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Proposed *Enhanced Farm Environment Record*

1. Background

- While we understand the desire of farmers to replace the lost ELS Management Plans, we have always been highly sceptical of their value in conservation terms. We don't think ELS has lost anything by dropping them.
- We don't subscribe to the view that ELS can or should address climate change. Significant reductions in GHG emission from agriculture will only come through new ways of cultivation and animal husbandry. We are not even sure that Defra knows what form this should take if it wants also to maintain food production.
- We are sorry the split list approach has been shelved. We believe it would at a stroke improve the diversity of habitats being adopted into ELS application, involved far less paperwork and hassle than is proposed here for the Enhanced FER.
- The notion that farmers are "struggling" to get into ELS because their farms lack features is extraordinary. The whole concept of ELS was that it should indeed reward farmers who had conserved natural habitats on their land by allowing them to get into the scheme by doing very little, but at the same time paying those farmers that had lost such habitats to put some back. There are loads of ELS options for "featureless" farms.
- Difficult to comment on the XCI point since we have no idea yet what Defra are going to decide.

2. **Awareness and targeting.** Of course we agree with these principles – but how are you going demonstrate them?

3. No comment

4. Key principles. It looks us like your proposals are elaborate and complex – not simple at all.

5. No comment

6. No comment

7. No comment

8. We suggest removing the climate change module. For reasons - see below.
9. No comment
10. We concur that these options should be dropped; but there is still some merit in "training" if it is delivered in the form of advice.
11. **Points allocation.** We think even these point allocations are too generous for what is a one-off exercise. Points given away for enFER modules will compete with some of the proposed ELS capital items – which are of real value.
12. As above
13. No comment on these rules
14. No comment.
15. Nice diagram. We suggest a points cap might be good for the reasons given in 11 above. You might also consider changing the exclamation mark after "Improved Outcomes" to a question mark. Not a joke – We seriously wonder about the value of all this.
16. No comment.
17. Since we have no idea what XCI will look like it is difficult to know whether enFER will help or not.
22. We would be in favour of a cap.
24. No quarrel with the logic of these steps
25. We strongly object to the line Natural England is taking here. NE is not the source of all knowledge when it comes to conservation advice on farmland. FWAG, for example, has a very good track record and, on a much smaller scale, so do we. While LMAS, of course, has expertise; the use of tax revenue to support them to give ELS advice and not, for example, FWAG is wrong. We see no reason why advice from FWAG and others (including LMAS) should not be funded through ELS points.

Annex A: Resource protection.

Seems a very elaborate exercise but we are not sure fields can be this neatly categorised. Many fields of course will slope in more than one direction.

It is difficult to see how some of these options. Like conservation headlands will really help. (by the way the revised ELS has one conservation headland option now)

Much more important to soil erosion will be methods and directions of cultivation and also the direction of tramlines in crops. These don't fit into ELS

Annex B: Climate change

The CLA CALM tool seems like a thoroughly comprehensive beginning to approaching the problem of GHG emissions from farming. We should certainly be encouraging landowners and farmers to use it. However the potential for using ELS to mitigate carbon loss is likely to be minute.

Annex C: Biodiversity

Improving farmland wildlife is what ELS is all about. The best way of doing that is to ensure that all farmers choose a range of options for their farm that include boundaries and infield options. These need to be appropriate to the style of farming and to be distributed sensibly. A combination of a split list and available advice is probably the best way of ensuring this.

As it stands this module is over-elaborate and baffling. The information that NE would provide doesn't look helpful. Really useful guidance would be site specific. Such as...
"put the Conservation Headland adjacent to a good hedgerow so that birds have both nesting cover and foraging habitat" or , "put the flower and nectar mix in a sheltered sunny location – not on the cold north side of a wood".

We are big fans of Joint Character Areas but they were mapped around landscape and land-use not species distributions. Their use to guide farmers on biodiversity we suspect is a bit limited.

Annex D. Historic environment

No comments

Conclusion

We are sorry to be so negative about this enFER proposal. We are big supporters of ELS and have been from the start. It is just what the agri-environment measures needed as a base level of conservation support. Of course ELS needs to be incrementally improved as we see how both the farmers and wildlife respond.

A few years ago Helen Phillips said she wanted to “raise the bar” for ELS. We fear that the measures proposed here; mainly designed to help farmers reclaim points they lost with the management plans, is probably going to lower it.

Stephen Tapper

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