

**Written evidence submitted by Farming Forum Grassroots Group (ELM0052)**

## Additional written evidence to the Environment, Food and Rural Affairs Select Committee inquiry into the Environmental Land Management scheme and the agricultural transition 25th May 2021

At the end of the hearing Neil Parish invited the witnesses to submit any further written evidence that we thought appropriate over the next few days. The TFF Grassroots Group would therefore wish the committee to accept the following comments and observations.

For clarity, please note that where we refer to TFF in this document we are specifically referring to the website owned and operated by Clive Bailye at [www.thefarmingforum.co.uk](http://www.thefarmingforum.co.uk) rather than The TFF Grassroots Group which is simply a group of unconnected users of that forum. The TFF Grassroots Group has no business interest in the forum itself.

### Will some farms find it hard to engage with ELMS:

A proportion of English farmers have engaged fully with all aspects of the agricultural subsidy system for many years. These farmers are likely to be confident and fully capable of entering the SFI without assistance or training. Many though are not of the mindset or education to understand and make best use of the complicated funding opportunities offered. Particularly at a disadvantage will be those on non-LFA lowland grass farms. Historic environmental schemes have offered nothing for these land types and so these farmers will have little track record in understanding and applying the available schemes.

We believe that Countryside Stewardship has done catastrophic damage to farmer trust in both the RPA and Natural England. We understand that the penalty regime was a requirement of European law but, to the average farmer, the nit-picking and punitive approach regularly demonstrated by both bodies has destroyed all trust. As an example, one TFF member left CS in 2012 and has been chased through the courts by NE for 9 years, at huge cost, for reverting to management that was normal before entering the scheme. TFF abounds with other examples. There is a swell of opinion that NE and the Forestry Commission have a clandestine policy of achieving wider landscape designation through environmental scheme participation. As a result views like the following, taken from public posts on TFF, sum up the thoughts of many:

*"I've always been keen to farm in a sensitive way that protects and enhances my surroundings. I went to an NE meeting promoting mid & higher tier schemes and was absolutely gobsmacked by the way the NE staff didn't even bother to try and hide their utter disdain and dislike of us farmers. This was before the Q&A when I asked how we could cancel an agreement should we need to.*

*Her response was of disbelief and disgust at why anyone would ever contemplate such a thing but did eventually say that it MIGHT be possible if you repaid all payments and received benefits.*

*That attitude is why I have not been in a scheme since."*

*"So it seems to me that this is the logical conclusion of environmental schemes, particularly ones that take land out of intensive production and leave them either unfarmed or farmed extensively. If the scheme actually achieves its goal you may well have created a landscape that then can never be reverted to intensive farming. Which is a lesson that anyone signing up to one of these schemes needs to bear in mind - when you sup with the devil, use a long spoon....."*

*"I am seen as something of a Luddite for having nothing to do with environmental schemes. I weakened once with the initial ELS scheme and couldn't get out of it fast enough after 5 years.*

*The schemes are effectively run by NGO's with a rather nasty agenda. They should be avoided at all costs."*

Compounding this, we consider that the standard terms and conditions used for ELS, HLS, CS, CSPSG, HABG etc are

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draconian, unfair and largely unacceptable. Offered in any other industry those terms would be rejected but farmers do not have that option if they need the money to remain viable. We need to reset the relationship of farmers with the “DEFRA family” to one more akin to a partnership in delivering public goods, not what feels like business handcuffs.

### Quality and effectiveness of DEFRA engagement with farmers:

Effective use of technology to engage with farmers has mostly been a missed opportunity. The TFF management and members have sought open and regular engagement with DEFRA but, with the exception of the two question and answer sessions undertaken by David Kennedy and Janet Hughes, the offer has not been taken up. DEFRA has yet to move from the mindset of engaging with representative bodies to engaging directly with farmers in their scheme co-design.

### How open are farms to adopting Agro-Ecology and how should it apply?:

A proportion of English farmers have been keenly working to foster natural recovery on their farms for decades. These farmers are ready and willing to engage with the government aims and embrace ELMS and the SFI. Many, though, are still of an overwhelmingly action oriented mindset and seem to see no benefit in adopting ecologically friendly farming. Reaching these farmers will be a long term project best achieved by them seeing those who adopt better practices early benefitting from doing so.

We are sad to see that the proposed SFI standard for tree protection appears incompatible with Silvopasture and awkward for Agroforestry (due to the required undisturbed area around each tree). We also consider that the proposed SFI Stocking rate limits are incompatible with Holistic Planned Grazing, a management approach which offers amongst the greatest benefits to nature. This points to a lack of understanding within DEFRA of the best techniques available to deliver the public goods desired.

### SFI – Will it be attractive enough for mass take-up? Will it deliver outcomes?:

We consider income foregone an irrational baseline from which to design a BPS replacement. Under that model the funding offered will never be attractive and effective.

DEFRA plan the SFI to be delivered by farms adopting “standards” of actions for set annual payments. The costs of adopting those actions will vary greatly across the diverse landscapes and businesses in English farming. Because of this a uniform payment rate will over reward some producers and under reward others, setting itself up to fail in many cases. In any case we consider the payments currently proposed for grassland in the SFI are woefully inadequate, especially as permanent pasture delivers public goods on so many levels. This appears to perpetuate the historic bias of English support schemes towards arable farming, despite arable farming generally being less biodiverse and despite lowland grazing farms being the least profitable sector in England.

We consider that future Biodiversity Offsetting, Carbon Offsetting, Net Biodiversity Offsetting, Water company infiltration payments and water quality payments could easily outvalue ELMS. For this reason, if stacking payments this way is dis-allowed it could wreck uptake levels. However it may be a decade yet before we know the true scale of opportunity offered by these payments streams.

Regenerative Agriculture can be implemented without livestock but it delivers the benefits faster, cheaper and more flexibly with livestock incorporated. The re-integration of livestock with arable land would be an ecological win-win but means reversing decades of infrastructure abandonment and decay. Livestock are being demonised on all sides despite being an essential foundation of solution delivery. We observe that the lack of integration between arable and livestock is stark even on mixed farms. Often the arable ground is seen as separate from the grazing ground resulting in a massive reduction over time in the health of the arable ground, observed as soil quality reducing and weed burden increasing. The mindset we observe in some farmers is that the arable is what matters, even on mixed farms. We propose more emphasis should be put on schemes such as GS4 in the current stewardship with farmers taking arable out of the rotation for a couple of years to recover and grazing of it being encouraged.

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Advice. Is it available? Who would pay? What should it cost? What quality is available/needed?:

DEFRA have stated that the SFI should not require farms to pay professional advisers in order to take part. We support that aim but feel that, for reasons we gave above, some farmers will still need help. That help should come from other farmers: peer to peer support. DEFRA's proposition that SFI support would all be delivered through the .GOV website is unrealistic. Navigating the .GOV website is often laborious and futile. Links often break and, in any case, a significant number of farmers have very poor internet access or lack computer skills. Why should these farms have to pay the disproportionate cost of using agents in order to make their application to the SFI?

Where professional advisers are involved, generally in the higher ELMS tiers, they should have to demonstrate the value added by their involvement in time and cost-effectiveness terms. ELMS is not intended as a professional adviser support scheme and so it should not function as one.

Our strong preference for advice delivery is to keep as much of the funding as possible within agriculture itself by utilising those farmers with the skillset. They could help others to apply and be rewarded, at modest rates, for doing so. We would prefer this to be delivered through open knowledge exchange events.

We are aware that TFF have applied for Round 2 of the "Future Farming Resilience Fund- Interim Phase project\_32224" but are struggling to gain full DEFRA engagement. DEFRA have built the fund mechanism around the traditional advisory approach of 1 to 1 delivery by high rate professionals costing £1000 per farmer trained. The TFF application has a cost of £47 per head to reach 3000 farmers. Because the open online and peer to peer based TFF approach is so different from the traditional land agent type one DEFRA may struggle to compare its approach to the other applications, where marking is done on a tick-box approach. The application is currently awaiting confirmation of success. Would splitting the future Resilience Fund (round 3 onwards) allocating some funds to peer-to-peer at maximum £100 a head and some to traditional methods at £1000 a head, be a good method of comparing the value of both?

Surely DEFRA should be adopting the Silicon Valley approach of embracing these disrupting advances, especially given that the TFF submission would deliver 33% of the target training of the round for 1.5% of the overall budget. If the committee wish to hear the full details then the TFF team would be happy to discuss the proposal.

There is another excellent model for farmer training and support that many of our group have experienced first hand and which has been fundamental to our transition to an agro-ecological approach to farming. That has been the Groundswell show and conference, created and run by the Cherry family, at Weston in Hertfordshire for the last 6 years. It has quickly grown to become an essential calendar date for agro-ecological professionals and practitioners in the UK with a growing international reputation. This event delivers more breadth and depth of training and networking over two days in June, for the £95 + VAT admission cost, than any professional adviser could deliver in person for £1000 per head. We consider attendance to be a key part of our calendar and feel that DEFRA should be looking to encourage tailored regional spin-off events in other areas of England to spread the incredible learning that takes place there. This year an autumn "Groundswell North" conference is being held so this process has already begun. It would be infinitely better value for money than high advice delivered by high cost professional advisers. Further details are to be found here <https://groundswellag.com/>

Finally, another highly cost-effective training model built around peer-to-peer learning that DEFRA should be supporting is the advisory organisation Agricoology, the knowledge exchange division of The Progressive Farming Trust charity. They act as a free online gateway to many resources around farming with nature. They run various peer-to-peer learning events around the UK, at modest cost that does not act as a bar to entry to any farm. Their website is here <https://www.agricology.co.uk/>

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Future viability of English farms without BPS funding

Whilst not the purpose of the hearing there was some discussion of the economic future of English farms during the hearing. Having discussed this within our group since we would like to make the following comment.

DEFRA are clearly aware of the serious risk of farm business collapse in England following the withdrawal of BPS. We consider that their proposals in the Agricultural Transition Plan, whilst noble in themselves, will not address this issue at all. The profitability issues English farming faces are mostly due to producing commodity outputs into an oligopoly market using inputs supplied on a near oligopoly basis. The most effective thing government could do for UK agricultural profitability is to end the cartels and monopolies that exist on inputs and outputs and to only allow equal standard imports. This would remove all need to financially support English agriculture for good. Reward of public goods delivered by farming, over and above that income, would then operate freely and be much more effective.

TFF Grassroots Group. 31/05/2021