

## Written evidence submitted by Richard Boden

You ask for two questions to be answered by way of introduction:

Who are you? Richard Boden: Environmental campaigner, farmer.

Why are you submitting evidence? ELMS in its current form will be an abuse of public money. It will fail to meet the targets by which Defra themselves have said that it should be measured; high participation, clear objectives, quantifiable results, reward of existing good practice, avoidance of prescriptive measures.

[https://consult.defra.gov.uk/elm/elmpolicyconsultation/supporting\\_documents/ELM%20Policy%20Discussion%20Document%20230620.pdf](https://consult.defra.gov.uk/elm/elmpolicyconsultation/supporting_documents/ELM%20Policy%20Discussion%20Document%20230620.pdf)

You will have seen the recent National Audit Office report on ELMS, which highlights the ways in which ELMS in its current structure will fail.

<https://www.nao.org.uk/wp-content/uploads/2021/09/The-Environmental-Land-Management-scheme-summary.pdf>

I have been saying what the SFI needs to look like since before Defra had even come up with the name SFI. Everything that has been released by Defra over the last two years has confirmed my approach to be the correct one. You have to instruct Defra to incorporate my suggestions into the design of ELMS.

### Summary: What ELMS needs to look like.

1. 90% of the ELMS budget to go to the Sustainable Farming Initiative

a) The first £1 Billion of the annual budget to go to the three measures outlined in Appendix 1: Permanent pasture, watercourse protection, hedgerow management.

b) Measures to be supported by the remainder of the SFI budget to include:

- Horticulture: Boosting productivity of fruit and vegetables. Reinventing the market garden; growing close to the market place and labour force, shortening the food chain.

- Capital grants: For infrastructure improvements to make more sustainable use of resources (water, manures, energy), and for new and second hand equipment.

- Knowledge exchange: Support for farmers and growers to increase productivity in an environmentally benign manner. (It will need a name; Agricultural Development and Sustainability?)

- New entrant support scheme: Bursaries for further education; payments to existing farmers to provide mentoring; seed funding.

- Public engagement: Major programme of school visits to farms.

2. 10% of the budget to go to Nature Projects.

Appendix 1: Priority measures for the SFI.

Appendix 2: Reallocation of the ELMS budget.

Appendix 3: Permanent Pasture delivers the greatest Public Good.

Appendix 4: ELMS and Critical Mass.

Appendix 5: Summary of ELMS in its current form

## Appendix 1.

### SFI, September 2021: Top 3 items to receive Public Money for Public Goods.

1. The only land to receive an area payment should be PP, at a rate of:

First 40Ha: £220/Ha.

40 – 400Ha: £22/Ha.

Over 400Ha: £2/Ha.

2. Water body buffering payment available on all land: £100/ 100 metres. (£1000/Ha).

3. Hedgerow management: £100/ 100 metres.

Notes:

1.

In England there are 50,000 holdings less than 40Ha in size.

An uptake of 80%, at an average of 30Ha of PP, would be 1.2 million Ha.

1.2 million Ha, at £220/Ha = £264 million to holdings less than 40 Ha.

A further 20,000 holdings at 40 – 100 Ha in size.

An uptake of 80%, at 40 Ha of PP, would be 640,000 Ha.

640,000 Ha, at £220/Ha = £140 million to holdings 40 – 100 Ha.

There is a further 3 million Ha of PP in England.

A 50% uptake at £22/ Ha = £33 million.

**Total of £437 million to PP.**

2.

In England there are 300,000 km of rivers, ie 600,000 km of bank.

20% uptake is 120,000 km, at £100/ 100 metres = £120 million.

Twice that for other water bodies (streams, ditches, lakes) £240 million.

**Total of £360 million for water protection.**

(There is a case for a payment at the same rate being made for land bordering domestic properties, but needs some data on this.)

3.

400,000 km of hedgerows in England.

25% uptake at £100/ 100 metres.

**£100 million for hedgerow management.**

**Total of £924 million/yr to Permanent Pasture, Watercourse protection, hedgerow management.**

It should be a central objective of ELMS for the first £1 Bn of the annual budget to be spent on these three items.

They meet the key criteria by which ELMS will be judged:

1) High take up rate by farmers.

2) Minimal expenditure on administration.

3) Measurable environmental gains: carbon sequestration, clean water, biodiversity.

- 4) Reverses the decline in critical mass in agriculture.
- 5) Increases productivity, reduces imports/ food miles/ pollution.
- 6) High multiplier effect, both within agriculture and the wider rural economy, eg tourism

## **Appendix 2.**

### **Under current proposals, the total ELMS budget will be split three ways:**

1)The Sustainable Farming Initiative. 33%.  
Support for individual farmers to deliver 'public goods'.

2)Local Nature Recovery. 33%.  
Collaborative projects between groups of farmers.

3)Landscape Recovery. 33%.  
To all intents and purposes: Rewilding.

This budget allocation needs amending now, with the three strands being cut down to two.

1)Sustainable Farming Initiative. 90%.

2)Nature Projects. 10%.

For the vast majority of farmers, the LNR and LR strands to ELMS will be irrelevant. Farmers are already facing one administrative burden with the SFI. Asking them to replicate this commitment of time and energy to a second or even third scheme, and mesh them in with the first, is totally unrealistic. It would be an abuse of public money to only allocate 33% to the SFI and to commit 66% to schemes that will only be of interest to those who least need public money.

There is no need for a 'Local Nature Recovery' strand to ELMS. There is nothing that can be achieved by such a scheme, that cannot be achieved via the SFI. If there is seen to be a need for work that crosses boundaries between individual farms, then simply offer that work as options within the SFI and let neighbouring farmers talk to each other about putting in mutually enhancing – but independent – applications. Three farms set up a joint project via LNR. The farmer in the middle then decides to sell up. Is the farm devalued by a legally binding agreement?

All collaborative schemes need coordinating. As soon as you introduce a supporting role into a scheme you are creating an administrative burden that needs paying for. It is absolutely vital that the vast majority of ELMS money finds its way to farmers. Creating 'clusters' and suchlike will just mean money being syphoned off for overheads.

The Landscape Recovery pilot is looking for sites between '500 and 5,000 connected hectares'. What proportion of England's farmers will find that relevant to them? If large landholding bodies - private estates, charities, NGO's – wish to carry out nature-based projects, then great. However, any 'public money for public goods' test would find them to be poor value, and they have access to existing funding streams without needing 66% of the ELMS budget.

The money is already being chipped away at. ELMS was being talked about as having an annual budget of £3 billion a year ago. A figure of £2.4 billion was mentioned by Defra recently. In the absence of any categorical assurances on what the budget will actually be, Defra must at the very least commit that 90% of it will go to those who deliver the most public good: farmers

### **Appendix 3.**

#### **Permanent pasture delivers the greatest public good. All area-based ELMS should be paid to permanent pasture.**

The public spend their high days and holidays on permanent pasture. The tourist industry is a crucial component of the UK economy, and without permanent pasture that industry would be decimated. Maintaining a viable beef and sheep sector in the less favoured areas is absolutely vital to the UK economy, and that simply will not happen without ELMS payments.

The greatest challenge facing mankind is climate change. Permanent pasture is the most stable, most effective carbon store we have. More effective than any other agricultural use, and more effective than trees. Plant trees on permanent pasture and we not only reduce our ability to feed ourselves but reduce our levels of carbon sequestration.

We cannot tackle climate change without reducing our food miles. Increasing our self sufficiency in food is a pre-requisite to building a more sustainable society. Our most productive land needs to remain just that; productive. Pay for an acre of grade 2 land to be taken out of production, and you send a signal to the marketplace for someone to plough up more than an acre of grade 3 land to provide the lost tonnage. Take cropped land out of production, and you cause more environmental harm than good.

We cannot afford wastage in the system. If this was always true, then post-corona it will be even more so. The public purse simply cannot afford an army of advisors and clipboard police. Pay ELMS to permanent pasture and all that will be needed is drones, satellites and minimal visits to ensure best practice.

What an arable farmer desires, above all else, is a 'high floor' in the price of grain and straw. A vibrant livestock sector ensures a competitive marketplace for grain and straw (with this destination being far more environmentally sustainable than power plants). Loss of chemicals and increased awareness of soil conservation are leading to arable farmers adopting more sustainable practices already. Arable land needs no payment of public money, and no public good would be delivered by doing so.

People will tell you that ELMS, with its broad range of environmental, social and economic objectives, is trying to achieve the impossible. They are wrong. Pay all area based ELMS to permanent pasture and you achieve all of those objectives. It is the only way to do so.

(Note this only applies to area-based payments. The other elements of ELMS - landscape features, public engagement etc - will present many opportunities for other sectors to deliver public goods).

#### **Appendix 4.**

##### **ELMS and Critical Mass**

Farmers.

Next time you are out there calving a cow, or unblocking the combine, or whatever, ask yourself: "Who is there in this parish, under the age of 40, who I could phone right now to come give me a hand?"

UK ag is sleepwalking into a critical mass crisis. It should be in every farmers top three of the issues facing the industry.

Defra.

You like surveys. Here's one for you to conduct. Of the 9000 rural parishes in England, how many now have no independent, full time farming business registered in them? Compared to, say, 30 years ago.

In many ways the greatest 'public good' delivered by farming isn't farming itself, but farmers. From snow clearance to footpath maintenance, from spending money in the village shop to putting bums on seats in the village school, you could quite easily make a list of 101 ways in which farmers and farm workers maintain and enrich our countryside.

Next time Mr Monbiot gives evidence to one of your select committees, you may like to ask him how many of these 'public goods' his nutrition tablets will provide.

There is an opportunity with ELMS to do something that the BPS never did; support new entrants. Conversely, there is the threat that ELMS will continue to do what the BPS has done; pay significant sums of public money to large landholdings for little discernible need or benefit. Which, if nothing else, has always provided an easy hit for those wanting to portray all of agriculture as 'feather bedded' farmers.

ELMS is to contain a 'new entrant support scheme'. A move for which Defra are to be applauded. However, it is a bolt-on, and like all bolt-ons it will be the first to go when the cuts come. Support for new entrants needs to be enshrined within the very structure of ELMS, to be there for as long as ELMS exists.

The SFI as it stands will pay a flat rate of £22/Ha for PP, with no upper limit. Instead it should be structured as follows:

Up to 40Ha: £220

40 – 400Ha: £22

Over 400Ha: £2

This would give a new entrant renting 100 acres of PP £9k/yr, enough to be a genuine help in getting on the first rung. UK ag needs to do this now; the clock on the critical mass crisis is ticking

## **Appendix 5. The SFI: A summary**

1) In treating arable land and grassland as two separate sectors it goes against one of the core principles of sustainable land management; rotation.

2) It offers a subsidy to one form of crop establishment over others, a process that will be difficult to administer, gets in the way of optimal decision making, and is based on dubious science.

3) It rewards repair over maintenance. By offering greater payments to reinstate grassland than to maintain existing grassland, it actively encourages the ploughing up of pasture.

4) The level of complexity - in applying, complying and reporting - means the money will be disproportionately allocated to those landowners who are big enough to handle the paperwork.

5) The timeframes required to achieve some of the (dubious) objectives will rule out applications from tenants. The only farming enterprises able to commit to the timeframes necessary – large estates, national charities - will be those who least need the support.

6) By paying the bulk of the money to the arable farmer it misses an opportunity to make use of the multiplier effect. A pound given to the livestock sector generates more economic activity, both within agriculture and the rural community as a whole, than if that pound is given to the arable sector.

7) By paying a flat rate, with no upper limit, it concentrates the money into the hands of the few. A progressive level of payments, with higher payments to the first x Ha, would encourage new entrants and support smaller businesses who provide a range of public goods within their rural communities.

8) It does nothing to increase productivity. Rather it will reduce output and increase imports, and in doing so have an adverse effect on UK GHG emissions and balance of payments. In an uncertain world, with pandemics and climate change just two of the threats to reliance on a globalized food system, the UK should see food security as being of primary importance. Our most productive land should remain just that; productive.

9) The administrative burden of the options as they stand will be huge. There is no public good in paperwork.

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