

Written evidence submitted by WWF (ELM0048)

29 January 2021

Dear Mr Parish,

WWF welcomes the EFRA Select Committee holding an early inquiry into the future of Environmental Land Management and the agricultural transition. Unfortunately, owing to limitations on resources due to the pandemic WWF have been unable to prepare a full submission to the inquiry. However, we fully support the recommendations of the response from Wildlife and Countryside Link and would like to take this opportunity to highlight some key issues relating to ELMS and wider environmental policy.

Following publication of discussion documents and initial consultation by Defra last year, WWF believes ELM should:

- Be more ambitious in all three tiers, with payments for taking land out of production linked to the natural capital value of the public goods delivered;
- Underpin payments through a fairly, but firmly, enforced regulatory baseline, with long-established good practice representing clear daylight that separates payments received under Tier 1 from that baseline; and
- Integrate with wider agricultural, climate, food, environmental, land-use and planning policies, as part of a wider vision for the future of UK landscapes.

The UK government has rightfully chosen to highlight a shift in agricultural subsidies to support more sustainable food production as a key part of negotiations for COP26; this should be embedded in the UK's ambition for the summit alongside efforts to promote 'systemic' nature-based solutions. To lead such ambitious global reform with credibility, all countries of the UK must develop a clear domestic vision and roadmap for the future of land-use and subsidy reform at home. To that end, ELM must guarantee further ambition to ensure the agriculture sector is fully supported to do its bit in tackling the so-called triple challenge: meeting the food needs of the world, while tackling the climate crisis and reversing the loss of nature.

A regulatory baseline must apply equally to land where managers choose not to participate in ELM as well as to scheme members in order to prevent efforts to maintain and improve biodiversity from being undermined elsewhere. A regulatory baseline can only be truly effective if adequately enforced, and so resources for enforcement need to be increased – in 2018 the Environment Agency were, on average, only making an environmental inspection

visit to each farm once every two hundred years. We understand this effort has been cut further.

Alternative land-uses are clearly part of Defra's proposals, and we welcome Tier 3 as the most transformative and world-leading part of ELM to achieve the government's environmental objectives. This should provide coherence with the Nature Recovery Network and Local Nature Recovery Strategies, among other schemes. ELM policies should be integrated and holistic to avoid both offshoring the environmental impact of the UK food footprint and to manage domestic tradeoffs, for example between afforestation and biodiversity. There are links that can and should be made to recommendations that will come from Part Two of the National Food Strategy in this regard.

Meeting the so-called 'triple challenge' of people's needs, net-zero and nature recovery requires scaled up thinking. The recovery of nature, if implemented well through resourced, supported and prioritised activities such as ELM, Local Nature Recovery Strategies and the Nature Recovery Network, should also deliver significant nature-based solutions to society's needs, including storing carbon, reducing emissions, preventing flooding and maintaining pollination, among others.

This can only be done if local efforts – on farms, in National Parks and nature reserves, in urban areas – scale up to meaningful national achievements. These must work across local, regional and devolved governments as well as interacting with efforts to tackle the UK's global environmental footprint. This requires catchment, regional, devolved, UK, and international vision and ambition.

WWF is advocating stakeholder-led processes to prioritise environmental objectives and determine how to optimise their delivery in respect of country and catchment plans; this should include clear support and advice for farmers on the steps they could take on farm to promote positive environmental outcomes, as well as how their efforts contribute to wider landscape- and catchment-scale changes. However, it will be important that the ELM scheme contributes to each of the 25 Year Environment Plan goals (including thriving plants and wildlife) at local and national levels. The nature of ELM options and the payment rates/methodologies for delivering them are obviously crucial to success.

[WWF has calculated](#) the potential investment in nature based solutions in line with a 2050 net zero target, showing where public investment will help the UK meet our targets through nature-based solutions while supporting economic return to the UK economy. For decarbonising the agricultural and land use sector, for example, this will require new economic incentives for UK farmers to introduce low-carbon agricultural practices, such as silvo-arable agroforestry. The ELMS can play a key role here providing the required incentives. It is worth noting that there are significant synergies between land use investment to reduce emissions, and investment to improve other forms of natural capital. The estimates presented here are narrowly focussed on decarbonisation. Estimates of investment needs to improve natural capital more broadly are provided in a recent joint NGO report on [Government investment for a greener and fairer economy](#).

The value or effectiveness of nature-based solution in this regard must therefore consider the wider challenges to UK landscapes, including transforming the food system, limiting global warming to 1.5°C and securing nature's recovery. Understanding the dynamics of these challenges will support resilient UK landscapes and sustainable communities, create more circular systems of farming and strengthen efforts to reduce our global footprint. This is a key priority in identifying which nature-based solutions will be most effective and where; and which carbon and nature hotspots need to be protected. Tools which can support the UK Government in this approach include the [IUCN Global Standard](#) on nature-based solutions, which allows for assessing and improving interventions over time, and [RSPB spatial work](#) to

map the UK's best places for climate and biodiversity - finding that two thirds of carbon and nature rich landscapes are situated outside our protected nature sites.

I hope the Committee will consider some of these key issues as part of your inquiry to ensure that ELM is designed to work for farmers, land managers and land users while restoring nature and tackling climate change.

In this vital year for climate and nature, I would welcome the opportunity to meet and brief you and the rest of the Committee on the essential steps WWF believe must be taken to set agricultural policy at home and abroad on a sustainable footing. We would also be happy to offer witnesses to provide oral evidence.

Debbie Tripley

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