

Environmental Standards for Farming:

Consultation on proposed changes to standards in cross compliance Good Agricultural and Environmental Condition (GAEC) and related measures in England

Proforma for responses

This form is designed to be completed electronically. Where appropriate, check boxes are used to make it easy to respond. Text boxes for additional information will expand as you type. If completing by hand please use black ink. You may need to expand the text boxes manually before printing.

Please send completed forms to GAEC.consultation@defra.gsi.gov.uk or post to: Sustainable Farm Management Team, Defra, Area 5C, 9 Millbank, c/o 17 Smith Square London SW1P 3JR by **27th May 2009**.

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Important Note: If you do not want your response - including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the consultation (you may use the space below). If your email automatically includes a confidentiality disclaimer, it will not count as a confidentiality request. Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

(use this space if you wish to request confidentiality)

No.	Question
Recapturing the environmental benefits of set-aside (Option A - mandatory approach plus ELS 'top-ups'; Option B - voluntary approach)	
1	Do you have any further evidence (preferably quantified) on the environmental benefits of set-aside/uncropped land?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
<p>Only the summaries of the reports commissioned by Sir Don Curry are shown on the HLSAG web-site so it is not possible to properly evaluate them. Mostly it seems the reports have considered the generality of set-aside and its probable effects on a range of, mostly bird, species. We note:-</p> <p>(1) that it does not appear that any bird species has increased in number as a consequence of the introduction of set-aside. The evidence is it that it may have stemmed a decline in several.</p> <p>(2) there is evidence that one mammal (the brown hare) did reverse its former decline and did</p>	

<p>increase in numbers since the introduction of set-aside.[See JNCC report for the Tracking Mammals Partnership].</p> <p>(3) The HLSAG group appear to have given scant consideration to instances where set-aside has been used intelligently and deliberately to provide benefits to wildlife. The Game & Wildlife Conservation Trust Allerton Project at Loddington did this. Since 1992 most of the set-aside allocation for this farm was distributed in small parcels around the farm and sown as Wild Bird Cover. Songbird numbers on this farm doubled within 6 years and although this was not solely due to the use of set-aside it certainly was partially so.</p>	
2	Do you think other or additional selection criteria should be considered in selecting which option to implement?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
<p>Both options require actions by farmers and their willingness to embrace the concept of enhancing wildlife on their farms is crucial. An important selection criterion should be farmers willingness to do this. In effect this means measuring farmers showing a positive response to Option B and not simply a negative response to Option A.</p> <p>We think the "increasing base-line" measure explained in para 3.5.5 is bogus. It is entirely contrived and based on projections which are unlikely to still apply. It should be dropped.</p>	
3	Do you think other or additional criteria should be considered in measuring the success of any measures adopted?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
<p>It is not clear whether or not some of these measures compete with one another. Stubbles for instance are a good ELS option: Does this get measured as (I) (III) or both?</p> <p>Whatever measures one chooses, in the end it is going to come down to a subjective judgement (at best) or some highly dubious modeling (at worst). Option A will clearly be aimed at measures I & II. Option B is likely to deliver under III & IV. There will be no end of arguments about which is best.</p>	
4	Do you agree that the short term outcomes (e.g. area, distribution, management of uncropped land) and longer term potential of any measure adopted should be assessed at the end of the first year of implementation?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If NO, please provide further information in the box below)	
<p>But, we would like to see most emphasis placed on III and IV (better ELS applications and renewals) especially in relation to Option B.</p>	
5	For Option A which alternative would you prefer to see implemented, A1 or A2, and why?
<input checked="" type="checkbox"/> A1 <input type="checkbox"/> A2 (Tick only one. Please provide any further information in the box below)	
<p>The extended list in A2 is of marginal value. In fact none of the additional options are even as good as former set-aside requirements.</p>	
6a	Bearing in mind the costs to farmers and environmental objectives, what percentage area do you think should be set for Option A– as alternative A1; or as alternative A2? Please give reasons.
<p>Tick only one box for either alternative. You may provide further information in the box below</p>	
<p>Option A Alternative A1 <input checked="" type="checkbox"/><4% <input type="checkbox"/>4% <input type="checkbox"/>5% <input type="checkbox"/>6% <input type="checkbox"/>>6% <input type="checkbox"/>Other</p>	
<p>Option A Alternative A2 <input checked="" type="checkbox"/><4% <input type="checkbox"/>4% <input type="checkbox"/>5% <input type="checkbox"/>6% <input type="checkbox"/>>6% <input type="checkbox"/>Other</p>	

We think all of these percentages are too high bearing in mind the potential loss of cropland.	
6b	Do you agree that the Option A requirement should only apply to farms with more than 20ha of cultivated land?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If NO, please provide further information in the box below)	
On farms with less than 20ha the Option A requirement is likely to be too small to matter in relation to other farmland features such as hedgerows	
7	Do you have suggestions for minimising any potential negative impact on ELS uptake should Option A be implemented?
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
8	What suggestions do you have for changing the existing GAEC 12 (agricultural land which is not in agricultural production) as part of Option B?
Most of the rules that restrict mowing, grazing and the application of pesticides should be lifted if they are being done for conservation purposes such as producing a bird seed crop or a mixed height sward for ground nesting birds.	
9	Do you have any suggestions for developing Option B so that it could deliver against the proposed success criteria (para 3.7.1)?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
Option B would be better supported if there were a number of changes made to ELS. These include; dropping the proposals for an ENFER and replacing it with a "points for advice" scheme; also a mandatory split-list should be introduced to ensure farmers choose a good balance of options.	
10	What would be the best form of cost-effective guidance and advice to help you understand the proposals for either Option A or B? (Examples include – hard copy, electronic form, workshops, farm demonstrations, farm walks, a telephone help-line, published articles, training of advisors etc.)
Assuming "you" in this context refers to a farmer, then face to face advice whether singly or in groups is usually necessary to give farmers the confidence to implement conservation schemes on their land. This is best backed up by farm walks and printed guidelines.	
11	Is Option A the most appropriate mechanism to act as a fallback should Option B (a voluntary approach) fail to deliver?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. Please provide any further information in the box below)	
12	Which option would you prefer to see implemented, Option A or B? Please state why.
<input type="checkbox"/> Option A <input checked="" type="checkbox"/> Option B (Tick only one. Please provide any further information in the box below)	
There are clearly risks with both options and the EU Commission and Defra served us badly by allowing set-aside to be set to zero without first devising an environmental plan to follow it.	
Ultimately we want to see farmers embrace wholeheartedly the concept of farmland conservation and for them to appreciate that it is more than ticking cross compliance boxes and signing up for the easiest of options under ELS. We think Option B offers a greater possibility of	

this than Option A.	
13	Do you have any further information and/or views on the costs, benefits and risks of the proposals?
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
Introduction of new GAEC standard on buffer strips next to watercourses	
14	Do you have further information, preferably quantified, that would improve the analysis presented in the impact assessment associated with the buffer strip options?
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
15a	What guidance and advice will be necessary to assist farmers in deciding where to locate buffer strips next to watercourses?
15b	What is the most effective way of providing guidance and advice to farmers on locating buffer strips?
16a	Do you agree that the success of policy option 3 (advisory targeting of buffer strips) is likely to be reduced if Option B for recapturing the benefits of set-aside is undertaken?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. Please provide any further information in the box below and see question 16b)	
Possibly this may be true, but plans for Option B include resource protection.	
16b	How would you mitigate this risk?
Stengthening ELS options for buffer strips next to watercourses. Currently there is no incentive to locate these next to watercourses - there should be.	
17	If monitoring showed that the advisory/ incentive approach under Policy Option 3 had not been successful in delivering sufficient buffer strips in appropriate locations, would you prefer to adopt Policy Option 2 (a blanket mandatory approach) or Policy Option 4 (a targeted mandatory approach)?
<input type="checkbox"/> Option 2 <input type="checkbox"/> Option 4 (Tick only one. Please provide any further information in the box below)	
Neither. An incentive based approach through ELS should be used. As outlined in the consultation document, Policy Option 3 actually contains no incentives - only advice.	
18	Can you advise on modifications to the options outlined that would effectively address water quality issues through the use of buffer strips next to watercourses as part of the GAEC standards?

<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
Using ELS incentives as suggested in 16b	
Consolidation of GAEC Standards on Soils	
19	Do you agree that the approach outlined above will improve the cross compliance GAEC standards on soils?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If NO, please provide further information in the box below)	
20	Have you any additional ideas for how the proposals might be further improved?
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
Abstraction Licences (for irrigation)	
21	Do you have any evidence that suggests we should consider a different approach to implementing the new cross compliance standard on abstraction licences?
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
Agricultural land which is not in agricultural production (GAEC 12)	
22	Is the list of proposed activities that would be permissible on agricultural land that is not in agricultural production appropriate?
<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If NO, please provide further information in the box below)	
23	Are there any activities you would wish to see included / excluded, if so provide an explanation of the impact on agriculture and the environment?
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
Protection of hedgerows and watercourses (GAEC 14), clarification of the rules to allow hedgebank maintenance	
24	Does the proposed exemption for hedgebank maintenance and restoration provide sufficient flexibility without decreasing the level of protection given to conventional hedgerows?

<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES (Tick only one. If NO, please provide further information in the box below)	
25	Can you provide any advice or referenced material that will help further inform clear definitions of casting up and hedgebanks?
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. If YES, please provide further information in the box below)	
Information and Guidance	
26	Which aspects of the activities undertaken as part of cross compliance are unclear in terms of their added value?
27	Is the proposed grouping a useful clarification around which further material could be developed?
<input type="checkbox"/> NO <input type="checkbox"/> YES (Tick only one. Please provide any further information in the box below)	
28	What is the most useful way for you (farmers) to receive such information? (e.g. in written format, face-to-face, site visits & farm walks, or any other suggestions you may have).