



Environment, Food
and Rural Affairs
Committee

Stakeholder policy priorities

Consultation 2024–5

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Introduction

Following its establishment, the Environment, Food and Rural Affairs Committee (EFRA) conducted a programme of engagement with stakeholders, to inform its decisions on its policy scrutiny priorities.

This included launching a survey to identify sector-specific policy priorities, the holding of a high-level engagement event with stakeholders, as well as meetings with organisations. Below is a summary of themes emanating from this initial engagement with stakeholders, following the Committee's formation.

The Committee will continue to proactively engage with stakeholders throughout this Parliament.

1. The future of farming

Major themes identified in survey responses included the impact of the Autumn Budget 2024 on farms and livelihoods, agro-ecological, regenerative and otherwise nature friendly farming approaches, soil health, sustainable fertiliser use and the Environment Land Management Schemes (ELMS).

The **Environmental Land Management (ELM) schemes** are the centerpiece of the UK Government's new approach to farm support in England, as well as being key to delivering its environmental ambitions for water, air, soils and nature recovery. However, some argue that these are too flexible and unlikely to offer significant benefits to the environment. Many would like to see these schemes geared towards a more substantive shift to more sustainable farming systems, such as regenerative farming, particularly through greater uptake of higher-tier actions. Several responses to the Committee survey highlighted functional problems with payments and issues with a lack of options for particular types of farms (such as small and upland farmers) and moving from older agreements into the new ELM schemes. The former Committee and the National Audit Office have added that better data and evaluation of the schemes is needed to ensure they are reaching their objectives and are value for money.

During the stakeholder event, the main topic of discussion was **the Budget:** agricultural property relief (APR) and business property relief (BPR) reforms; the Carbon Border Adjustment Model or 'fertiliser tax'; and acceleration of Basic Payment Scheme reductions from 2028 to 2026.

Many stakeholders identified the transition to more sustainable farming as vital for nature recovery and long-term food security. However, issues have been identified, including the **regulation of pesticides and herbicides**; barriers to tackling **emissions** (particularly methane); **restoring peatlands** and the need for a **stronger regulatory baseline** for land management. Other stakeholders highlighted the need to move away from **intensive/industrial farming practices**, particularly in the livestock sector, which is frequently associated with water pollution and poor welfare.

Stakeholders were keen to emphasise the significant and often unique challenges facing **tenant farmers**. The Government has announced the appointment of a Tenant Farming Commissioner and has made commitments on the findings of the Rock Review.

Many stakeholders referenced the challenges facing the **horticulture sector**, important for both food production and nature recovery, including labour shortages and complexities around the Seasonal Worker Visa Scheme. The future of **peat** and the transition away from its use in horticulture was discussed.

Agriculture policy is devolved in the UK, but **trade policy for agri-food** is not. The UK has negotiated, or is negotiating, several Free Trade Agreements, including with Australia, New Zealand and the Comprehensive and Progressive Trans-Pacific Partnership (CPTPP). The former EFRA Committee investigated the opportunities and challenges that FTAs present for food and agriculture and the cumulative impact of FTAs on the agri-food sector. Many stakeholders highlighted that cheaper imports from abroad could undermine more sustainably produced food from domestic farmers and growers.

The need for a **Land Use Framework** was repeatedly raised by stakeholders. Many ambitions such as nature recovery, water security, access to nature, flooding and food security place competing demands on land use. Several initiatives have been introduced to enhance nature and deliver more ecosystem services, including Biodiversity net gain, Local nature recovery strategies, and a Green Infrastructure Framework but some stakeholders have indicated that this has led to a system that is complex and fragmented. To develop a more cohesive approach, previous Governments and the new Labour Government have committed to creating a Land Use Framework, but how it will integrate with other policies is unknown.

Innovation in agriculture, and its associated risks and opportunities for farmers and the environment, has been mentioned by stakeholders. Potential areas to explore include gene-edited foods and other novel foods; automation; collaboration between farmers; data-driven farming; better supporting diversification, including anaerobic digestion; and alternative animal feeds. Some stakeholders would like to see more financial support for investing in or researching these different approaches.

2. Reforming the water sector

Water bodies are under threat from agriculture, sewage, road run-off and industrial sites, with implications for drinking water and the water-based leisure industry. The Government is largely off track to meet its statutory targets for improving water quality, and has announced plans to reform the water sector in England and Wales through legislation and following the recommendations of a review by Sir Jon Cunliffe.

Various organisations and individuals are responsible for managing water supplies and water bodies, ranging from single farmers to major charities such as the Canal and Rivers Trust. We heard that this can be complicated, and it can be **difficult to encourage improvements and coordinate action**, especially given the difficult financial position some face.

Water companies, responsible for supplying water and sewerage systems, were criticised for failing to invest enough in infrastructure and prevent **water pollution**, particularly from **sewage overflows**. The economic regulator, **Ofwat**, despite recent changes to its powers and approach, has also received criticism for either not allowing enough investment or not driving better performance. Ofwat has recently announced its final determinations under the 2024 **Price Review**, which will allow companies to raise water bills by an average of 36% in return for over £40bn of investment in new infrastructure. Ofwat will also gain more powers under the **Water (Special Measures) Act**

Some stakeholders argue that **water regulations** need an update. The Office for Environmental Protection (OEP) has criticised the implementation of legislative protections for water and has also called for an update to Bathing Waters regulations to ensure that these are fit for purpose – a Government consultation has been launched into this. The Government has also announced an Independent Commission into the water sector, led by Sir Jon Cunliffe, which is looking at the effectiveness of regulation and the water industry. It is expected to report in June.

The need to limit the **impact of agriculture** on water supply has also been mentioned. Fertilisers, pesticides and herbicides can pollute watercourses and physical changes to river flows can also be a major problem. Ensuring the guidance for the Farming Rules for Water are fit for purpose and enabling farmers to make supportive changes to the landscape to help were mentioned as potential solutions to these issues that the Committee could consider; the

Government is conducting a “rapid review” of the Farming Rules for Water. The OEP has also recently announced an investigation into the guidance that supports these rules. Many **harmful chemicals** are making their way into water courses–this is discussed in the circular economy policy area (see p.13).

Water security was highlighted by stakeholders in the water sector as a long-term challenge that could have major implications for human health and could lead to damaging abstractions from the environment. Part of the issue is, like pollution, a lack of investment, particularly in water supplies (such as reservoirs) and in preventing leakages. Planning barriers can also be a challenge to surmount when building new infrastructure. The water system is also under increased pressure due to population growth and climate change. **Water resilience** – the ability to respond well to sudden problems – has also been highlighted by stakeholders: for instance, to cybersecurity risks and water outages.

Flooding has been raised by many stakeholders, including the need to scale up **nature-based solutions** for tackling flooding (as well as water quality).

3. Animal and plant health

In 2023, the value of the UK's food, feed and drink exports was £24.4 billion. A robust regime of disease and pest prevention, detection and response is imperative to protecting this trade and our agricultural, horticultural and forestry sectors. Animal and plant diseases and pests can have far-reaching consequences on national food security, animal welfare, the environment, human health, and the wellbeing and finances of the UK's farmers and growers.

Concerns regarding **vulnerabilities in the UK's biosecurity infrastructure, workforces and control measures** have been raised by stakeholders. The Animal and Plant Health Agency (APHA) is currently undergoing a major redevelopment programme and stakeholders noted the importance of that programme and concerns about its long-term funding. The **resourcing and efficiency of Defra and its arms-length bodies** was also raised; for example, slow response times from APHA to traders, whether there are enough civil servants working on import policy, and the need for Defra to work more effectively with other Departments.

The UK's decision to leave the EU customs union and single market means that the UK is required to apply import controls on goods arriving in Great Britain from the EU. One component of this is **sanitary and phytosanitary (SPS) controls**, for which Defra is responsible. SPS controls are applicable to imports of live animals, germinal products, animal products, plants and plant products. The previous government delayed implementation of SPS controls on goods from the EU five times. It published a new policy for the border in August 2023—the **border target operating model (BTOM)**—and phased in controls detailed in the document throughout 2024.

Concerns have been raised about the **BTOM's effectiveness at protecting biosecurity and the burden that new processes have placed on traders**. Key concerns relate to cost, administration, delays, spoilage, waste and the operation of border control posts. Small and medium-sized enterprises were identified as being particularly affected. Defra's **communication and technology** were reported as needing improvement.

Some stakeholders suggested that digitisation of processes and delivery of the Single Trade Window could ease pressures. Negotiation of **an SPS agreement with the EU** has been identified as a priority for the veterinary sector, businesses and workers. Stakeholders have argued that the Committee could play a role in identifying what UK industry wants from such an agreement.

Some stakeholders proposed that the Committee scrutinise **divergence in standards and regulations** across the UK and the lack of monitoring of divergence, including consideration of the implications for compliance, businesses, trade and consumers.

In relation to the operation of the UK border, stakeholder fears include the risk of illegal meat imports to biosecurity and food hygiene standards. In particular, the risk of an outbreak of **African swine fever** or **foot and mouth disease** have been cited as major concerns. **Invasive non-native species** were highlighted as a major threat to biodiversity and a substantial cost to the economy. It was suggested that **species recovery and reintroduction** could warrant further scrutiny.

Labour shortages were cited as compounding pressures on trade and domestic supply chains and contributing to concerns about a potential major outbreak. Respondents noted toxicologists, official veterinarians, environmental health officers and trading standards officers as affected professions. Examination of the Skilled Worker visa, Seasonal Worker visa, workforce planning, recruitment, training, retention and regulation were recommended.

The need for a **One Health** approach to biosecurity was raised in the survey responses, reflecting the interconnection of animal, plant, human and environmental health. Stakeholders identified this as being particularly important to tackling **antimicrobial resistance** and responding to climate change.

Some stakeholders have urged the Committee to look into the **enforcement of animal health and welfare laws**, arguing that the current expectations placed on local authorities are unreasonable. It was suggested that training, information sharing and resourcing need improvement in order to effectively meet demand. The welfare of companion animals was raised, including in relation to dog and cat breeding, rehoming organisations, electric shock collars, the movement of animals across borders and mutilation practices such as tail docking and ear cropping. Some stakeholders suggested that the Committee should scrutinise whether **the Dangerous Dogs Act** is fit for purpose.

With regards to **standards and welfare in the food supply chain**, the religious and cultural importance and economic value of the Halal meat market and take up of the ‘Demonstration of Life’ protocol was raised, in addition to animal welfare labelling, the role of small abattoirs, and the impact of free trade agreements on standards and competition.

Numerous stakeholders have also highlighted **replacement of the Veterinary Surgeons Act 1966** as a policy priority. Relatedly, the need for the Government to issue guidance to resolve outstanding regulatory uncertainty about the application of the Veterinary Surgeons Act 1966 to canine assisted breeding procedures and tests has been raised with the Committee.

Strong concerns have been raised about **access to veterinary medicines in Northern Ireland** beyond 2025.

The regulation of the **use of new technologies and Artificial Intelligence (AI) in veterinary practices** has been raised as an emerging issue that would benefit from Committee scrutiny.

4. Fairness in the food supply chain

Food policy was a leading issue of concern raised by stakeholders in response to the Committee's survey. At a macro level, stakeholders are concerned by the UK's lack of an overarching food strategy and have called for the Committee to challenge the new Government's vision on food.

Stakeholders have raised the **resilience of supply chains and food systems** with the Committee, whilst the Defra Secretary of State has set boosting **food security** as one of his five core priorities. Stakeholders have identified scrutiny of the **level of support for domestic food production** as a priority for the Committee.

Fairness in the food supply chain, and the introduction of legislation to promote it, is a related priority identified by stakeholders. During its inquiry into fairness in the food supply chain, the previous EFRA Committee heard about power imbalances between farmers, processors, manufacturers and retailers, with producers failing to receive farmgate prices which reflect increases in the cost of production. In engagement with the Committee, stakeholders have argued that the Committee could be instrumental in scrutinising progress towards, and assessing the impacts of, the introduction of **fair dealing obligations in supply chains**. The **effectiveness of the Groceries Code Adjudicator to enforce the Groceries Supply Code of Practice** and regulate retailers' relationships with direct suppliers is also a key point of concern.

Food prices and household food insecurity were raised as issues of concern with the Committee. The previous EFRA Committee found access to healthy and affordable food to be a major challenge for lower-income households in the wake of recent high rates of food price inflation and rises in the cost of living.

Stakeholders have also argued for consideration of **how the UK's food systems could be adapted to deliver healthier diets**. The National Food Strategy independent review called in 2021 for several Government interventions aimed at reducing diet-related inequality and addressing what it termed the UK's 'junk food cycle'. The issue of the need to promote healthier diets has been repeatedly raised in survey responses.

Stakeholders have advocated for policies to promote more **localised supply chains**. This includes **public sector procurement of food**, with respondents calling for reform of the Government Buying Standards for Food and Catering Services (GBSF) which sets out standards for public sector organisations to apply when procuring food and catering services.

Stakeholders have also commented on the **opportunities and challenges Free Trade Agreements (FTAs) present for the UK's food sector**. The previous EFRA Committee examined UK trade policy in relation to their effects on the agricultural and food industries. Stakeholders have raised concerns about the **potential detrimental impact of trade deals with Australia and New Zealand on domestic food production**.

Stakeholders in some agri-food sectors, such as the horticultural sector, have raised concerns regarding the impacts of **new trading arrangements with the EU** on their businesses. While **access to labour** throughout food supply chains, including challenges in relation to the Seasonal Worker Visa Scheme, was identified as an issue.

The use of **food labelling** to provide information to help consumers make informed decisions was also an issue of interest raised by stakeholders, including potential reforms to method of production labelling indicating animal welfare standards.

5. Fisheries and the marine environment

As it strives to deliver its energy, environmental and growth commitments, balancing the pressures on the marine environment will likely be a challenge for the Government.

Adequate **protection of Marine Protected Areas (MPAs)** to ensure their restoration and recovery was raised by stakeholders as a scrutiny priority for the Committee. Concerns have been raised regarding bottom trawling and dredging in MPAs. The marine impacts of carbon capture and storage development in the North Sea, and the marine impacts of oil and gas decommissioning were also raised.

There are outstanding issues around domestic fisheries management, **annual international quota negotiations and the post-2026 arrangements for EU vessels to fish in UK waters**. These negotiations are an issue of major concern for stakeholders. Fisheries and marine policy is largely devolved in the UK, but external relations are reserved. Shellfish producers expressed concerns about the impact of post-Brexit trading arrangements.

The need for a **UK National Fishing Strategy** has been raised by the fishing sector, with stakeholders arguing for a joint industry-government strategy to consider what it can do to support commercial fishing in the UK.

The concept of **‘Spatial Squeeze’** has also been raised as a key issue facing the fishing sector. Representatives of the fishing sector are concerned about the loss of fishing grounds to an array of competing spatial pressures of which offshore wind, the installation of energy-related infrastructure and marine protected areas were mentioned. Consideration of how to balance the competing interests in the sea and their impact on fisheries, such as offshore wind interests and energy-related infrastructure, was discussed during the stakeholder event.

Environmental NGOs and campaigners have raised the issue of **overfishing in UK waters**, with the vulnerability of UK fish populations to climate change also a concern.

Stakeholders also raised as concerns about the **implementation of fisheries and marine protection policy**, including the adequacy of **Fisheries Management Plans (FMPs)** as a way to manage fisheries and called for the Committee to develop recommendations to improve them.

Marine mammals are key to maintaining a healthy ecosystem. Relatively little is known about their status as they are difficult to monitor but many are endangered. This is due to a range of issues including: bycatch in fishing gear, hunting, noise, ship strikes, pollution and climate change. Bycatch is the single biggest threat to marine mammals but stakeholders have raised concerns about reporting mechanisms in this regard.

Stakeholders have also identified the **decline in seabird species** as a priority meriting scrutiny. Stakeholders have argued this also poses consequential risks in terms of delivering Environmental Improvement Plan (EIP) targets for species abundance and extinction. Relatedly, the development of offshore wind without accounting for nature's needs (and specifically seabird needs), has been raised an issue.

6. Preventing waste and enabling a circular economy

The UK economy is still primarily based on a linear, “use and dispose” consumption model. UK and devolved governments have committed to developing a more circular economy which means reducing consumption and minimising waste through reuse, repair and recycling. However many believe that progress has been slow, despite the potential benefits for the environment as well as the creation of new industries and jobs. The Government is establishing a circular economy taskforce to create a circular economy strategy, potentially focusing on particular sectors.

Stakeholders raised the reforms that are underway to create **more circular systems for packaging**. Several of these reforms (such as Extended Producer Responsibility for packaging, consistent kerbside recycling and a Deposit Return Scheme) have suffered delays, partly due to diverging devolved policies across a UK-wide internal market, but also partly due to ineffective delivery plans. It is also thought that the UK lacks the infrastructure to process and recycle this waste. Several survey respondents highlighted that local authorities and the waste management sector need greater support to enable these reforms.

Stakeholders raised **waste crime** as a major issue; around a fifth of waste is managed illegally, leading to illegal dumpsites, pollution and costs for landowners– often in rural communities. Much of this illegal activity is operated by criminal gangs, and the Government has been reforming waste carrier and broker regulations and is introducing waste tracking to tackle waste crime.

We heard that other policy areas have seen less Government attention, including areas that should be a higher priority according to the **waste hierarchy**, such as developing **reuse and repair systems** for consumer products (such as packaging and white goods) and encouraging more **sustainable imports**–i.e. disincentivising products that have a higher carbon footprint or lead to deforestation elsewhere (offshoring UK environmental impacts). Many survey respondents are keen for more **bans on single use plastics**.

Survey respondents mentioned several sectors that the Committee should focus on, including **WEEE products, textiles, construction, food waste** and other **organic waste (like garden waste)** which impact the environment through emissions and wasted energy. Mandatory food waste reporting is seen by some as an important step to reduce food waste in supply chains.

Despite potential impacts on human health, **chemicals policy** has seen less Government focus and parliamentary scrutiny. Chemical pollution, such as microplastics, PFAS (or “forever chemicals”), hormones and metals, is widespread and caused by household products, pharmaceuticals, sewage, landfills, industrial practices, food additives, pesticides, and widespread use of plastics. Application of the waste hierarchy – in particular a focus on prevention and upstream regulation – could limit chemical pollution of the environment. There have been calls for a less fragmented approach to chemical regulation.

Stakeholders noted that **farms** could also become more circular. It is thought that **fertilisers and pesticides** are overused, and some farms are also using energy recovery systems such as **anaerobic digestion** to handle organic wastes. Government support for this is diminishing and there have been issues with farms choosing to grow crops as feedstock rather than food.

Landfill, incineration and energy recovery may play some role in the future – potentially with improvements through innovations such as carbon capture – but cases of mismanagement have been raised with the Committee, as well as issues around air pollution and with closed landfills sites polluting local areas. Some have called for a moratorium on incineration or improvements to its regulation.

7. Work of the Department and scrutiny of arm's-length bodies

Arm's-length bodies

In total, Defra sponsors 34 [agencies and public bodies](#) which fall under the purview of the Committee. Many of these arms-length bodies (ALBs) play an important role, especially where it comes to monitoring and protecting natural resources. Many act as advisors and must work with other Departments or local authorities. We heard that **ALBs** are often responsible for **establishing baselines and monitoring** of the environment over time. To achieve targets set out in the Environmental Improvement Plan, the Government needs to establish effective indicators to monitor progress. During the stakeholder event, it was suggested the Committee could engage more **with citizen science**.

Monitoring is also important for catching pollution incidents and other illegal behaviours, but it is often reported that regulators like the Environment Agency and Natural England lack sufficient resources to carry out sufficient levels of inspections. The **enforcement** that can follow can also be contentious or potentially ineffective at deterring repeat behaviour. Having appropriate indicators and measuring changes in the environment is also vital for monitoring progress towards targets and the effectiveness of interventions: however in some cases, these tools are not fully established.

Limited capacity and skills are often identified by stakeholders as a reason behind poor monitoring and enforcement. It may be behind other difficulties experienced with ALBs, such as **slow processing of environmental permits**, and **poor relationships with landowners** such as farmers—although other factors may also be at work.

National Park Authorities and Natural England also play a key role in **managing protected areas** (e.g. SSSIs, Special Areas of Conservation and National Parks and Landscapes) which are important for reaching targets for tree planting, peatland growth and hitting the 30by30 target, adopted at the UN Biodiversity Summit COP15 in December 2022. Evidence suggests however that over 60% of protected areas are in poor condition and under 3% of land in total is “effectively protected.” Protected areas were mentioned by many survey respondents.

Work of the Department

Environmental policy is a broad subject area, in which Defra often plays a leading role. Subjects raised by stakeholders included:

- Air quality policy (both indoor and outdoor). The UK often breaches limits for air pollution and air pollution is linked to many poorer health outcomes. Air quality is a Defra responsibility but many of the most responsible sectors are outside of Defra’s remit, such as housing, transport and energy.
- Environmental protections and the need to ensure that the “polluter pays” – some stakeholders called for “ecocide” to be recognised in UK law. Potential divergence from EU standards has also been raised, which may be the case with sewage, product design, chemicals controls and other areas of policy.
- Nature and biodiversity recovery; some stakeholders specifically mentioned progress towards national targets for the Global Biodiversity Framework and nature-based solutions to societal issues (such as flooding, health inequality); tree planting is another area of interest.
- Climate adaptation and resilience: issues include flooding, resilience of national infrastructure, protecting food production against extreme weather events such as heatwaves) and emerging threats such as novel pathogens and pests.

Many would like the Committee to investigate how **national and local government work together**. Local authorities play an important role in implementing policy (planning, trading standards, responsibilities for air quality, waste management, public health, adaptation) but can lack the guidance, resources or skills to do so. Some have pointed to a lack of the necessary **green skills**, and **employment** as a particular issue to investigate.

8. Supporting rural and coastal communities

Rural areas are home to around one-fifth of England's population and a quarter of all registered businesses. Defra recognises that policy outcomes in rural areas—including island communities—"can be affected by economies of scale, distance, sparsity and demography" and has guidance for policy makers on how to consider rural outcomes and delivery.

Defra's **rural proofing** policy seeks to offer practical guidance for policy makers and analysts in government to assess and take into account the effects of policies on rural areas. However, stakeholders questioned the efficacy of the policy and identified a range of policy areas that could be designed and delivered more effectively for rural communities. These include but are not limited to:

- public transport,
- public services such as health and social care,
- broadband,
- Universal Credit,
- tackling rural crime,
- affordable housing and
- the net-zero transition and energy infrastructure, including access to electric vehicle charging.

Some stakeholders called for a focus from the Committee on **rural poverty**, arguing for examination of the challenges faced in rural communities in relation to fuel poverty, insecure housing and deteriorating access to essential services. The centralisation and digitisation of services was identified as compounding challenges for those without access to the internet and/or who are not confident with literacy or using digital technology.

Many services and policies in rural communities are not designed or delivered by Defra and so fall outside of the EFRA Committee's direct scope. Therefore, stakeholders suggested that the EFRA Committee could work collaboratively with relevant committees to **advocate for rural and coastal communities**.

Stakeholders suggested the best approach may be for the Committee to take a holistic look at rural proofing rather than specific issues in isolation. The Committee could also embed consideration of the unique experiences and perspectives of rural and coastal communities across its inquiries and was encouraged to visit these communities.

The **rural economy** was also proposed as a subject for scrutiny. Stakeholders would welcome the examination of the efficacy of current funds for local authorities (such as Defra's Rural England Prosperity Fund) and exploration of opportunities for unlocking the potential of the rural economy.

Coastal communities face some particular issues that stakeholders have highlighted, such as **coastal erosion**, and **water pollution of coastal areas**—which can affect local businesses that rely on this resource.

9. Weather and climate resilience

Numerous stakeholders raised the issue of weather and climate resilience in relation to many facets within the Committee's remit.

Climate adaptation and resilience including issues relating to flooding, resilience of national infrastructure, protecting food production against extreme weather events and emerging threats such as novel pathogens and pests were all raised as concerns by stakeholders.

Stakeholders were also concerned with increasing **ecological diversity** as part of responses to **climate change**.

The impact of **climate change on coastal communities** in the context of rising sea level and coastal erosion was raised as an issue of concern in responses to the Committee's survey, with stakeholders highlighting some geographic areas of the UK as particularly vulnerable to **coastal erosion**.

Some respondents called for a need for an **overarching ocean strategy** encompassing ocean-based solutions to climate change and ocean conservation.

Natural flood management was also raised by some stakeholders as a process meriting further scrutiny.

The Committee could also embed consideration of weather and climate resilience across its inquiries, given the multiple different policy areas within the remit of the Committee that these issues impact.

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