

Evidence submitted by Wildlife and Countryside Link

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 62 organisations to use their strong joint voice for the protection of nature.

General:

1. The ‘public money for public goods’ approach introduced by the Agriculture Act 2020 is likely to improve value for money. Since the Agriculture Act, in its ‘Agricultural Transition Plan’, Defra has outlined its intention to ensure that Environmental Land Management contributes to delivery of the 25 Year Environment Plan and Net Zero. At the same time, the Government is developing targets under the Environment Bill such as a target to halt the decline in species abundance by 2030.
2. Even with the backdrop of the Covid19 pandemic, Defra has made significant progress to advance Environmental Land Management, including tests and trials, some of which Wildlife and Countryside Link members were involved in running with Defra.
3. While this direction of travel is promising, to ensure that Environmental Land Management schemes help to deliver Government objectives and provide value-for-money Defra must publish specific, measurable, actionable and time-bound (SMART) environmental targets for each component of the programme (Sustainable Farming Incentive, Local Nature Recovery and Landscape Recovery) to anchor the level of ambition and effort that each component will be expected to contribute toward delivery of net zero and nature’s recovery..
4. Setting clear outcome targets in this way will provide a guide for how the schemes must develop and “ratchet up” effort over time to achieve the environmental improvements required in the farmed environment. Without clear objectives, there is a risk that the policy becomes rudderless—remaining fixed in early, low-levels of ambition, or drifting off course.
5. We also note that key elements of the 25 Year Environment Plan are missing from Environmental Land Management Schemes at present, including on access to nature.
6. Defra has been operating in an extremely challenging landscape, with many staff seconded to Covid-19 rapid response teams. The Department has also experienced the added challenge that because this policy is being designed in tandem with key future environmental objectives—most notably under the Environment Bill—it has been difficult to link the public goods set out in Section 1 of the Agriculture Act with the targets in Clause 1 of the Environment Bill. As a result, we know what kinds of public goods may be delivered, but we do not know how much of each public good farmers are expected to deliver.
7. Despite challenges, there must not be a delay in the design, communication and roll-out of Environmental Land Management. This is to minimise the risk that Government will fail to meet its environmental objectives. It also lessens the risk of disenfranchisement from farmers and land managers that could result from delaying.

8. Defra committed to paying for outcomes and supporting a market in environmental improvement through the payment principles published in June 2021. There should be a further principle added to ensure that all paid actions will contribute to achieving climate and environmental goals. This will increase the likelihood that Environmental Land Management provides value for money.
9. While this sits outside of Environmental Land Management, the wider Food Farming and Countryside Programme is committed to developing in a new regulatory regime from 2024, after cross-compliance ends. However, as yet no roadmap for changes to regulation and enforcement has been published. If the gaps emerging from the loss of cross-compliance are not addressed there is a risk that, post-2024, Environmental Land Management will either pay for actions once under cross-compliance—therefore lowering the regulatory baseline—or it will sit on top of a lowered regulatory baseline. This would result in an overall lowering of ambition, and therefore a lowering of value-for-money.
10. Defra has stated an intention for 70% of farmers to participate in the Sustainable Farming Incentive. While we agree that farmer buy-in is important, creating a target for uptake, without an articulation of what the Sustainable Farming Incentive will deliver from 2024, is problematic. This is because it puts pressure on Defra to bring farmers on board at the expense of environmental ambition, which could compromise environmental ambition in favour of meeting the headline uptake target. This would result in a scheme which is expensive without delivering environmental objectives.
11. Better value for money can be assured in the long-term by setting out expectations for how key components of ELM will be strengthened over time. For example, the Government should set out a clear ladder of ambition for the SFI, removing the “bottom rungs” progressively over the farming transition, while adding on more ambitious options over time. This would ensure that the lowest added value actions, which may be necessary in the short term to get the transition underway, do not continue to use up large allocations of cash. This would also help to provide certainty for farmers and land managers to plan their businesses, and avoid the costs of continual renegotiations of policy approaches.

Stakeholder engagement:

12. We are broadly supportive of Defra’s commitment to co-design the scheme with farmers, land managers and other stakeholder to ensure the scheme is designed for its users. Wildlife and Countryside Link has 62 members, many of which run projects to protect and restore nature. As a member of Defra’s Environmental Land Management Engagement Group (EEG), Link plays a go-between role between our members and Defra, ensuring that the wider network of eNGOs are well-informed. However, at times the confidential nature of much of the information provided in EEG means that Link cannot share this vital information with our members. This can result in key stakeholders being under/misinformed about Environmental Land Management key developments, as well as limiting our ability to draw on the widest possible range of expertise.
13. We welcome Defra policy updates, which the Department has committed to publishing every six months. However, to-date there has not been the level of detail in the announcements that farmers and land managers need to plan for their businesses ahead of time.
14. Clear gaps in public information require the following actions in response:
 - a. A clear articulation of the planned contribution of Environmental Land Management to the delivery of the Government’s environmental objectives

- b. A clear description of the purpose of each Environmental Land Management scheme, an indication of what they will fund and how they will interact to provide a comprehensive offer.
- c. A transition strategy that maps out a clear route from existing to future schemes in sufficient detail to enable farmers to plan, adapt and succeed. As a minimum this should provide detail (beyond that which was provided in the Agricultural Transition Plan) until the end of 2024.
- d. Scheme mechanics for SFI 2022/early roll out, including details on governance, application process, compliance and audit).
- e. Clarification of the relationship between Environmental Land Management, regulation and enforcement and plans to plug emerging gaps as a result of the end of cross compliance. Even if the SFI achieves the intended uptake of 70%, unless addressed, this gap could undermine the some of the objectives of the scheme and result in an uneven playing field.
- f. A plan to address lack of progress on a new regulatory framework for agriculture following the recommendations of the Stacey Review. There are risks of incoherence between future regulation and ELMs without such a plan. ,Already an opportunity has been missed to trial SFI in the context of a new approach to regulation and enforcement.

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