

OF&G Command Paper

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Response to Defra Consultation - Health and Harmony:

The Future for Food, Farming and the Environment in a Green Brexit

On 29th February, DEFRA published “Health and Harmony: The Future for Food, Farming and the Environment in a Green Brexit”, which sets out the key issues around which the consultation on the future of UK agriculture policy will be framed. This submission provides OF&G’s opinion on specific issues.

Organic Farmers & Growers (OF&G) is a Community Interest Company, established in 1973. OF&G certifies organic operators, anaerobic digestion sites, compost sites as well as woodland and peatland schemes across the entire UK. OF&G is the second largest organic certifier and certifies over 50% of the UK organic land area. Our vision for UK agriculture policy is based on the complementary alignment between the latest agri-tech and cutting edge ecological innovation with organic farming as a market oriented public goods provider, at the forefront of food production that exploits ecological methods. With the Government’s focus on public goods the organic certification model offers a cost-effective means by which to monitor and verify their delivery. With ‘organic’ operating as a Gold Standard, the regulatory and legal requirements that are already in place recognise, in an accessible and understandable way, the integrated systems approach that delivers organic food alongside a range of public goods¹. Organic operators are regularly inspected and certified by established Control Bodies. The knowledge, systems and expertise are already available.

Food and farming policy must be recalibrated so that takes into account the planetary boundaries within which we must live, whilst recognising the needs for an equitable, healthy and resilient food system for everyone.

Food production and environmental protection can be compatible

The approach to environmental land management outlined in “Health and Harmony” presents risks in that there appears to be a conflict between protecting the environment and producing food. It is important to recognise that while the correct farming techniques can help the environment it is equally important to recognise that the environment can help farming. Currently many environmental indicators are in decline – biodiversity, water quality, air quality, soil functionality, climate stability, resilience to flooding to name a few. Simply allowing this to continue (even at a reduced rate) by separating food production from a broader ‘conservation’ area (land sparing rather than land sharing) will still mean [1 OF&G Policy Paper: An Organic Systems Approach to the Delivery of public goods. December 2017](http://ofgorganic.org/organic-systems-approach-provision-public-goods/)

that a very significant proportion of the UK’s food producing agricultural land area will continue to be degraded. The costs to Government of interventions to mitigate the outcomes of increased intensification are already significant and will only increase as the current degradation increases. A significant change of emphasis in food and farming policy and production systems is needed. The question is what systems of production should be encouraged through a future Green Brexit food and farming policy?

Cutting edge ecological innovation must be one cornerstone of a domestic agricultural policy. Organic farming is currently in the vanguard of the ecological farming revolution. We do not see it as an alternative or global panacea; we see it as an integral part of innovation now and in the future.

The current approach to policy, outlined in the Defra Health and Harmony consultation paper, suggests that only the largest farms, able to invest in getting bigger and adopting capital intensive agri-tech farming solutions, will continue to produce food as a commodity, increasingly subject to the uncertainties and risks of global markets. There may also be risks associated with the lower resilience of such systems, meaning that they are likely to be more vulnerable to disruptions from weather events and market disruptions. The very smallest and most resilient farms, which already survive without subsidy, will also continue to survive as part of a niche but they will struggle with underinvestment. The middle band of active farms, particularly those producing dairy, meat, arable crops will struggle to survive. The focus must therefore remain on food production on these mid-sized farms within the context of a balanced approach to supporting the environmental outcomes they can create, alongside their greater resilience.

A significant financial benefit of using agro-ecological farming techniques relates to the much-reduced working capital requirement of an organic farm business (agro-ecological farming with no use of synthetic modern pesticides nor artificial nitrogen or compound fertilisers). The avoidance of these costly external inputs has a positive impact on the farm business cash flow. While yields and premiums fluctuate in both organic and non-organic production, variable costs in organic systems are around 40% of non-organic. The working



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capital requirement on organic farms is therefore only 35% - 40% of non-organic requirements². Not only does this allow greater opportunities for farm diversification it also provides greater financial resilience and helps new entrants get on the farming ladder.

To build resilience in UK based food production we need to ensure domestic agricultural policy is not based on exporting high quality goods to world markets, whilst we import lower quality food to feed ourselves. Therefore, meeting national demands for food should take precedence over establishing export markets. This would be beneficial for a number of reasons. It will:

- Reduce our reliance on imported food, reducing the sway these markets can have on prices and accessibility.
- Build resilience in our food production ensuring the delivery of fresher, more nutritious and affordable food that is directly accessible to local communities, bringing agricultural policy into line with public health strategies.
- Reduce transport costs and the carbon emissions associated with long distance food transport, minimising this aspect of our contribution to climate change.
- Allow greater visibility for consumers and enable greater equity across the supply chain, thus making farming enterprises more profitable and valued for their contribution to local economies, without resulting in higher prices for the consumer. The retailer Morrison's has stated that 70% of consumers prefer to buy British food.
- Encourage more diverse, sustainable and mixed farms, with multiple products, enabling more on-farm recycling, lower input use and reduction of food waste, alongside other environmental benefits and public goods.

Over the past decades there has been significant underinvestment in local supply chains, leading to today's situation in which very little financial support exists to develop farm enterprises and local markets.

We propose a local food fund, supporting development of direct sales by small businesses, for example through direct supply box schemes, food hubs, Community Supported Agriculture (CSA), delivery rounds, farm shops and catering businesses, which make fresh affordable food accessible to people of all income levels.

Under the development of the new ELM the government should prioritise systems-based approaches to securing environmental outcomes as public goods via agriculture. We suggest that the transition period should include testing to understand the opportunities and challenges of new approaches, including how these are assessed and valued both in terms of their public good and in terms of productivity and efficiency.

The proposed pilots during the agricultural transition period must include a whole systems agroecological approach, which can utilise the existing organic certification and assessment process as a means of demonstrating compliance as well as public value. The organic sector can continue to serve as a testbed for innovative and sustainable food production coupled with the delivery of social and environmental outcomes.

² Briggs, S. (2018) Is organic an option? Presentation to Hoare's Bank Organic meeting. Abacus Agriculture

Rural Vitality

We agree with the critique presented in the command paper of "a system of subsidy skewed towards those with the biggest landholdings has kept land prices and rents high, prevented new talent coming into farming and held back innovation". However, we are against the reduction of financial support for active farmers, most of whom depend on the payments to survive in the face of market failure. We feel strongly that it is essential to support the ecological and humane production of food.

The analysis in "Health and Harmony" implies that farmers are not earning a living from farming because they are inefficient, haven't adopted modern farming technologies, or are lacking business skills. The reality is that the current economic climate for farmers is incredibly difficult and has been undermined by the removal of market regulatory mechanisms to help stabilise and guarantee fair prices. Furthermore, prevailing measures of productivity and efficiency tend to focus on factors of production that are less relevant to agro-ecological systems. Organic farming is efficient by the Government's own measures^{3 4} and if productivity is deemed to measure output in terms of overall benefits to society as a whole, then organic production should definitely be in the mix. What has to be weighed up is how public goods are defined and valued and conversely how actions that negatively impact on them are mitigated.

The current farm support system is in need of reform, but this should not be used to cut funding for farming. Many of our problems are bound up with the area-based payment system, which is decoupled from production, environmental protection and the production of healthy food. We strongly believe that the government should dedicate the same level of financial commitment to supporting farmers, but this support should be redirected towards rural development and the provision of environmental public goods in a way that recognises and rewards farmers for the multiple positive farming system environmental impacts whilst also actively producing food. This could be achieved through a set of targeted rural development support schemes, providing support for productivity and environmental management at all scales on ecologically focused farms, including organic farms. It is particularly important that the support for increasing productivity and efficiency is not only targeted at farms exploiting agri-technological intensification innovations, but also for farms that adopt ecological intensification innovations based on whole farm management systems, such as organic.

We recognise that organic represents an opportunity for many but not all and it will deliver the policy outcomes sought by Government, given the fresh vision alluded to by the Secretary of State and his team at Defra. OF&G urge the government to take a positive approach to organic growth in its future policy, including as mentioned the specific organic support to reward and encourage the public and economic benefits that can be achieved.

³ UK National Accounts, The Blue Book: 2015 Edition <https://www.ons.gov.uk/economy/grossdomesticproductgdp/compendium/united-kingdomnationalaccountsbluebook/2015-10-30>

⁴ HM Treasury Guidance, The Green Book: Appraisal and Evaluation in Central Government July 2011 <https://www.gov.uk/Government/publications/the-green-book-appraisal-and-evaluation-in-central-government>

In this context OF&G suggest that 10% of UK agricultural land would be a valid ambition for organic production in the near term within a broader overall UK food and farming policy. This would allow the public benefits that organic systems offer to be more widely felt and contribute to a general shift towards more agro-ecological approaches to both production and, of huge importance, consumption as well. It would also allow, through the benefit of scale, the organic sector the opportunity to address the supply chain dysfunctions it currently faces and consequently make organic food more accessible to all

Public Goods

OF&G welcomes a future agriculture policy that focuses on the environment and measures for environmental stewardship, as outlined in the Command Paper. The command paper however falls seriously short of secretary of state's ambition that "Food production is about the health of human beings - all of us. And if our methods of food production don't contribute to improving health then we need to ask why."⁵

However, despite mentions of the need to support public goods, such as environmental quality and public health, the suggestions outlined for a new environmental land management system may have detrimental impacts on productivity (by non-organic farmers possibly sacrificing land area to meet public goods targets that could also be met by farming organically) whilst having no impact on public health. This seems to be an important missed opportunity.

Beyond public health, we also believe that we should be targeting the sustainable use of resources by both recognising the benefits of closed nutrient cycles and also the removal of products that are likely to be associated with environmental impacts (and also possibly human health impacts). Initial estimates suggest that if 10% of UK land area were to be managed organically, this would remove approximately 1,600 tonnes of synthetic agrochemical pesticide active ingredients and 160,000 tonnes of artificial nitrogen fertiliser⁶ from the UK agro-ecosystem with the resultant impacts on water and air quality, biodiversity and soil functionality

The isolation of public goods as discrete targets, independent of food production, will lead to a reduction in UK agricultural output as farmers opt for the cheapest ways to deliver certain targets. If such a system was allowed to develop, we could see farmers paid to increase soil carbon by letting arable land turn to scrub, or improve water quality by stopping agricultural activity on land near streams and rivers. Any reduction in UK food production, unless associated with a corresponding fall in consumption in line with a healthy and sustainable diet, will simply lead to an increase in imports of food products.

OF&G believes that the delivery of the public goods outlined in the Command Paper will depend on the one hand on rewarding farmers that benefit the environment, whilst on the other, properly implementing the 'polluter pays' principle to provide the finance to fund a public goods support system for UK farmers. Those responsible for the manufacture and/or application of fertilisers and pesticides would pay ('polluter pays') a tax to contribute towards the mitigation of impacts. Such a system could specifically recognise and reward

⁵ Rt Hon Michael Gove - Sustainable Food Trust Conference: The Future of UK Farming. Fir Farm 27th April 2018

⁶ OF&G estimates using figures provided by the Pesticide Action Network

the delivery of multiple public goods through a productive ecological farming system.

OF&G would also suggest extending this principle to the introduction of GM technology to the UK environment. GM (and similar technologies, including New Breeding Techniques (NBTs)) are not compatible with organic farming and so coexistence of organic with GM crop production would be almost impossible within the geographic constraints of the UK. Currently there is no appetite for GM from UK consumers and neither are any retailers interested. Many consumers actively seek to avoid GM and organic food provides the necessary assurances of this. Any potential adventitious contamination through wind, animal or human transmission of GM cultivars onto organically certified land would potentially compromise status of the organic land and given the potential losses to the producer and supply chain of this, then those affected would seek legal recourse from government and those actively marketing GM crops. Ultimately the introduction of commercial GM crops in the UK would significantly restrict the availability of UK produced organic food to the current 48% of UK consumers who buy organic food annually

We support a well-financed stream of funding for a dedicated "ecological innovation" grants scheme to help farmers develop and implement ecological farming methods.

OF&G also propose the establishment of an Organic Market Observatory. This would be a joint initiative between different organisations with the aim of providing better analysis of organic farm production and market data. Currently there is a lack of reliable information that is easily available to organic producers, processors and all involved in the organic supply chain. Clearly an integrated approach to capturing outcomes on farm alongside market opportunities and synergies would allow for the introduction of greater supply chain efficiencies. It would also allow for more open and consistent messaging regarding organic food, its production, manufacture and end markets.

From the evidence above, it seems to be reasonable to judge that organic food and farming systems do successfully internalise external costs, so that the premium currently borne by the final consumer of organic food could, in fact, be borne by society.

For these reasons, we believe that a dedicated organic support scheme, which recognises the multiple benefits delivered by this systems-based approach is fully justified and should be accessible to all organic farmers regardless of area farmed.

If Government are committed to projecting UK food and agriculture as the "Gold Standard" then the recognition and support of organic farming techniques that deliver multiple environmental outcomes and are already within the consumer's consciousness would present a powerful signal to voters of the breadth of the Government's vision for a Green Brexit. It would send a strong, confident and positive message to its citizens and the rest of world that it means business, and the adoption of a strategy that enables food production approaches that are more ecologically driven and organic in practice would provide a tangible demonstration of the Secretary of States commitment "to ensuring we leave the environment in a better condition than we found it" whilst also "enhancing the environment, safeguarding animal welfare, producing food of the highest quality, improving public health and contributing to a fairer society".

OF&G have undertaken a survey of all its English and Welsh producer licensees to ensure we provide a truly representative view in our submission. You will see specific reference to this in the responses we provide.

Questions	Responses
<p>Please rank the following ideas for simplification of the current CAP, indicating the three options which are most appealing to you:</p> <ul style="list-style-type: none"> 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 	<p>a) - develop simplified packages based on evidence based, legally enforceable standards relevant to farms and forestry businesses that deliver multiple public goods simultaneously</p> <p>b) and c) allow for simplified applications online and expand the offer</p>
<p>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?</p>	<p>Make sure there are support schemes that specifically support organic farm systems and small-scale commercial forestry and agro-forestry. These should be for conversion and maintenance of organic production alongside additional organic specific elements. These should be non-competitive and to ensure the lowest cost of entry be linked to maintaining a valid organic certificate. Over 96% of respondents had been in an environmental stewardship scheme with the vast majority (75.3%) under the old OELS. Farmers were split exactly 50:50 as to whether organic options should be within a standalone organic scheme (as under OELS) or as organic options within a wider scheme.</p> <p>It is critical that there is flexibility to move to new elements within CS during existing agreements. This would allow farmers to be more dynamic and proactive.</p>
<p>What is the best way of applying reductions to Direct Payments?</p> <p>Please select your preferred option from the following:</p> <ul style="list-style-type: none"> 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) 	<p>c) The current £3.1bn annual level of public funding for farming and the farmed environment needs to be maintained, in order to deliver environmental goals and support rural development. An independent assessment of scale of need should be commissioned. Future funding should be targeted to ensure that food production is not undertaken to detriment of environment and society. It is not a binary decision as to whether we produce food or have a healthy environment, both can be achieved with the right policy framework and incentives.</p> <p>85% of respondents indicated that they would be under increased financial pressure were payments to be reduced.</p> <p>One respondent commented “Would need the market to pay more for produce to account for fact that payments designed to keep food prices low are being withdrawn.”</p>
<p>What conditions should be attached to Direct Payments during the ‘agricultural transition’?</p> <p>Please select your preferred options from the following:</p> <ul style="list-style-type: none"> 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) 	<p>d) strengthen the current active farmer rules and improve provision and payment for public goods.</p>



Questions	Responses
<p>What are the factors that should drive the profile for reducing Direct Payments during the 'agricultural transition'?</p>	<p>There should be particular emphasis in ensuring that farms that support the delivery of policy objectives remain productive and profitable during the transition, rather than encouraging them to leave farming. Payments should be focused towards farmers that seeking to deliver business innovation and address multiple public goods simultaneously.</p>
<p>How long should the 'agricultural transition' period be?</p>	<p>We endorse the introduction of a new framework for English agricultural support by no later than 2024.</p>
<p>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:</p> <p>a) Encouraging benchmarking and farmer-to-farmer learning</p> <p>b) Working with industry to improve standards and coordination</p> <p>c) Better access to skills providers and resources</p> <p>d) Developing formal incentives to encourage training and career development</p> <p>e) Making Continuing Professional Development (CPD) a condition of any future grants or loans</p> <p>f) Other (please specify)</p>	<p>a) Encouraging benchmarking and farmer-to-farmer learning. 64% of respondents identified this as the top priority. This should involve Defra working with industry in developing a network of best practice and provide funding for third parties to develop farmer to farmer learning networks. One respondent wrote which is typical of the responses we received "not enough meetings where ideas and techniques are passed on to like-minded producers especially... we have NSA, Sheep Association and Cluster Groups where I get most of our information and new ideas by discussion</p> <p>c) Better access to skills providers and resources. 42.7% identified this as the second priority – one immediate way to achieve this would be to reintroduce a public/private arrangement delivering an on-farm advisory service aimed at increasing farm productivity (similar to OCIS+) focused on whole farm management.</p> <p>b) Working with industry to improve standards and coordination. 42.6% identified this as the third priority. One of our respondents wrote "one set of standards and no add-on's from any of the certification bodies"</p>
<p>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:</p> <p>a) Insufficient access to support and advice</p> <p>b) Uncertainty about the future and where to target new investment</p> <p>c) Difficulties with securing finance from private lenders</p> <p>d) Investments in buildings, innovation or new equipment are prohibitively expensive</p> <p>e) Underlying profitability of the business</p> <p>f) 'Social' issues (such as lack of succession or security of tenure)</p> <p>g) Other (please specify)</p>	<p>a) Insufficient access to support and advice – research and development within the industry has focused on placement and reduction fertiliser and pesticide that are largely irrelevant to ecological systems as they are already removed. There are requirements for high tech solutions that optimise low input systems (for example mechanical weeders and drones for weed and disease identification) There is no reason why there couldn't be an organic 'hands free' hectare. There is however a need to promote on-farm farmer led innovation that can drive more financially accessible innovation and create business opportunities for creative and entrepreneurial businesses. These innovations could directly increase the efficiency and productivity of ecological farms.</p> <p>d) Investments in buildings, innovation or new equipment is prohibitively expensive - experience suggests that targeted capital grants are an effective tool for delivering a transition to more sustainable farming methods.</p> <p>e) Underlying profitability of the businesses – farmers that prioritise ecological production, high animal welfare and living wages for employees are forced to compete with subsidised competitors producing food at lower social and environmental standards. This is a significant barrier to both profitability and capital investment. This substantiates the need for conversion and maintenance of organic production alongside additional organic specific elements.</p>

Questions	Responses
<p>What are the most effective ways to support new entrants and encourage more young people into a career in farming and land management?</p>	<p>We would like to see a New Entrants capital grant scheme introduced, modelled on the Scottish Young Farmers and New Entrants Schemes. We would particularly like to see support for new entrants from non-farming backgrounds as well as succession planning schemes that enable effective transition to younger farmers.</p> <p>Better vocational training for ecological farming and farmer to farmer learning networks.</p>
<p>Does existing tenancy law present barriers to new entrants, productivity and investment?</p>	<p>Yes. Land Trusts, County Farms and other measures to increase access to land are essential. There is a need to protect the network of County Farms and ensure long term tenancies of at least 20 years that can encourage new entrants to make the essential long-term investment.</p>
<p>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:</p> <p>a) Plant and animal breeding and genetics</p> <p>b) Crop and livestock health and animal welfare</p> <p>c) Data driven smart and precision agriculture</p> <p>d) Managing resources sustainably, including agro-chemicals</p> <p>e) Improving environmental performance, including soil health</p> <p>f) Safety and trust in the supply chain</p> <p>g) Other (please specify)</p>	<p>b) Crop and livestock health and animal welfare was the top priority for our respondents – This should include the development of plant varieties and animal breeds that thrive in low input systems. Currently many of the commercially available crop varieties are bred for high input systems and so do not thrive as well under organic management. There needs to be funding to develop more naturally resilient varieties. Resilience should be selected as a core trait in future breeding programs.</p> <p>d) Managing resources sustainably was a close second. For example, if 10% of the UK agricultural land area was farmed organically this would remove around 160,000 tonnes of artificial nitrogen from the environment of which it is estimated half is either lost to the atmosphere or leaches into the water system.</p> <p>e) Improving environmental performance, including soil health, was a very close third. At least 40% of the research budget should be spent on broad scale holistic management techniques to promote agro-ecological practices and organic farming.</p>
<p>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:</p> <p>a) Encouraging a stronger focus on near-market applied agricultural R&D</p> <p>b) Bringing groups of farms together in research syndicates to deliver practical solutions</p> <p>c) Accelerating the ‘proof of concept’ testing of novel approaches to agricultural constraints</p> <p>d) Giving the farming industry a greater say in setting the strategic direction for research funding</p> <p>e) Other (please specify)</p>	<p>b) Bring groups of farmers together in research syndicates to deliver practical solutions</p> <p>e (i) other encourage farmer to farmer innovation networks like Farmer led Seed saving and Breeding programmes (example Southwest Seed Saving Network)</p> <p>e (ii) Give public funding to open source research institutes looking at whole farm management techniques for ecology and organic farming.</p> <p>a) Encourage near market consumer focused R&D that recognises and seeks to address consumer objectives</p>
<p>What are the main barriers to adopting new technology and ideas on-farm, and how can we overcome them?</p>	<p>There should be a policy of seeking to support and encourage both new technologies alongside low-tech, low cost or open source innovation. Grants for helping farmers to adopt whole farm management techniques allowing for standard agricultural equipment to be used in innovative ways alongside appropriate high-tech innovation should be implemented.</p>



Questions	Responses
<p>What are the priority skills gaps across UK agriculture? Please rank your top three options by order of importance:</p> <ul style="list-style-type: none"> a) Business / financial b) Risk management c) Leadership d) Engineering e) Manufacturing f) Research g) Other (please specify) 	<p>f) research - organic and ecological farming techniques. One respondent suggested “flexible rental agreements. apprenticeships based on good wage rates and grants to employ i.e. like university loans”; another suggested “Provide funding or low interest loan for new entrants, which could be repayable in future”</p> <p>g(i) whole farm management approaches. “More courses at agricultural colleges and universities. Also more local training and farm walks.”</p> <p>g (ii) short supply chains</p> <p>c) leadership – recognising the value of alternative approaches. “... promote organics as an alternative new entrant strategy.</p>
<p>What can industry do to help make agriculture and land management a great career choice?</p>	<p>Encourage farming methods that are more financially resilient and ensure returns reflect the value and effort delivered by farmers. While yields and premiums fluctuate in both organic and non-organic production variable costs in organic systems are around 40% of non-organic. The working capital requirement on organic farms is therefore only 35% - 40% of non-organic requirements (<i>Stephen Briggs – Is organic an option? - Abacus Agriculture</i>) . Not only does this allow greater opportunities for farm diversification, it also provides greater financial resilience.</p> <p>Apprenticeship programmes</p> <p>Work with schools to reclaim the cultural value of agricultural livelihoods</p> <p>Funding for further professional development and training</p>
<p>How can government support industry to build the resilience of the agriculture sector to meet labour demand?</p>	<p>Introduce a new entrants scheme</p>
<p>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</p> <ul style="list-style-type: none"> 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. 	<p>74% of respondents believed that public goods could be prioritised.</p> <p>a) Improved soil health was seen as the most important with 33% of respondents putting this as the first priority.</p> <p>b) Improved water quality was second with 20% of respondents putting this first.</p> <p>d) Increased Biodiversity was third with 9% of respondents putting it first.</p>
<p>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.</p> <ul style="list-style-type: none"> 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 	<p>a) World class Animal health and welfare was first priority by a significant margin</p> <p>c) Protection of crops, tree, plant and bee health was second</p> <p>b) Preserving rural resilience, beauty and heritage was third</p> <p>We do not see Improved productivity and competitiveness as a public good but a function of market forces and demands.</p>

Questions	Responses
Are there any other public goods which you think the government should support?	Additional public goods are a sustainable and resilient domestic food supply and public health
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	<p>f) Soil quality b) Water quality d) & e) Habitat restoration and species recovery</p> <p>The Environmental Land Management Schemes should be open to farm and forestry businesses of all sizes, with no minimum claim area. Smaller scale land owners can work together with others to enter into joint agreements for larger scale packages.</p>
What role should outcome based payments have in a new environmental land management system?	Outcome based payments must be linked first foremost to positive outcomes. Food and farming support payments must seek to protect natural resources, have a positive impact on the environment for future generations, reduce waste, limit climate change and protect the health and welfare of animals.
How can an approach to a new environmental land management system be developed that balances national and local priorities for environmental outcomes?	What is critical for the development of a new environmental land management system is that both the local and national focus must be on providing a resilient food production system leading to high levels of productivity and efficiency. For example, organic farms use significantly less external inputs and generally develop a healthier soil that among other things can retain more water thus requiring less irrigation and so being more drought tolerant and better for reducing the risk of flooding. This could be vital as the earth continues to warm and water available for irrigation becomes more scarce and storm events more frequent.
How can farmers and land managers work together or with third parties to deliver environmental outcomes?	The "polluter pay" principle integrates farmers and government with accredited independent inspection and certification bodies. We suggest penalties for those companies whose products adversely affect the environment or are found in food products. The money should go towards payments to support initiatives that support and encourage cultural control methods and the costs of conversion, certification, training and ongoing maintenance payments for organic farmers.
Do you think there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare?	Yes. We believe however that high animal welfare should not simply be about health and safety but also about the animal's ability to exhibit natural behaviours. Trade agreements should restrict imports from countries with lower animal welfare.

Questions	Responses
<p>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:</p> <p>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)</p>	<p>a) Yes. Organic systems demonstrate high animal welfare and should be eligible for higher levels of support as part of an overall organic specific support scheme as recognition alongside other the public goods provided simultaneously</p>
<p>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:</p> <p>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</p>	<p>a) Use of regulation to ensure action is taken b) Use of financial incentives to support action – however this would be unnecessary if the polluter-pays principle was effectively enforced i) promoting organic farming because the animal welfare standards are part of the regulations</p>
<p>How can government best support industry to develop an ambitious plan to tackle endemic diseases and drive up animal health standards?</p>	<p>Intensive animal production is always going to provide animal health challenges due to the proximity and density of animals. There should be support for the extensification of animal production using land sharing between species simultaneously. Capital grants should be made available to support infrastructure to support this.</p>
<p>How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?</p>	<p>We recognise that there is a growing public interest in the re-wilding of the uplands for public benefit, however we are also committed to prioritising environmentally responsible food production. We therefore support a modest increase in the stocking of the uplands in order to increase productivity within environmental limits and maintaining farming cultures while at the same time maintaining public access.</p>

Questions	Responses
<p>There are a number of challenges facing rural communities and businesses. Please rank your top three options by order of importance:</p> <ul style="list-style-type: none"> 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 	<p>d) more affordable housing for rural workers, including self build. Changes to planning laws to allow for more affordable housing</p> <p>h) Rural communities need a wide range of farms selling and processing locally for a vibrant rural economy. Loss of farms will greatly impact rural communities. Rural development funding to create sustainable land-based employment for rural workers.</p> <p>c) access to finance- A Local Food Fund- creating more profitable farming businesses by shortening supply chains and creating vibrant local food networks. Must not let farms go out of business, but help them transition to short supply chain farms using techniques that create employment.</p>
<p>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?</p>	<p>Well financed rural development schemes- including a new version of Leader plus funding. A New Entrants Start up scheme.</p>
<p>How can we improve inspections for environmental, animal health and welfare standards? Please indicate any of your preferred options below.</p> <ul style="list-style-type: none"> 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) 	<p>b) Organic standards and certification is an internationally recognised, legal accreditation scheme requiring annual physical inspections and all Defra approved control bodies are accredited to ISO 17065. This existing infrastructure provides the highest possible integrity available in the market currently as it encompasses both domestic and international products. Organic certification provides a least cost option for recognised and verifiable standards and the delivery of specific outcomes to Government</p>
<p>Which parts of the regulatory baseline could be improved, and how? How can we deliver a more targeted and proportionate enforcement system?</p>	<p>Enforcement of the “polluter pay” principle through more transparent labelling to highlight environmental impacts and subsequent costs associated with negative impacts on public goods from their use. This would mean equity of certification between the polluter and those delivering positive public good impacts.</p>
<p>What factors most affect farm businesses’ decisions on whether to buy agricultural insurance? Please rank your top three options by order of importance:</p> <ul style="list-style-type: none"> 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 Complexity and administrative burden of insurance e) Availability of relevant insurance products f) Other (please specify) 	<p>a), b), c)</p>



Questions	Responses
<p>What additional skills, data and tools would help better manage volatility in agricultural production and revenues for</p> <p>a) farm businesses and</p> <p>b) insurance providers?</p>	<p>Diversifying production to include mixed farming enterprises and ecological systems – this enables economic resilience as well as biological resilience against pests, diseases and weather events. There is a need for training and capital support for the transition to more resilient systems. Long term resilience can be built through transition to shorter supply chains and better systems across the whole chain. Community Supported Agriculture is a new and innovative model of farming that enables farmers to share the risk of the enterprise with the consumer.</p> <p>Import tariffs reduce price volatility for farmers exposed to global market prices.</p>
<p>How can current arrangements for managing market crises and providing crisis support be improved?</p>	<p>The strengthening of market management tools, and the powers of the Grocery Adjudicator, that there is guarantee of fair prices. Local support charities should be supported like Rural Stress and the Farm Crisis Network.</p>
<p>How can we improve transparency and relationships across the food supply chain? Please rank your top three options by order of importance:</p> <p>a) Promoting Producer Organisations and other formal structures?</p> <p>b) Introducing statutory codes of conduct?</p> <p>c) Improving the provision of data on volumes, stocks and prices etc.?</p> <p>d) Other (please specify)?</p>	<p>b), a), c)</p>
<p>What are the biggest barriers to collaboration amongst farmers?</p>	<p>Farmers struggle to work cooperatively as this has not been encouraged in the UK. They need technical support to put together collaborative applications and initiatives and clear benefits need to be promoted through case studies.</p> <p>Where there are financial barriers there should be a rural development scheme focused on increasing collaboration in the farming sector and top up funding on any scheme that is carried out collaboratively.</p>
<p>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?</p>	<p>Government can develop promote a policy of cooperation. Offering support and promoting best practise industry led cooperation for marketing, processing, and knowledge sharing. Farmers can get together to supply specific materials into processing sites providing much greater visibility of the challenges and opportunities within the supply chain. Consumers love to talk directly to farmers larger volumes of produce for public procurement or to use collective distribution systems like open food networks</p>
<p>Where there are there are insufficient commercial drivers, how far do you agree or disagree that government should play a role in supporting:</p> <p>a) Industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?</p> <p>b) Landscape recovery following pest and disease outbreaks, and the development of more resilient trees?</p> <p>c) The development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?</p>	<p>Strongly agree.</p>

Questions	Responses
<p>Where there are insufficient commercial drivers, what role should government play in:</p> <p>a) Supporting industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?</p> <p>b) Promoting landscape recovery following pest and disease outbreaks, and the development of more resilient trees?</p>	<p>The government should offer guidance based on expert advice about how to control pests and disease and offer financial support for collaborative responses.</p>
<p>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?</p>	<p>The government should issue guidance based on expert advice about how to ensure a bio-secure supply chain in all of these sectors, but should not increase the regulatory burden on these sectors with the introduction of movement orders.</p>
<p>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?</p>	<p>We would like to ensure that any devolution deal does not risk diluting any policies currently in place. England should adopt the rural development programmes that the Scottish have, such as the Small Farms, Young Farmers and New Entrants Schemes. UK organic regulation should be the same across all devolved administrations.</p>
<p>What are the likely impacts on cross-border farms if each administration can tailor its own agriculture and land management policy?</p>	<p>It would be good to have equivalent support systems so that all farms operate on a level playing field, and one region is not disadvantaged over another leading to supply chain complications and the loss of local markets for local producers.</p>
<p>How far do you agree or disagree with the broad priorities set out in the trade chapter?</p>	<p>Answer: Disagree. While organic export markets offer opportunities domestic food supplies should be prioritised. If new export markets do require opening government should support the administrative burden but not the financial burden. Accessing new markets increases exposure to global market volatility and supply chain integrity issues.</p> <p>Need more emphasis on the developing UK supply to ensure public good benefits are on-shored</p>
<p>How can government and industry work together to open up new markets?</p>	<p>OF&G advocates an integrated tariff regime to enforce the maximum permissible rates under current WTO rules relating to agricultural goods and services. This includes low tariff rate quotas plus selectively applied seasonal tariffs to protect sensitive industries. Tariffs raise revenue for government, which can be used to support the development of greater UK supply.</p>
<p>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?</p>	<p>By protecting UK food production from imports produced to lower standards We should maintain our world-leading animal welfare and environmental standards by applying strict trade rules. GM and related gene editing technology should be prohibited in the UK. If the UK seeks to remain a global leader in food quality, safety and environmental protection then the adoption of these techniques will fundamentally and irreversibly undermine the position.</p>
<p>How far do you agree with the proposed powers of the Agriculture Bill?</p>	<p>Agree. We welcome the opportunity to reorientate agricultural support and regulation specific to a UK context, however we would like to see an equal emphasis on ecological innovation alongside agri-tech. To establish the governments long term vision for UK agriculture will require a diversity of solutions and this should be embraced within the Agricultural Bill.</p>
<p>What other measures might we need in the Agriculture Bill to achieve our objectives?</p>	<p>The government should use cross departmental policies to link with health, education, planning/housing, trade and the 25-year environment plan</p>

