

I am working farmer from a small family farm in the Peak District. We are an all permanent grassland farm of 180 acres 2/3rds of which are owned and one third of which is farmed on short term farm business tenancies. We have around 30 beef suckler cows and 250 breeding ewes. We also have holiday accommodation in one of our limestone barns. We are third generation farmers, our son has a business related to farming, but unfortunately the economics of uplands farming cannot support him working within the farm. We are prepared to change, adapt and embrace new measures, however there are limitations to how much we can actually do. This is particularly relevant in the uplands because of shorter growing seasons, depth of soils, suitability of livestock due to climate and restrictions due to national park planning for example.

The reason I am submitting evidence is my concerns for the future of farming families and their businesses particularly in the uplands. The timescale and severe reduction in BPS payments, in a relative short period of time. In addition there are difficulties with Defra's proposals, which will mean along the way many farming businesses will not survive. Alternatively, there could well be some unintended consequences of the present proposals.

I feel that the time frame for the National Pilots starting in the Autumn of 2021, will be very tight.

Yes this follows on from the test and trials, but within this there are a lot of unknowns and areas of concern. The standards are been rolled out, but some of these standards for example grassland do not allow farmers to access even the first rung of the ELMS ladder ie the SFI. At present as these standards are presented there will be an extremely low uptake and I am concerned about the further rolling out of standards. In particular grassland wherever it is situated should be paid at the same payment rate. To have a chance of success on a tight time frame, the national pilots have to start out from a position of success. We do not have time to have a whole scale overhaul of the pilots. To continue on your time scale in 6 years to remove all direct payments is extremely tight. We are facing a 50% reduction in BPS in 3years, some farmers even more up to 70%. No amount of money from the ELMS and the ATP will replace that loss of income on farm.

The SFI at the moment lacks detail, which is of a concern with the timings. This is supposed to be a stepping stone between CS and the ELMS. What must not be forgotten is that many farmers especially in the Uplands where payments rates are extremely poor for grassland and have problems with control of land issues and SSSI land are not in CS schemes. At present the revising of the schemes still does not address these issues. The SFI has to be simple to apply, without advice, if advice is needed you have designed the wrong scheme. Everyone should be able to apply to apply for this scheme.

It is true Defra have tried to engage with land managers around the design of the ELMS. We have had more opportunity, than with previous governments. However, although Defra have to engage with stakeholders it is vital for them to recognise it is the landowners and active farmers which will in many cases be carrying out the desired environmental outcomes. On a personal level I am concerned about how much these discussions are played out on social media. It is positive that there is a more openness to talks and ideas however, there should not be a form of competition as to who gets their voices heard and therefore the direction of policy.

For the ELMS to be attractive to farmers it has to be well funded, and certainly not on the income foregone model of present schemes. It has to be simple to administer, accessible to all farmers both

SFI and at LNR levels. They have to feel an ownership and a pride in the scheme , not that it had been imposed on them . However, to do the environmental good they have to be viable in the first place. If the farmers are not there in the black, they cannot and will not deliver. If the scheme with realistic standards is in place they will be a good uptake in numbers. At the moment it looks like there are two options productivity or environment. There should not be these options ,we can deliver on both. Many young farmers will walk away from the environmental restrictions and push production and therefore you will not deliver your environmental options. Livestock farmers in particular want to produce British food, to high standards, but of course with the environment in mind.

The farming productivity scheme needs to be well consulted on with as wide as range of options as possible across all sectors. As a result of these our productivity will improve, with the bonus of contributing to net zero as well.

The Animal Health & Welfare Pathway has to deliver, but care must be taken not to add an extra financial cost to the business. Any changes should be fair and proportionate.

It is fairly simple for government to avoid intended outcomes, if they co-design a simple scheme which is well funded which truly recognises what farming delivers from all sectors. At the same time it has achievable outcomes, which are realistic and progressive but does not deter farmers from getting on the first rung of the ladder. There should be more engagement with the people you intend to do the work, in the main farmers and land managers. When I say farmers, real farmers who do the job day in day out, not the hobby farmers who have a few cattle/sheep and lambs. The generations of skills will be lost, these skills need to be passed onto the young people who will hopefully manage the future landscapes.

Of course, any industry would welcome reduced regulatory burden, because with any regulation comes an extra cost. These costs have to be met from at times volatile prices on markets for livestock, cereals etc. At the same time with the intention of losing all direct support by 2027, and the replacement environmental schemes projected to show at the best between 10-20% profit compared to 80 to 90% profit on BPS.

Defra will clearly only get value for money if there is a good uptake of the scheme , which follows on from good scheme design. If when rolled out , it is easy to administer and pay on time with a simple payments system it will be a success.

Regarding lessons learnt, you have to go back in time to what did work and what didn't. The present CS clearly does not and certainly for upland grassland farmers it is not worth applying for.

Then old ELS had merits and the old ESA was popular, so much so as you wanted your land to be in a ESA area. Clearly lessons of what worked, and why it worked should be carried forward to this new ELMS. A positive outcome would be if you actually wanted to be in the new ELMS and not because you were forced into it. As a result you get a better partnership with farmers and land managers and a positive result all round.

February 2021

