Game & Wildlife Conservation Trust[1] response to the Defra consultation on

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

Executive Summary

We have sought to address the questions posed in each chapter of the consultation document. In many cases we have not ranked the options as requested as such a process in our view limits our ability to make valuable observations.

In particular we would like to highlight:

1. We support in principle the direction taken by the consultation document and the Government's intention to take the opportunity provided by leaving the CAP to reform the industry and put it on a sustainable footing for the future.
2. We support the decision to remove direct payments for farmers but are concerned that the current environmental benefits delivered to society by cross-compliance and greening measures will be lost. Modifying the current greening requirements to underpin the delivery of soil health and farm biodiversity benefits is proposed.
3. We are concerned that this consultation has placed individual aspects of farming and food production into silos. There is a lack of focus on what can be achieved through the adoption of a systems approach such as organic farming and the Integrated Farming System (IFS) developed by Linking Environment And Farming (LEAF).
4. We believe that agro-ecological approaches, a developing area, have the potential to improve farm business efficiency and deliver favourable environmental outcomes and should be encouraged through support.

[1] The Game & Wildlife Conservation Trust (GWCT) is a leading UK charity conducting conservation science to enhance the British countryside for public benefit. For over 80 years we have been researching and developing game and wildlife management techniques. We use our research to provide training and advice on how best to improve the biodiversity of the countryside. We promote our work to conservationists, including farmers and landowners and offer an on-site advisory service on all aspects of game and wildlife management, so that Britain's countryside and its wildlife are enhanced for the public benefit.

5. Training and advice is discussed at various points in the consultation document. Whilst we believe that mechanisms already exist for providing relevant advice to the farmer in some areas, we see great value in the provision of additional advice to aid farmers in the switch from a system which requires an understanding of cross compliance and greening measures to one which values natural capital.
6. If we are to consider better implementation of the polluter pays principle then this should be applied across all of society; it is unfair to single out farming.
7. Relevant, practical advice to farmers is also important in the establishment and management of agri-environment schemes. Whilst mechanisms already exist they need to be staffed by knowledgeable personnel with the ability to tailor schemes to individual farm requirements.
8. In our opinion provision of appropriate training for farmers/land managers is key. Our experience is that this is valued by farmers particularly with respect to agri-environment schemes where initial training is important in achieving the desired outcomes.
9. The regulatory regime must be proportionate and fair with the inspection process a positive force involving constructive engagement between the independent assessor and the farmer, his customer.
10. Our experience is that the excessive burden of administration and poor implementation are significant barriers to farmer participation. It will therefore be important for these areas to be improved and in particular for Natural England ("NE"), the Rural Payments Agency ("RPA") or their successors to be appropriately resourced and funded.
11. We think that leaving the CAP provides us with a unique opportunity to re-invest in one of our important national assets, our soils. Incentivising increases in soil organic matter, conserving nutrients and reducing their losses and improving soil structure and water holding capacity should become part of a national agricultural strategy, for now and for future generations.

Ch2 - Reform within the CAP

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

a). We support any measures which encourage farmers to participate in environmental schemes and contribute to improvements in water, soil, air quality and biodiversity. Entry Level Stewardship (ELS), introduced in 2005 following the recommendations of The Curry Report for a "broad and shallow" agri-environment scheme, open to all, was successful in achieving farmer participation, with around 70% of the farmland-area committed at its peak.

Unfortunately, this high level of participation has been eroded by endless changes to the scheme rules, the introduction of a uniform start date, fear of inspection and the impact this could have on the BFP and complex, detailed and inflexible rules.

The recent introduction of the four simplified packages is most welcome. We believe that, apart from some tweaking to the rules and payment rates for certain options e.g. conservation headlands, the scheme is essentially sound. We would not wish to see further "simplification" until we have reviewed how the newly instigated packages are being received. However, we strongly recommend that a basic capital works package be included for the field boundary options.

b). We do not think the application form should present a problem to most applicants, however the computer system being used by the RPA is not fit for purpose and should be replaced.

c). We would welcome the expansion of the on-line offer with on-line mapping included. This worked very well for ELS on-line and removes problems with paper maps getting mis-laid in the application process and reduces the risk of errors.

d). We do not think that the evidence burden is excessive, but the administration of the scheme has been poorly implemented. This has deterred farmers from applying.

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?

The biggest deterrent for farmers joining the environmental schemes is the poor administration, fear and burden of inspection. They particularly complain about changes made to rules part-way through agreements; the need to complete a 6-page form just to request an Information Pack is unhelpful and unnecessary; the strict adherence to prescriptions with no flexibility to apply common-sense; delays to payments; repeat requests for information already sent; un-necessary and repeat evidence requirements; issues over mapping and the “hedge layer”.

Environmental outcomes are improved by making clear what the rules are around each prescription and why they are there, and by the provision of good, practical and tailored advice from knowledgeable staff (so that farmers understand how the options would complement their own farming system). Advice is particularly important but does not need necessarily to be provided free.

We would also suggest allowing adjustments to scheme design during the “contractual period” to allow for new ideas and motivations initiated by the farmer or additional opportunities that emerge from existing management options thereby capturing further environmental gains.

Ch3 - An ‘agricultural transition’

What is the best way of applying reductions to Direct Payments. Please select your preferred option from the following:

a) Apply progressive reductions, with higher percentage reductions applied to higher payment bands

b) Apply a cap to the largest payments

c) Other (please specify)

We support the proposals obtained in option a). which spreads the burden across all but the lowest recipients.

What conditions should be attached to Direct Payments during the ‘agricultural transition’? Please select your preferred options from the following:

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)

d) We would prefer to offer another option based on retaining the environmental benefits of current cross-compliance and greening measures. We accept that greening measures do not deliver sufficient value for money and only limited benefit to the environment, however they do confer sufficient benefits to farm biodiversity and soil health to merit retention.

The GWCT envisages support for a “Foundation Scheme”, which would include payment for the delivery of the environmental criteria included in current statutory requirements and good agricultural practice. We propose that 5% EFA is maintained; that legumes be included in this but that the use of crop protection products be permitted, but with a restriction on the use of insecticides limited to night spraying to avoid contact with pollinators,

particularly bees. The removal of the use of inputs for growing legumes deters farmers from growing these on EFA land yet they are valuable crops for farmland birds and pollinators.

Payment would not be entirely related to farm size, but would reward the retention of features such as field margin strips and buffer zones. The level of payment must also fully reflect the 'cost' to the farmer of undertaking the work involved and the 'value' to society (the Government and public) of the environmental benefits delivered. It is important that policy recognises environmental delivery on the farm as a cost centre in a similar vein to the costs of food production.

We see little benefit in the three-crop rule. It results in inefficiencies for very little benefit as 75% of the land area can continue to be mono-cropped. In any new scheme we'd prefer to see a requirement and funding for sustainable rotational crop sequences which focus on a balance of restorative and exploitative phases as a means of supporting soil health. We propose therefore, that during transition the 3 crop rule is dropped as a greening measure.

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

We do not understand what this question is asking.

How long should the agricultural transition be?

A transition period up to 2023 will be needed to allow farming businesses time to adapt. Farming is a long-term business with crop production based around rotations and capital costs depreciated over a number of crop years. However, clarity is still required as to the future policy framework that farm businesses will be required to adapt to – trade, regulation, labour and application of the payments for public goods approach. Until these are clear, to cushion the short-term impact on an industry that has to invest long term this length of transition will be needed.

We also think that Government will require time to install and apply a computer system fit for purpose. The previous track record is poor and has led to an excessive burden of administration and impacted nationally on agricultural efficiency. A key criticism of the CAP was its administrative burden and if we fail to improve upon this then it is opportunity missed.

Ch4 - A successful future for farming

Farming excellence and profitability

How can we improve the uptake 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 co-ordination

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?)

We are conscious of a number of benchmarking groups, some run by industry others, for example, by the levy body Agricultural & Horticultural Development Board. We consider the latter to be a good basis for a national scheme and suggest that this is developed to be so. What would not be helpful is a duplication of effort.

We do not think that grants or loans should be dependent upon CPD accreditation at this point. However, changing from a system which requires an understanding of cross compliance and greening measures to one which values natural capital and invokes the polluter pays principle is a seismic shift. We see great value in the provision of advice in aiding this switch, as was provided at the instigation of Cross Compliance, coupled with the development of a national CPD accreditation for the agricultural industry. CPD Accreditation has worked very successfully within the Agronomy and spray operator sectors and could be developed into a national scheme.

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)

Advice already exists through the Farmer Advice Framework so we don't think that is a barrier to new investment. But it will be important to provide advice during the transition period so that each farmer can make the right decision for their farming business.

We feel that shortage of capital given the weak underlying profitability of many farming businesses, particularly in disadvantaged areas, is a significant barrier. To address this we would advocate the provision of a capital grants scheme for investment in buildings, new technology or new equipment related to the delivery of key policy objectives such as reducing pollution, improving productivity or reducing ammonia emissions.

What are the most effective ways to support new entrants and encourage more young people into a career in farming and land management?

Attracting new entrants with the rights skills will be key but perception of the industry as backward will limit this possibility, and the availability of skilled labour from around the world (see also responses below under Skills and Labour). Re-branding the industry as part of a global, high tech supply business has been advocated by others. Investment in new technologies will increase their adoption across the sector and ultimately change perception.

We support the Country Landowners Association's (CLA) approach of advocating funded training, mentoring and preferential loans. Alternative farming structures such as joint ventures and share farming should be promoted through the Land Partnerships Service as advocated by Tenancy Reform Industry Group and initiatives such as 'starter tenancies' should be incentivised.

Does existing tenancy law present barriers to new entrants, productivity and investment?

This part of the response is outside our area of expertise, but we suggest there is a clear need to look at very short-term Farm Business Tenancies (FBT's) where fields are let for a single season to the highest bidder. Such short-term contracts are giving rise to negative environmental impacts. Land is not eligible for environmental payments since the owner needs to have control of the land for a minimum period of 5 years, and soil management practices are excessively exploitative with scant regard to sustainable rotations or the creation of good soil structure.

Agricultural technology and research

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)

There is a definite need for research into best practice farm environmental management which would include aspects mentioned in a-f.

Identifying research topics as 'silos' ignores the inter-relationship between many of the above factors. What is needed is a collaborative approach to research led by the industry that encourages sustainable farming techniques across the whole farm.

We see the management of resources, including agro-chemicals as very important. The blanket ban of crop protection products should be avoided unless there is compelling scientific evidence of safety or environmental impacts. Limiting the use of products through restrictions and the application of best-practice is an infinitely better approach and allows products to be used in the circumstances of least risk. For example GWCT research has shown that kale provides an excellent food source for a range of farmland birds in winter, yet it is a crop which is difficult to grow due to flea beetle attack at the seedling stage with much of the pest population resistant to pyrethroid insecticide sprays. A neonicotinoid seed dressing provides protection but this would not be possible should a blanket ban be introduced. Likewise the systemic herbicide glyphosate is an essential tool in Conservation Agriculture which is acknowledged globally as a technique which delivers major benefits to soil stability. Whilst we strongly support the benefits of incorporation of grass phases in current all-arable rotations, the benefits are diminished if this leads to an increase in the use of the mould-board plough. In this situation

glyphosate is an essential component for successful crop sequencing from ley to tillage phases.

However, we are very much in-favour of the use of crop protection products integrated more effectively with agro-ecological approaches. We believe this developing area is insufficiently adopted but has the potential to improve farm business efficiency and deliver favourable environmental outcomes.

There is an urgent need for investment in two specific aspects of soils research.

1. We need to have a better understanding of the fluxes which occur in soil organic matter levels in response to rotations and cultivation regimes. This will require the gathering of data in the first instance to look at gains and losses over time and then using the data to model scenarios in relation to climate variations and soil type. This data could then be used to calculate soil health support payments.
2. We need a better understanding of gaseous emissions from soils under different land-use types. The work on nutrient fluxes is reasonably well understood, but not gaseous emissions. If we are to provide science-based guidance on sustainable soil management this is an important, and neglected component.

There are opportunities to develop “smart and precision agriculture” particularly in the interpretation of field variable data and relating that back to crop management. Spatial targeting of inputs to ensure optimisation and reduced environmental impacts would be a high priority.

Additionally, we are conscious of market failure in the take-up of robotics particularly in the arable and fresh produce sectors. The miniaturisation of machines for precision weed control have been successfully developed but commercialisation has yet to be realised. This has potential to help reduce soil structure problems caused by compaction from heavy machinery and in-turn reduce soil erosion from tramlines.

With respect to point d) we suggest there is a need to look at the current maximum levels for the use of nitrogen fertilisers particularly in arable systems. At present around 85% of the crop yield is delivered by 50% of the nitrogen which means the remaining 50% is used less efficiently and is more likely to be lost to the environment impacting particularly on aquatic ecosystems. There is a need to adjust the economic optimum by means of capping or taxing nitrogen to create an “environmental optimum” level. This

could be combined with environmental payments for farmers to introduce grass clover leys into all-arable systems and the use of catch and cover crops to take-up and recycle nitrogen back to the crop, reducing nitrate leaching. Such an approach has advantages on many levels including climate change mitigation – N fertiliser accounts for at least 40% of the fossil fuel input required to grow most conventional arable crops.

How can industry and government put farmers in the driving seat to ensure that agricultural R&D delivers what they need? Please rank your top three options by order of importance:

a) Encouraging a stronger focus on near-market applied agricultural R&D

b) Bringing groups of farms 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)

We strongly advocate a return to the LINK research funding mechanism where industry and government equally funded near market research. The mechanism required the research need to be identified by industry who then identified academic partners with the expertise to collaborate. The requirement that industry provide 50% of the funding ensured that projects were practical and out-come focussed yet offered excellent value for public money, with a "bottom-up" approach. The projects that were successfully funded were wide-ranging and included a substantial number which targeted positive environmental outcomes. We do not believe the AgriTec Strategy has achieved the objectives originally envisaged with much of the work remote from potential end-users who are disenfranchised from the Strategy.

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

New technology is widely adopted by progressive farming businesses, but farming would benefit from better cross-sectorial collaboration. This particularly applies to recruitment where there is a tendency to use traditional channels.

We suggest the re-introduction of the LINK research funding mechanism is an excellent way to foster cross-sectorial collaborations and bring innovative ideas and technological development to farming.

Farming also has to deal with confounding factors which introduce variability for example weather and soil type, which are less of a problem in controlled environments. This presents a barrier to technological fixes.

Labour: a skilled workforce

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)

Other – integrated farm management is in our opinion a key skills gap.

We see the development of agro-ecological approaches to crop management as an important development area. There is insufficient understanding amongst farmers of how to employ this approach and uncertainty in many instances as to the efficacy and reliability of individual components. For instance, the use of beetle banks at our research farm in Leicestershire has removed the need for the application of summer insecticides to our cereal crops for over a quarter of a century. Yet many farmers lack the confidence to rely on natural predator control and are inclined to "insurance spray". This can often have a negative impact on the natural regulation within the system requiring further treatments.

Leadership and benchmarking initiatives already exist and so should not be priorities, with the Institute of Agricultural Management and the Worshipful Company of Farmers both running highly regarded leadership courses.

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

There is lack of awareness of significant technological advances employed in modern agriculture with many young people perceiving agriculture to be a backward industry. There is a huge opportunity for the industry to promote

itself more positively and draw on skills from other industry sectors. Indeed there has been a tendency for the industry to be inward-looking and this has stifled innovation.

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

It will be essential that the agricultural industry is able to recruit labour, at all levels of expertise, from across the globe. Schemes existed prior to our accession to the EU and these should be re-visited including proposals for the efficient provision of visas. There is a real danger, as we have already seen in some sectors, that labour shortages will stifle UK production and export employment.

Ch5 - Public money for public goods

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

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

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

Rather than rank the options we would like to emphasise the importance of recognising the inter-relationship between all environmental outcomes listed and that the relative importance of each option within that 'inter-relationship' will alter by region reflecting different soils, geology, farming systems etc. For example climate change mitigation and improvements in water quality benefit from measures to improve soil health and increase biodiversity. Our concern is

that ranking may result in an undue focus on some environmental aspects to the detriment of others. For instance there is great public interest in wildlife with many people subscribing to organisations which protect and conserve species, yet there is little public interest in the soils which support all terrestrial ecosystems; GWCT believes both have equal importance.

We would also highlight that whilst public access is desirable given the current level of disengagement, Government should not ignore that in some habitats there can be a negative impact on flora and fauna. We would suggest that there should be continued focus on engaging the public at a young age and that the current school syllabus gives much opportunity for this. We would support the continuing involvement of the Country Trust, Farming and Countryside Education (FACE), Open Farm Sunday and other initiatives in engaging with the young and families and would suggest that educational access payments are not limited to any higher tier scheme.

The delivery of the public goods listed should be integrated with the desire to support food production.

We are concerned that this consultation has placed individual aspects of farming and food production into silos. There is a lack of focus on what can be achieved through the adoption of a systems approach. Systems such as organic farming, Conservation Agriculture and the Integrated Farming System (IFS) developed by Linking Environment And Farming (LEAF) can contribute significantly cross-sectorially.

We would prefer to see a greater focus on encouraging farmers to adopt such approaches. The suggestion that grass should be introduced to all arable rotations (whether grazed by livestock or not) is scientifically sound and we would advocate that a systems approach to crop rotations is developed where restorative phases are balanced with exploitative phases with the objective of achieving net soil organic matter increases across the rotation. Trials examining stockless organic farming systems have shown that grass/clover leys grown in all-arable rotations can be successfully cut and mulched to build soil organic matter and fertility. This removes the need to re-introduce livestock, which comes with a huge capital and operational burden including:

a) The need to install stock proof fencing

b) The need to establish water supplies to all fields

c) The need for over-winter housing

d) Investment in forage making/storing equipment and infrastructure

e) Employment of stockmen including accommodation

f) Administrative burden of veterinary medicines and movement records, and animal identification

g) Additional requirements to meet Nitrate Vulnerable Zone rules.

Given falling consumption and low prices in the red meat sector, which is the only one which could use significant areas of rotational grass, we think there is a strong case for examining the introduction of support payments for ley rotational periods as an investment in soil health. However, not all the cost would need to be covered by support, as the farmer also benefits from better crop yields elsewhere in the rotation and a reduction in the use of agro-chemical and fertiliser inputs. Indeed, ley periods have shown to be the singularly best way of controlling resistant black grass which costs farmers millions each year in chemical applications and lost crop.

Ch6 – Enhancing our environment

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)

Landscape scale management is most applicable for action relating to:

a) Recreation;

b) Water quality;

c) Flood mitigation;

d) Habitat restoration;

e) Species recovery - some species only;

j) Woodlands and forestry.

However scheme design needs to be flexible, to allow for individual farmer preference and different start dates for example, and facilitation should be incentivised through the highest level of financial support.

Soil quality is best dealt with through a National Strategy and England has the opportunity to be a global leader in establishing a framework to achieve this.

Likewise, there is a need to re-visit our approach to planting trees, particularly the incentives for small mixed species planting on farms and agro-forestry schemes.

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

We support a move towards payments by results for habitat management options **only**. Assessment methodologies for species monitoring can be specialist (and difficult to simplify for qualitative self-assessment) and the factors that govern species success are more fluid and vulnerable to un-controllable events such as the weather at nesting or on migration.

It will be important to understand the drivers of success. The current Results Based Agri-Environment Payment Schemes in Yorkshire and East Anglia will be important to understanding how such schemes might operate in future. Although some farmers and landowners are skilled and motivated in the management of species and habitats we think that some form of simple verification and payment scheme would be highly beneficial. We are largely content with the options within Countryside Stewardship ("CS"), but if we are to make real progress in reversing declines in British flora and fauna we need to aspire to the universal adoption of environmental measures (certainly achieving similar if not higher levels of farmer participation as under ELS), with higher quality implementation and better connectivity exactly as advocated by The Lawton Review "Making Space for Nature – More, bigger, better joined".

Our understanding is that training will be key to ensure effective delivery of the "outcomes" such as wild bird seed mix establishment and management. Payments should be tiered to reflect outcomes. This need not be complex – a simple scheme of "poor", "good" and "excellent" would suffice, with "poor" simply attracting a payment of income foregone and costs incurred, whilst excellent would be rewarded more highly. Introducing such a competitive element has been shown to act as a driver for success and be a source of pride to farmers in a way that crop yield or quality is currently.

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

The GWCT advocates a tiered system of support with an 'entry level' voluntary *Foundation Scheme* open to all farmers and land managers where payment is related to the delivery of key environmental criteria such as currently included in the statutory management requirements and good agricultural practice. Such a scheme could therefore deliver national priorities such as soil health.

As the next tier, attracting additional levels of financial support, we envisage a *Universally Accessible Scheme* to support the delivery of species, biodiversity and other public goods based on personalised or predetermined packages, designed to address declines in farmland birds for example. Such a scheme could be based in part on identified localised priorities (as expressed in the existing 14 delivery areas or the use of Natural Character Areas). It will however be important not to stifle individual preferences, local initiative and enthusiasms as experience has shown that encouraging those can improve motivation to deliver good environmental outcomes substantially.

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

Experience of successful collaborative schemes already exists such as Farmer Clusters and the results from these should be used to underpin future policy in this area.

The Farmer Cluster concept, developed by the GWCT in association with Natural England, has facilitated the creation of farmer-led groups which work more cohesively together in their locality, enabling them to collectively deliver greater benefits for soil, water and wildlife at a landscape scale. We believe they work as they harness the motivation of a group of farmers to achieve success by allowing them to design their own conservation plan based on what **they** hope to achieve.

A Farmer Cluster is designed to start life as a bottom-up, farmer led initiative, under the guidance of a lead farmer – a good farmer, respected in the community and prepared to lead, with strong green credentials. The right choice of lead farmer is important. The second step is for the lead farmer to invite a group of local farmers to work with him and to agree the area they manage – whether that's centred on a geographical feature such as a river or

valley, or simply some friends who farm a contiguous area of land – and what they hope to achieve. This will be expressed in their **own conservation plan** usually assisted by their advisor or facilitator. The final step, therefore, is to choose a facilitator – a local professional conservationist who can advise on improvements; offer training in monitoring techniques, law and other practicalities; liaise with NE; bring in experts for assistance and training; and otherwise support the project.

This approach has driven the popularity of the programme with farmers, and as a result the five Clusters established across southern England as part of the pilot scheme (2013-15) have grown nationally to a total of 98. Farmer Clusters also form the bedrock of major GWCT research projects including Waders For Real, where local farmers responded voluntarily to GWCT concerns about the conservation status of breeding waders, forming the Avon Valley Breeding Wader Project and securing EU LIFE+ funding.

Ch7 - Fulfilling our responsibility to animals

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

Yes, if the Government aspires, as it states, to achieve the highest welfare standards and above those of our international competitors and trading partners then some element of piloting will be required, not least to define the cost/benefit ratio of any measures introduced.

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)

b) Government needs to be mindful that while there is likely to be widespread support for improved welfare this must be balanced with costs and supported by good evidence. There is a perception in the public mind that “factory” farms are bad for welfare and small farms are good, yet the evidence points generally to the opposite. We need also to be mindful that where welfare benefits come at a cost to British farmers, permitting the importation of livestock products not subjected to similar standards will simply export the problem. Hence, in defining higher standards we must be careful not to disadvantage home produce.

However, we do not think that that it is for government alone to ensure greater consistency and understanding of welfare standards but through building a partnership approach through AHDB, trade associations and retailers. Should future trade arrangements permit the importation of goods produced to lower standards then we ourselves insist upon, raising public awareness will be very important.

*if you answered ‘perhaps in some areas’, please elaborate. N/a

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.

j) We see merit in many of the approaches but consider those more closely involved in animal production and health to be better placed to rank priorities.

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

This part of the response is without our area of expertise.

Ch 8- Supporting rural communities and remote farming

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

The GWCT believes in a working landscape with a financially viable land management sector able to deliver the public goods and services desired. Support must therefore be provided to enable upland farmers to deliver the public goods and services desired, not only in terms of financial payments that fully reflect the higher management costs of working in Less Favoured Areas ("LFAs") and the value to the 'downstream' consumer, but also capital grants to facilitate investment in new infrastructure that improves environmental outcomes. Furthermore it will be important to provide access to advice to ensure that the farmers have the knowledge and skills to deliver.

Rural development funds should be used to help integrate rural social, environmental and economic activity, increasing sustainability.

Current unintended consequences on upland farming from agri-environment scheme option rules and the influence of the supply chain on breed genetics need addressing.

There are a number of challenges facing rural communities and businesses. Please rank your top three options by 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

a) We highlight the need for improved broadband coverage in remote areas given this will be increasingly important in making grant and agri-environment scheme applications – and in the future submitting evidence in any payment by results approach.

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?

This part of the response is without our area of expertise.

Ch9 – Changing regulatory culture

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)

In our vision for domestic agri-environment policy post CAP we envisage yearly reviews by independent assessors working with the farmer, rather than inspections with verifiable standards and failures. Yearly action plans would be drawn up, based on the advice given at these reviews. Increased farmer engagement with such a collaborative, advisory process could increase motivation to achieve conservation goals. These reviews would be commissioned, paid for, and the inspector chosen by the farmer – as with many current certification schemes. The review cost would be reflective of farm size.

Inspection must be a positive force, a constructive engagement between the independent assessor and the farmer, his customer.

Moving to the points listed above:

a) We think that those farms which do not participate in some form of voluntary assurance should be targeted for inspections of compliance of statutory measures.

b) We propose the introduction of a British Farm standards certification as acknowledgement of good farming practice. This could be achieved through voluntary inspection by a UKAS registered inspector.

c) This has limited potential but could be an invaluable tool in identifying and rectifying soil erosion incidents which are currently largely unmonitored.

d) We support this.

e) We would welcome this. The recent difficulties between the RPA and NE in delivering CS illustrate the urgent need for this.

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

The recent Farming Rules for Water have demonstrated a common sense approach with Defra indicating a desire to work with farmers to ensure they are compliant and prosecution considered a last port of call for non-compliance.

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

Our vision of a light touch regulatory regime with annual reviews not managed by a Government body would allow the RPA or equivalent to inspect those farms not subscribing to a voluntary foundation scheme and to follow up on persistent offenders who fail to act on the advice and action plan resulting from the annual review. Repeated breaches would lead to disqualification from any support or environmental scheme and civil sanctions.

Currently penalties are based on impractical levels of accuracy. We propose a 10% deviance threshold to allow for the practicalities of implementing environment measures in the field. This is similar to the approach used in the application of speed limit zones for motorists, which allows some deviation above the maximum limit.

Ch10 – Risk management and resilience

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)

What additional skills, data and tools would help better manage volatility in agricultural production and revenues for (a) farm businesses and (b) insurance providers?

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

We are not qualified to comment in detail on this section. We would make one specific point regarding a National Soils Strategy. By creating healthier, better structured soils we will protect farmers, the environment and our food supply from excessive rainfall and periods of drought. This is another reason we should use this opportunity to value our soils.

Ch11 – Protecting crop, tree, plant and bee health

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?

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?

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?

We agree that Government should lead on policy designed to protect our environment from pest and disease outbreaks. Government needs to provide funding for research that can guide the best means of control and recovery, provide guidance on good practice in prevention and fund (perhaps through agri-environment options) actions that improve the resilience of these sectors.

In addition, the assistance and availability of expertise, for instance through facilitation fund support, to help farmers monitor pests and diseases would be useful. A simple risk register and periodic audit would be helpful.

This is an area that needs a common approach across the UK (see Ch13 response).

Ch12 – Ensuring fairness in the supply chain

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)?

What are the biggest barriers to collaboration amongst farmers?

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?

We have partnered with 102 farmers in Cumbria and Scotland who supply milk to Nestle in an exciting, innovative project to properly reward farmers directly through their producer contracts for delivering appropriate and quality agri-environment work. This experience has demonstrated that:

1. we need to look more closely at the CS options available to livestock farms and the rules on their management
2. where the customer supports the producer both with financial incentives AND practical technical advice, uptake and enthusiasm are high, and
3. that public/private/NGO partnerships could be used very effectively to achieve benefits to society i.e. public goods.

We have concerns that decisions made within the supply chain can have an impact on the delivery of one of the Government's key public goods – biodiversity. Consumer demands have changed the breeds of cattle and sheep commonly found on UK farms. These 'generic' breeds which lack regional and local variety often have different grazing habits impacting on grassland habitats, particularly in upland marginal areas, and may require the farmer to change his farming system (away from extensive grazing systems to more intensive concentrate led systems).

Ch13 – Devolution: maintaining cohesion and flexibility

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

We would highlight the need for a common approach to:

- woodland management standards
- pest/disease control
- livestock traceability and movements
- organic farming
- regulation in particular with respect to pesticides and other regulated inputs, and
- animal welfare and food quality standards.

We also flag the necessity of having a common approach to water quality and flooding (and associated environmental compliance) given that rivers and catchments are cross-border.

We suggest that there ought to be some UK cross-border consistency in the approach to benchmarking/measurement of public goods as the basis for future environmental payments (although important for each administration to adjust to their own circumstances) and to Less Favoured Area support.

It will also be important to ensure that administrative mechanisms such as the oversight bodies involved, inter-Governmental dispute resolution and ministerial accountability are appropriately aligned to the new policy.

Devolved powers, especially where there is new legislation, should not be undermined as these provide a different operating framework for the devolved countries.

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

This part of the response is without our area of expertise.

Ch14 – International trade

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

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

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?

Our comments relate specifically to the WTO support options and equivalence in environmental standards.

Government has already indicated its desire to negotiate its share of the Amber box allowance and we see this as important as it allows continuation of supporting measures that could be deemed trade-distorting whilst schemes that are Green box compliant are developed. This would allow proposals for higher levels of support to be tested before they are introduced as opposed to creating schemes which result in a WTO challenge. In particular we feel that scope within Annex 2 to allow higher payment for outcome based schemes needs to be explored.

We are concerned that a Free Trade Area (FTA) arrangement with a country where welfare or environmental standards are lower would put the domestic farming industry at a significant disadvantage and impact on its viability whilst exporting the negative impacts.

Ch15 – Legislation: the Agriculture Bill

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

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

We are concerned that the Agriculture Bill does not give due regard to the importance of food production (although we recognise this is included in the Industrial Strategy). We would prefer that the approach to agriculture and land use put the environment and food production on an equal footing and considered them inter-related. This will be the reality at farm and field scale and fundamental to delivering the reversal of biodiversity loss across the 70% of land that is farmed.

Any future domestic agricultural policy needs to ensure that:

- there is sufficient funding available for agencies and farmers/land managers to deliver the intended outcomes. Government has promised to 'reward' not merely compensate farmers for the future delivery of environmental goods and services. That reward has to be sufficient to allow farmers to continue to deliver good environmental outcomes and biodiversity in the absence of, or a significant decline, in farming profits. At the moment on most farms, there is 'hidden support' in both BFP and enterprise profit which underpins the delivery of environmental goods and services. This needs to be accounted for;
- there are appropriate policy structures in place to assist farmers with the transition to a new funding and operating framework including advice and training;
- the future of the industry is underpinned by:
    - supporting research into new systems and technologies;
    - the availability of labour (both seasonal and skilled);
    - planning policies that facilitate improvements to farm practices and aid the sustainability of rural communities; and,
    - the availability of finance to encourage environmental improvements and support new entrants;

- future agri-environment policy should focus on achieving the widest possible farmer participation;
- game management is embraced as a conservation tool to capture the very real contribution it makes to the delivery of a number of public goods, including biodiversity and the rural economy, across the landscape;
- the regulatory regime is less onerous than currently; and
- enforcement is proportionate and fair.

Our comments on the questions posed in this consultation seek to encourage domestic policy, as expressed in the Agriculture Bill, towards these objectives.

Game & Wildlife Conservation Trust
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