

Environmental Audit Committee

Oral evidence: Revised Environmental Improvement Plan, HC 1622

Wednesday 21 January 2026

Ordered by the House of Commons to be published on 21 January 2026.

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Members present: Mr Toby Perkins (Chair); Jonathan Davies; Carla Denyer; Chris Hinchliff; Sojan Joseph; Manuela Perteghella; Martin Rhodes; Dr Roz Savage; Blake Stephenson; John Whitby; Sammy Wilson.

Questions 25-58

Witnesses

[II](#): Sally Hayns, Chief Executive Officer, Chartered Institute of Ecology and Environmental Management; Martin Lines, Chief Executive Officer, Nature Friendly Farming Network; and Dr Diane Mitchell, Chief Environment Adviser, National Farmers' Union.

Examination of witnesses

Witnesses: Sally Hayns, Martin Lines and Dr Diane Mitchell.

Q25 Chair: Welcome, everyone, to the second panel for our look at the revised environmental improvement plan. I am very pleased to have this session on farming and ecology, joined once again by a distinguished panel. I invite the three of you to introduce yourselves and the organisations you represent, and also give us your first thoughts on how ambitious you consider the EIP to be.

Dr Mitchell: Good afternoon. I am Diane Mitchell, the chief environment adviser at the National Farmers' Union.

On the ambition of the environmental improvement plan, we were pleased to see, as the previous panel mentioned, the more detailed delivery plans that accompanied the environmental improvement plan. We have all been calling for those, so it was good to see them and good to see the detail. We understand that those plans will be iterative, which is really important, and hopefully we will all be involved in those iterative plans as they develop. Following on from that, the commitments and actions and who is responsible for those is clearer within the plan, which is very welcome.

On some of the renewed targets within the EIP, there are some that are real drivers for the SFI. For example, the new interim target that talks about doubling the number of farms providing sufficient year-round resources for farm wildlife is welcome. We applaud the ambition in a number of areas to look forward and to develop a number of strategies and plans. Of course, we have the water White Paper and the proposed circular economy strategy, too.

As the OEP quite rightly mentioned, we need to see some clarity in support for farmers. There is a real appetite for farmers to deliver for the environment and farmers are keen to engage and be involved, but they lack confidence to plan and invest. Part of that relates to the fact that we do not have the clarity that we might need and the plans that might sit alongside environmental delivery—the plans for food production and food security—or equally ambitious targets for food.

The previous panel talked about the need to join up on a number of these plans that we are all looking forward to receiving. That is a real opportunity for farmers to plan and to look forward and invest and to improve confidence, as well as the elements of the food strategy that were published in July.

Q26 Chair: If I could stop you there for a minute, Dr Mitchell; we will get into many of those topics and explore them. Mr Lines, I invite you to introduce yourself and your organisation, for those who are not aware of who you are. Then the same question to you: how ambitious do you believe the revised EIP is?



Martin Lines: Thank you for the opportunity. I farm in Cambridgeshire with my family, and I am also the chief executive of the Nature Friendly Farming Network, which is a UK-wide membership organisation for farmers trying to champion the join-up of nature, food and other production from our landscape.

On the EIP, I welcome the clearer ambitions and targets compared to the previous one, but it really lacks detail for farmers and farming. We are looking for plans that are coming in the future to deliver outcomes. When we look at the detail of what farmers are asked to do, there is not much detail encouraging farmers to do it. If farmers do not pick up the environmental land management schemes, how will these targets be delivered? How will investment and improvements be done through farming, particularly when we look at the water quality and other elements, where the water companies are able to get investments from their customers? For farming, where will the investment come from? How do we shift that cost burden up the supply chain or to others to really deliver the joined-up approach?

Unfortunately, I do not think it is ambitious enough to halt nature decline by 2030, or encourage farmers to see the relationship whereby nature underpins food production and the other produce that comes from our landscape, which underpins our businesses and the economy.

Q27 **Chair:** Thank you very much. Ms Hayns, please introduce yourself and the organisation you are representing today, and then give us your sense as to how ambitious the revised EIP is.

Sally Hayns: Thank you very much for the opportunity to speak to the Committee this afternoon. I am Sally Hayns, the CEO of the Chartered Institute of Ecology and Environmental Management, which is the professional body for ecologists and environmental managers across the UK and Ireland.

On the EIP, as others have said, as a document it is a better plan. It is not particularly easy to read, if I am honest, but there is more structure, more detail to it, and it is more delivery focused. There is more reference to ownership of commitments and targets, and some more specifics about funding, stronger policies on unlocking private finance opportunities and some clearer pathways and targets than in the 2023 version. In that regard, I think DEFRA should be commended for all the work and the effort that has gone into this plan. It clearly matters very much to the ministerial team and to the civil servants working alongside that team to get this plan out and to try to get it right.

Overall, I have to say it is very disappointing. We think it is not so much a significant step forward in restoring nature—as stated by the Secretary of State—as more a stumble in the right direction. It completely underdelivers on the sense of urgency, particularly on pace and scale. We do have an environmental emergency and we need an emergency response plan that is at a pace and scale to match that.



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Chair: Sorry but I have to stop you. I do apologise, Ms Hayns. Unfortunately, the Division bell has gone and we have what we expect to be the final vote today. I have to suspend the sitting again; we will hopefully return in a few minutes.

Sitting suspended.

On resuming—

Q28 **Chair:** We will carry on with the second panel. I cut you off in your prime there, Ms Hayns. You were talking about the areas that you remain disappointed by. From your perspective, do you think the EIP sufficiently recognises the join-up between farming and non-farming sectors to deliver it? How will your members feel about that aspect?

Sally Hayns: I will say from the outset that I am not a farming expert, despite having experience on a farm. I am not a farming expert, and I hope we might be able to return to some areas that were discussed by the previous panel, particularly around skills, access to nature and cross-Government engagement, and how we might be able to support that.

As was previously said, the farming community are absolutely essential to achieving a number of the targets in the environmental improvement plan. We have to make sure that we are putting in place mechanisms and funding that properly enable them to do that, like any other business. We see this also with the developers that a lot of my members work with. Some agencies tend to talk about the environment and the work to improve the environment by those businesses as burdens. We should be talking a lot more about the benefits and how positive environmental action can help make your business more successful and more sustainable, and ensuring that farmers and other business owners have the skills and the incentives to do so. I do not necessarily see much of that in the environmental improvement plan.

Again as was mentioned previously, to some extent, we are waiting with bated breath, if not excitement, for the land use framework and the farming route map, because they will be critical in how they join up the environmental improvement plan.

Q29 **Chair:** Yes, absolutely. Dr Mitchell, what do you think farmers are wanting to see in the revised EIP, or what additional bits are they are wanting to see? Are there any aspects that give you optimism that farmers will be able to make the contribution to nature that you referred to them being keen to make?

Dr Mitchell: Thank you for the question. I mentioned earlier the elements around the ambitious plans for food production alongside environmental delivery. Similar to Sally, the link and join-up between the various plans is important and fundamental to improving farmers' confidence, particularly the land use framework and the farming road map. The environmental land management scheme is a fundamental delivery mechanism for the statutory environmental targets and a



number of the other targets set out within the environmental improvement plan. One of our key asks is for a smooth and seamless transition to new environmental schemes. That is really important to give farmers confidence and certainty to plan.

We have some more information from the Oxford Farming Conference on the sustainable farming incentive scheme, so we have a little bit more clarity, certainly on timescales. We are expecting two application windows this year, one in June and one in September. Farmers are looking towards those timelines for them to get a little bit more information about what it means for their business. We understand there will be further clarity on the various aspects and detail of that scheme. It is encouraging that DEFRA will be working with farmers and others within the sector to develop those more detailed plans that we are expecting very shortly. We would like the SFI scheme, which is fundamental because it sits alongside food, to be accessible and relevant to all farm sizes, tenures and farming types.

Q30 Chair: If I could stop you there for a moment, Dr Mitchell; could I encourage you to move the mic slightly closer to you? I am told that on the broadcast it is a little bit quiet, so please speak up.

On the alignment in the EIP between the various goals, such as health, access to nature and nature restoration, do you think that the plans are sufficiently aligned at the moment?

Dr Mitchell: That is a really good question. I must confess that I have not looked at the depth and detail of all of the 13 more detailed delivery plans that were published. I have looked at some them. On whether they are aligned between the various targets and the various commitments, we would ask that at least they should be, because it could be that one of the targets delivers for another commitment and another activity. For example, to what extent does the water quality target and its various actions and activities—whether it is through regulation or agri-environment schemes or innovation and research—deliver also for some of the biodiversity targets? We certainly hope they were aligned and, similarly, aligned with the other non-statutory targets.

Q31 Chair: None of us in this place will have failed to notice that the Government and farmers did not entirely get off on the right foot. You talk about confidence. Clearly, the ELMS programme predates this Government; none the less, it is requiring this Government to make the changes you are talking about. Do you think the division over inheritance tax and agricultural property relief impacts on farmers' confidence in the Government more generally, with or without the changes that have been recently announced? Do you think it makes any difference, or do you think that farmers will say, "Look, I'm angry about that, but none the less, on this scheme I'm interested, if you get it right"?

Dr Mitchell: I think it is a contributing factor, certainly. The NFU runs its confidence survey each year and we will hopefully have results in the



next few weeks. One of the striking things from our survey last year was that confidence was at an all-time low. The discussions around IHT was certainly one of the contributing factors, alongside a number of other things. It does undermine the confidence and trust that farmers have in the Government.

Q32 Chair: Mr Lines, what is your sense of what your members—farmers who focus on nature-friendly farming—are looking to see from the Government? Do you feel there is anything that Government should be looking to the farming sector to do that they may not be doing in enough quantity at the moment to help achieve their goals?

Martin Lines: Many farmers are looking for certainty of funding plans so that we can put a business plan into it, and for the longevity of that funding. We are seeing lots of schemes moving down to a three-year window, where we used to have five and 10-year windows, so that means short-term actions and short-term delivery. There are also over 27,000 farmers coming out of schemes in the next year or so. Where is the pathway to get them in, if the window is going to be between June and September but they do not finish their scheme until the end of December? Will there be any money and opportunities for them to come in, or will they get stranded? Many farmers who have been doing lots in the past have found themselves disadvantaged by being the early adopters, and the timelines of schemes have not joined up. They have been stranded, and many habitats have been taken out to then be paid for to be put back in again. I think that is really daft.

We need to see from Government a clear plan of what they want from farming and our farm landscape—food, nature, fibre, timber, access to nature; all of it, in different places—and that clear message of the role of the farmers to shift, in terms of not just food production but delivering a range of outcomes, and who and how they will get funded. Some of the core costs for farmers is maintaining the environment, so public money for public good can manage that. It keeps the cost of food down because you do not have to use the profit from food to underpin the environmental delivery, but that is not quite happening now and we do not have the certainty to go forward.

We also need to see where regulation needs to come in, because many farmers are not doing as much as they should be doing and they are causing some problems. We need to get that balance of regulation to come in to push them along and improve them, while those already doing stuff get rewarded for what they are delivering. Many are thinking about why they should do more when they can see neighbours and colleagues not doing enough.

Q33 Chair: Absolutely. Do you think the revised EIP should have had more to say on the topic of fly-tipping and waste crime in rural areas, including on farms? Is that an issue that your members feel strongly about? Do you think there should have been more in the EIP on that?



Martin Lines: Definitely. Fly-tipping and waste disposal, not just in rural areas but in urban areas as well, is a blot on the landscape. Many farmers are now picking the rubbish up and taking it to the tip and then getting blocked from taking it in because it is commercial. We need to have a better relationship. It is pleasing to see the fines going up, but for many it is still cheaper to dump it than get a skip. We need to make sure that works.

It is not just the fly-tippers; it is the criminality that comes around it and all the other associated problems that rural communities are facing. Yes, there should be stronger action on how we deal with that waste and whose responsibility it ends up being, particularly for the commercial waste that is dumped in large lorry volumes that is costing farmers tens of thousands of pounds to dispose of. It is not their responsibility. It is just imposed on them.

Q34 **Chair:** On that topic, Dr Mitchell, how much of not just an inconvenience but a serious threat to their business is this to the farming community? We have heard more and more about waste crime recently and, as Mr Lines said, it being wrapped up with organised crime. Does it also have a big impact on the quality of life of farming communities if they feel under siege from this type of thing?

Dr Mitchell: Absolutely. On rural crime, fly-tipping—and I include organised waste crime within that—is one of the biggest concerns. Rural crime generally has a real impact on farmers' feeling of safety and wellbeing. The environmental improvement plan commits to doing various things to tackle waste crime, including cracking down on illegal waste sites, waste tracking and the reform of the legislation on carriers and brokers, which is great. The House of Lords recently issued a report on the issue of waste crime and we agree with a number of things that were set out in that. This also applies to fly-tipping as well as organised waste crime.

Farmers need a single reporting mechanism when reporting fly-tipping incidents, because quite often they do not know who to talk to. They might talk to a local authority, the police and so on, and they can get passed from pillar to post. There also needs to be increased collaboration between the various bodies. There is a number of bodies that deal with fly-tipping and waste crime: the police, local authorities and the Environment Agency.

Q35 **Chair:** Yes, absolutely. Do farmers feel that the police take this sort of crime seriously enough and are resourced enough to give it the serious focus it deserves?

Dr Mitchell: I may come back to you on that and provide a written submission. We are concerned about how reports on fly-tipping and waste crime are handled, not just by the police but generally, across the board, and about how intelligence is shared between those organisations.



Q36 Martin Rhodes: In the previous panel, there was quite a bit of discussion about policy alignments, and you have already made reference to it yourselves. Dr Mitchell, how important is alignment between the revised EIP and other current and forthcoming policies? The land use framework has been mentioned quite a bit; how important is it?

Dr Mitchell: It is very important, and farmers are looking to get that clarity. As I mentioned earlier, we published our food strategy in July, which outlined several actions that need to be taken forward. We now have the revised environmental improvement plan. Baroness Batters has published her farm profitability review, and the Government have already considered various aspects of that and committed to taking various actions forward. The next thing is the land use framework, which will hopefully provide some clarity for farmers, setting out various principles on land use. Hopefully this will all come together in the farming road map. Farmers are looking to that farming road map to bring all of these things together and provide the clarity that is much needed, and hopefully a long-term plan, but also perhaps some shorter-term milestones that they can be working towards.

Q37 Martin Rhodes: On the policy and the areas of delivery, to what extent is it necessary to join up between Government Departments to deliver? Do you see any particular gaps between Departments where things might get missed?

Dr Mitchell: Yes, absolutely, there needs to be join-up. I think that is particularly important for the food strategy and thinking about how that feeds through to the farming road map. Clearly that involves a number of different Government Departments working together—the Department of Health, DEFRA, DESNZ, MHCLG and others. That clearly is very important.

On gaps, one of the areas that we would like to see worked on more is adaptation to climate change. We have a Government national adaptation programme, which I think is the third one, and it runs to 2028. There is mention of agriculture in there, but it is not a huge discussion or debate. There is a number of threats to agriculture as a result of climate change, and farmers will need to adapt to manage those changes. We would like to see in that fourth national adaptation programme from Government more of a discussion on what is needed to support agriculture, particularly around soil health but also managing water, whether that is too much or too little.

There is also something on planning. We are really encouraged by some of the more recent discussions on planning. At the Oxford Farming Conference the Secretary of State mentioned taking forward a number of measures of support for development on farms, such as on-farm reservoirs. There are probably still some challenges. Planning is seen as a barrier to investment. Although there are really supportive comments in the NPPF, and also by the Secretary of State at the Oxford Farming Conference, we would like to see more done to recognise betterment—



improvements on farm infrastructure that might reduce emissions. If you are improving slurry stores or livestock buildings, that should be seen to be a good thing and might need some join-up between DEFRA and MHCLG.

Q38 Martin Rhodes: Mr Lines, how important is policy alignment? How should Government Departments be joining up on delivery? Where do you see any gaps in the set-up?

Martin Lines: It is absolutely critical to get a lot of these delivery plans laid out in a structure, but it is about not just DEFRA but the Health Department, Education and others. How does the EIP stack together what all Departments bring in, and look at farmers as the delivery for many of those actions in a joined-up way, and get those delivery plans?

Many farmers are really disconnecting from Government schemes. They are not in an area-based payment any more, or very minimally. They are not going to be participating or want to engage. For many, they are not listening to the mood music or the information is not getting to them. If DEFRA has set out a plan, how will we as stakeholders be encouraged to communicate that plan to those on the ground so that action can start being delivered as quickly as possible?

There is an increasing disconnect between those on the ground in diverse landscapes when it comes to delivery plans and trying to join that up. Who are the contact points? There are multiple agencies that have a control mechanism over water. As a farmer and land manager, who do I need to go to for the SSSIs and other features? Is it a Natural England person or an RPA person? It is really complicated for farmers to understand and use their time to work it out. Instead of having a one-stop shop—"This is my information for your arm's length bodies to deal with"—the farmers are expected to reach out to everybody, wait for responses and then try to join it together. Many farmers are finding it hard to know who to talk to and to give the right piece of information to. It is disconnecting them, because they are so busy. They need advice and support to make sure they are getting the right actions delivered as a whole farm plan, rather than a pick and mix and cherry-picking the easy bits.

Q39 Martin Rhodes: We have been talking about Government Departments having to work together to deliver, but it is also about the interface of how farmers make contact with Government and who they make contact with. You are saying one stop—one point in. It is not just about them joining up; it is also how people communicate with them.

Martin Lines: Rather than having multiple local levels, national levels and different Departments, how can we have more of a one-stop shop—"This is what I can offer as a land manager; as a farmer, what can I connect to?"—rather than having to go to each of the different places, platforms and funding streams? It is multiple funding streams now; some of it comes through RPA and ELM, some of it might come from a tree,



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some might come from private finance, some might come from water companies. It is getting confusing.

For our own business we have nine different schemes and funding opportunities, where we used to have three. It is all about delivering schemes and ELMs and public and private finance. It is becoming a complicated business model. Farmers need the stability of a one-stop shop of getting as much action as possible delivered, and then stack on top the private finance to deliver the additionality that is beyond what the public are willing to pay for.

Q40 Martin Rhodes: Ms Hayns, the same question to you about policy alignment, joined-up delivery, and where there might be gaps.

Sally Hayns: I can talk not in the context of farming but more widely on the plan, and particularly around restoring nature. The thing we have to understand is that the context for the plan has changed quite considerably since 2023. As previously mentioned, there appears to be a weakening of cross-Government ownership and support for the environment generally and the environmental improvement plan. As was mentioned, on the same day the plan was launched we had the Prime Minister responding to the Fingleton review, and unfortunately a negative narrative about the importance of nature and nature recovery.

After the plan was launched we heard about the outcomes of the JNCC's quinquennial review, and the recommendations were largely dismissed out of hand by the Government. In that recent reform of the Planning and Infrastructure Act, we have environmental regression for the first time in over 40 years, and we are now discussing potential changes to habitats regulations assessment and other remaining environmental policies and regulations, which will basically make the job of achieving the targets in the environmental improvement plan much harder. As we heard in the previous panel, there is very little transparency or evidence on the environmental principles that every Government policy is supposed to take account of.

The environmental improvement plan overall relies too heavily on DEFRA—I think almost 90% of the commitments relate to DEFRA—and where there are actions allocated to other Departments they are generally quite weak. I will give MHCLG as an example—apologies to MHCLG. It has quite limited actions assigned to it. Making sure that local planning authorities take account of local nature recovery strategies does not require any outcome to be achieved. It is maintaining current protection for ancient woodland and veteran trees in the NPPF, not improving protection for ancient woodlands and veteran trees. The current NPPF protects all irreplaceable habitats, with loss or deterioration only in exceptional circumstances.

Misinformation is allowed to proliferate unchecked across Government. I think DEFRA needs our help to explain to other Government Departments why nature matters. There is so much evidence of the positive benefits



that nature can provide, but also the risks of biodiversity loss to business in the UK and more globally. English nature assets alone are valued at £1.3 trillion, for example, and nature-related risk could shrink our GDP by 3% over the next decade.

To some extent I feel when we come along to this Committee we are talking to the environmentally literate—if you will forgive me saying so—and we need to go beyond that. We need to be talking to other Committees or helping DEFRA talk to other Committees. We need to talk to the Committees serving the built environment about how the built environment can deliver for nature in ways that deliver for the built environment as well. We need to be talking to the health Committees. Nature itself can deliver us over £800 million-worth of benefit to health through pollution control, let alone the benefits for mental health and obesity.

We need to be talking to those Committees and helping Government talk to those Committees to say, “Look, environmental protection and environmental recovery is not a burden; it can help deliver multiple objectives. We can show you how, we can help you, but you then need to align your policies and legislative agendas.” This has to be a cross-Government priority and it does not seem to be at the moment.

Q41 Martin Rhodes: You mentioned DEFRA’s role as the lead, and one of the things you said is support from us for the wider network and people interested in these sorts of issues, but does DEFRA have the necessary levers to deliver on the plan?

Sally Hayns: No, I do not think it has. I do not think it has sufficient funding and consistency of funding to hand out to support the delivery of a number of the goals of the plan, including farming and environmental land management. It is that long term certainty. There are some welcome announcements of funding in the EIP but it is only a starting point, so funding is a big lever to pull. The EIP references a lot of good evidence to show how the wider Government agenda can be supported by environmental improvement more broadly and can support environmental improvement, but it has to have a voice and be listened to. We have heard so much negative narrative about the environment, particularly over the last 12 months. Quite frankly it does not stand a chance, and we need to find a way of changing that.

Q42 Martin Rhodes: Dr Mitchell or Mr Lines, do you want to say anything about DEFRA? Do you think it has the levers necessary to deliver?

Martin Lines: Has it got the clout within the Cabinet? It is always the bottom Department; it is not the champion. Actually, DEFRA, nature, climate is critical for the UK economy and everything else. It should be the one being championed, not parked in the corner. How does it get a stronger seat in the Cabinet to have a stronger voice? It would be welcome to have the Prime Minister starting to champion it rather than use language and a negative tone about it blocking development and



growth. It should underpin growth, particularly as our climate changes. We are running out of time to put the foundations into our landscapes that deliver the growth and the opportunities for nature and the economy going forward. That is critical for farmers. Farmers are 70% of our landscape. We need to encourage and incentivise them to see their role as delivering those outcomes.

Dr Mitchell: We have already talked quite a bit about it, but to finish on the environmental land management scheme, one of the things that I think is absolutely critical is clarity and transparency about the farming budget. We do not have that at the moment and that is important. Coming back to Martin's point about the expiring agri-environmental schemes, we need to be able to plan, and if we do not have clarity in the budget, it is very difficult for us to be able to argue for the right actions and activities, and for farmers to plan as well. That is critical.

The other major farm funding aspect relates to private markets and private finance. We are very supportive of private markets. As was talked about in the previous session, they clearly have important potential to deliver some of the environmental improvement plan's statutory targets. We need to understand some of the challenges and blockers, but also the opportunity and potential around private markets. We are all working very closely with DEFRA, the Treasury and also the BSI. One of the difficulties is that currently, beyond developers, it is uncertain or unclear what the demand is in the private market space. Clearly there is demand for biodiversity net gain and nutrient neutrality, but beyond that it is a little bit unclear.

There is a lot to do in that area to try to support further investment in private markets. One of those things is making sure that we have clear standards and clear rules so that everyone knows what they are working towards and that the goalposts will not change. Beyond that there may also be a role for inseting. What can the Government do to enable or support inseting, encouraging supply chain incentives or better agreements for farmers so they are rewarded for more sustainable production and activity? That is an important element, and there is more work still to be done on helping farmers to baseline monitor and to be able to report. I will leave it there.

Q43 Martin Rhodes: You mentioned certainty around funding, and Mr Lines previously mentioned the multiple funding schemes and so on, so there are obviously issues around funding. Is there enough funding for farming to deliver what is needed with the EIP? Mr Lines, do you want to answer that one?

Martin Lines: We have the same budget we had 10 years ago, and with inflation it is roughly half. All of the various organisations say it needs to be roughly doubled, and then we need to stack in private finance as well. If we want farmers to deliver 7% within this EIP, that only halts nature's decline. If we want recovery, it is about 10%-plus across farm



landscapes, and the majority of farms being focused on delivering environmental outcomes. That is at a cost.

As a farmer I cannot afford to deliver that if it is not benefiting my business. I will deliver good outcomes that increase pollinators and predatory insects that support my business and healthier soil, but the additionality, the public goods and what society needs needs to be rewarded. We currently do not have the budget. It is not set within this Parliament, so we know we will not see it extended, and the hope of getting the right outcomes at a whole-farm approach on farms is pretty limited. We currently have so much money tied up in previous schemes that were not managed very well and not delivering the right outcomes.

We need to focus: what does nature need investment in and how much does nature need? What is the investment to improve farming outcomes around the whole farm and all of the soil? We need more money, basically.

Dr Mitchell: I perhaps answered part of that question in my previous answer, but I will add that there are other schemes that support farmers and sustainable production outside of ELM, and perhaps we need some greater clarity around those non-ELM funding pots. For example, will there be another round of the slurry infrastructure grant? It is currently uncertain.

If we go back to the ELM funding and the landscape recovery project, they are quite interesting because they are part public funded and part privately funded. One of the challenges that has emerged is that attracting private investment is difficult. Attracting that to enable more blended finance and private funding has been difficult. I think there is some work to be done there to look at how we can learn from the lessons and the challenges that we are currently experiencing in the landscape recovery projects that are ongoing at the moment.

Q44 **Martin Rhodes:** What do you think is the underlying reason for the difficulty in getting private finance coming in? Is it about the certainty of current funding? What are the issues that create that problem?

Dr Mitchell: Part of it is around demand, as I mentioned earlier. There are funding streams that are more certain, and developers are certainly one of those. Some of the more voluntary markets are a little bit more uncertain. Although perhaps there may have been some water company funding available, that again is a little bit uncertain at the moment. This is why we are pivoting to the insetting and the role of the supply chain in providing incentives and more certainty through agreements.

Martin Lines: I think DEFRA needs to clearly set out what public goods it wants to pay for, to let the market pay for other additionality. There are supply chains that are having conversations with farmers like myself about rewarding us for more regenerative actions and other things, but they only want to pay for the stuff that I am not getting paid for. If the



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Government are willing to pay for x, the supply chain will contribute the additionality where they see the benefit to their business and their supply chain, and we get the food security from having healthy soil and a healthy structured business. It is about having certainty from the Government on the plan for public goods and the values and the asks, and what they will reward, to allow the private market to come in.

Some farmers in Cambridgeshire where I am are saying, "We can get easily connected supply chains to the market," and some farmers cannot. How do those farmers then get the right amount of value coming in, where public money may need to step up and do more and give the heavy lifting, particularly in landscapes like uplands and grasslands and others where the public good of access, water management and others are the key drivers? That means in the business model for those farmers the revenue streams may come from funding from public goods and some private markets, alongside food production, but some of those public good markets may be the key driver for their business resilience in the future.

Q45 **Martin Rhodes:** Overall there is obviously an issue about the level of funding, and the complexity of some of it, but there is also a key factor of the certainty that will attract other funding to come in from the private sector.

Martin Lines: And transparency. Who is paying for what in what landscape, and in fact in what field? If somebody is already paying for carbon sequester in that field, another investor will say, "I don't want to pay there, but here is space where I will now invest." We have to have some transparency into market to get some certainty and clarity to drive investment.

Q46 **John Whitby:** Ms Hayns, do you think that non-farming projects and programmes have access to private investment?

Sally Hayns: I think they have access to some private investment. Biodiversity net gain is a prime example of that but, as was previously mentioned, the lack of certainty has rocked confidence in private investment. I think the EIP is quite strong in finding ways to boost and encourage private investment, but as soon as the Government starts casting doubt on some of its mechanisms, such as biodiversity net gain, the market steps back. It is too new and risky at the moment for any signs of uncertainty or loss of confidence to keep people in the market. It will be an important area in achieving some of the outcomes of the environmental improvement plan, but we need to keep the mantra and the certainty going, and make it easy for private investors to feel confident about investing in the market.

Q47 **John Whitby:** To what extent do farmers have the necessary clarity on producing food while at the same time delivering environmental goals and nature restoration? That question is for anyone who's prepared to answer.



Martin Lines: Clarity on how much food, where and what, should come in the food strategy and the land use framework. We have to recognise that many farms are not producing food we consume; they are producing energy crops, fibre, timber, animal feed and other things. What do we want from our landscape? Is a farmer's role now and in the future just about food production? Are those farmers who are doing cut flowers or energy crops no longer farmers because we are not feeding people from that land? I think we need to redefine what we want from our land. As a farmer, what does the market want?

I often call myself in financial terms an asset manager of natural capital, producing goods and services the market wants. You can reward me for nature, reward me for timber, reward me for food and energy crops; I will make my business work within that. It is about the balance. For me, without the habitat and the biodiversity we will not have food production in the future. If we want food security, we have to focus on nature restoration, healthy soil and systems. Our soil is our bank account for farmers and for the nation. We have to join that together and be clear that having a little bit of area for nature is not competing with food; it is complementing it and supporting food production now and in the future.

Dr Mitchell: I agree. Going back to some of our previous comments, it would be helpful to see the published land use framework and also the farming road map, which is meant to draw a lot of these things together. We asked to see more emphasis on multifunctional land use, so there was quite a lot of emphasis in the land use framework consultation last year on that land use change. That caused a great concern to farmers, so we have asked for there to be more emphasis on multifunctional land use, whether it is delivering food or energy crops, and so on. It is basically delivering multiple benefits on the same area of land, so we can do more within a certain land area. Hopefully we will get more clarity on that and some principles around the land use framework too.

In our response to the land use framework consultation, we questioned some of the DEFRA assumptions around agricultural productivity and growth. They assumed that despite this land use change and despite loss of agriculture production, we would still be able to produce the same amount of food in future, which we questioned quite a lot. What sort of support do we need or barriers do we need to address to increase our productivity?

On supporting that multifunctional land use change, we circled back to the support mechanisms that we need to have. Farmers need clarity around ELM but they also need good data and information to help them make good decisions about land use in future.

Q48 **John Whitby:** Given what you have already said, I think I know what the answer will be to this next question, but I will ask it anyway. The Government said they will invest £2.7 billion a year into sustainable farming and nature recovery for the next three years. Is that sufficient to



deliver both food and nature recovery?

Martin Lines: Should the budget be supporting food production or should the market mechanism support food production? Should we get a fair return for the food we produce and then use public money to deliver the environmental and sustainable systems that produce food and other goods and services? Particularly when we look at the range of actions in the EIP, and actions to reward all that, we need to be clear on what we want public money to support and underpin. Then where do we use other market mechanisms that provide support? If I am producing food, I want a fair and transparent marketplace, not undermined by imports of a different standard and quality. We need to make the food market work and then also the nature market work. We need to drive investment to get the right outcomes and have the connectivity in landscapes.

I welcome the budget and the commitment over this Parliament for the budget, but we need to define what we want to spend it on and the outcome society wants the public to pay for, and what the private market pays for food and other goods.

Dr Mitchell: My response is very similar. We need to be clear about what we want that budget to deliver and where that funding comes from. We have to think about the non-ELM budget as well, and think very carefully and clearly about what we want that element of the budget to do and how it can support farmers in non-ELM activity, whether it is around productivity or other support that needs to be put in place.

Sally Hayns: I have a slightly tangential response, if you will allow me. It is not just about the money. The short answer is that is probably not enough money, but it is also what that money will be spent on. Some money needs to be invested in skills development. There is reference in the plan to developing skills in areas such as water, forestry, agriculture and horticulture, but not on nature recovery, ecology and skills around nature restoration or habitat and species management.

Under the previous Government I was chair of DEFRA's nature skills working group; that no longer exists. We were working towards contributing to the green skills delivery plan; that never got published. We have managed to keep some engagement going—we are working on a level 4 apprenticeship, for example—but the level 7 apprenticeship has had funding pulled if you are over 21. It is an area where we can see a lot of potential for people changing jobs, looking for career changes, but that has turned off one of the ways they can get into environmental and agricultural professions.

We need proper workforce planning and access to skills. Alongside that the National Audit Office, only this month, in its report on environmental regulation, reported that Natural England—an environment agency that is critical to supporting the delivery of not only the farming objectives but other objectives in the environmental improvement plan—has low confidence in its ability to deliver some of the key aspects of its role.



Some of those issues are around low salaries, being unable to compete with the private sector market, not having enough people and having a capability gap. You could say the same for local authorities who are also critical.

We need to think about more investment in skills and capacity and about paying people properly for the jobs they do so that we do not lose all the best people. We heard earlier about the number of people who have left Natural England under the voluntary exit scheme, and I know this because a lot of them are my members. They are going into better-paid areas, but we need those skills, that expertise, that advice in Natural England, the Environment Agency, the Forestry Commission and the Marine Management Organisation.

I will also briefly touch on the GCSE in natural history, the campaign for which was started in 2011. We thought in 2022 it had been approved, but not quite. It has now been approved again in 2025. By the time it is actually up and running it will probably be 20 years after that campaign started. We need to have a delivery plan for teachers to have the skills and the confidence to roll out that GCSE. That is all about improving the environmental literacy of the nation, which will be key to the success of the environmental improvement plan.

At CIEEM we run an initiative called Green Jobs for Nature. It is all about engaging young people, particularly those from our under-represented sectors, in thinking about ways they can help deliver the environmental improvement plan in the future. Last year we spoke directly to over 9,000 young people about the potential for green careers, and that is an almost 300% increase on the year before. But if that is to happen, there needs to be a proper workforce strategy and mechanisms, ways for them to get into forestry, agriculture, ecology, the private sector, the public sector. We need to have a proper workforce strategy and proper mechanisms to help them into those careers. Without people, none of this plan will happen.

Q49 Sojan Joseph: Dr Mitchell, in your initial remarks you welcomed the revised EIP setting a target for the number of farms providing resources to farm wildlife. Is it clear to you how progress against this target could be measured?

Dr Mitchell: Good question—not off the top of my head. I might have to go back and look at the EIP in a little bit more detail, but I am certainly happy to answer that question more fully in a written comment, if that is useful. I don't have the background and the detail and I would rather come back to you in a written comment, if that's okay.

Q50 Sojan Joseph: Mr Lines, is it clear to you and farmers how this will be measured?

Martin Lines: No, it is not clear. They want to double the numbers, so what is the package of actions that farmers can deliver to make 7% of



their land deliver a range of outputs for nature? We have seen in previous scheme designs that farms are allowed up to 25% of their farm for one action—for birdseed mix or something. It is great if birds have some birdseed, but where are they going to nest? Where is the habitat? It is about the combination of actions.

I am not clear and have not heard how that will be measured and evaluated. It is not just a tick box, with a farm being in a scheme and doing some actions; it is a combination of actions across the farm that delivers nature connectivity. There is no point putting nature in the corner over there and polluting over here. Also, if a farm is doing good stuff and there is a gap, we need to join stuff together.

Hopefully the local nature recovery strategy can be part of those connections, but farmers need to understand what their role is and who is coming to support them with advice to get the right actions. I am not sure how they will measure it. I am not sure what combination of actions they want to stack to make the 7% work for nature.

Q51 Sojan Joseph: Does the new farm wildlife target improve the clarity and ambition of the EIP when compared to the previous target?

Martin Lines: It is a watered down target, because it was 10% and now it is 7%; 10% is about recovery, while 7% is about maintenance. Yes, it will halt nature decline, but let's be clear: half the farmers are not in schemes. The schemes that are coming forward will be short-term, three-year schemes for many farmers, which will not start delivering until two years down the line. Many of the farms with SSSI sites may not be able to get funding support to deliver management for those sites. If we are realistic, the chances of getting the delivery and the outcomes we want with the structure, design and budget of the schemes we have is pretty limited, when it comes to getting that traction working and the outcomes we need to see.

Q52 Sojan Joseph: Do you think further measures are needed to measure the impact of the actions on farm wildlife?

Martin Lines: We need a baseline. What have we got and what do we need improving? If you are driving public and private money, what are the baseline measures we have for biodiversity on a farm? What do we already have? That means we need assessments through digital audio, and through people coming to farms to measure and then target outcomes.

The best schemes I have seen in the past worked where farmers knew what they had and what they should have, and you put habitats in the landscape that work for those species, because then you get joined-up outcomes. What do we have? What is the baseline measurement we are using? How do we record it to show improvements in future years to come and that public money was spent well and delivered well?

Sojan Joseph: Dr Mitchell, do you have anything to add? Or do you want



to include it in your written statement?

Dr Mitchell: I will make sure that I go back to the EIP, consult with colleagues and give you a considered response, because that is important. I certainly agree with Martin on baselining. I think I mentioned earlier that there is more to do to help farmers to baseline. DEFRA has a good project looking at harmonising carbon calculators and helping support farmers in measuring carbon, but we probably need the same methodologies for water and biodiversity. I agree that we could be doing more on the baselining of biodiversity on farms.

Martin Lines: And across the UK. We cannot just see this as an England thing; it is about Wales, Scotland and the shared island of Northern Ireland and Ireland. How do we make this all work? Because if not, we will have perverse actions. If we look at farmers in England, we have had the area base removed where the devolved nations have not. There are real complications coming with an internal market for nature and payments and structures. Where does the private market fit into that? A standard set of measures and data could drive investment, and the right outcomes.

Sally Hayns: It is essential that farmers are supported in this and get good advice. Farm environment advisers can be key, in helping do that baseline assessment but also passing on skills to farmers on monitoring so that they can do a lot of the monitoring and reporting themselves. A few years ago we developed a farm environment adviser competency framework, which kind of blended the ecology and wildlife skills with the farm business acumen. The advice they were given was not just about nature recovery. It was about what will work well for your business and help you turn a profit as well.

I think we need to follow that line perhaps, and make sure we are developing more competent farm-environment advisers, and do baseline assessments but also pass on those skills to the farmers to then do monitoring and reporting themselves. It is very important that they have ownership of what they do but are also able to see how well it is going, and how to adjust and adapt, because you do need to adapt even the best laid plan.

Q53 **Chris Hinchliff:** Ms Hayns, could you unpack your organisation's position that the revised EIP has a pattern of pushing deadlines beyond 2028, which risks undermining the credibility of the 2030 legal targets? Do we have a situation here where we are giving with one hand and taking away with the other?

Sally Hayns: There is an inherent risk in any long-term strategy owned by Government. Governments tend to work in five-year cycles, so when you have a new Government there is a period of 12 to 18 months of taking a breath and looking at what is happening, with not very much actually happening. The EIP even refers to the statutory reviews and resetting. If resetting every time means, "We're not where we should be



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so let's push everything back a bit," those targets will get further and further away and the urgency will increase. I would like to see more detail on the milestones that will get us to the revised targets—and some of the targets have been weakened as well—and the action plans and the certainty of funding to deliver it.

The other point I will make is that the plan does not say a lot about protecting what we already have. It is about restoring and creating new habitat; it does not say very much about the importance of protecting the special places and species that we already have. There is a real risk if we take our eye off the ball there. Neither does it say very much about urban environments. We are talking a lot about nature recovery in rural areas, but on access to nature, improvements to people's health and so on, it does not say very much about the urban environment.

It is natural when you are failing to say, "Sorry about that; we will do it, but it's taking us a bit longer," and rejig and reset the target and make that sound as positive as possible. That is fine, but if that happens every time there is a change of Government, we will be in even more trouble than we are now. There need to be some very coherent milestones, and some real long-term funding commitments that then can be easily picked up by whatever Government we have next.

Q54 Chris Hinchliff: Thank you; that is helpful in respect of the milestones and the funding in particular. Do you feel it is slightly cynical? Is it a facet of the way this works, as you described, when a new Government comes in and has to reassess the situation? Or do you feel there is a slightly more cynical situation where the targets have been lifted so they sound better, but also pushed back?

Sally Hayns: Because it may not be your problem to deal with.

Chris Hinchliff: Yes.

Sally Hayns: You could take a cynical view on that, maybe. As I say, another Government could come in and the situation is worse for achieving targets. I do not blame DEFRA for this. We said earlier that it is not the strongest Department, it does not have the funding it needs and it is trying to do the best it can with a bad situation. We need to change that narrative and that situation to enable it to be able to deliver and lead more effectively.

Q55 Chris Hinchliff: You called earlier for a workforce strategy on ecological skills, which this Committee heard a lot about during our housing and sustainability inquiry. What do you think the Government mechanisms should be for supporting that workforce strategy? Which Department should lead? Who should be involved?

Sally Hayns: When we had a nature skills working group we had attendance on that group not just from DEFRA but also Ministers from the Department for Education and the Department for Work and Pensions, for example, and the Institute for Apprenticeships and Technical Education,



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as it was then. We were able to identify solutions and pathways because we had undertaken research that showed it was very much a degree-led profession and it was quite inaccessible to a lot of people. It was not very diverse. We wanted to create more vocational routes and a sort of stepladder into the profession.

We had good engagement then but, as I say, I am afraid it fell away when we had a change of Government. We were told that skills matters relating to nature, waste and water would be picked up by Skills England, and that has not been the case yet. There are all sorts of opportunities. We have been delivering a schools group camp for 60 people, on biodiversity net gain. A number of those people are career changers. It is a way in to getting a career in helping to deliver biodiversity net gain. We need the Department for Education and the Department for Work and Pensions to be coming in and thinking about how can they fund and help support a workforce strategy.

Q56 Chris Hinchliff: It is certainly a frustration of mine that we hear so much about the job potential of tackling net zero, but there is an equally massive job potential for nature recovery and that does not seem to get the same attention. Would you say the easiest immediate step the Government could take would be to reconstitute the board you were on? Or is there something that Skills England should be asked to do immediately to get the ball rolling?

Sally Hayns: Skills England should maybe be encouraged to take this area more seriously and give it a bit more of a priority. Certainly having a skills working group to develop a strategy that involved things like land-based colleges, statutory agencies and so on was helpful at the time.

Q57 Chris Hinchliff: Brilliant, thank you. Mr Lines and Dr Mitchell, from a land-based skills perspective, it is obvious that if we are to deliver on the hedgerow restoration targets, we will need a lot more hedge layers—a highly skilled, rewarding job. How can we, as Government, work with farmers and the farming community to open up more routes to that employment? How can we help you bring people into your businesses in entry-level jobs?

Martin Lines: We should make sure that the colleges and educational places can teach those qualifications, but also look at the apprenticeships and other things. For many small businesses it is difficult to have an apprentice on farm, because you take a lot of time out of your current business to provide support. How do we have a role and an opportunity to bring in young people, but also recognise the benefits for physical and mental health of access to nature for that workforce on stone walls, hedges and so many of the environmental features? It is great planting trees, but someone has got to take the guard off, someone needs to control the deer, someone needs to thin them out and then look at new economic opportunities in terms of the materials and services that can be provided.



It is about looking at what we will need to manage those environmental features and what is that skillset. How do we get the opportunity for young and reskilled people? Many workforces will need new skills to deliver the management to get the best outcomes.

Dr Mitchell: We have a specialist skills adviser who I will consult, so I will write to the Committee, because I am sure there is quite a detailed and considered response to your question. I do not think I would give it justice, to be honest. Certainly it is a fantastic industry that we are working in, and making it as attractive as possible to young people, but also more generally to people who have skills they can bring to the sector, would be appreciated.

Q58 Chris Hinchliff: Given that, as we have mentioned, we do not often talk about these jobs as much as we should do, do you feel that apprenticeships and other workplace policies are designed effectively for your industry? Is there a recommendation that you think the Committee should make to the Government about apprenticeships or other policies that would help farmers to pick them up more?

Martin Lines: There is a role in the language about how important these skillsets are. I talk to many young people and they want to do climate action, they want to be involved in it, and this is the actual critical work for reversing biodiversity, climate solutions, and delivering management in the landscapes. Many farmers are small businesses and they struggle to manage the apprenticeships, and all the training and health and safety and everything. How do we have an apprenticeship scheme that has the mentoring support around it, that gets the people on to the farms, that supports them, but maybe takes some of the paperwork and the hard work off the farmer so the workforce can be there? How do you manage a scheme that works for small businesses?

Chris Hinchliff: Do you have anything further to add, Dr Mitchell?

Dr Mitchell: I will get back to you to make sure I provide the Committee with the most up-to-date NFU view.

Chris Hinchliff: Brilliant. Thank you very much.

John Whitby: Thank you very much, Dr Mitchell, Mr Lines and Ms Hayns, for your time this afternoon, your input and your patience in a slightly disrupted session.