifying the right course of treatment.

## CHAPTER 8. Supporting rural communities and remote farming

### 8.1 Summary

This chapter asked for views on a number of areas including how farming, land management and rural communities should continue to be supported in the uplands; the relative importance of the challenges facing rural communities; and how government should address these challenges.

Key themes from the responses are listed below:

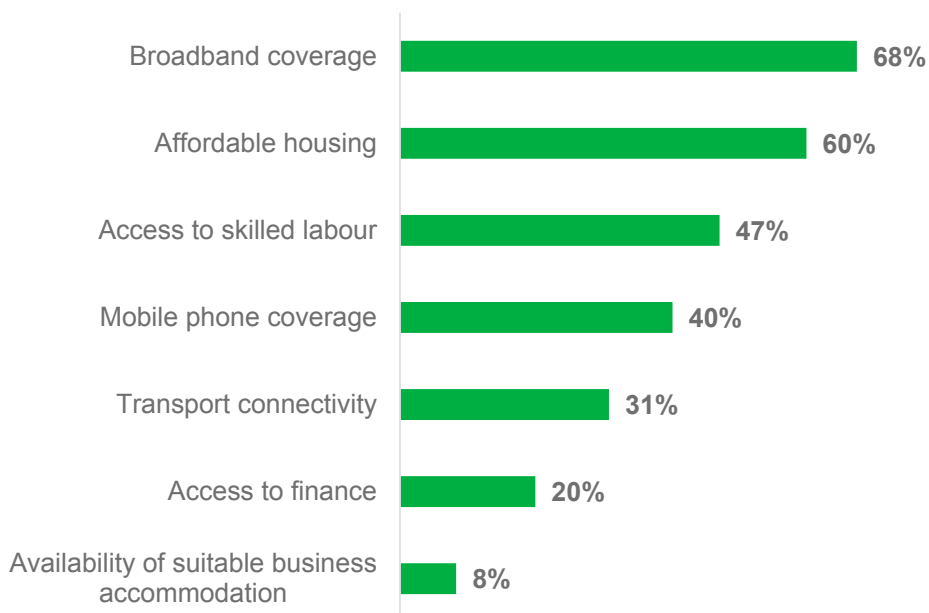
- the need for continued **financial support** for upland farming to provide environmental, social and cultural benefits for remote upland rural areas;
- **broadband and communications infrastructure** and **affordable rural housing** were seen as major challenges for rural communities and businesses; and
- rural areas should have a '**level playing field**' with urban areas.

## 8.2 Consultation Questions

**There are a number of challenges facing rural communities and businesses. Please rank your top three options in order of importance:**

- a) Broadband coverage
- b) Mobile phone coverage
- c) Access to finance
- d) Affordable housing
- e) Availability of suitable business accommodation
- f) Access to skilled labour
- g) Transport connectivity
- h) Other, please specify

**Proportion of respondents who ranked each option as challenges facing rural communities**



Over 3,400 respondents to the online survey gave a top choice priority (79% response rate). Of those that selected, 68% of respondents chose 'broadband coverage' as a top 3 challenge faced by rural communities. This was followed by 'affordable housing' (60%) and 'access to skilled labour' (47%).

Those who answered 'other' gave a range of views, with most suggesting that all of the above were priorities in rural areas. In terms of what additional issues were important to rural communities, many focused on what they thought to be the lack of or declining **services available to rural communities** such as schools and education opportunities, access to health care providers, and the poor state of repair of rural roads. There were also repeated concerns raised about the **profitability and viability of rural businesses**. The Foundation for

Common Land felt that enhancing business skills and risk management of rural business, for both their traditional livestock enterprises and other interests was critical for supporting business viability. **Planning policy** (including for farm diversification projects) was repeatedly raised by respondents, who answered 'other', in relation to the provision of local housing and the availability of affordable housing to young people and agricultural workers in particular, and for the provision of business premises. Retaining and providing local infrastructure to support rural businesses, such as abattoirs, was also highlighted by several respondents.

Most respondents highlighted poor **broadband speeds** and connections and the lack of **mobile phone coverage** as a particular issue affecting the success and viability of rural businesses. Many respondents highlighted how poor communications infrastructure for remote rural workers could affect their safety in an emergency. Many respondents highlighted the need for **affordable rural housing** for local people. Respondents suggested that housing was needed to attract and retain younger people; and to make sure rural areas were multigenerational and had access to labour for rural businesses and services. Repeated concerns were raised about the lack of flexibility in addressing local needs in the planning system to build new affordable homes for local people. Specific examples included comments about too many executive homes being built and the impact of second home ownership on house prices.

Many respondents thought that inadequate **public transport** negatively affected the success of rural businesses and the rural economy. Many respondents commented that the lack of public transport, combined with a shortage of affordable housing, had a negative impact on access to labour.

**Access to education and skills** also concerned many respondents. These respondents highlighted the impact this had for rural businesses finding skilled local labour and also for individuals travelling long distances to schools and colleges. Several respondents noted that it was **not only the uplands** that were remote and struggling but other rural areas, such as Cornwall, should be considered.

**With reference to the way you have ranked your answer to the previous question, what should government do to address the challenges faced by rural communities and businesses post- EU exit?**

Key themes were that rural areas should have a level playing field with urban areas in the provision of services; and that local planning and decision making is important in achieving this.

Many respondents said that there was a need for **universal fast broadband** and that **mobile phone coverage** should be improved in rural areas. Some respondents suggested that government should require broadband and mobile phone providers to provide a universal service (with fines for non-provision) or that government should fund local communities to provide it themselves. Alternative suggestions included encouraging mobile phone operators

to share masts and focussing on future 5G provision or long range Wi-Fi rather than fibre broadband to achieve good connectivity in remote areas.

A range of ideas were put forward to encourage the provision of **affordable rural housing**. Concerns about second and holiday home ownership were repeatedly expressed. Suggested solutions included tourist taxes on holiday homes, a limit on second home ownership in popular tourist areas to a percentage of total housing stock and an increase to council tax levels on second homes.

Many respondents suggested changes were needed to the planning system to allow greater **local decision making** around house building. Several respondents wrote that planning changes were needed to support the building of small starter homes which would be tied to local communities. They suggested that this should be done in a similar way to an agricultural housing tie (where a planning condition restricts occupancy of a house to those involved in agriculture) in order to retain affordable housing stock for local people. Additionally, these respondents suggested it should be made easier to get planning permission for small scale in-village developments and for the reuse of farm buildings. This would provide essential housing for rural and agricultural workers and also business premises.

A recurring theme was that government needed to acknowledge that **local services cost more to provide in rural areas than in urban areas**. Some respondents said that the government needed to use a different basis for providing funding for services such as healthcare, the provision of public transport and schools in rural areas.

A few respondents proposed the continuation of a **LEADER<sup>2</sup> type approach** to support rural communities and businesses. They valued an approach which was adapted to local areas, was developed locally and could provide flexible grants and funding to support rural business growth and diversification.

Supporters of the National Farmers' Union (NFU) campaign, Back British Farming, expressed their strong belief in the value of farming in supporting rural communities and their significant contributions to the national economy.

### **How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?**

This question focused specifically on support that might be needed in the uplands. Key themes mentioned were that **farming businesses were an important component** of the wider rural economy. Respondents suggested that farming and rural communities in the uplands needed continued financial support. This would provide environmental, social and cultural benefits.

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<sup>2</sup> LEADER is a local development method which has been used to give local communities the responsibility and resources to identify local needs and fund projects to meet them. Local LEADER groups decide how to spend funds in their area.

Many respondents said that farming currently made a positive contribution to the uplands and that **farmers should be recognised for the environmental outcomes** that they already provided. An alternative view from several respondents was that farming currently had a negative impact on upland areas, for example through overgrazing of livestock, and they wanted funding to be targeted differently.

Several respondents stated that rural communities needed a thriving farming sector to survive as their local economies were supported both directly and indirectly by farming businesses. Respondents argued that developing local markets for farming produce and wider trade negotiations were important to the uplands, because of the livestock sector's reliance on exports. Many respondents said that upland farms needed to be profitable if they were to deliver environmental benefits.

A range of views were received on why **financial support** should be provided to support upland farming. A predominant view was that if society wanted farmers in upland areas to provide environmental benefits and maintain the historic appearance of the uplands, farmers needed to be rewarded for the public benefits they helped deliver. Other comments included the continued importance of food production and the high costs in upland areas of accessing markets. Several respondents, however, highlighted concerns that improving environmental outcomes, high levels of public access and supply of high quality affordable food were competing priorities in upland areas. It was suggested that government should look beyond schemes focused solely on delivery of environmental outcomes.

National Parks England highlighted that future environmental system had the potential to make an important contribution to rural businesses, but needed to recognise the risks of land abandonment, rural depopulation and other negative impacts on the rural economy if farm businesses were unprofitable.

Like the responses to other questions in this chapter, **broadband and communication infrastructure and rural housing** were mentioned by many respondents. Some respondents also mentioned the importance of access to flexible grants and funding to support business growth. Additionally, several respondents recognised a need to support young people and new entrants to the upland economy. Respondents from rural businesses cited an aging population, high housing costs and limited transport as barriers to attracting skilled labour.

### 8.3 Regional events and policy round tables

The majority of events raised the need for good **rural infrastructure**, specifically **broadband, mobile phone coverage** and availability of **public transport**. Some attendees said that access to fast reliable broadband was critical to the success of upland businesses, in particular in the tourism sector. Broadband was also seen to be important to the local community more generally, due to many services being delivered through online platforms. Mobile phone coverage was also highlighted as a challenge for many rural communities, especially given the increasing importance of smart phone technology to businesses, residents and visitors. The importance of good public transport was thought to enable young people to get to employment and training. The provision of affordable housing was also important to make sure young people could continue to live in the area.

At several of the regional workshops, attendees emphasised the importance of a **localised approach** to supporting rural communities in the future. They wanted the government to adopt localised approaches that provided sufficient flexibility to address local priorities, with reduced bureaucracy, suggesting LEADER as a possible model for supporting rural communities post EU exit. At the Berkshire event, it was also suggested that the government should focus its support and investment on encouraging innovation and diversification of the rural economy.

At some events, attendees raised the importance of **succession planning** in upland areas. At the uplands roundtable, attendees made the link between succession planning and affordable housing, identifying this as a barrier to maintaining the vitality of rural and upland communities, particularly as families with young children were often priced out of the market. One solution suggested was allowing farmers to build up to two homes on their land to support succession and to house workers close to their place of employment.

At both the uplands roundtable, and in the regional events, there were some suggestions that **new entrants** were being discouraged from entering farming. At the uplands roundtable, participants suggested that this was because of perceived poor viability of the farm business, their own inability to effect change within an existing farming business and an inability to see a future within the industry. The regional event in Cambridge highlighted that the declining numbers of County Council farms had made it more difficult for new entrants to obtain tenancies. Concern was also expressed about the potential risks to rural communities arising from changes in agriculture.

Many attendees at the regional workshops and the roundtables commented on the **positive role of farmers** in managing upland landscapes and the importance of the uplands in delivering environmental benefits. At the Penrith regional event and upland round table events, there was a desire for environmental system for upland farms to be of longer duration with increased flexibility to modify agreements.

Other issues discussed at the regional workshops included the availability and affordability of rural housing; labour supply, particularly post EU Exit; the importance of farming as part of the wider rural economy; and the role of education in raising awareness of farming and the environment. Furthermore, the importance of advice and knowledge transfer was stressed for both farms but also other businesses in the uplands.

Overall, attendees saw opportunities from EU Exit, particularly in being able to introduce increased levels of flexibility to address local challenges.

## CHAPTER 9. Changing regulatory culture

### 9.1 Summary

This chapter set out objectives, proposed by the government, to improve regulatory culture. These were to:

- maintain a strong regulatory baseline of standards that reflects the 'polluter pays' principle. We proposed that this would be the foundation of our future environmental land management system, setting out minimum standards that all farmers and land managers would be obliged comply with; and
- replace cross compliance with a new, better targeted and proportionate mechanism to enforce the regulatory baseline. This could cover measures already paid for under Pillar II of the CAP or extend further.

Respondents were asked how we can improve inspections for environmental, animal health and welfare standards; which parts of the regulatory baseline could be improved; and how we can deliver a more targeted and proportionate enforcement system.

Key themes from the responses are listed below:

- greater use of **earned recognition**;
- better **data-sharing** between government agencies;
- greater use of **risk-based targeting**.

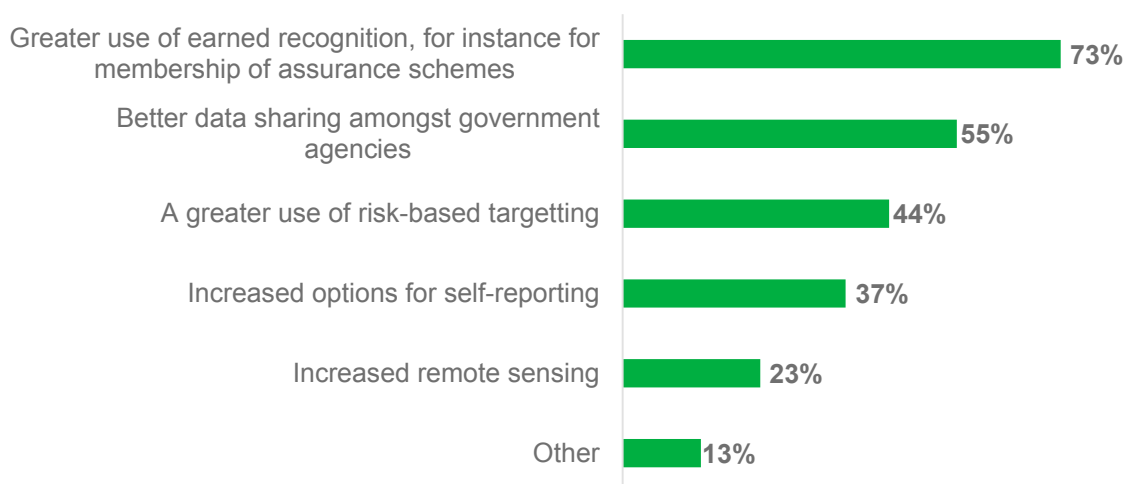
Additional themes included: the suggestion that inspectors should take on advisory roles, investment in enforcement to maintain standards, an emphasis on reducing inspection duplication, and the implications of the polluter pays principle.

## 9.2 Consultation Questions

**How can we improve inspections for environmental, animal health and welfare standards? Please indicate any of your preferred options below.**

- a) Greater use of risk-based targeting
- b) Greater use of earned recognition, for instance for membership of assurance schemes
- c) Increased remote sensing
- d) Increased options for self-reporting
- e) Better data sharing amongst government agencies
- f) Other (please specify)

**Proportion of respondents who selected each option as ways to improve inspections for environmental, animal health and welfare standards**



Respondents were able to select multiple options for this question. 79% of respondents selected at least one option. 'Greater use of earned recognition, for instance for membership of assurance schemes' was the most popular option, (selected by 73%). 'Better data sharing amongst government agencies' (55%); and 'greater use of risk-based targeting' (44%) were also selected frequently.

Many suggested that greater use of **earned recognition** would be a way to reward farmers and landowners who exercise good practice with fewer inspections. It was said that multiple inspections were a burden and often repetitive, asking to provide the same information multiple times to different government bodies.

The Soil Association agreed with the government's proposal for greater use of earned recognition stating that there should be greater recognition of existing certification schemes, such as those recognising organic production. The National Farmers Union (NFU) also said

that those who demonstrated they presented a low risk of infringing rules, and those that went further through voluntary schemes, should have this effort recognised.

Some stakeholders were cautious about earned recognition being too reliant on assurance schemes. The RSPB (Royal Society for the Protection of Birds) highlighted the risks of assurance scheme statistics, stating that earned recognition must be underpinned by reliable data. The Agricultural Industries Confederation also raised this concern and suggested that whilst assurance schemes have a role to play, they are not a complete solution. It was highlighted that the government should engage with industry and existing schemes on future policy.

**Data sharing** was selected by many people, across respondent groups, as a way to improve inspections. Several respondents felt that poor communication between government agencies was an inconvenience and saw data sharing as a way to reduce inspection duplication.

Many stakeholders supported better data sharing. Dairy UK stated that data sharing should incorporate industry data and could allow for greater collaboration and reduce duplication. Sustain agreed that there were benefits to data sharing between government agencies but suggested that agencies, and the knowledge of their inspectors, were not interchangeable.

Respondents interpreted **risk-based targeting** in two main ways: targeting inspections on farms with a history of non-compliance; and targeting inspections and/or regulatory standards to address specific risks (such as high disease risk).

The Country Land and Business Association (CLA) suggested that risk based targeting could improve fairness of inspections, avoid duplication and encourage scheme uptake through minimising the responsibility placed on scheme participants. The Royal Agricultural University thought that risk based targeting could be more sophisticated if better data sources could be used.

Natural England (NE) suggested that minimum baseline standards could be applied nationally, with stronger regulation in geographical areas with protected habitats or where standards are not met. They proposed that lighter touch regulation could be applied where there is lower risk to the environment.

There was less support for the other options available. Some participants saw the benefits of increased **remote sensing** as a way to reduce physical inspections. A significant number of respondents expressed frustration with the current mapping, with many suggesting that technology needs to be improved for remote sensing to be used effectively. Sustain ranked increased remote sensing as their preferred option for improving inspections.

There were a range of views regarding increased options for **self-reporting**. Some thought that it would encourage responsible behaviour or could help to reduce administrative burdens, while some commented that self-reporting was unreliable and open to abuse. The Environment Agency thought that self-regulation could be beneficial in reducing the administrative burden on the organisation and allowing resourcing to be concentrated where it is most needed.

### Which parts of the regulatory baseline could be improved, and how?

This section outlined the government's intentions to maintain a strong regulatory baseline for environmental, animal health and animal welfare standards after we leave the EU, reflecting the 'polluter pays principle'.

Maintaining high environmental, animal health and welfare **standards** was a predominant concern amongst respondents. There were many comments surrounding assurance schemes, with some respondents proposing that minimum environmental, animal health and welfare standards should be raised. Some respondents stated that there needed to be more investment in enforcement to maintain high environmental standards, Woodland Trust, National Trust and the Wildlife Trusts shared these views. Compassion in World Farming (CIWF) emphasised the need for improved enforcement of welfare regulation.

Many respondents cited that **regulations** relevant to farmers could be improved or updated. Many respondents suggested that the government should move towards regulations that are based upon science rather than perceived risks.

The Agri-Brexit Coalition specified that regulations should be based upon sound science and economics. The NFU argued that leaving the EU provided the opportunity to adopt a different approach to regulation that takes a greater account of risk, innovation and the cost of taking action. The National Pig Association suggested that raising regulatory standards could raise costs for pig farmers and lower competitiveness if producers abroad do not have to meet these same standards.

The Wildlife Trusts believed that it should be easy for farmers and land managers to help nature without being weighed down by unnecessary bureaucracy and paperwork. WWF said that regulation needs to be fairer because many farmers adhering to environmental regulations are frustrated that they 'do the right thing' whilst their neighbours 'take shortcuts and get away with it'.

Many respondents who identified as individuals or as part of environment focussed organisations were supportive of the **polluter pays principle** and a shift towards strengthening enforcement on those that pollute. The National Trust were pleased to see a more effective application of the polluter pays principle set out in the consultation. The Wildlife and Countryside Link were supportive, but highlighted that the line between 'polluter pays' and 'provider gets' should be consistent and fair to farmers, taxpayers and beneficiaries of environmental services from farmed land. The Environment Agency suggested that the polluter pays principle should be fully introduced into agriculture policy and regulation, as has been the case with other sectors. However, it was suggested by the NFU that Defra should focus on the five principles of good regulation set out by the Better Regulation Task Force, rather than use the polluter pays principle.

Many respondents who identified as part of a food and farming business called for a more effective use of **technology** to maintain the regulatory baseline. It was suggested by respondents that the use of technology such as geo-tagged photos, CCTV, and linked up databases could be used to identify compliance.

### How can we deliver a more targeted and proportionate enforcement system?

The consultation set out the government's intention to design a new, fairer enforcement system whilst maintaining a robust approach that delivers value for money for taxpayers. Respondents to this question had a mostly positive response to the proposal of moving towards more proportionate enforcement.

Popular themes around reducing **inspection burden**, **risk based targeting** and **earned recognition** were mentioned again in response to this question. Additional ideas included: risk based targeting of persistent offenders, the provision of advice, the use of discretion by enforcement officers, better local support and a more common sense approach to enforcement.

**Earned recognition** was a popular theme in response to this question. Many respondents were in agreement that greater use of earned recognition through working more closely with assurance schemes would allow the government to deliver a more targeted and proportionate enforcement system. Many suggested that the government should do more to recognise farmers who take voluntary actions to exceed regulatory standards, such as paying into assurance schemes.

Many individuals supported the need to **help farmers to comply** before taking enforcement action. Many thought that inspectors should provide advice, educational materials, and support for farmers before applying penalties and that farmers should be given a corrective window to remedy non-compliance. Many of these respondents believed that this would deliver a more proportionate enforcement system. The NFU supported the case for a culture shift towards advice provision and allowing farmers to rectify non-compliance. The Royal Society for the Protection of Birds (RSPB) supported advice-led approaches to enforcement, stating that they can improve outcomes for farm businesses and the environment, but need significant levels of investment if they were to be effective.

Another theme was the need for more **investment in support and advice services** for farmers. Many respondents stated that the regulatory baseline was complex and that a lack of understanding causes non-compliance. It was reinforced that, in the future, inspectors should provide information and support to farmers when complexity of regulation was the cause of disproportionate enforcement.

A range of respondents felt that the **technology** currently used by the government was not effective enough. Many respondents that identified as part of the food and farming sector stated that recent mapping issues have caused farmers to miss payments. Some consultation respondents suggested that online systems would be a viable option once the technology is improved and more tailored to the industry.

Wider points were made on the use of innovation, with the CLA stating that the use of new technology should be encouraged. The Royal Society suggested that many scientists see current EU regulation as a barrier to farmers and land managers applying the products of research. They specifically mentioned genetically modified organisms (GMOs), suggesting we

should primarily be concerned with regulation of the product of genetic modification, as we would with any new product, rather than the technique.

The consultation proposed replacing **cross compliance** with a new enforcement system that was better targeted and more proportionate. This received mixed views. A significant number of respondents saw the need for cross compliance to be streamlined, but some believed cross compliance should not be removed during the transition period. Others suggested that cross compliance should no longer be a requirement to receive payments. Some stakeholders expressed reservations about changes to cross compliance and efforts to simplify, stating that this could compromise standards. The Open Spaces Society were concerned that obligations in relation to rights of way and the duration of the hedge-cutting prohibition would be lost or undermined. The RSPCA proposed increasing the scope of cross compliance during transition to cover all animal health and welfare regulations.

Several stakeholders focussed on the effectiveness and strength of **enforcement**. The RSPB supported proportionate and targeted enforcement but stated that this should not compromise the effectiveness of regulations. CIWF wanted to see substantially improved enforcement of animal welfare legislation, specifically at slaughter, while the Wildlife Trusts wanted to see improved enforcement, particularly for new rules such as the Farming Rules for Water.

Others were concerned by the **resources** available to enforcement authorities. The Woodland Trust and National Trust were concerned about enforcement capacity in the Environment Agency.

### 9.3 Regional consultation events and roundtables

Several key themes emerging from these discussions included:

- comments that the **administrative** elements of schemes needed to be improved as complexity often led to accidental non-compliance. It was suggested that government should be sensitive to local challenges in design, advice provision and inspection;
- some participants thought that **inspectors** should take on a more advisory role, suggesting that this could be achieved through increasing the number of advisors, and discretion in making enforcement decisions and local support;
- some stated that a more practical, common sense approach should be taken to enforcement, and respondents in the farming industry called for persistent offenders to be targeted; and
- participants reinforced the point that **data-sharing between** government agencies needs to be improved.

## 9.4 Additional points

Additional points made included improving the regulatory baseline in relation to environmentally damaging agro-chemicals: herbicides, pesticides and fungicides. This was raised specifically by the Landworkers' Alliance.

Respondents also mentioned the use of the **precautionary principle**. The NFU stated that regulators have been overly focussed on the potential hazards posed by certain actions or technologies, rather than on real-world risk.

## CHAPTER 10. Risk management and resilience

### 10.1 Summary

This chapter proposed that the best way of improving resilience in the farming sector is to support increases in farm productivity and ensure that farmers have access to the tools they need to manage risk.

Key themes from the responses are listed below:

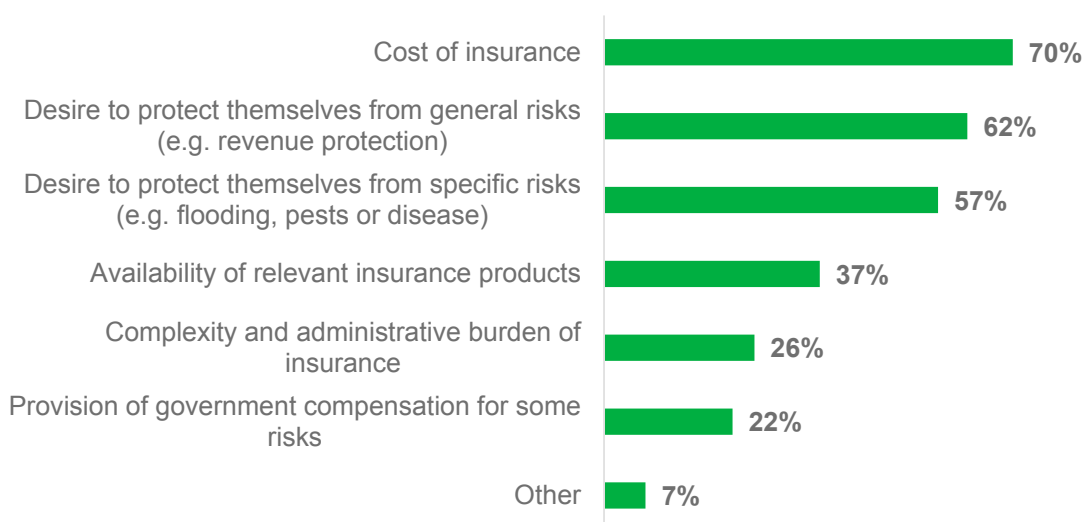
- **insurance** was too costly and complex with some gaps in available insurance cover;
- a need for better, more accessible **data**;
- greater availability of unbiased information on financial systems and markets for producers; and
- a belief that, while current crisis schemes could be improved, it is the **responsibility of government** to intervene and support farmers in a crisis.

## 10.2 Consultation questions

**What factors most affect farm businesses' decisions on whether to buy agricultural insurance? Please rank your top three options by order of importance:**

- a) Desire to protect themselves from general risks (e.g. revenue protection)
- b) Desire to protect themselves from specific risks (e.g. flooding, pests or disease)
- c) Provision of government compensation for some risks
- d) Cost of insurance
- e) Complexity and administrative burden of insurance
- f) Availability of relevant insurance products
- g) Other (please specify)

**Proportion of respondents who ranked the following as top factors that affect if farm businesses' buy agricultural insurance**



Over 2,700 online survey respondents ranked at least one factor (64% response rate). 70% of respondents selected 'cost of insurance' as the factor that most affects whether farm businesses buy agricultural insurance. The 'desire to protect themselves from general risks' (62%) and 'specific risks' (57%) were also frequently selected.

Respondents from both emails and the online survey explained that the high **cost of agricultural insurance** was a barrier to its uptake. It was also highlighted that insurance was perceived as an additional cost for farmers already managing slim margins and respondents were concerned that the cost of insurance was increasing faster than inflation. Respondents thought the high cost was because of: a lack of availability of insurance schemes; a lack of market competition; a consequence of insurance premium tax; and a lack of available data and information to aid insurers in better understanding underlying risk profiles and improve affordability of insurance.

Some respondents noted that it was **difficult to get repeat insurance cover if they have claimed for damages in the past** (examples included bovine tuberculosis, flooding, and foot and mouth disease) and the cost of this cover would become prohibitively expensive.

The **complexity and administrative burden** of taking out insurance was regularly cited as affecting farmers' decisions to buy insurance. Several respondents stated that the process of submitting an insurance claim was complex, and the evidence burden high. Several respondents noted the perceived high number of policy exceptions, with Norfolk County Council and Norfolk Rural Strategy Steering Group observing that cover could be withdrawn by insurance companies at times of highest risk. Some respondents commented that insurers fail to make payments on time, and were not held accountable for this.

Many respondents noted a **lack of available insurance** policies and felt there were gaps in the cover that is available, highlighting general crop insurance and damage as a result of extreme weather events as two common examples. Where cover was available, the cost of a more specialised policy was considered by some to be prohibitively high.

**Public liability** was highlighted by some respondents as a specific area of concern. The majority view was that public liability insurance was an unfair burden on farmers, and some respondents propose that the government should subsidise public liability insurance.

Some respondents said that they were already insured against **specific risks**, including extreme weather events, and personal injury or sickness. It was also suggested by a few respondents that, where the risk likelihood was relatively low, it was not always worth insuring, even if there was high impact (for example, hail damage to a flowering crop).

#### **What additional skills, data and tools would help better manage volatility in agricultural production and revenues for farm businesses?**

The majority of responses argued that improving skills, data transparency and access to risk management tools would support farmers in managing their risks.

Most respondents argued that **information** should be easily and openly accessible to all and provided by an independent authority.

A high number of respondents suggested improving **information exchange** would allow better management of volatility. Information exchange would encourage sharing best practice among farmers, improve farmers' negotiating positions with retailers, and enable risk sharing through cooperatives and collaboration. Some respondents asked for the creation of a seed fund to support farmers to set up working groups or co-operatives.

Many respondents requested better access to information and improved understanding of **futures markets**. A future is a legal document that commits one party to deliver a specified quantity of a commodity on a certain date in the future, at a price agreed in advance. Futures

can be used to reduce exposure to volatility in prices: producers can use futures as a tool to minimise the risk of price reductions while buyers can minimise the risk of price increases.

Many respondents who mentioned futures markets felt that they were frequently betting against a better informed market. More specifically, they requested that unbiased, readily available market information be provided by an independent organisation. The market information services currently provided by the Agriculture and Horticulture Development Board (AHDB) were cited as particularly useful, but more information and analysis was desired. Stable, a market-led index-based insurance tool, was specifically mentioned by a number of respondents as a positive example of how data can help farmers manage volatility.

There were repeated suggestions that **training** was needed to allow farmers to manage risk themselves. Many respondents noted that the government could play a role in facilitating specific business and risk management training, though mechanisms for this were not suggested.

There were repeated calls for the government to provide **financial support** in order to manage risk and volatility. This included a government role in ensuring minimum market prices, stabilising markets, and the provision of quick and easy to access crisis loans. The idea of re-establishing marketing boards was also suggested by a small number of respondents as a tool that would help risk management with market controls.

#### **What additional skills, data and tools would help better manage volatility in agricultural production and revenues for insurance providers?**

Information exchange, data sharing and government support, were the key themes in response to how insurance providers could best help manage volatility in agricultural business.

The majority of respondents argued that better provision of **information** and **data sharing** is key to managing volatility in agricultural production and revenues.

In responding to this question, respondents identified that the key reason for the high cost of insurance was a lack of useful and accessible risk **data**. This varied from detailed on-farm information, to weather and disease forecasts, and information on regional variations. The National Beef Association highlighted that the farmer has better information than the insurer and this is a key reason for market failure of insurance. A suggested solution for this was the provision of compulsory market reporting. Some respondents also felt that insurers need to better understand the complexity of on farm risks and management and more communication between the sectors and training is needed.

Many respondents to this question highlighted the role **government assistance** could have in supporting access to the insurance market. Roles that were suggested for government included insurance subsidies, funding for products that may help the industry but not be profitable for insurers, and import tariffs to reduce market volatility.

Some respondents suggested that the market is not competitive, citing this as a reason for the perceived low innovation in the industry and high cost of insurance products.

### How can current arrangements for managing market crises and providing crisis support be improved?

Lack of awareness, government intervention and 'fall-back' support were themes discussed in relation to how measures for managing market crises and providing crisis support could be improved.

Many respondents suggested that there is a **lack of awareness** about current crisis support mechanisms. There was a perception that where support mechanisms do exist, they were reactive and ill-defined. Some respondents noted that there was a lack of clarity as to what defined a crisis and what the timelines were when the government might step in to support. There was criticism that when the government did act in a crisis, it is slow to pay out, and the farming recovery fund was cited as an example of this.

The majority of respondents suggested that **government intervention** was essential in a crisis. Reference to crisis intervention was not limited to disease outbreak or adverse weather, respondents also referenced market intervention in times of extreme price volatility.

Many respondents noted the role of **Direct Payments** in providing 'fall back' support in a crisis by reducing the severity of its impact. While some responses commented that government subsidies could distort the market. The RSPB expressed concerns that publicly subsidised risk management tools might have significant drawbacks by encouraging risk taking behaviour, as losses would be covered. There were multiple concerns that this riskier practice has led to environmental damage in other countries, and that the same might be seen here.

## 10.3 Regional consultation events and roundtables

The marginal role of agricultural insurance in managing risk was mentioned by participants. Several also stated that the high **cost of insurance** and the high cost of accessing **futures products** act as barriers to entry to the markets. Some suggested that there was a need to re-balance the burden of price volatility (perceived to fall heavily on producers) more equally across the **supply chain**.

Participants also said they did not know where best to get unbiased and reliable **knowledge and advice** in order to manage risk and volatility. They argued that as well as knowing where to turn to for advice, farmers also needed the knowledge and skills to be able to implement risk management advice in practice. Participants expressed the view that there was a role for the government in facilitating a 'one-stop' shop for advice – with the AHDB mentioned as a potential candidate for this function.

The importance of collaborative **engagement** and **information** sharing in respect of risk management was also discussed. Peer-to-peer learning approach was widely supported, with several participants suggesting that County Council farms should be re-established as good practice models.

## **10.4 Additional points**

A range of views about whether farmers should be encouraged to buy insurance, or whether farmers should **manage risks themselves** were raised as additional points by respondents.

The majority of respondents did not support government intervention to encourage farmers to buy agricultural insurance, instead preferring subsidies and support. Many respondents argued that farmers should manage risk themselves through a variety of farming techniques. These included diversification, as well as use of futures markets and grain storage, and take-out business insurance where needed.

Many respondents requested the continuation of some form of government subsidy to manage risk. A minority of respondents commented that government subsidies distort the market.

# CHAPTER 11. Protecting crop, tree, plant and bee health

## 11.1 Summary

This chapter outlined the government's aim of enhancing the protection of plants, trees and honey bees against pest and disease risks. Where there were insufficient commercial reasons to invest, the chapter set out our intention to take appropriate and timely action in response to pest and disease outbreaks, and to support recovery from outbreaks. It also highlighted our intention to promote bio-secure supply chains to reduce the risks from tree, plant and honey bee pests and diseases.

Key themes from the responses are listed below:

- strong support for the government to protect **biosecurity** at the border to prevent outbreaks (this was a recurring theme across the questions covering risks to plants, trees and bees);
- strong support for the **government in leading and coordinating** multiple stakeholders and providing **financial support**, in the event of outbreaks;
- suggestions that the government should improve access to **information and advice** on managing pest and disease risks and outbreaks;
- strong support for **government funding** to help landowners implement landscape scale replanting, on recovery from outbreaks.

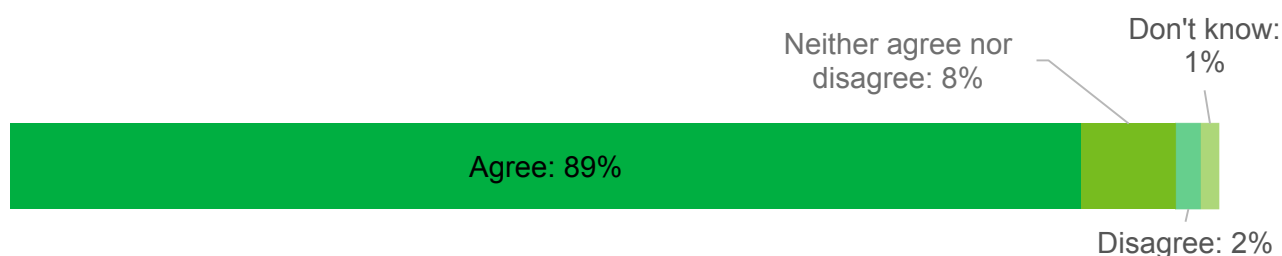
A small number of views disagreed with action on outbreaks and recovery, as they felt that pests and diseases were part of nature which should be left to recover by itself.

## 11.2 Consultation questions

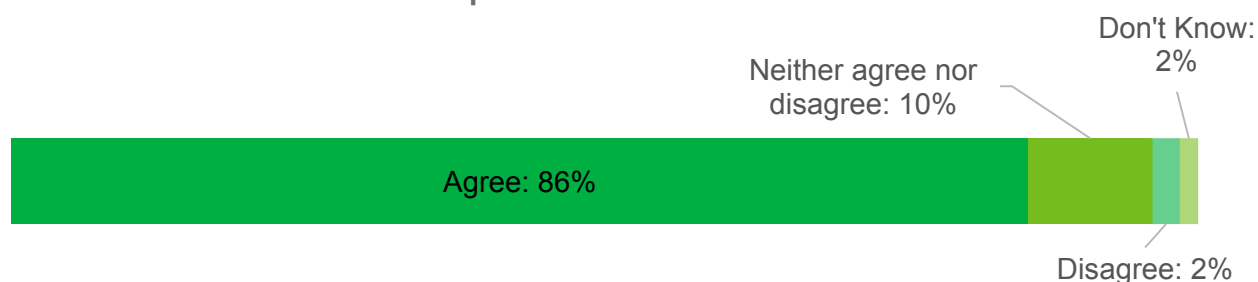
**Where there are insufficient commercial drivers, how far do you agree or disagree that government should play a role in supporting**

- a) Industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?
- b) Landscape recovery following pest and disease outbreaks, and the development of more resilient trees?
- c) The development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?

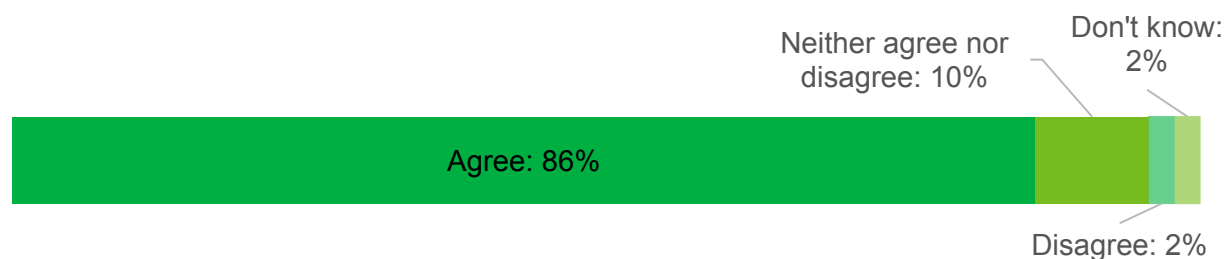
**Proportion of respondents that agree or disagree that government should play a role in supporting industry, woodland owners and others to respond to outbreaks of pests and diseases in trees**



**Proportion of respondents that agree or disagree that government should play a role in supporting landscape recovery following pest and disease outbreaks, and the development of more resilient trees**



**Proportion of respondents that agree or disagree that government should play a role in supporting the development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors**



The predominant view of respondents suggested strong support for the government's role across all three of these areas where there were insufficient commercial drivers, with a particular emphasis on taking preventative measures. There was strong support for government to protect the value of the 'public goods' provided by plants, trees, bees and the wider environment.

A few respondents disagreed with government action on pests and diseases as they felt that such threats were part of nature, with dead trees providing valuable ecosystems. They therefore suggest that woodlands should be left alone to recover. The development of more resilient trees was viewed by some as a fundamentally commercial activity, and therefore not suitable for government action.

Additional comments raised by respondents to this question were provided in the responses to the other questions in this chapter.

**Where there are insufficient commercial drivers, what role should government play in:**

- a) Supporting industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?
- b) Promoting landscape recovery following pest and disease outbreaks, and the development of more resilient trees?

**a) Supporting industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees**

There was strong support for government to lead and co-ordinate responses to outbreaks in collaboration with landowners and local groups, to provide specialist evidence-based advice and guidance, to provide financial support including for research, and to protect biosecurity at the border to prevent outbreaks in the first place.

Most respondents strongly supported a **leading and co-ordinating** role for government in supporting industry, woodland owners and others to respond to outbreaks of pests and diseases in trees where there are insufficient commercial drivers. These responses, including from Confederation of Forest Industries (Confor), Woodland Trust, Wildlife and Countryside Link, CLA (Country Land and Business Association) and the National Trust, suggested that government should connect multiple stakeholders to take collaborative action.

There were repeated calls for government to **improve access to specialist advice, information and training**. Most respondents felt that the government's leadership role included providing information, guidance, advice and training on managing pest and disease risks and outbreaks. This role also covered disseminating evidence-based risk assessments, management actions and contingency plans for a proactive response to threats and outbreaks. Alongside providing training and guidance for the sector, a few respondents suggested that the public should also be educated on disease and pest outbreaks.

Some suggested that the government needed to improve surveillance of pests and diseases, with more horizon scanning to understand risks, and to then communicate this data. Confor and the CLA stressed the importance of evidence-based measures, otherwise they could be counterproductive, onerous and costly. The CLA felt that only the government has the resources and authority to lead and co-ordinate a national response to a pest or disease outbreak, even if confined to a small area, working in partnership with the private sector.

Several respondents mentioned the importance of the government's role in **dealing with outbreaks to protect the valuable ecosystem services provided by trees**. A small number of other respondents argued that policies and management of woodland should aim to protect their non-market (public good) value.

Several respondents suggested that the government should **work with local stakeholders and groups** including non-government organisations, charities, private industry and landowners when responding to, and recovering from outbreaks. Confor highlighted the positive impact that local groups have had on raising awareness of tree pests and diseases and on promoting significant private sector engagement. According to Fera Science, the fragmented nature of the forestry and horticulture sectors means that government must drive cooperation between such a disparate range of stakeholders.

Many respondents felt that the government should **provide financial support** in response to outbreaks and risks from pests and diseases. Respondents identifying themselves as from the plant sector suggested that government should help set up insurance schemes or offer compensation for losses. Some respondents thought that there should be financial support for plant and tree health offered through grant schemes alongside more finance available for research into pest and disease management and preventative measures. Several respondents wanted continued and improved resources for the Forestry Commission and for the APHA; so they could continue and build upon their existing work on managing pest and diseases. Some respondents wanted support for woodland management in general, which would improve resilience to pests and diseases; and support to plant diverse woodlands which would lead to improved resilience overall.

Many respondents suggested that the government had an important role in **protecting biosecurity to prevent outbreaks in the first place**. Suggestions included thorough application of strict border controls on plants, trees, woody material and firewood, and strict implementation of existing pest and disease and invasive non-native species legislation. Several respondents wanted to restrict or ban imports from high risk areas, and follow biosecurity and border controls of other countries such as Australia and New Zealand. . Others wanted to ban imports completely or have more frequent or stricter border inspection.. The Royal Horticultural Society noted that everyone (the public, industry and government) has a role to play in protecting biosecurity and suggested that government should remove the current concession which allows passengers to import plant material in their baggage.

Several respondents argued for **increased domestic production** to reduce reliance on imports of plants and trees (and associated pest and disease risks). A few others wanted the government to help reduce the amount of imports through improved regulation and encouraging greater reliance on home grown nursery stock.

A small number of respondents commented that government has a role to play in **research**. Many of these respondents wanted adequate resourcing of research and more focus on effective management of pest and disease outbreaks, including eradication, containment and ways to reduce their impact. Several respondents supported research on horizon scanning (including early detection), monitoring and mapping. Others believed that research should also focus on knowledge exchange to ensure that policies and management responses to outbreaks are evidence-based.

A small number of respondents expressed alternative views on responding to outbreaks. They felt that efforts to control pests and diseases were futile, as they had little impact; and that pests and diseases are part of nature, with dead trees providing valuable ecosystems. These respondents often thought that woodland, particularly non-commercial woodland, should be left to recover from outbreaks naturally and monitored for development of resistance.

#### **b) Promoting landscape recovery following pest and disease outbreaks, and the development of more resilient trees?**

Most respondents supported a role for government in **landscape recovery** after pest and disease outbreaks. Suggestions included: promoting outbreak recovery programmes: encouraging treescape resilience through restocking and planting schemes; and undertaking research in developing resilient trees. A few opposed government intervention in landscape recovery, suggesting that nature should be left to take its course.

Several respondents felt the government should **promote a programme that could be adopted to assist with outbreak recovery**. This would help reduce the risk of spread of pests and diseases and build future resilience into the landscape. Several other respondents wanted the government to support improved woodland management, which would lend itself to improved resilience. A small number thought the government should help to remove and destroy infected material and material at high risk of becoming infected (preventative clearance). Some wanted the government to educate the sector on the risks involved in certain activities (for example, importing species from abroad). Several respondents thought the government should consider the wider landscape when providing support, including building greater diversity into the ecosystem during the recovery process and making sure that key habitat features are considered within management plans.

There was some support for the government to **encourage treescape resilience building through restocking and planting schemes** by supporting the use of home grown trees and species diversification. Some respondents wanted longer-term grants as this would allow nurseries to better plan production and also boost UK production. A few also thought that landscape recovery actions should feature in any targeted ELM system. The CLA suggested that the government should incentivise a significantly increased level of tree planting to help mitigate the large number of ash trees expected to die in the next few years.

Many respondents suggested that the government should **provide financial support** to those affected and to help land owners implement the necessary landscape recovery work in the event of outbreaks. Suggestions included specific grants to respond to outbreaks; support for

felling, treatment and clearance; and help with the subsequent replanting and associated maintenance costs.

**Research into the development of more resilient trees** was a repeated suggestion. This included research into disease tolerance, genetic diversity, climate change resilience, and tree breeding programmes. Others thought the government should provide financial support for research on landscape recovery (for example, restocking with suitable trees). Some also wanted more information on research and development and advice on the best tree species to plant following an outbreak.

There were some opposing views, with a few respondents who felt that trees did not require assistance to improve their resilience or help to recover from pests and diseases. Some also felt that developing resilient trees was a commercial activity and not one for the government. A small number raised concerns that developing more resilient trees would mean increased use of genetically modified organisms.

**What support, if any, can the government offer to promote the development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?**

Overall there was strong support for the government's role in **co-ordinating, leading and supporting biosecurity efforts between industry, landowners and both local and national government**. The majority of respondents agreed that the government should play a role in the development of a supply chain, particularly to protect the value of the 'public goods' provided by plants, trees, bees and the wider environment. The NFU suggested that this role should include: providing better communication to businesses about threats, biosecurity risks and how to reduce them, as well as support for education, training and continuing professional development. There were, however, some respondents who felt that pests and diseases were natural occurrences and dead trees are valuable to ecosystems, so woodland should be left alone to recover.

The importance of the government's role in **protecting biosecurity at the border** was echoed here too. Strict and adequately resourced border inspection was thought to be the starting point for biosecurity by many respondents. They wished to see tighter import controls and regulation with some wanting greater use of penalties or fines set at a high rate. Some wanted imports of plants, trees, soil and bees to be banned. A few wanted additional resources at the border for surveillance or to enforce biosecurity standards. An alternative view from a few respondents suggested that more guidance was needed rather than additional regulations.

British Summer Fruits noted that core parts of the horticulture supply chain rely on imports of young plants from EU Member States. They stressed that this trade needed to continue, or there would be a loss of UK berry production unless there were investments in UK propagation for this sector.

Some respondents felt that the government should promote **biosecurity across the supply chain** as it alone had the resources to do so. Several had concerns about the biosecurity of supply chains with some calling for better industry standards and access to better advice and information. Many respondents mentioned the importance of information and most stated that they would like more information on best practice. Some mentioned that the government's Plant Health Portal could be extended to support better communication about plant and tree pests and diseases to industry.

Some respondents felt that government **financial support was needed to help private sector plant and tree health assurance schemes to establish and grow**. Respondents highlighted two existing schemes that would benefit from such support - the Woodland Trust's UK sourced and grown accreditation scheme, and the new Plant Health Assurance Scheme being developed by the Horticultural Trade Association in collaboration with member nurseries.

Respondents expressed consistent support for **more rigorous inspections of imported bees** (queens and packages), including some suggestions that the government should ban bee imports, and for financial help for delivering education. Some asked for the government to support UK bee production to reflect better the public good provided by the bees' pollination services. For example, one regional beekeeping association asked for the removal of VAT from beekeeping equipment.

Many respondents who specifically mentioned bees also expressed concerns about disease risks in the supply chain. The Bee Farmers Association (BFA) felt there should be further promotion of the BFA/Defra Disease Accreditation Scheme for honeybees, with meaningful hive counting, supported by a system of registration for all beekeepers and husbandry surveys asking relevant questions specific to the industry. Beekeeping associations felt that swift collaborative responses to limit disease spread continue to be essential and that the government was best placed to lead this. The BFA cited the recent outbreak of Asian hornet as an example of where collaboration had worked well to identify and destroy nests and eliminate the risk. Some also praised the work of the National Bee Unit.

A small number of respondents **called for more research** and additional funding for research into plant/tree/bee health. A few others highlighted the need to turn research results into practice advice.

## 11.3 Regional events and policy round tables

A **national event hosted by the Forestry Commission on the 23 March 2018** was held in Birmingham, attended by around 80 people from across the tree-related sectors. The main themes that emerged from the discussion were:

- **improved communication**, including:
  - the need for proactive communication on tree health issues to engage the public and the various sectors;
  - reduce mixed messaging; and
  - improve and expand information and education on preventative measures, outbreak management and legislation (for example, imports)
- **financial support** including:
  - offering compensation following outbreaks to affected landowners and business;
  - incentivising landscape recovery;
  - making sure that future grants have longer agreements to help nurseries plan better;
  - reducing reliance on foreign imports; and
  - improved financial support for the relevant plant health authorities (Forestry Commission and the Animal and Plant Health Agency [APHA]) so that they can achieve their objectives
- **greater support for research** to improve future resilience to pests and diseases and climate change, focusing on species diversification and horizon scanning. The development and implementation of new and novel technologies was also seen as an area that required government support.
- the need for an **integrated land management approach** was noted, recognising that tree health should not be managed as an isolated issue and should be included in any future management plans. There was an emphasis on including woodlands in land management, as it was thought that a well-managed woodland will improve resilience and reduce pest and disease risks.
- the need to **collaborate** including:
  - improved data sharing between government departments (to reduce mixed messaging);
  - continuing data sharing with European countries to support horizon scanning; and
  - improved collaboration between the government and industry stakeholders in terms of information and knowledge sharing, and to utilise local resources and networks to communicate messages better.

## 11.4 Additional comments

Most respondents stated that the **use of chemicals and pesticides should be minimised to safeguard biodiversity and pollinators**, with many voicing support for the ban on neonicotinoids. A number of individuals from all sectors went further in desiring pesticides to be banned, or stronger regulation and enforcement. Pesticide Action Network UK suggested a number of measures they believed could help reduce pesticide use. These included a pesticide use reduction target, new approaches to measuring use and impact, a pesticide tax, and institutional support for Integrated Pest Management (IPM).

Broad backing for IPM was echoed by LEAF, who emphasised its importance in improving farm resilience. Wildlife and Countryside Link also prioritised resilient habitats and agricultural practices, though recognising the need for pesticides to control some invasive non-native species. The Agricultural Industries Confederation (AIC) suggested building on existing voluntary measures to support IPM and best practice in pesticide use.

Some farmers and agricultural businesses stressed how **pesticides were needed for healthy crops, and supported development of more effective chemicals to protect their crops**. The Agri-Brexit Coalition, cautioned that pesticides were crucial to our food supply, and recommended developing a regulatory environment that encouraged investment in crop protection research and development. The NFU suggested targeted investment in technology and education to help minimise pesticide impacts, and research into crop varieties more resistant to pests and disease.

Signatories to the Pesticide Action Network UK petition wanted the **introduction of a quantitative pesticide reduction target** and an **increase in support to farmers to reduce their pesticide use**. The statement accompanying the petition argued that, in order to deliver a sustainable EU Exit, the government had to achieve a reduction in the use of pesticides. This included the suggestion that there needed to be concrete policy proposals included in the Agriculture Bill, including a quantitative pesticide reduction target, and an increase in support to farmers in order to reduce their pesticide use.

## CHAPTER 12. Ensuring fairness in the supply chain

### 12.1 Summary

This chapter outlined issues relating to the supply chain and discussed a number of options for improving transparency across the supply chain and fairness.

Key themes from the responses are listed below:

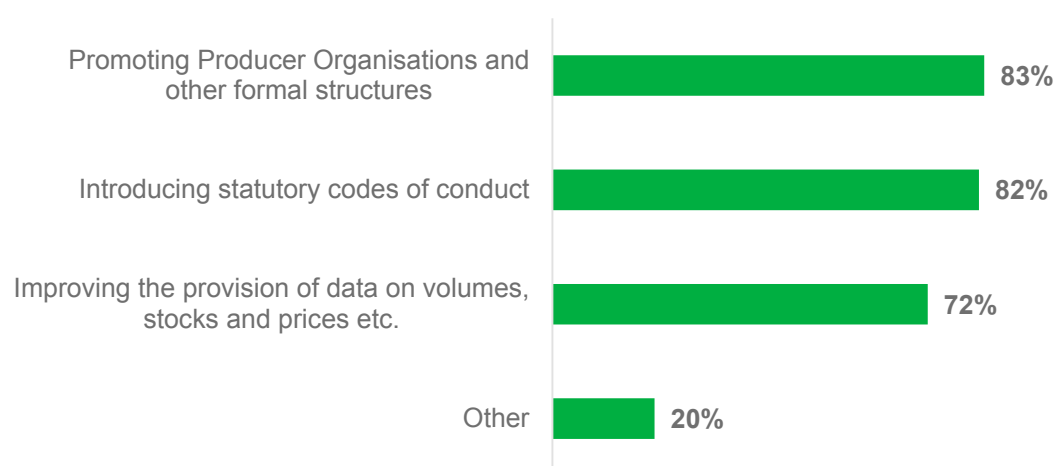
- the majority of responses supported the three options put forward (promoting Producer Organisations and other formal structures, introducing statutory codes of conduct and improving the provision of data on volumes, stocks and prices);
- the need for government intervention to strengthen the position of farmers in the **supply chain** and to support programmes for collaboration both between farmers and within supply chains;
- a range of **barriers to collaboration** were put forward, including a cultural preference for farmers to work independently; as well as resource, leadership and logistical issues; and
- economies of scale, increased bargaining power and higher prices for the primary producer were seen as the main **benefits of collaboration** by many respondents.

## 12.2 Consultation question

**How can we improve transparency and relationships across the food supply chain?  
Please rank your top three options by order of importance:**

- a) Promoting Producer Organisations and other formal structures?
- b) Introducing statutory codes of conduct?
- c) Improving the provision of data on volumes, stocks and prices etc.?
- d) Other (please specify)?

**Proportion of respondents selecting each option as a way to improve the transparency and relationships across the food supply chain**



Almost three quarters of respondents to the online survey (73%) selected a top choice preference. Of those respondents, 83% ranked promoting Producer Organisations and other formal structures as one of their top 3 options and 82% ranked introducing statutory codes as a top 3 option.

Most respondents who ranked '**Producer Organisations and other formal structures**' as their first choice, suggested that Producer Organisations would provide farmers with the necessary scale to gain better representation and restore fairness and balance in the supply chain. Some felt that these organisations could support shorter supply chains, promote local products and reconnect farmers and consumers. Others referred to the benefits of shared knowledge and best practice, increasing efficiency and managing supply with improved knowledge of the markets. Some respondents, however, thought Producer Organisations and co-operatives have not always been successful in the UK, can increase costs to farmers, and that too many Producer Organisations would compete against each other.

Respondents that ranked '**Introducing statutory codes of conduct**' as their first choice commonly thought that proper enforcement of statutory codes was the only way to secure more transparent pricing and fairer trading practices for farmers. Some felt that statutory codes could provide clarity to all parties on their contractual obligations, as well as aid traceability

and transparency for the consumer by enforcing more transparent labelling. These responses were similar to those that selected 'other' and specified that additional regulation is needed to increase supply chain fairness.

Respondents that ranked '**Introducing statutory codes of conduct**' as their first choice commonly thought that proper enforcement of statutory codes was the only way to secure more transparent pricing and fairer trading practices for farmers. Some felt that statutory codes could provide clarity to all parties on their contractual obligations, as well as aid traceability and transparency for the consumer by enforcing more transparent labelling. These responses were similar to those that selected 'other' and specified that additional regulation is needed to increase supply chain fairness. On a similar theme, many respondents referred to extending the remit and powers of the Groceries Code Adjudicator in order to strengthen trust within the supply chain.

Many respondents, who ranked '**Improving the provision of data on volumes, stocks and prices** etc.' as their first choice, suggested that this would empower primary producers and establish them on an equal footing with purchasers. Respondents mentioned better management of supply and a means to communicate consumer demand and preference back to the producer as benefits.

Those who selected 'other' mainly made one of two suggestions. Firstly, many respondents suggested **increased regulation** to make sure food producers are treated fairly by processors, retailers and other parts of the supply chain. Secondly, many respondents also suggested there should be more **transparency in the supply chain** in order to inform the consumer where and how their food was produced. Assurance schemes and improved labelling were seen as key to transparency, with some concerns raised about the inaccurate use of farm branding, a lack of transparency regarding country of origin and the monitoring of standards for imported foods. Linked to this, the **promotion of local food initiatives** with shorter supply chains were also suggested as a way to increase the farmers' share of the retail price, reconnect them with consumers and improve traceability. Some respondents thought collaboration within the supply chain would improve fairness through long term partnerships fostering better relationships and communication. Others felt that educating consumers about the provenance of their food would enable them to make more informed choices and encourage them to buy British.

### What are the biggest barriers to collaboration amongst farmers?

A number of barriers to collaboration were put forward including cultural, financial, geographical and logistical constraints. Many respondents referred to the highly **independent nature of farmers** who are historically used to running businesses autonomously and may prefer to remain independent. Competition between farmers and a lack of trust both between farmers and the wider supply chain were also mentioned as reasons that farmers are reluctant to collaborate, particularly where it involves sharing data and commercial information.

Many respondents made references to a **lack of resources**, notably: time, money, knowledge and leadership skills required to establish collaborative ventures and reach collective agreements. The Prince's Countryside Fund considered the biggest barrier to be lack of opportunities for farmers to come together for peer to peer learning. The individual nature of farm businesses with variable scale, diverse enterprises and production systems was also mentioned as a potential barrier. Some respondents noted that collaboration between farms is not suitable in all circumstances particularly where biosecurity, logistical and geographical constraints exist and make sharing machinery or labour counterproductive.

Some respondents thought that **farmers' opinions on co-operatives** deterred many from taking part. Co-operatives UK suggested that there is currently a lack of emphasis on cooperatives' excellence, whilst identifying suitable farms with similar goals was a barrier mentioned by LEAF. The Country Land and Business Association (CLA), Soil Association, Harper Adams University and Co-Operatives UK also suggested that some farmers have limited knowledge or experience of co-operation upon which to build. Some respondents perceived government intervention as a barrier to the success of co-operatives. Other views suggested that many successful types of horizontal and vertical cooperation already exist such as contract farming arrangements, collaborative groups growing and processing vining peas, buying and marketing groups and machinery rings, with no further government intervention required.

**What are the most important benefits that collaboration between farmers and other parts of the supply chain can bring? How could government help to enable this?**

Respondents most frequently cited that the benefit of collaboration was the **positive financial impact** on farmers by: economies of scale, increased productivity and efficiency, fairer prices, and reduced costs. Many of these benefits were seen to arise as a result of a stronger negotiating position within the supply chain. Respondents also mentioned the sharing of risk particularly in the case of vertical integration as price volatility does not necessarily affect the whole supply chain at the same time. Some suggested that increased prices and business stability, which subsequently give farmers more confidence to invest in their businesses, was another benefit of collaboration. Respondents also highlighted that sharing of knowledge, skills and data (including benchmarking); and the opportunity to share and invest in marketing, innovation and R&D were all benefits of collaboration. Some respondents referred to improved levels of trust and a sense of partnership, with a better understanding of the challenges facing different businesses within the supply chain.

Key themes emerged on government help. One was for support with establishing and facilitating **collaborative ventures and farmer networks** to improve the position of farmers in the supply chain. Suggestions included a legislative framework as well as financial assistance via grants, loans or tax incentives. Some respondents mentioned the importance of retaining the existing Producer Organisation recognition scheme, but in a simplified format and extended to other sectors. The Organic Milk Suppliers Co-operative highlighted the need for grants to make sure that farming can share the benefits from supply chain export investment and opportunities.

The other key theme was for **strong, enforceable legislation** to help improve transparency and supply chain relationships. Some respondents expressed doubt about government intervention in the supply chain, particularly through legislation, suggesting it should be left to the market or industry led.

### **12.3 Regional consultation events and roundtables**

Many attendees thought that farmers are not fairly rewarded for the production of food. They suggested that legislation and improved labelling could help consumers make more informed decisions. Attendees noted that Producer Organisations and co-operatives were a good way to spread knowledge and advice. Other ideas included providing government funding to promote collaboration and Community Supported Agriculture models to reconnect the public with farming.

## CHAPTER 13. Devolution: maintaining cohesion and flexibility

### 13.1 Summary

This chapter outlined how agriculture policy could be devolved and the establishment of common frameworks to be determined by the devolved administrations and UK government, as agreed by the Joint Ministerial Committee (JMC)). The JMC agreed the following principles:

- **Common frameworks will be established where they are necessary in order to:**
  - enable the functioning of the UK internal market, while acknowledging policy divergence
  - ensure compliance with international obligations
  - ensure the UK can negotiate, enter into and implement new trade agreements and international treaties
  - enable the management of common resources
  - administer and provide access to justice in cases with a cross-border element safeguard the security of the UK
- **Frameworks will respect the devolution settlements and the democratic accountability of the devolved legislatures and will therefore:**
  - be based on established conventions and practices, including the competence of the devolved institutions and will not normally be adjusted without their consent
  - maintain, as a minimum, equivalent flexibility for tailoring policies to the specific needs of each territory as is afforded by current EU rules
  - lead to a significant increase in decision-making powers for the devolved administrations
- **Frameworks will ensure recognition of the economic and social linkages between Northern Ireland and Ireland and that Northern Ireland will be the only part of the UK that shares a land frontier with the EU. They will also adhere to the Belfast Agreement.**

This chapter asked for views on what common agriculture and land management frameworks were needed for when the UK leaves the EU. It also sought views on the likely impacts on cross-border farms if each administration tailored its own agriculture and land management policy.

Key themes from the responses are listed below:

- many respondents were in support of **common approaches** as presented in the JMC principles;
- common approaches were also seen to be needed in policy areas for the environment (particularly climate change, biodiversity, water, air and soil), animal and plant health and welfare, production regulations, food standards and labelling;

- a repeated concern was the potential **market distortion** caused by policy and divergence. Respondents felt that divergence in funding support and regulations would cause unfairness and barriers within the internal UK market.

## 13.2 Consultation questions

**With reference to the principles set out by JMC (EN), what are the agriculture and land management policy areas where a common approach across the UK is necessary?**

Many of the respondents recognised a need for a **common approach** in the areas referred to in the JMC principles, as well in areas outside of these principles. There was particular backing for common approaches to support the internal market, protect the environment, safeguard the UK (including food standards, biosecurity and productivity), make sure the UK meets its international obligations, and provide high standards of animal/plant welfare and food. Respondents recognised that mechanisms were needed to guarantee the accountability of UK and devolved administrations.

Predominantly, respondents sought a **common approach** across all policy areas to avoid confusion and perceptions of unfairness, and to achieve shared environmental targets and high food/welfare standards. A small minority were against any common approach and felt that due to the diverse nature of rural landscapes, devolved administrations were best placed to make any policy decisions on agriculture. A few respondents, including National Farmers Union (NFU) Cymru, thought that common frameworks should be flexible enough to allow the devolved administrations to address local issues. In addition, some respondents sought more involvement and devolution to local authorities in planning and woodland management.

There was a general view that the **environment** would benefit from a common approach particularly in tackling climate change, encouraging biodiversity and managing common resources such as water and soil. Some respondents felt that a common approach would be needed for consistent regulation on GMOs and pesticides for example, as they felt that policy divergence in one devolved administration would weaken safeguards in the rest of the UK.

Many of the respondents would like a common approach to ensure **animal and plant health**, welfare, and traceability, and to protect the UK against disease and pest outbreaks. A few respondents also asked for a common approach to the **deployment of biotechnology**.

It was generally recognised that a common approach was needed to make sure the UK meets **international obligations**. Meeting standards for trade was seen to be a priority for the agriculture sector. Some of these respondents also suggested that a common approach to food, environment and welfare standards would facilitate internal and international trade. There were also concerns that imports may not meet the standards of UK producers and would undermine UK products.

A few respondents asked for a common approach to **standards and labelling**, particularly for organic farming. Some suggested that a common approach to labelling would help consumers make educated choices and encourage high standards.

A minority also suggested that a common framework should encourage the **sharing of good practice**, research and rural development schemes such as the Small Farms, Young Farmers and New Entrant schemes.

Respondents were mainly concerned that divergence in areas such as funding support and production regulations/standards would create **internal market barriers and distortion**. Many would like a level playing field in relation to funding support. A minority of respondents suggested funding should be directed to disadvantaged areas and not dependent on country. The Ulster Farmers' Union suggested that policy divergence in areas such as regulatory standards would affect businesses working across internal UK borders and may cause trade barriers for those wishing to trade with the UK.

**What are the likely impacts on cross-border farms if each administration can tailor its own agriculture and land management policy?**

Respondents had a general view that there would be **negative impacts** if each administration could tailor its own agriculture and land management policy. Such impacts included administrative and management confusion, environmental impacts, issues with animal and plant health and disease control, unfair competition and criminal activity. Alternatively, a minority of respondents felt that there would be little to no impact on cross-border farms. NFU Cymru suggest that the level of divergence between England and Wales after the UK has left the EU, need not be any more difficult to manage than the policy divergence already faced under the CAP.

The concern about possible **internal market distortions and barriers, alongside unfair competition**, arose here too. Respondents were concerned that diverging animal welfare and environmental standards could limit market access, jeopardise supply chains, and incentivise low standards. One respondent from the food and farming industry used the example of the Longtown Auction Mart in Carlisle, England, to describe potential regulatory and market access concerns. Differing rules across the devolved administrations could create extra regulatory burdens for Scottish farmers buying and selling stock just over the border in Carlisle, potentially pricing these farmers out of the English market.

Additionally, respondents felt that multiple standards and **conflicting priorities** would reduce the number of schemes in the area, potentially impacting biodiversity and the environment negatively. More **cooperation and commonality** in standards and regulations across the UK was a suggested solution.

A minority of respondents suggested that cross-border farmers should have **flexibility to nominate an administration** for their land. The Farmers' Union of Wales also suggested that

these decisions should be long-term and binding, and safeguards should be established to prevent abuses of the system. A few individual respondents felt that neighbours being treated differently would cause bad feeling and a sense of unfairness.

Many respondents were worried about the **financial cost and extra time** associated with administration and compliance on cross-border farms; as well as delays in paying financial support. Some were concerned that there would be confusion over regulations and tolls for the **movement of food and animals** within cross-border fields and farms (pre-market) and across the border (for market). A minority also expressed concern over different veterinary procedures for transporting livestock. The potential for **criminal activity** and lack of police resource to deal with the smuggling of livestock cross-borders, financial fraud and tax issues, was also raised.

### 13.3 Regional consultation events and policy round tables

Consultation events in England did not discuss devolution issues specifically. A number of stakeholders from Scotland, Wales and Northern Ireland attended a round table with Minister Eustice to discuss frameworks.

Minister Eustice hosted a roundtable for stakeholders from Wales, Scotland and Northern Ireland in order to seek their views on our proposals, in particular, on 'devolution and frameworks'. There was a broad consensus round the table that common frameworks were likely to be needed in the UK (for example, for pesticides), while maintaining flexibility for the devolved administrations to design their own policies. Stakeholders also highlighted future funding as an issue and indicated that they did not want future funding to be subject to the Barnett formula. With regards to cross-border farms stakeholders felt that there should be a robust system in place to share data amongst the devolved administrations. This will make sure the cross-border farms are not penalised for where they are located

## CHAPTER 14. International trade

### 14.1 Summary

The chapter asked for views on the trading priorities set out in the consultation including:

- how government and industry could work together to open up new markets; and
- how we can best protect and promote our brand, remaining global leaders in environmental protection, food safety, and in standards of production and animal welfare.

Key themes from the responses are listed below:

- there were repeated concerns expressed about the impact of future trade deals on the agriculture sector, particularly in relation to the **costs of domestic production** and the **quality of imports** from other countries;
- many respondents wanted a greater prioritisation of the domestic market and a **focus on locality**; and
- most respondents wanted to maintain **high animal welfare and environmental standards** and some form of protection from low-quality imports.

## 14.2 Consultation questions

**How far do you agree or disagree with the broad priorities set out in the trade chapter?**

Proportion of respondents who agree or disagree with the broad priorities set out in the trade chapter



Over 2,412 citizen space respondents (56%) answered this question. 37% of respondents agreed with the broad priorities set out in the trade chapter, and 12% disagreed.

**How can government and industry work together to open up new markets?**

Most respondents emphasised the need for greater prioritisation of the **domestic market**, rather than the opening-up of new markets. Many advocated a more local approach to producing and buying food, using the UK leaving the EU as an opportunity to educate the British public on the agricultural sector.

There were mixed views about how this could best be achieved. A small number of respondents argued for the UK to become completely self-sufficient in agricultural produce (for example, through banning of all imports and increasing the volume of domestically produced food). Other respondents did not want to see an increase in domestic production. They instead suggested significantly reducing the amount of land used for agriculture and putting it back to its natural state, citing concerns over rising greenhouse gas emissions and global warming.

Many respondents commented that there needed to be greater co-operation across all areas of the **supply chain** to be able to access new markets and make industry more efficient and responsive to the needs of consumers. Some respondents were concerned that higher **welfare standards** may increase costs that would be passed on to consumers, which could make the price of certain products too high for low-income families, forcing them to buy products of inferior welfare standards from abroad.

Several respondents also mentioned that in order for industry to raise domestic standards of production to meet the aims set out in the chapter –there would need to be greater **investment** in the sector. Suggested measures included increasing productivity, developing abattoirs capacity and research into more efficient farming techniques.

Many respondents were concerned that trade liberalisation would result in low quality imports being available on the UK market. Many respondents were concerned about **the quality of imports** that could potentially be available on the UK market if trade liberalisation occurs. They were also concerned that UK agricultural sectors may be forced to compete with

countries operating with lower welfare and environmental standards. Many stakeholders felt that the opening-up of new markets should not mean a lowering of domestic standards, with many believing high domestic standards to be a unique and powerful selling point for British produce, which could be used to gain access to new markets.

Supporters of the National Farmers Union (NFU) submitted two campaigns: 'Successful Future for Farming' and 'Back British Farming'. The Successful Future for Farming campaign wanted to see future policy safeguarding UK farm businesses, ensuring that any post-EU exit trade deals did not undercut British farmers by allowing cheaper and lower quality imports. Respondents to the Back British Farming campaign expressed appreciation for the affordability and quality of domestically-produced food, with some respondents highlighting the additional environmental benefit by reducing the nation's food miles.

Several respondents were also concerned that the agricultural industry could be competing with markets where those agricultural sectors were supported with **subsidies** or other **market interventions**. Many respondents referred to a 'level playing field' in future trade deals, with only products of an equivalent standard of production being allowed into the UK market. Several respondents suggest imposing tariffs on inferior-quality produce, with tariff-free access only for imports meeting equivalent domestic standards. A small number of respondents were in favour of removing protections for agricultural sectors and letting consumers decide what they wish to purchase.

Several respondents also raised concerns about the **environmental demands** of accessing new markets. They suggested that accessing new markets would increase production both on a domestic and international level to meet demand, exacerbating issues such as greenhouse gas emissions, soil erosion and decreasing biodiversity. This was raised by stakeholders, such as the RSPB, who expressed concerns that an increase in trade may lead to environmental degradation abroad.

Many respondents believed that there would need to be a cultural and practical shift in the domestic agricultural industry to become more export-focused as a result of leaving the EU. Respondents had mixed views as to who would have overall responsibility for **promotion of agricultural sectors to new markets**. Some respondents wanted the government to play a leading role, while a small number wanted accessing of new markets to be left solely to industry. Most respondents wanted future access to be a combination of industry- and government-led action. Respondents felt that there needed to be a proactive marketing strategy for British produce, irrespective of whether it government or industry took the lead.

There were a wide range of views on how best to support the industry to access potential new markets. These ranged from diplomatic visits, trade shows and the creation of a new government department or body. Many of the respondents cited the AHDB (Agriculture and Horticulture Development Board) as an organisation that could potentially provide assistance here as part of their existing remit. In addition, a small number of respondents identified the Netherlands, Ireland and New Zealand as countries that could be potential models for the UK to follow in becoming more export-focused.

Some respondents and stakeholders, such as the Royal Institute of Chartered Surveyors, raised the point about new market access being dependent on the UK's final trade deal with the EU. Respondents stated that a lack of clarity over this issue meant that industry was unable to create strategies for targeting new markets, as they did not have clarity on issues such as Single Market access and potential tariffs payable.

Many respondents thought that maintaining a **relationship with the EU** was as important as accessing new markets, although there was a general lack of consensus as to what form the future UK-EU relationship should take. Respondents largely wanted to maintain tariff-free access to the Single Market. There were a variety of different reasons given for this, including: the EU being seen as a reliable trading partner; that customers in the Single Market demand the same standards of product as the UK market; and that agricultural sector supply-chains are often integrated across Europe. There were also a number of alternative views on Britain's relationship with the EU, ranging from several wanting to remain in the EU, to a small number wanting a clean break from the EU with no membership of the Single Market or Customs Union.

Individual stakeholder groups from the livestock industry raised concerns that a lack of tariff-free access to the Single Market would severely affect their sectors. They were concerned that production costs would rise if they were unable to trade cuts less popular in the UK with the EU. Respondents highlighted the importance of existing EU trade agreements, which facilitate exports of, for instance, dark meat and offal, which serves carcass balance in the UK. Some respondents also stated that high welfare standards could bring greater opportunity to export, if alongside proactive marketing by government and industry.

A small number of respondents raised the issue of the **Northern Ireland / Ireland border** as an area of great concern, citing the free movement of people and the close integration of supply chains between the two countries as a benefit of EU membership.

**High standards of animal welfare** were thought to be a unique selling point by some respondents, which could be used to gain access to potential new markets. More specifically, many respondents had concerns with the **live export** of animals. There were a range of views on this, with many respondents, including stakeholders such as the Royal Society for the Prevention of Cruelty to Animals (RSPCA), wanting a ban on live exports. A small number wanted live export movement to remain, commenting that a ban would place needless restrictions on the sector at a time when competitiveness was paramount.

**Respondents mentioned research, technology and innovation** in relation to accessing new markets. Many respondents expressed the view that more research was needed to improve domestic production, as it could help tailor products to specific markets. Additionally, many of the respondents commented that more intelligence was needed on potential new markets and their customers' requirements, in order that the domestic agricultural sector be better able to adapt to new trading environments.

**How can we best protect and promote our brand, remaining global leaders in environmental protection, food safety, and in standards of production and animal welfare?**

Approximately half of respondents' answers to this question related to **animal welfare**, with many being concerned with international and domestic standards. The primary view was that products made to inferior standards in terms of animal welfare, environmental protection and food safety should not be allowed to enter the UK. It was said that lower-quality products would have a severe impact on domestic agriculture sectors due to associated lower prices. Particular practices identified included the transportation of live animals, sow stalls, growth hormones, battery farming, and chlorinated chicken. Some respondents noted that they considered these products to pose a public health risk, similar to answers received for the question above.

Many respondents commented that high welfare standards must be maintained and protected in the UK market and be promoted on an international level. Some thought that animal welfare standards should increase through inspections and more stringent assurance schemes. Many also commented that the UK should focus on becoming world-leading in animal welfare standards, with a few suggesting that schemes such as Linking Environment and Farming (LEAF), Red Tractor and RSPCA Assured could potentially be used internationally to improve standards. Several respondents thought that though there should be a focus on high welfare standards, more legislation was not required as this risked adding extra costs which would be passed on to farmers. A few respondents also called for a shift away from livestock farming altogether, to veganism and plant-based agriculture.

Many respondents were concerned that if cheap, low quality imports were allowed onto the domestic market, UK farmers would be at serious risk of going out of business. Many believed there would need to be some form of support for agricultural sectors in order to maintain high welfare and environmental standards. Other respondents wanted a reduction in the amount of bureaucracy they had to navigate. Some respondents thought that the UK's exit from the EU presented an opportunity to re-educate the public on food production, either through advertising, labelling or farm visits. It was felt that if the public knew more about domestic production, they would be more likely to buy British produce.

Respondents mostly wanted environmental standards to be maintained, not reduced, as part of any future trade deals. Some respondents mentioned soil quality and environmental footprints as particular issues the UK should tackle in order to be world-leading. Some wanted a greater focus on sustainable farming practices, such as organic farming, in order to reduce environmental impacts and help protect the British brand.

**Biosecurity** was another concern for several respondents, who suggested that an effective biosecurity system needed to be in place for imports, exports and domestically to stop the spread of diseases that could affect trade, such as avian flu or airborne diseases.

Many respondents mentioned **marketing and branding**. Labelling needed to be much clearer, with some suggesting that the origin of food should be explicit, particularly in relation to processed foods. Some respondents mentioned the Red Tractor scheme (a domestic assurance scheme that promotes and regulates food quality in England and Wales) as a potential promotional scheme for the international market. There was, however, a lack of clear consensus about the scheme itself, and others wanted Red Tractor replaced with an assurance scheme with higher welfare and environmental guidelines. In contrast, several respondents and stakeholders such as the British Poultry Council wanted to keep the scheme due to concerns over potential increased costs if a new assurance scheme were introduced.

### 14.3 Regional consultation events and roundtables

Key themes emerging from these discussions included: concerns over lower-quality imports; being unable to plan future investment due to uncertainty over the type of trade deal that the UK might finalise with the EU; and a need for a more effective biosecurity system.

Other ideas included an assurance scheme for imported products and an increase in investment for farming in order to allow agricultural sectors to raise animal welfare standards. In addition, a small number of consultation and roundtable events raised World Trade Organisation measures on a range of different issues –

e.g. A small number of participants at the roundtables challenged the idea that some interventions that are considered to be trade distorting (such as subsidies) are not in practice whilst several participants noted that incentives to support the agricultural sectors are limited by WTO rules.

### 14.4 Additional points

Many respondents raised what they perceived to be a **conflict** between increasing welfare and environmental standards, and reducing costs to the consumer. Many respondents thought that unless there were some form of government support in place, the agricultural industry faced a choice about what it could realistically deliver for the consumer.

A small number of organisations, such as the Fairtrade Foundation, Traidcraft and Oxfam, were concerned about the impact of accessing new markets in **developing countries**.

## CHAPTER 15. Legislation: the Agriculture Bill

### 15.1 Summary

This chapter sought respondents' views on legislative powers that could be included in the Agriculture Bill.

Key themes from the responses are listed below:

- **most respondents agreed** with the basis for the proposed legislation. However, many felt that it did not go far enough.
- several respondents suggested a change of name to capture the full breadth of what the bill would cover, including land management, and forestry;
- given the title of the consultation, it was considered that **neither food nor public health was sufficiently addressed** in the consultation paper. Both of these were considered by the respondents to be an integral part of the bill, and as such, should be included; and
- many felt that the bill needed **clarity** on what it could deliver and how it would be achieved. It was suggested that it should set out the **purpose** of future policy including set duties for ministers, objectives and targets for environmental improvement: respondents felt this would play an important role for the public in holding government accountable.

### 15.2 Consultation questions

#### How far do you agree with the proposed powers of the Agriculture Bill?

Proportion of respondents that agree or disagree with the proposed powers of the Agriculture Bill



Over 2,500 (59%) respondents to the online survey answered this question. Of those that answered, around 4 in 10 (41%) agreed with the proposed powers of the Agriculture Bill. 10% disagreed and just under half either did not agree nor disagree (30%) or answered 'don't know' (18%).

Some respondents repeated their concerns about the need for **continued Direct Payments** in this section. They highlighted that since many people currently relied on basic payments, any future legislation must be able to redirect spending effectively in order to maintain support for

farmers. Some respondents felt that the Bill was an opportunity to put in place the legislation necessary to manage the introduction and development of new policies, providing the industry with the tools required to manage the transition successfully.

Some respondents stated that there was a need to reduce **bureaucracy** in the bill. They acknowledged that while the administration of new schemes needed to be streamlined, there would still be a requirement to have oversight and inspections to make sure targets were delivered. This included the suggestion that inspections could be linked into the parliamentary cycle – allowing for the need for longer term planning. Respondents mostly agreed with the **new schemes** proposed in the consultation paper, but some suggested that the Agriculture Bill should introduce schemes that should be run on a multiannual basis, to reduce administrative costs and allow farmers and land managers to better plan for the future.

Many respondents to this chapter thought increasing **productivity and resilience** was important consideration for the bill as it is key to food production. Some thought that measuring productivity would protect our food security and reduce dependence on imported food.

Respondents also wanted a bill that supported **R&D** to generate the technology, skills and business approaches required across agriculture and horticulture.

**Animal health and welfare and plant health** were viewed as important aspects of the proposed bill. Many respondents suggested that the prominent inclusion of these topics in the bill would encourage farmers to take up actions voluntarily that were above the current minimum standard. Some suggested that the baseline for animal welfare should be raised, with farmers rewarded for going beyond the legislative minimum. Alongside this, respondents suggested that fines or penalties should be issued where poor animal welfare was identified. Many also thought that standards applied to domestic produce should be applied to imports.

There was a wide range of views about **public access**. While people agreed with the principle of increased access to the countryside, respondents felt that legislation should consider:

- the location of access, to avoid disturbances and damage to residences, businesses, livestock and wildlife habitats;
- assurances that payments only go to those who improve access;
- protection for landowners against illegal trespassing;
- educating the public on responsible access; and
- ensuring that access is improved for all, particularly those with limited mobility.

Some respondents suggested that legislation should give farmers and landowners flexibility on public access, (as they are best placed to know when and where to give access) could better allow these considerations to be taken into account. Some suggested that the government should commit to improving and maintaining existing routes before new routes are created.

On **compliance or inspection regimes**, most agreed that some form of system was required but that it needed to be simplified, and enforcement would need to be fair and proper. It was

agreed that in some cases a **combined approach** of self-reporting and random inspections with penalties for non-compliance might be required.

Respondents had a range of views on where legislation was required to ensure compliance. It was felt that simple schemes did not need to be heavily regulated. It was suggested that public payments should only be provided where compliance had been demonstrated. Despite the need for simplicity, there were some concerns that stripping back bureaucracy and reducing compliance would reduce the capability of the system to effectively and fairly deliver its objectives. Instead, some respondents suggested we should look to retain, strengthen and modernise the current system.

Continuity during the **transition period** was considered a priority for the legislation. Some respondents suggested that there be a Transitional Agriculture Bill, with the full bill being implemented once negotiations with the EU were completed. Some respondents, however, felt that the bill was necessary for managing the introduction and development of new policies, providing the industry with the tools required to manage the transition successfully. Generally, respondents stated that some support was required during the transition period. Suggestions included a safety net whilst new measures were introduced, powers that would enable the continuation of current schemes, powers to run trials and pilots and powers to recognise devolution. It was suggested that future policy must be able to redirect spending effectively in order to maintain support for farmers.

Some respondents suggested that if **emergency powers** were required, there would be a need for clear limitations, obligations and safeguards on the extent of those powers, with a focus on government being proactive rather than reactive. The National Farmers Union (NFU) requested that safeguards be put in place, specifically relating to 'Henry VIII powers', providing clear parameters on when and how the powers could be used. Respondents sought clarification on the circumstances in which emergency powers would be invoked, and which businesses would be eligible. They noted that this should be available to all land users and not just farmers.

NFU Cymru stated that any **UK framework** where commonality was required would need to be reached by mutual consent, in partnership with the devolved administrations. It was also suggested that a common framework be implemented. Some respondents thought that there should be a shared level of environmental ambition with full involvement and consent by the devolved administrations of all clauses, and this should be legislated for within the bill.

Some felt that there was no mention of **funding arrangements**, or how payments would be allocated. In relation to public goods, it was considered that payments for these should be allocated proportionally via a multi-annual framework that sat outside the Barnett formula. In line with this, it was suggested that ministers should review funding on a regular basis (for example, every five years). There were also several suggestions that funding saved should be refocused into other areas, such as productivity, investment in research and development, innovation and training.

### What other measures might we need in the Agriculture Bill to achieve our objectives?

Respondents also shared suggestions on how the government could help the farming sector and rural communities. Some thought that the bill should address the challenges experienced by rural communities on all fronts, with additional measures to give local authorities greater power to set their own priorities. Some also wanted to see legislation on a **retirement scheme** to provide support to those farmers needing to leave the industry; improved **education** opportunities for careers in agriculture; and measures covering **housing and tenancy**.

Some thought the bill should include legislation to support sectors such as **organic farming methods, horticulture and forestry**; alongside **rewards for sustainable practices** and recognition of **flood risk management**.

It was felt that not enough emphasis was placed on **food** within the consultation and legislation and that food and the environment should be on equal footing. The Soil Association have a vision of food and farming which incorporates aims on better food and farming, environmental development and health outcomes in concert with the devolved administrations. Measures to promote food including food security, production, and waste were also suggested. A few respondents also wanted provisions in the bill for **improving public health** through promoting a healthy sustainable diet in particular. Respondents suggested the development of national metrics and targets which would track whether food production is moving towards sustainable delivery of healthy diets.

Some respondents wanted the Agriculture Bill to create a formal procedure for regular **feedback** to the government on policy. These respondents wanted to ensure that the government continues to engage with interested parties to help guide future policy.

## 15.3 Regional consultation events and roundtables

Consultation events did not discuss the content of the Agriculture Bill specifically although there was an appetite for legislation at least as ambitious as that of the Agriculture Act 1947 after the end of the Second World War.

## 15.4 Additional points

Some respondents felt that there needed to be **cross government collaboration** on all areas of crossover on areas such as health, education, communities, housing and trade.

Some respondents felt that there should be a strong **regulatory baseline** with simple and meaningful standards. Respondents specifically wanted a regulatory baseline in legislation to protect environmental and plant health and animal welfare that would create a level playing field. Respondents also suggested standards that should reflect the 'polluter pays' principle and how it should be approached. Wildlife and Countryside Link felt that the regulatory

baseline should consist of value for money and clarity on how the 'polluter pays' principle would apply for future payments.

Respondents also suggested that the government should be held accountable and that ministers should be required to develop and adopt milestones and targets which would then be written into legislation. Respondents suggested that these should be driven by the **25 Year Environment Plan**, noting the importance of the future environmental land management system in securing outcomes. This was a view point supported by several stakeholders including the Campaign to Protect Rural England and the National Trust. Alternatively it was suggested that the Agriculture Bill should link to existing and future environmental legislation.

## Annex A: About the analysis

It is important to keep in mind that public consultations are not necessarily representative of the wider population. Since anyone can submit their views, individuals and organisations who are more able and willing to respond are more likely to participate.

Because of this likelihood for self-selection, the approach of this analysis has not only been to count **how many** respondents held a particular view. The approach taken is largely qualitative - with the aim being to **understand the range of key issues raised by respondents**, and the **reasons for holding their particular views**. This includes potential areas of agreement and disagreement between different groups of respondents.

The objective of a meaningful consultation process is to be as inclusive as possible. This allows as many people to share views in whatever form is easiest and best from their perspective.

In presenting the results, we have aimed to provide a broad picture of all views and comments. Therefore, a range of qualitative terms are used, including 'many', 'some', 'most', and 'a few'. Interpretation of the balance of opinion must be taken in the context of the question asked, as not every respondent answered all the questions, and not every respondent who provided an answer to a closed question provided additional detail.

In this respect, qualitative terms are only indicative of relative opinions to questions on the basis of who responded. Therefore, they cannot be assumed to relate numerically back to the total number of people and organisations.

## Annex B: Types of responses

### Online survey

Respondents were encouraged to submit an online response by completing an online survey hosted on Defra's consultation website, Citizen Space. A link to the Citizen Space survey was widely advertised online<sup>3</sup>.

The online survey followed the questions asked in the consultation paper: featuring both closed (for example, tick-box or ranking questions), and open questions (asking for respondents to detail their views). Respondents were able to answer as many or as few questions as they wanted.

For closed questions, descriptive statistics are provided in each chapter, including the relevant characteristics of the respondents who gave their views. For open questions, a summary of the main themes emerging from the responses are provided.

### Email and post

Responses could be submitted directly by email or post. Not all of these responses answered consultation questions directly – some related to issues not covered by the document, while some were related to several consultation questions.

Where responses answered specific consultation questions, these have been included in the most relevant chapter. Where responses related to issues not covered by the document, we have made reference to these in the 'additional comments' section of the most relevant chapter.

### Organisational responses

Organisations and stakeholder groups were able to submit responses to the consultation on behalf of their members. The key arguments raised in these organisational responses are included alongside individual responses in the relevant chapters. A list of organisations who submitted a response is included in Annex E.

### Campaigns and petitions

Organisations could also co-ordinate responses with their members. These **campaign responses** were typically based on a standard template provided by the campaign organiser, and submitted by email, post or via Citizen Space. Campaign responses are referenced separately in the relevant chapters of this document.

For more information about campaigns, please see Annex C.

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<sup>3</sup> <https://www.gov.uk/government/consultations/the-future-for-food-farming-and-the-environment>

This consultation also received **petitions**. Petitions typically consisted of an initial petition statement, information about the consultation, followed by a list of signatures. Similar to campaigns, petitions are addressed separately in the relevant chapters of this document.

For more information about petitions, please see Annex D.

## **Regional events and policy roundtables**

Officials from Defra, Natural England, the Rural Payments Agency, the Forestry Commission and the Environment Agency facilitated 17 regional stakeholder events across a six week period.

Approximately 1,250 people attended these events, including a mix of farmers, land owners, agronomists, environmental specialists and other interested stakeholders. Events were co-hosted with a stakeholder organisation.

To make sure a diverse range of voices across England were heard, the events were held in regions ranging from Northumberland to Cornwall. Delegates were nominated from Defra teams and through co-hosts' established networks.

These events were held alongside the following co-hosts:

- Forestry Commission
- Country Land and Business Association (CLA)
- Centre for Rural Economy, University of Newcastle
- Yorkshire Agricultural Society
- Centre for National Parks and Areas of Outstanding Natural Beauty (AONB)
- Royal Society for the Protection of Birds (RSPB)
- Sustain Alliance
- Royal Norfolk Agricultural Association
- Friends of the Earth
- Wildlife and Countryside Link
- National Trust
- Kent Rural Communities Council
- Soil Association
- Harper Adams University
- Eden Project
- National Farmers Union (NFU)
- Woodland Trust

These events included facilitated workshops (see table). Participants could self-select two workshops to attend and were encouraged to share their views in an open discussion. Each session was structured around questions mentioned in the consultation paper. In total, there were 184 workshops and the following table shows the attendance at each.

Policy Workshops					
	Environmental Land Management	Farming Excellence	Reducing Direct Payments	Animal Health & Welfare	Rural/Uplands
<b>Number of Workshops</b>	56	20	32	30	46
<b>Number of Attendees</b>	545	569	315	178	226

Defra officials also held six policy roundtables to consult with a smaller group of interested stakeholders on specific policy areas.

The topics included:

- Innovation
- Agri-greenhouse gases
- Rural communities
- Organics
- Uplands
- A 'gold standard metric' for food and farming quality

Detailed notes from each of these workshops and policy roundtable were taken by officials and analysed separately in the relevant chapters. These workshops did not apply to every chapter identified in the consultation paper.

## Annex C: Campaign responses

As part of the consultation, we received 32,769 campaign responses from 20 campaigns.

In this document, we refer to campaign responses when organisations coordinated responses with their members. These were typically based on a standard template provided by the campaign organiser, and submitted by email or post. A small number of campaign responses were submitted through the online survey Citizen Space.

In these campaign responses, respondents could add their name and contact details to the standard response, and then send their message. These responses are referred to as **standard campaign responses**. Alternatively, respondents could edit a campaign, add their own comments, or provide information that supported the standard campaign response. In other cases, campaigns provided a list of prompts for respondents to provide their own comments. These responses are referred to as **personalised campaign responses**. We have summarised these additional points of value alongside standard campaign responses.

As well as individual points being included in the relevant chapters, these are described below in alphabetical order.

Although a large number of responses were identified as part of campaigns, due to the high levels of personalisation of some responses, and lack of self-identification, this number is a conservative figure. Therefore, the figures quoted for each campaign in this document are also conservative, based on the number of responses containing standard campaign text.

### Campaign for the Protection of Rural England (CPRE): 53 responses

The majority of these respondents wanted to see a future agricultural policy that supported a resilient farming sector and rural communities, and promotes a countryside that is accessible to and valued by all. Many respondents wanted to make farming more accessible to new entrants and measures developed to prevent the loss of farm businesses, particularly smaller businesses.

Respondents also wanted to enhance the environment through landscape protection, with some concerns relating to protecting farmland and countryside biodiversity (for example, by increasing hedgerow coverage). A small number of respondents also suggested that better countryside access could improve mental health, whilst others thought that reducing chemical inputs could reduce illness. It was suggested that improvements in both of these areas could reduce pressure on the NHS.

### Compassion in World Farming (CIWF): 3,363 responses

Many of these respondents welcomed the inclusion of animal welfare in the consultation, with the majority expressing support for high animal welfare and subsidies for farmers who adopt these standards. Many also suggested that they wanted a firmer commitment from government to do so, mentioning that animal welfare should be a priority for the Agriculture Bill.

Respondents raised a wide range of concerns about animal welfare in their responses. These included the desire to ban live exports, and ethical concerns about non-stun slaughter methods. They also emphasised the importance of recognising animal sentience, as well as environmental protection, less intensive farming practices and the impact of technology, including gene editing. A few respondents referred to the impact of antibiotic-overuse on animals and subsequently public health, with some arguing the need for better disease management.

There were also concerns raised about the need for future trade agreements to protect British agriculture from cheaper imports produced at a much lower welfare standard. Some respondents suggested that farmers may not want to accept further legislation to increase standards, if they are being undercut by low quality imports.

#### **Cumbria Wildlife Trust:** 1,523 responses

The standard campaign response expressed support for the principle of public money for public goods, and the emphasis on the environment being the cornerstone of a new environmental land management scheme. They asked that any new scheme should focus on wildlife and habitat restoration, as this could subsequently provide a number of environmental outcomes such as flood mitigation, improved soil health and carbon sequestration. To achieve this, supporters wanted government to implement clear schemes with measurable targets and accessible expert advice to ensure effective use of public money. The Cumbria Wildlife Trust campaign letter concluded by asking that the government make sure that environmental practices are not weakened as the UK leaves the European Union.

Personalised campaigns highlighted the importance of wildlife conservation to public health through the provision of environmental services, and improved mental health through a better connection to nature. A small number of respondents were concerned by the decline of species that were common during their childhoods. They wished to see the restoration of wildlife to allow future generations to experience and engage with nature in the way they did.

A few respondents wanted to see robust legislation and enforcement to make sure that new regulations were effective. Some also suggested that farming should be made more sustainable, through reduced agro-chemical inputs, greater use of mixed farming methods and the incorporation of more extensive wildlife habitats on farmland. It was hoped that by doing this, biodiversity could be supported whilst protecting food security into the future.

#### **Cycle UK:** 2,541 responses

These respondents highlighted the importance of public access, suggesting that maintaining and enhancing public rights of way improves public health and wellbeing through access to exercise and clean air. They also commented that greater access also provides opportunities for recreation and tourism.

Personalised responses highlighted the disconnected nature of the current cycling network. It was often suggested that any new subsidy system could be used to encourage farmers to allow access, in order to create coherent cycling networks with clear signposting and allow for safer, off-road cycling. Some respondents also argued that farmers should be required not only to allow access, but also ensure the usability of the routes through active maintenance efforts. A few respondents suggested that existing footpaths could be expanded into bridleways, or alternatively, that bikes should be allowed on some footpaths.

Other suggestions included the opening up and maintaining of cycle routes, as they would provide a safer cycling environment and encourage more people to derive health benefits. Several respondents mentioned these actions would decrease the burden on the NHS, in particular by reducing obesity.

#### **Disabled Ramblers:** 11 responses

These respondents' highlighted concerns that people with disabilities often have limited access to the countryside due to barriers such as stiles, steps and narrow passages. They wanted farmers to be incentivised to remove these barriers and replace them with accessible solutions. This would improve access not only for people with disabilities, but also for the elderly and families with pushchairs.

#### **Feedback's Pig Idea:** 27 responses

These respondents wanted to see food waste halved by 2030, with unconsumed food being fed to pigs. Many also believed that there was no need to increase agricultural productivity, which was thought to deplete soil fertility and create environmental pollution. They believed the focus should instead be on reducing food waste.

Some respondents also wanted to see a reduction in imported animal feed, with food waste being suggested as a sustainable alternative.

#### **Garden Organic:** 318 responses

These respondents expressed concern at the absence of organic production in the consultation, as they believed that these methods could protect food supplies, the environment and public health.

The majority of respondents commented on how organic farming could help us achieve beneficial environmental outcomes.

Most respondents thought that organic practices could:

- protect and improve our soils;
- have a positive impact on wildlife (including pollinators) biodiversity; and
- help reduce the level of agro-chemical inputs in our agricultural system (such as herbicides and pesticides) to reduce diffuse pollution and negative impact wildlife and human health.

They wanted to see government recognition of organic growers as major contributors to a sustainable food production sector.

### **GM Freeze:** 8 responses

The standard campaign responses expressed a need for greater regulation on genetic modification (GM), believing that this would protect the health of people, animals and the environment. Respondents also asked for clearer labelling to make sure that consumers can make informed choices and more robust protection against GM contamination.

Personalised responses also mentioned support for improved soil health and the protection of biodiversity.

### **Growing Communities:** 33 responses

These respondents wanted to see greater support for organic and agro-ecological farming through grants and maintenance payments, to help achieve various public goods and provide better working conditions for farm workers. Many respondents wanted government support for smaller-scale farms, new entrants and taxation of agro-chemical inputs which were perceived as being harmful to health.

Respondents also expressed support for shorter supply chains, with a desire to see the public have access to a supply fresh, local produce.

### **The Landworkers' Alliance:** 256 responses

These respondents expressed support for Defra's commitment to move away from area-based payments towards a system of public money for public goods. They suggested that agroecological production systems could deliver these goods.

Many respondents were concerned about food security, as well as the delivery of public goods such as improved biodiversity, water quality and soil health. These respondents also wanted to see the recognition of public health as another public good, suggesting that this could be delivered through a new food and farming policy that gave the public greater access to fresh, local produce.

Many respondents stated that they would like to see the expansion of agroecological, horticultural, agroforestry or organic farming systems, through grants and maintenance payments raised through a taxation on agro-chemical inputs thought to be harmful. Respondents also wanted the government to support new entrants into farming and safeguard the working conditions of farmers.

While respondents welcomed government's support for greater agricultural productivity, they did not believe that high-tech innovations would be able to help small-scale farmers. Rather, they suggested that there should be a focus on ecological innovation and appropriate scale technology. Respondents also suggested that specific funding should be made available for farmer-led research and innovative agricultural projects.

Most respondents suggested applying progressive reductions to Direct Payments, with higher percentage reductions applied to the higher payments.

In addition, a wide range of points were raised by respondents through the online survey. These included: a preference for CAP reform to include simplified packages and applications, and an extension of the online offer; comments that the new framework for English agricultural support should be introduced before 2024, whilst transitional support should be provided before the suggested start in 2019; incentives for organic certification; and support for trade regulations to protect farmers from lower import standards.

#### **The National Farmers' Union (NFU) Back British Farming:** 485 responses

The standard campaign responses expressed their strong belief in the value of farming in supporting rural communities and their significant contributions to the national economy. Respondents also expressed appreciation for British food quality, animal welfare and environment standards.

Many respondents valued the affordability of domestically-produced food, but wanted to see future trade regulations that protect British farmers from being undercut by cheaper but lower quality imports. Some respondents also highlighted the additional environmental benefit of domestically-produced food as it would reduce the nation's food miles.

#### **The National Farmers' Union (NFU) Successful Future for Farming:** 1,859 responses

These respondents wanted to see future policy safeguarding UK farm businesses, ensuring that any post-EU exit trade deals did not penalise British farmers by allowing cheaper and lower quality imports to undercut these businesses. Many of these respondents expressed an appreciation for British farmers' contribution to an efficient, domestic food production sector whilst also acting as custodians of rural landscapes.

Some of these respondents called for clarity on future farming policy, stating that current subsidies are vital to many farm businesses. A few respondents were concerned by the risks associated with moving away from the Common Agriculture Policy, suggesting that new policy could lessen farmers' ability to maintain food production and safeguard the environment.

#### **The People's Trust for Endangered Species (PTES):** 78 responses

Most respondents expressed support for environmental outcomes, such as soil, water, flood mitigation, carbon sequestration and forestry and woodlands, which were linked to an overall desire to see greater biodiversity, species recovery and habitat restoration. This included suggestions that biosecurity should be enhanced, in order to protect against the import of invasive species, and greater public access, to allow for greater engagement with nature.

Respondents stated that outcome-based payments would be the best way to achieve these environmental outcomes, alongside a regulatory culture that encouraged data sharing and increased self-reporting. They suggested that this should be backed with sufficient funding in enforcement and advice to ensure these regulations are effective.

Respondents wanted greater research into improved environmental performance, resource management (including agro-chemicals) and crop and livestock health and animal welfare. They suggested that this would help to integrate environmental land management with improved productivity to create a sustainable agriculture sector. It was also suggested that NGOs and third sector organisations could provide support in this area, whilst themselves benefitting from an engagement with the agricultural sector.

The campaign also identified the preservation of rural resilience, traditional farming and landscapes in the uplands as a public good.

Many of these respondents emphasised the need for CAP reform to ensure that payments and applications are completed on time. The standard response also asked for greater investment in Natural England, to expand their capacity to provide advice, and further investment in scheme promotion.

Respondents also suggested that powers proposed for the Agriculture Bill were insufficient, with the suggestion that the purpose should be made clear within the bill. They suggested that ministers should be made responsible for setting clear environmental targets and regular funding assessments, while the public should be able to hold government to account.

#### **The Ramblers (regional groups): 29 responses**

Each regional group suggested that enhanced beauty, heritage and engagement with the natural environment are valuable public goods and that they could also help deliver other public goods. These responses asked that the current legal baseline for maintenance of public access be maintained as we leave the European Union.

Most responding groups believed that access to rural areas improves both physical and mental health through regular exercise and engagement with the natural environment. Many responses suggested that there should be improvement to route quality and rights of way, with some suggesting that this maintenance should be carried out by farmers.

#### **Royal Society for the Protection of Birds (RSPB): 5,643 responses**

These respondents expressed support for the emphasis placed on the environment within the consultation, emphasising that they would like to see this translated into policy in the Agriculture Bill.

Most respondents suggested that there must be greater support and legislation for the protection and enhancement of the natural environment, with habitats such as hedgerows, field boundaries, meadowland and woodlands being a particular focus. The majority of respondents felt that there are currently too many agro-chemical inputs in our farming system. By reducing such inputs, these respondents hoped that the decline in pollinator species would be reversed, the quality of soil and water restored and the risk of pollution reduced. A small number of respondents also believed that welfare standards should be raised, with a small number of responses wanting wildlife to be considered in animal welfare efforts.

Some respondents acknowledged the challenge of achieving food security, in an environmentally sustainable way, within a changing climate and without farmers suffering as a consequence. It was suggested by many that collaborative work between farmers and specialist environmental bodies could further support sustainable agricultural practices. A few respondents believed that supporting the natural environment would have positive impacts on human health and wellbeing, while some valued it as part of Britain's heritage, culture and a legacy to leave the next generation.

#### **Royal Society for the Prevention of Cruelty to Animals (RSPCA): 4,316 responses**

These respondents expressed a desire to see improvements in UK animal welfare.

Standard campaign responses detailed how respondents felt that the costs of investment in buildings, innovation and new equipment, and the underlying profitability of businesses were barriers to improving on farm animal health. Many respondents supported financial incentives for welfare. Some believed that, whilst there was a desire amongst livestock farmers to improve welfare, they may not be able to afford to do so. Some also wanted to see the withdrawal of public money to farms that rear animals intensively.

Many respondents wanted to see new regulations to provide clarity on where farmers should invest to improve animal welfare. There were suggestions that subsidies should only go to farmers only if they went beyond legal baselines. Most responses also wanted to see better consumer choices and method of production labelling of products to allow people to make more informed decisions when purchasing food.

These respondents valued animal health and welfare as the most important public goods for government to support. They strongly argued that animal lives matter, with some emphasising their sentience. Some responses wanted to see the extension of the definition of animal welfare to cover wildlife. Of these respondents, many were concerned with the destruction of habitats, inhumane control of wild animals (such as rodents) and the culling of badgers in bovine tuberculosis eradication initiatives, with the suggestion that vaccination would be a more compassionate and effective alternative.

There was a common concern amongst these respondents that future trade deals must incorporate regulation on animal welfare to prevent the import of low welfare produce and to help raise standards elsewhere.

#### **An unidentified campaign: 145 responses**

These respondents identified strongly with the specific points raised above by the Cumbria Wildlife Trust, but with a particular emphasis on flood mitigation. They suggested that flood mitigation should be included in the suite of public goods mentioned in the consultation.

Most of these respondents also suggested that a new environmental land management scheme should use outcome-based payments to ensure that environmental objectives are met. They suggested that the delivery of environmental, social and cultural benefits in the

uplands should be integrated to ensure that no social and cultural benefits come at the detriment of the environment.

#### **An unidentified campaign:** 15 responses

These respondents answered a wide range of questions across the online survey.

Regarding the reduction of Direct Payments, these respondents wanted to see the same percentage reductions to be applied across all payment bands. However, they wanted the dairy industry to be exempt from reductions due to the long-term planning required in this sector.

The campaign supported benchmarking in order to share best practice and enable greater uptake of knowledge, particularly to improve animal health and welfare. It was also suggested that research and technology should consider the longer planning cycles that dairy farming requires. In particular, they emphasised the need to support dairy producer organisations such as Arla. They suggested that this would make sure there would be greater collaboration and representation of farmers.

On devolution, respondents wanted uniform payment and regulatory schemes across the UK to protect existing dairy supply chains.

#### **Wildlife Trust:** 22 responses

While we received unique responses from regional groups and Wildlife Trust members, we also identified a campaign response from some local Wildlife Trusts and individual supporters.

Most of these respondents supported the idea of public money for public goods. They wanted to see farmers being supported for delivering a number of environmental outcomes, including a greater number of habitats created, protection of pollinators and enhanced water quality. This included the suggestion that land management with a strong consideration for wildlife could deliver these goods simultaneously.

Respondents raised concerns about a 'cliff edge' during the agricultural transition period, with many asking for new ELM schemes to be in place to bridge the gap. The majority of respondents also wanted to see the better use of technology to ease the burden of inspections on farmers. They would however also like to see enforcement of rules to be strengthened as we move

#### **World Wide Fund for Nature (WWF):** 14,056 responses

These respondents emphasised the importance of paying farmers to restore nature, holding high environmental standards for agriculture, and providing farmers with professional advice to support them throughout any transition period.

The standard campaign responses stated that they would most like to see the Agriculture Bill 'pay farmers to restore nature', suggesting that could be achieved through planting hedgerows, sowing wildflower meadows, planting trees, and sowing grass and flower strips to

bring back birds and butterflies. They also suggested that the policy should support farmers with ways of protecting crops without poisoning wildlife with pesticides.

Respondents also emphasised the need for high environmental standards for agriculture established, and a fair enforcement system that gives taxpayers value for money.

Standard campaign responses also asked the government to pay for professional advice that will equip farmers with the knowledge and resources to help protect and restore nature on their land, ensuring they feel supported throughout any transition.

Personalised responses added support for public access and engagement with nature, whilst some also stated that they want to see improvements in animal welfare. Some suggested that the government should make habitat corridors and connectivity a priority in order to make wildlife enhancement and protection a success.

## Annex D: Petitions

As part of the consultation, we received 127,183 responses from three petitions.

Petitions typically consisted of an initial petition statement, information about the consultation, followed by a list of signatures. As well as individual points being included in the relevant chapters, these are described below in alphabetical order.

Although a large number of responses were identified as part of petitions, please note that this estimate is a conservative figure.

### **38 Degrees:** 77,628 responses

38 Degrees conducted a survey of its members in response to this consultation. In the survey, respondents were asked to state how they would like farming and the countryside to be managed after we leave the EU.

The results of the survey indicated a significant public interest in the proposed shift to a system underpinned by 'public money for public goods'.

The key findings of the survey were:

- significant support for public money for public goods;
- that the principle of public money for public goods should have 'legal backing and that the law should be changed to reflect this';
- biodiversity was considered the most important of the environmental outcomes; and
- there was 'a strong preference that new farming rules should focus on the protection of crops, trees, plant and bee health, animal welfare, and high animal health standards'—with further support for the provision of financial support to farmers who promote animal welfare.

### **Pesticide Action Network UK (PAN UK):** 37,555 signatories

PAN UK petitioned to introduce a quantitative pesticide reduction target and an increase in support to farmers to reduce their pesticide use.

The statement accompanying the petition argued that in order to deliver a sustainable EU Exit, the government had to ensure a reduction in the use of pesticides.

This included the suggestion that there needed to be concrete policy proposals included in the Agriculture Bill to achieve these aims.

**Ramblers, Cycling UK, the British Horse Society, the British Mountaineering Council, and Open Spaces:** over 12,000 signatories

The Ramblers collaborated with Cycling UK, the British Horse Society, the British Mountaineering Council and Open Spaces to petition for measures protecting and enhancing access to the countryside to be included in the Agriculture Bill.

The Bill was considered to have far reaching consequences to both the quality of the environment and those that enjoy it. The statement accompanying the petition argued that because of this, it was inherently beneficial to society that responsible access to the countryside was integral to the bill.

The statement suggested that access to the countryside would be beneficial to physical health, mental health and wellbeing. It also suggested that a system that encourages walking, cycling, horse riding, carriage driving and disability access is vitally important in connecting the public with the countryside, and encouraging a better understanding of the critical work carried out by farmers.

It was suggested that the bill should include measures to ensure farmers fulfil their existing legal responsibilities and reward them for improving and increasing access. It emphasised that public money be used to support farmers and help make sure that the countryside is more welcoming.

## Annex E: List of responding organisations

This list of responding organisations is not exhaustive. Rather, it is based on those that declared their organisation. This may include responses from individuals who are members of specific organisations and therefore does not necessarily reflect that organisation's views.

This list also does not include those that asked their response to be kept confidential.

A Team Foundation	Association of Local Government
AB AGRI	Archaeological Officers (ALGAO)
AC Hulme & Sons	Association of local government
Action in Communities	archaeological officers
Action with Communities Rural	Assured Food
England	Australia Department of Foreign
ADAS	Affairs and Trade
Agri tech Alliance	Aviagen
Agri-Brexit Coalition	Bangor University
Agricology	Barclays
Agricultural Biotechnology Council	Barnsley University
Agricultural Christian Fellowship	Barton Rose Holsteins and Arla
Agricultural Engineers Association	Battlefields Trust
Agricultural Law Association	Bayer Crop Science
Agriculture and Horticulture	Bed & Camb Rural Support Group
Development Board (AHDB)	Bedfordshire Beekeepers
Agriculture Industries Confederation	Bedfordshire Climate Change Forum
(AIC)	(BCCF)
Agrifocus Ltd	Bedfordshire Local Nature
Agri-Matters	Partnership
Agriskills Forum	Bee Farmers Association of the UK
Allensmore & Clehonger Action	Beef + Lamb New Zealand and the
Group	Meat Industry Association of New
Alliance to Save our Antibiotics	Zealand
Altrincham Young Farmers Club	Beyond GM
Alvis Bros Ltd	BHS West Sussex
Amenity Forum	BIFGA (British Independent Fruit
Amphibian and Reptile Conservation	Growers Association)
Ancient Tree Forum	Biodynamic Agricultural Association
Andersons Eastern	of Great Britain and Northern Ireland
Anglian Pea Growers Ltd	Biodynamic Agricultural College
Anglian Water	Bishop Burton College
Angling Trust	Blackdown Hills AONB Partnership
Arbtech Consulting	Blackwater Valley Countryside Trust
Arla	Blaenau Gwent County Borough
Association of British Insurers	Council
Association of Drainage Authorities	Bournemouth University
(ADA)	Braunton Neighbourhood Plan
Association of Independent Crop	Steering Group
Consultants	Bristol Food Producers Network
	Limited

British Beekeepers Association (BBKA)  
 British Canoeing  
 British Christmas Tree Growers (BCTG)  
 British Ecological Society  
 British Edible Pulse Association  
 British Egg Industry Council (BEIC)  
 British Free Range Egg Producers Association (BFREPA)  
 British Growers Association  
 British Hemp Association  
 British Hop Association  
 British Horse Society  
 British Horse Society / Forest of Rossendale Bridleways Association  
 British Horse Society Gold Member and District Access and Bridleways  
 British Independent Fruit Growers' Association  
 British Institute of Agricultural Consultants (BIAC)  
 British Meat Processors Association [BMPA]  
 British Mountaineering Council  
 British Pig Association  
 British Potato Trade Association  
 British Poultry  
 British Poultry Council  
 British Protected Organic Association  
 British Protected Ornamentals Association  
 British Reed Growers Association.  
 British Retail Consortium  
 British Standards Institute (BSI)  
 British Sugar  
 British Summer Fruits  
 British Vet School  
 British Veterinary Association  
 British Wildlife Management  
 Broads Local Access Forum  
 Broads Reed & Sedge Cutters Association  
 Bug Life  
 Bumblebee Conservation Trust  
 Bushey And District Footpaths Association  
 Business in the Community  
 BW Field & Partners

Camgrain  
 Campaign for National Parks  
 Campaign to Protect Rural England  
 Catapult  
 Catholic Action for Animals  
 Cattle Health and Welfare Group (CHAWG)  
 Conservation Agriculture – United Kingdom (CA-UK)  
 Central Association of Agricultural Valuers (CAAV)  
 Central Bedfordshire and Luton Joint Access Forum  
 Centre for Agri-Environment Research, University of Reading  
 Centre for Agroecology, Water and Resilience  
 Centre for Ecology and Hydrology (CEH)  
 Centre for Rural Excellence  
 Centre of Innovation and Excellence in Livestock  
 CF Fertilisers  
 Chartered Institute of Ecology and Environmental Management (CIEEM)  
 Chartered Institute of Waste Management  
 Chartered Institute for Archaeologists and Council for British Archaeology  
 Cheshire and Warrington Local Enterprise Partnership  
 Cheshire East Council  
 Cheshire East Countryside Access Forum  
 Cheshire LEADER Programme and West Cheshire Rural Growth Board  
 Cheshire Leader Programme, West Cheshire Rural Growth Board  
 Chilterns Conservation board  
 Chilterns LAG  
 Church of England: Mission and Public Affairs Council  
 Claythorpe Parish Council  
 Climate Friendly Bradford on Avon  
 Community First Yorkshire  
 Community Supported Agriculture (CSA) Network UK  
 Compassion in World Farming (CIWF)  
 Confederation of Forest Industries (CONFOR)

Conservation Foundation  
 Conservative Animal Welfare Foundation  
 Conservative Rural Forum  
 Co-op Culture  
 Co-Op Group  
 Co-Operatives UK  
 Coppice Association North West  
 Cornwall AONB Partnership  
 Cornwall Council  
 Cornwall Council/Cornwall and Isles of Scilly Local Enterprise Partnership  
 Cornwall Food and Farming Group  
 Cotswolds Conservation Board  
 Council of National Beekeeping Associations of United Kingdom and Ireland  
 Countryside Alliance  
 Country Land and Business Association (CLA)  
 Cranborne Chase Area of Outstanding Natural Beauty Partnership  
 Cranfield University  
 Craven Ramblers  
 Crop Protection Association  
 Cumbria and North & East Lancashire RFN  
 Cycling UK  
 Dairy Crest  
 DAIRY UK  
 Dartmoor Access  
 Dartmoor Commoners Council  
 Dartmoor National Park  
 David Holmes Farming Co  
 Department of Archaeology, Durham University  
 Derbyshire County Council  
 Devon Beekeepers Association  
 Devon Countryside Access Forum  
 Devon County Council Waste Management Team  
 Devon Hedge Group and the Devon Landscape and Ecological Resilience Group  
 Diocese of Chelmsford  
 Donkey Sanctuary  
 Dorset Local Nature  
 Dorset County Council

Duchy and Bicton College and the Cornwall College Group  
 Duchy College  
 Durham University  
 East Durham College  
 East Essex Local Access Forum  
 East of England Agricultural Society  
 East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum  
 East Riding of Yorkshire Council  
 Easton Food Assembly  
 Ecological Land Cooperative  
 Elsham Linc Limited  
 English Organic Forum  
 Environment Agency (EA)  
 Environmental Law Foundation  
 Essex Society for Archaeology and History  
 Estates, Farms and Woodlands  
 EuCAN (a Community Interest Company)  
 Executive Committee of the Farm Woodland Forum  
 Exmoor Society  
 Faculty of Public Health of the Royal Colleges of Physicians of the UK  
 Fairtrade Foundation  
 Family Farmers Association  
 Farm Animal Welfare Committee  
 Farm Safety Foundation  
 Farmers Union Wales  
 Farming and Wildlife Advisory Group South East  
 Farming and Wildlife Advisory Group South West Limited  
 Farmland Conservation  
 Farmwel  
 Federation of Cumbria Commoners  
 Feedback Global  
 Fera Science Ltd  
 Fisheries, Conservation & Land Use Management  
 Flo Domes  
 Floodplain Meadows Partnership  
 Food and Drink Federation Scotland  
 Food Durham  
 Food Ethics  
 Food Foundation

Food Plymouth Local Food  
 Partnership and Network  
 Forest Enterprise England  
 Forest Stewardship Council (FSC)  
 Forestry Commission (FC)  
 Forestry Commission North East  
 Forestry and Woodlands Advisory  
 Committee  
 ForFarmers UK  
 Foundation for Common Land  
 Free Range Dairy Network CIC  
 Fresh Growers  
 Friends of Lake District  
 Friends of the Earth, England, Wales  
 & Northern Ireland  
 friends of the lake district  
 Friends of the New Forest (New  
 Forest Association)  
 Friends of the South Downs - The  
 South Downs Society  
 G Growers  
 Game and Wildlife Conservation Trust  
 GARNet  
 Garth pig practice ltd  
 Gleadell Agriculture Ltd and Dunns  
 (Long Sutton) Ltd and Agricultural  
 Industries Confederation  
 Gleam  
 Gloucestershire Local Access Forum  
 Gloucestershire Local Enterprise  
 Partnership (GFirstLEP)  
 GM Free Dorset Campaign  
 GM Freeze  
 Greater Lincolnshire LEP  
 Greater Lincolnshire Nature  
 Partnership  
 Green Alliance  
 Green Lands Protection Group  
 Greens for Animals  
 Growers Community  
 Grown in Britain  
 Hagge Woods Trust  
 Harper Adams University  
 Heart of Southwest LEP  
 Hedgelink  
 Herefordshire Council  
 High Weald Area of Outstanding  
 Natural Beauty Unit  
 Hilton Foods

Historic England  
 Historic Houses  
 Horticulture Trade Association  
 Howardian Hills Area of Outstanding  
 Natural Beauty [AONB] Partnership  
 Hunts wildlife Landscapes Est.  
 IlettoCPN  
 Increment Limited  
 Innovative Farmers Programme  
 Institute of Chartered Foresters  
 Institute for European Environmental  
 Policy  
 Institute of Agriculture Engineers  
 Institute of Alcohol Studies  
 Institute of Development Studies  
 Institute of Public Rights of Way &  
 Access Management [IPROW]  
 International Society for Human  
 Rights  
 Isle of Wight Area of Outstanding  
 Natural Beauty  
 James Hutton Institute  
 John Strutt Conservation Foundation  
 Joint Parish Flood Group and Parish  
 Council  
 Kent County Council  
 Kent Nature Partnership  
 Kimber family farming partnership  
 King's College London  
 Land and Livestock Management for  
 Life (3LM)  
 Landworker's Alliance  
 Land, Life and Livelihoods  
 LandBase  
 Landex 'Land Based Colleges  
 Aspiring to Excellence'  
 Landscape Institute  
 Landworkers' Alliance  
 Landworkers' Alliance and Growing  
 Communities Horticulture Campaign  
 Languard Limited  
 Lantra  
 Launceston Anglers Association  
 Lea Valley Growers Association.  
 LEAF (Linking Environment and  
 Farming)  
 LEAF Marque  
 Leeds Beckett University

Leicestershire County Council  
 Lincolnshire County Council  
 Living Valley  
 Local Action Groups within the Leeds City Region  
 Low Carbon Louth  
 Mainwaring Dean Associates  
 Manchester and District Beekeepers' Association  
 Marches Local Enterprise Partnership  
 Marches Nature Partnership  
 Metro Mayor's Office  
 Micropropagation Services - BeadaMoss®  
 Mid & West Berks Local Access Forum  
 Mid Norfolk Ramblers Walks Society  
 Mountaincraft and Leadership  
 MRC Epidemiology Unit, University of Cambridge  
 MSD Animal Health  
 N8 AgriFood  
 National Association of Agriculture Contractors (NAAC)  
 National Association of British and Irish Millers (Nabim)  
 National Beef Association  
 National Coppice Federation  
 National Farmers Union  
 National Farmers Union Cymru  
 National Farmers Union Mutual  
 National Farmers Union Scotland  
 National Farmers Union Wiltshire  
 National Federation of Young Farmers Clubs  
 National Forest Company  
 National Health Service (NHS): Health Scotland  
 National Institute of Agricultural Botany (NIAB)  
 National Land Based College (NLBC)  
 National Office of Animal Health (NOAH)  
 National Parks  
 National Pig Association  
 National Sheep Association  
 National Society of Master Thatchers  
 National Trust  
 National Wildflower Centre

Natural England  
 Nature Friendly Farming Network [NFFN]  
 Nature Matters Northern Ireland  
 New Anglia  
 New Forest Access Forum  
 New Forest Commoners Defence Association  
 New Forest National Park Authority  
 New Forest National Parks  
 Newcastle University  
 Norfolk County Council/ Norfolk Rural Strategy Steering Group  
 Norfolk Farming and Wildlife Advice Group  
 Norfolk Local Access Forum  
 North West England Forestry and Woodland advisory Committee  
 North and West Northants Local Access Group  
 North East Farming Rural Advisory Network (NEFRAN)  
 North Somerset Local Access Forum  
 North Wessex Downs Area of Outstanding Natural Beauty  
 North York Moors, Coast and Hills LEADER Programme  
 North Yorkshire County Council  
 Northern Farmers & Landowners Group  
 Northern Ireland Meat Exporters Association  
 Northern Red Squirrels  
 Northumberland Coast AONB Partnership  
 Northumberland National Park and County Joint Local Access Forum  
 Northumberland Uplands Leader Local Action Group  
 National Sanitation Foundation International  
 Open Farm Sunday  
 Open Spaces Society  
 Openfield  
 Organic Advice  
 Organic Farmers and Growers  
 Organic Growers Alliance  
 Organic Milk Suppliers Co-operative  
 Organic Research Centre  
 Organic Trade Board

Ornamental Horticulture Roundtable  
 Group - a sector led organisation  
 representing industry  
 OXFAM  
 Paddlers International  
 Paramaethu Cymru / Permaculture  
 Wales  
 Peak District Green Lanes Alliance  
 Peak District Land management  
 Forum  
 Peak District Local Access Forum  
 Peak Horsepower Bridleway  
 PEAK Local Action Group  
 Pennine Heritage Ltd  
 Pensthorpe Conservation Trust  
 Peoples Food  
 Peoples Trust for Endangered  
 Species  
 Permaculture Association  
 Pesticide Action Network UK  
 Pet Food Manufacturers Association  
 Pig Health and Welfare Council  
 (PHWC)  
 Pig Veterinary Society  
 Potato Processors' Association Ltd  
 Poultry Health and Welfare Group  
 Processors and Growers Research  
 Organisation  
 Protected Food Names  
 Provision Trade Federation  
 Quality Meat Scotland  
 Queen's University Belfast  
 The Ramblers  
 Ramblers Essex Area  
 Rare Breeds Survival Trust (RBST)  
 Renewable Energy Association  
 Rescue - the British Archaeological  
 Trust  
 Responsible Use of Medicines in  
 Agriculture Alliance (RUMA)  
 Riverford Organic  
 Rockingham Forest Coppice Group  
 Rothamsted Research  
 Royal Agricultural University  
 Royal Agriculture Society of England  
 Royal Forestry Society  
 Royal Horticulture Society

Royal Institute of Chartered  
 Surveyors  
 Royal Society for the Prevention of  
 Cruelty to Animals (RSPCA)  
 Royal Society for Public Health  
 Royal Society for the Protection of  
 Birds (RSPB)  
 Royal Society of Biology  
 Ruminant Population Health Group,  
 University of Nottingham  
 Rural Business School, Duchy  
 College, Cornwall  
 Rural Coalition  
 Rural Community Council of Essex  
 Rural Services Network [RSN]  
 Rural Sub Group at SEMLEP  
 Rutland County Council  
 SAC Consulting  
 Sainsbury's  
 School and Nursery Milk Alliance  
 School of artisan food, slow food, rare  
 breed survival trust  
 School of Life Sciences, University of  
 Warwick  
 Scotland's Rural College (SRUC)  
 Severn Gorge Countryside Trust  
 (SGCT)  
 Sherwood Forest Project  
 Shropshire Hills AONB Partnership  
 Shropshire Marches  
 Small Woods Association  
 Smithsonian Hill  
 Society for the Environment  
 Society of Social Medicine  
 Soil Association  
 Somerset CC  
 South Devon Area of Outstanding  
 Natural Beauty  
 South West Beekeepers' Forum  
 South West England Forestry and  
 Woodland Advisory Committee  
 South West England Sustainable  
 Enterprises (Trelay) Ltd  
 South West Green Party  
 South West Water  
 Southeast Water  
 Southern Water  
 Sparsholt College Hampshire  
 Sports and Creation Alliance

St Michael & All Angels Church  
 Staffordshire Chambers of Commerce  
 Staffordshire Moorlands District Council  
 Stockbridge Technology Centre  
 Strine Internal Drainage Board  
 Suffolk CC  
 Suffolk Local Access Forum (SLAF)  
 Supply Intelligence  
 Surrey Hills AONB Board  
 Sustain  
 Sustainability Research Institute, University of Leeds  
 Sustainable Agriculture Systems  
 Sustainable Food Trust  
 Sustrans  
 Swaledale Sheep  
 Swinbank and Tranter  
 Swindon and Wiltshire Local Enterprise Partnership (SWLEP)  
 Sylva Foundation  
 Tasset 2050CIC  
 Taylor Vinters  
 Tenant Farmers Association  
 Texel Sheep Society  
 Thames Water  
 The Agricultural Industries Confederation Scotland  
 the AgriFood Training Partnership  
 The All Party Parliamentary Group on Agroecology [APPG]  
 The Anaerobic Digestion  
 The AF [Anglia Farmers] Group  
 The British Society of Plant Breeders  
 The Central Association of Agriculture Valuers  
 The Chartered Institution of Water and Environmental Management (CIWEM)  
 The Country Trust  
 The Dartmoor Society  
 The Donkey Sanctuary  
 The Dorset AONB Partnership  
 The England & Wales Wildfire Forum  
 The Exmoor Hill Farming Network  
 The Farmer Network  
 The Farming Community Network  
 The Fens for the Future Partnership

The Food Foundation  
 The Forest Farming Group  
 The Grain and Free Trade Association  
 The Green Halo Partnership  
 The Green Pea Company  
 The Heather Trust  
 The Heritage Alliance  
 The Institute of Agricultural Management  
 The Institute for Chartered Accountants in England and Wales  
 The International Meat Trade Association  
 The Land Trust  
 The Methodist Church (Plymouth and Exeter Methodist District)  
 The National Federation of Meat and Food Traders  
 The Natural Environment Research Council  
 The Outdoor Swimming Society  
 The Pasture-Fed Livestock Association  
 The Prince's Countryside Fund  
 The Rivers Trust  
 The Royal Association of British Dairy Farmers [RABDF]  
 The Royal Horticultural Society  
 The Royal Society  
 The Scottish Wildlife Trust  
 The Sheepdrove Trust  
 The Soil Association  
 The Sustainable Soils Alliance  
 The Three Counties Traditional Orchard Project  
 The Trails Trust  
 The Tree Conference  
 The Vegan Society  
 The Wildlife Trusts  
 The Yorkshire and Humber Forestry and Woodlands Advisory Committee.  
 Traidcraft  
 Transition Marlborough  
 Transition Northwich  
 UK Export Certification Partnership (UKECP)  
 UK Finance  
 UK Health Forum

UK Pesticides Campaign  
 UK Squirrel Accord  
 UK Hospitality  
 Ulster Farmers' Union  
 UNITE  
 United Kingdom Independence Party  
 United Utilities  
 Universities Federation for Animal Welfare (UFAW)  
 University College London  
 University of Bristol Veterinary School  
 The University of Cambridge  
 University of Cumbria  
 University of East Anglia  
 University of Leeds  
 University of Nottingham and Rural Business Research  
 University of Reading  
 University of Sussex  
 University of Winchester  
 Uplands Alliance  
 Values In Nature and the Environment (VINE)  
 Velcourt  
 Waitrose  
 Wales Environment Link  
 Waste Saddoes Ltd  
 Water Resources East (WRE)  
 Water UK  
 Wellcome  
 Welsh Local Government  
 Wessex Water  
 West Berkshire Council Archaeology Service  
 West Cumbria Rivers Trust  
 West Midlands Forestry and Woodland Advisory Committee  
 West Sussex Access Forum  
 West Country Rivers Trust  
 Westmorland County Agriculture Society

Wetheriggs Animal Rescue and Conservation Centre  
 Weybread Tree Warden  
 Which?  
 Wildlife and Countryside Link  
 Wiltshire Council  
 Wines of Great Britain  
 Winsford Parish Council  
 Woodland Trust  
 Woodland Trust NI  
 Worcestershire County Council  
 World Animal Protection  
 World Wide Fund for Nature (WWF)  
 Wright Hassall  
 Wrongs Covert Woodland Project C.I.C.  
 Wildfowl and Wetlands Trust (WWT)  
 Wychavon District Council  
 Wye & Usk Foundation  
 Wyre Forest Vegans  
 York, North Yorkshire & East Riding LEP  
 Yorkshire Agriculture Society  
 Yorkshire Derwent Partnership  
 Yorkshire Humber and North Lincolnshire Regional Access Forums  
 Yorkshire Regional Care Farmers Network  
 Yorkshire Water  
 Yorkshire Wolds Heritage Trust

## Annex F: Glossary

<b>APHA</b>	The Animal Plant and Health Agency
<b>ASSURANCE SCHEME</b>	Food assurance schemes - such as Red Tractor and the Lion logo for eggs - guarantee defined standards of food safety or animal welfare.
<b>CAP</b>	Common Agricultural Policy
<b>CPD</b>	Continuing Professional Development
<b>CROSS COMPLIANCE</b>	Cross compliance is a set of rules that farmers and land managers must meet or else be penalised through a reduction to their Direct Payment and some rural development schemes.
<b>DIRECT PAYMENTS</b>	Direct Payments are the EU's main method of income support for farmers. They are principally calculated on an area basis. In England there are three components to Direct Payments: the Basic Payment; a 'greening' element, representing 30% of the total payment; and a Young Farmer top-up for farmers no more than 40 years of age.
<b>ELM System</b>	Environmental land management system
<b>GMO</b>	Genetically modified organism
<b>GREENING</b>	Greening: 30% of Direct Payment funds are made on condition that the recipient performs three agricultural practices which are intended to benefit the environment and the climate. The three greening practices are: crop diversification (also known as the three crop rule); maintenance of permanent grassland; and the establishment of an Ecological Focus Area covering at least 5% of each farm holding's arable land.
<b>LEADER</b>	LEADER is a local development method which has been used to give local communities the responsibility and resources to identify local needs and fund projects to meet them. Local LEADER groups decide how to spend funds in their area.
<b>NGO</b>	Non-governmental organisation
<b>RPA</b>	Rural Payments Agency
<b>WTO</b>	The World Trade Organisation