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## **Health and Harmony: the future for food, farming and the environment in a green Brexit**

### **Background to comments.**

The Cotswolds Conservation Board was established by Parliamentary Order under part iv of the Countryside and Rights of Way Act 2000. The duties of the Board are :

- To conserve and enhance the natural beauty of the Cotswolds AONB
- To increase the understanding and enjoyment of the special qualities of the AONB, ensuring these are compatible with its conservation and enhancement.

In carrying out its twin duties, the Board shall seek to foster the economic and social well-being of its local communities.

Section 85 of the Countryside and Rights of Way Act 2000, places a duty on public bodies, including Defra, Natural England, Forestry Commission and the Environment Agency, to have regard to the purposes of AONB designation when carrying out their functions in relation to, or so as to affect, land.

The Cotswolds is a farmed landscape, recognised formally in the areas designation as an AONB. Farming covers 87% of the AONB of which 49% is arable and 43% grassland. Arable and pasture are both key characteristics of the Cotswold landscape and a viable farming economy is vital for the future conservation and enhancement of the Cotswolds AONB. Farming in the Cotswolds is also essential in supporting rural business worth £337m, nearly 8,000 jobs dependent on landscape quality and a tourism sector worth £1bn. 23 million day visitors a year come to the Cotswolds to experience its landscape.

Farming in the Cotswolds faces a range of natural constraints ranging from thin brash soils to the steep slopes of the Cotswold escarpment and incised river valleys. Without support, most farming enterprises in the Cotswolds are not economically viable. For most farming businesses the single payment scheme has been essential for survival and without it will struggle to survive and maintain food production. As the single payment is withdrawn it is vital that farming businesses can quickly access funding for environmental land management and the provision of public goods and services to ensure business viability.

The Cotswolds Conservation Board has developed with the farming sector a proposal for a locally designed and delivered combined environmental land management and rural development scheme, which was submitted to Defra in 2017

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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and discussed with Lord Gardiner during his visit in November 2017. The proposal would enable farmers and land managers to conserve and enhance the key characteristics of the Cotswolds AONB whilst developing viable post-Brexit farming businesses producing food. It takes account of the Board's landscape evidence and the AONB management plan alongside the Board's input to agri-environment schemes and experience as the Accountable Body for the Cotswolds LEADER programme. The proposal would deliver many of the aspects within the 25 Year Environment Plan and several of the areas focused on by this consultation.

## **Responses to consultation questions**

### **2. Reform within the CAP**

#### **Consultation questions**

**Please rank the following ideas for simplification of the current CAP, indicating the three options which are most appealing to you:**

- a) Develop further simplified packages**
- b) Simplify the application form**
- c) Expand the online offer**
- d) Reduce evidence requirements in the rest of the scheme**

**Our three ranked options are:**

- b) Simplify the application form
- a) Develop further simplified packages
- d) Reduce evidence requirements

**How can we improve the delivery of the current Countryside Stewardship scheme and increase uptake by farmers and land managers to help achieve valuable environmental outcomes?**

Whilst we have chosen d) as our third choice above it is really a change in the approach taken by the RPA that is required. The sometimes heavy handed approach to enforcement is one of the main factors cited by farmers as to why they are reluctant to look at the current scheme.

Feedback from farmers in the Cotswolds also clearly points to the request for support and advice from an adviser to explain the scheme, help develop an application and provide an element of ongoing support during scheme delivery. Where this has happened, current scheme uptake has increased.

The Board, by providing scheme promotion, support, advice and guidance, has first-hand experience of assisting Natural England to achieve and exceed their application targets and in particular in the development of difficult and challenging applications with landowners.

Assist farmers to promote ideas and schemes they have identified as adding value. The opportunity for farmers to discuss innovative ideas with Defra and the RPA should be welcomed.

Tailor schemes to the local area, based on units of distinct landscape such as the Cotswolds or Severn Vale, with appropriate payment rates, moving away from the 'income forgone' approach.

### **3. An 'agricultural transition'**

#### **Consultation questions**

**What is the best way of applying reductions to Direct Payments? Please select your preferred option from the following:**

- a) Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands \***
- b) Apply a cap to the largest payments**
- c) Other (please specify)**

The best approach is to apply progressive reductions equally across all payment bands. A reduction of 15% for example applied to all will result in larger sums being taken from higher payment bands anyway. Applying the same rate across all bands is much fairer approach and all farm businesses will have to adjust to the withdrawal of direct payments by the same time anyway. It is also incorrect to assume that larger farming businesses rely less on direct payments than small farmers.

If a cap is to be applied to larger holdings it may be worth exploring how it could be offset against introducing start up enterprises and training for young and new entrants into farming.

**\* please provide views on the payment bands and percentage reductions we should apply.**

**What conditions should be attached to Direct Payments during the 'agricultural transition'? Please select your preferred options from the following:**

- a) Retain and simplify the current requirements by removing all of the greening rules**
- b) Retain and simplify cross compliance rules and their enforcement**

**c) Make payments to current recipients, who are allowed to leave the land, using the payment to help them do so**

**d) Other (please specify)**

a) removing greening rules – some rules such as crop diversification can be removed. Most of the EFA requirements can also be removed but there would be considerable environmental and public benefit in retaining buffer strips alongside water courses. Buffer strips have a proven track record in the protection of water quality by trapping soil and agricultural run-off and as an important wildlife habitat. Buffer strips are also valuable as headland paths where they coincide with public rights of way or other forms of access.

There is also considerable benefit in retaining the requirement to seek an EIA screening decision in advance of ploughing permanent pasture or semi-natural grassland.

b) retain and simplify cross compliance rules – the rules need to be retained but there is considerable scope to simplify them particularly where there are areas of overlap such as the various rules/regulations covering water quality and pollution.

**What are the factors that should drive the profile for reducing Direct Payments during the ‘agricultural transition’?**

**How long should the ‘agricultural transition’ period be?**

To enable farm businesses time to plan and adjust we consider around 5 - 7 years is appropriate.

#### **4. A successful future for farming**

##### **4.1 Farming excellence and profitability**

###### **Consultation questions**

**How can we improve the take-up of knowledge and advice by farmers and land managers? Please rank your top three options by order of preference:**

**a) Encouraging benchmarking and farmer-to-farmer learning**

**b) Working with industry to improve standards and coordination**

**c) Better access to skills providers and resources**

**d) Developing formal incentives to encourage training and career development**

**e) Making Continuing Professional Development (CPD) a condition of any future grants or loans**

**f) Other (please specify)**

Our top three options are:

- c) Better access to skills providers and resources
- b) Working with industry to improve standards and coordination
- f) other – long-term independent research

Making CPD a condition for future grants or loans is an interesting area to explore. Most industries have CPD and to some extent it currently happens within agriculture through training for the use of machinery and equipment, scholarships and events organised by facilitation groups. It will depend on how it is promoted and implemented. For some it may create a disincentive to future scheme take up as well as adding to the bureaucratic burden.

There is also the issue of the relationship between landlord and tenant. Tenants can be discouraged from entering schemes as their work to improve soils etc results in an improved asset for the landlord ie the tenant doesn't necessarily benefit from their investment of time or resource.

**What are the main barriers to new capital investment that can boost profitability and improve animal and plant health on-farm? Please rank your top three options by order of the biggest issues:**

- a) Insufficient access to support and advice**
- b) Uncertainty about the future and where to target new investment**
- c) Difficulties with securing finance from private lenders**
- d) Investments in buildings, innovation or new equipment are prohibitively expensive**
- e) Underlying profitability of the business**
- f) 'Social' issues (such as lack of succession or security of tenure)**
- g) Other (please specify)**

- e) Underlying profitability of the business
- b) Uncertainty about the future and where to target new investment
- g) other – security of tenure for tenant farmers in knowing you can make an investment into expensive pieces of equipment or building improvements.

A further barrier identified by the Board from its experience of promoting and delivering LEADER in the Cotswolds is the confusion caused by competition and overlap between different capital investment schemes. The overlap between LEADER and Countryside Productivity is one example. This needs to be avoided by simplifying and merging capital investment programmes into a single scheme in the future. There should also be tiered application process with smaller projects delivered by a simpler application process.

## **What are the most effective ways to support new entrants and encourage more young people into a career in farming and land management?**

High land rental and capital values are a significant barrier to new entrants.

It is easier for new entrants to establish themselves in the livestock sector than arable farming. Capital for livestock farming is not nearly as great as arable farming, for example to invest in machinery for a 300ha arable farm will run into hundreds of thousands of pounds. Throughout areas such as the Cotswolds there are landowners who have purchased estates that are either contract farmed, farmed in hand for tax purposes or convenience. A programme can be developed where some of this land is made available to new entrants on longer term contracts. Tax incentives on Farm Business Tenancies may help.

Retain County Farms – County Council Farms bring new entrants and ideas into the industry who after a few years, move onto larger non-public holdings and continue their progression. Many Councils have been and continue to sell their farm holdings firmly closing a route for new entrants.

Review the 1995 Agriculture Tenancies Act - The current system of Farm Business Tenancies gives rise to short termism. The 1986 Farm Tenancies Act tied up land for too long and the 1995 Agricultural Tenancies Act compounded the problem. Land released would and does always attract more rent from an established farmer than a new entrant can afford. The 1947 Agriculture Act and 1948 Agricultural Holdings Act were probably the best for stability of agriculture and would, with amendments, be a good basis for the future.

New entrants with farming qualifications could specifically be supported by the new scheme.

Encouraging new entrants is also partly covered by question 4.3 further on in the consultation response seeking suggestions for making agriculture and land management a great career choice.

### **Does existing tenancy law present barriers to new entrants, productivity and investment?**

See paragraph above on Tenancies Acts.

Research into grazing commissioned by the Cotswolds Conservation Board<sup>1</sup> identified that to avoid the establishment of a farm business tenancy, agreements are often short term and informal which prevents investment in fencing and water supplies etc as neither the prospective grazier or landowner is willing to invest on such a short-term basis. This stifles the development of a new business and opportunities for new entrants. Although the Board's research looked at grazing, the same barrier applies to arable farming.

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<sup>1</sup> The Feasibility of a New Approach to Grazing the Cotswold NIAs. RAU and CCRI for the Cotswolds Conservation Board 2013

## **4.2 Agricultural technology and research**

### **Consultation questions**

**What are the priority research topics that industry and government should focus on to drive improvements in productivity and resource efficiency? Please rank your top three options by order of importance:**

- a) Plant and animal breeding and genetics**
- b) Crop and livestock health and animal welfare**
- c) Data driven smart and precision agriculture**
- d) Managing resources sustainably, including agro-chemicals**
- e) Improving environmental performance, including soil health**
- f) Safety and trust in the supply chain**
- g) Other (please specify)**

Our top 3 options are:

- e) Improving environmental performance, including soil health**
- c) Data driven smart and precision agriculture**
- f) Safety and trust in the supply chain**

**How can industry and government put farmers in the driving seat to ensure that agricultural R&D delivers what they need? Please rank your top three options by order of importance:**

- a) Encouraging a stronger focus on near-market applied agricultural R&D**
- b) Bringing groups of farms together in research syndicates to deliver practical solutions**
- c) Accelerating the 'proof of concept' testing of novel approaches to agricultural constraints**
- d) Giving the farming industry a greater say in setting the strategic direction for research funding**
- e) Other (please specify)**

Our top 3 options are:

- d) Giving the farming industry a greater say in setting the strategic direction for research funding**

- b) Bringing groups of farms together in research syndicates to deliver practical solutions
- c) Accelerating the 'proof of concept' testing of novel approaches to agricultural constraints (provided this does not mean reducing safety or environmental standards)

### **What are the main barriers to adopting new technology and ideas on-farm, and how can we overcome them?**

1. cost – new technology and implementing new ideas can be expensive. Rural development schemes such as the current LEADER and Countryside Productivity provide valuable support but are very bureaucratic, time consuming and can overlap causing confusion.
2. mind-set, tradition and confidence – there is often reluctance to introduce new ideas and approaches simply because they are new and break the traditional approach of the farm business. Those who have taken the opportunity to change are sometimes seen as 'crackpot' even though they can demonstrate the benefits of how they farm.
3. Social pressure – farming is a very public industry. Make a mistake and all your neighbours and those you trade with see it.
4. Risk – On larger managed units a farm manager is putting their job and usually house on the line if a mistake is made and how likely are owners going to support new initiatives and changes of direction. On family owned farms it can be pressure from family members not to be the one who loses it all.
5. CAP regulations – the prescriptive aspects of some of the CAP regulations and those of the Qualitative Assurance systems may also prevent new ideas.
6. Rural Broadband – there is a real need to improve access to broadband and to improve speeds and consistency. Some rural areas have broadband speeds less than 2mbs.
7. Mobile 'phone coverage – an increasingly important part of the day to day running of a business (as well as for farm safety etc). 'Not spots' with no signal is still an issue for some farms.

### **4.3 Labour: a skilled workforce**

#### **Consultation questions**

**What are the priority skills gaps across UK agriculture? Please rank your top three options by order of importance:**

- a) **Business / financial**
- b) **Risk management**
- c) **Leadership**
- d) **Engineering**

**e) Manufacturing**

**f) Research**

**g) Other (please specify)**

**Our three options are:**

- a) Business / financial
- b) Risk management
- g) other - agronomy

**What can industry do to help make agriculture and land management a great career choice?**

The ideal would be to create an agricultural career structure with opportunities for progression supported by accessible training and skills development. This would, however, be difficult where the usual staff compliment is 1. It will also be difficult to overcome the image of the farm labourer.

Instigate an educational programme in schools. This could include informing and educating teachers especially leaders as the areas and opportunities in modern farming, giving talks to schools especially before year 9. Children in care are often particularly keen on more practical outdoor work.

Support micro-businesses – enabling entrepreneurs to enter the sector and test their ideas and commitment ideally through a locally managed system (i.e. not through the RPA)

Farms and estates could offer opportunities for summer holidays and work experience

**How can government support industry to build the resilience of the agricultural sector to meet labour demand?**

This issue is centred around the availability of seasonal labour and workers willing to work in processing. There are no queues outside local job centres to pick apples or harvest cabbages hence the reliance on labour from Europe and elsewhere. Processors such as abattoirs also rely on labour from outside the UK.

Traditionally farmers used to house their workers in farm cottages. Many of these properties are now let on as free market housing, as holiday cottages or industrial units to support farm income or just to make money for the estate on a commercial basis. As a consequence, there is little on farm or affordable housing meaning that workers would have to commute from nearby towns and cities. Areas such as the Cotswolds have very low unemployment rates but travel costs, farm labour pay rates as well as the job itself are just not attractive to potential labour sources in Gloucester, Cheltenham, Swindon etc.

The harsh reality is that the agricultural sector cannot rely on sourcing labour locally and has to look elsewhere as has been the case for some time and government needs to facilitate this.

## **5. Public money for public goods**

### **Consultation questions**

**Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:**

- a) Improved soil health**
- b) Improved water quality**
- c) Better air quality**
- d) Increased biodiversity**
- e) Climate change mitigation**
- f) Enhanced beauty, heritage and engagement with the natural environment**

Our top three are:

- f) Enhanced beauty, heritage and engagement with the natural environment**
- a) Improved soil health**
- b) Improved water quality**

**Of the other options listed below, which do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:**

- a) World-class animal welfare**
- b) High animal health standards**
- c) Protection of crops, tree, plant and bee health**
- d) Improved productivity and competitiveness**
- e) Preserving rural resilience and traditional farming and landscapes in the uplands**
- f) Public access to the countryside**

Our top three:

- f) Public access to the countryside**
- d) Improved productivity and competitiveness**

c) Protection of crops, tree, plant and bee health

**Are there any other public goods which you think the government should support?**

The range of public goods and services farming and land management does and can deliver is wide and often interlinked. Many, such as health and well-being, pollinators and landscape although not listed, can be interpreted as delivered by public access, biodiversity and natural beauty and heritage in the above lists. There are, however, three which are worth specifically listing:

- Carbon sequestration
- Natural flood management
- Health and wellbeing improvement for resident and visiting populations

**6. Enhancing our environment**

**Consultation questions**

**From the list below, please select which outcomes would be best achieved by incentivising action across a number of farms or other land parcels in a future environmental land management system:**

- a) Recreation
- b) Water quality
- c) Flood mitigation
- d) Habitat restoration
- e) Species recovery
- f) Soil quality
- g) Cultural heritage
- h) Carbon sequestration and greenhouse gas reduction
- i) Air quality
- j) Woodlands and forestry
- k) Other (please specify)

All the above, a) to j), can be delivered by incentivising action across a number of farms. However, b) water quality, c) flood mitigation d) habitat restoration and a) recreation are best delivered collaboratively across a number of farms.

k) other – conservation and enhancement of landscape. Whilst this applies to all landscapes, this is a priority for AONBs and National Parks and best delivered by farmers and land managers working collaboratively across the protected landscape with Conservation Boards, AONB Partnerships and National Park Authorities.

To maximise the benefits to landscape, a locally designed menu of environmental land management and rural development options delivered locally would be the best approach.

### **What role should outcome based payments have in a new environmental land management system?**

There may be a role for outcome based payments. However, it is vital that such payments are based on outcomes under the control of the farmer/land manager. A farmer can, for example, provide good habitat for skylarks, but this does not guarantee they will turn up.

Outcome based payments would in some instances create incentives for land managers to maximise returns at the expense of public goods. One system of management is likely to be more profitable than another, notwithstanding the relative ecological merits of both. Ensuring that such payments do not create perverse incentives will require a significant degree of administrative intervention.

Outcome based payments could fit well with water quality, habitat restoration, soil health and landscape conservation and enhancement. Outcome based payments could support the recovery of certain species such as Duke of Burgundy butterfly over a long time period, say 10 years, but will need to have realistic targets and measures allowing for seasonal weather variation.

### **How can an approach to a new environmental land management system be developed that balances national and local priorities for environmental outcomes?**

The best approach is to design a scheme fit for the locality that delivers national priorities and local priorities. Localities include AONBs, National Parks and National Character Areas. In many instances, local priorities will reflect national priorities, but the method of delivering the desired outcomes will need to vary according to local circumstances and conditions. This is something recent and current schemes fail to take into account.

In terms of localities, AONBs and National Parks are well placed to help design and deliver schemes fit for their protected landscape to achieve national and local priorities.

A Whole Farm Plan/Farm Environment Plan approach has proven important for the delivery of national and local objectives at a local, farm holding scale. Sometimes seen as a negative cost, these plans, when undertaken properly, are a good long-term investment. They identify the public goods and services provided by the farm

and alongside national and local priorities guide future land management decisions and subsequent support.

### **How can farmers and land managers work together or with third parties to deliver environmental outcomes?**

To coordinate delivery across protected landscapes it is important to raise awareness of relevant documents and guidance. AONB and National Park Management Plans are statutory documents often supported by additional guidance and position statements. These are not always digestible by the farming audience and require an element of 'translation' into something more practical. Within the Cotswolds AONB we have the AONB Management Plan, Landscape Character Assessment etc which have been 'converted' into a Landscape Strategy and Guidelines a more practical guide of activities to conserve and enhance the landscape and activities to avoid. There is, therefore, a role to third parties to inform farmers and land managers and support collaborative working.

There are a good number of farmer cluster and facilitation groups across the country and there is scope to establish many more on a variety of themes. The common denominator is the group coordinator funded, in the case of Facilitation Groups, through agri-environment. Farmers are not good at working together and the importance of the coordinator role and the need to fund it cannot be overstated.

### **8. Supporting rural communities and remote farming**

#### **Consultation questions**

**How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?**

**There are a number of challenges facing rural communities and businesses. Please rank your top three options by order of importance:**

- a) Broadband coverage**
- b) Mobile phone coverage**
- c) Access to finance**
- d) Affordable housing**
- e) Availability of suitable business accommodation**
- f) Access to skilled labour**
- g) Transport connectivity**
- h) Other, please specify**

Our top three are:

- f) Access to skilled labour
- a) Broadband coverage
- b) Mobile phone coverage

**With reference to the way you have ranked your answer to the previous question, what should government do to address the challenges faced by rural communities and businesses post-EU Exit?**

A valuable element of the current CAP is Rural Development delivered through schemes such as LEADER and Countryside Productivity. These grant schemes, although heavily bureaucratic, provide capital investment to grow business, create jobs and support the wider rural economy. Support for rural development should continue after EU exit, ideally in combination with environmental land management to maximise benefits and efficiency and avoid duplication, competition and confusion. A model for a single menu of environmental land management and rural development has been developed by the Cotswolds Conservation Board and submitted to Defra for consideration. The Board is keen to work with Defra to develop and pilot this approach.

The European Structural and Investment Funds includes money for social and agricultural development, both of which help support rural communities and businesses. Such support, but in a simplified scheme, should continue.

Continued funding for rural communities and businesses will also help them evolve and adapt to post EU conditions.

## **9. Changing regulatory culture**

### **Consultation questions**

**How can we improve inspections for environmental, animal health and welfare standards? Please indicate any of your preferred options below.**

- a) Greater use of risk-based targeting**
- b) Greater use of earned recognition, for instance for membership of assurance schemes**
- c) Increased remote sensing**
- d) Increased options for self-reporting**
- e) Better data sharing amongst government agencies**
- f) Other (please specify)**

Our preferred options are:

- a) Greater use of risk-based targeting (see comment below)
- e) Better data sharing amongst government agencies

b) Greater use of earned recognition, for instance for membership of assurance schemes

**Which parts of the regulatory baseline could be improved, and how?**

In addition to the comments made to question 3 above, any new regulatory baseline should ensure that SSSIs, Local Wildlife Sites, Ancient Semi-natural Woodland and veteran trees obtain greater protection than currently provided under cross-compliance regulations.

In a) above, it is not so much better data sharing between agencies but better use of the data held and improved responsiveness to changes signalled by the data.

Risk based systems need to avoid becoming over onerous otherwise they will stop effective production.

Current assurance schemes include an array of codes of conduct and are good options to use.

**How can we deliver a more targeted and proportionate enforcement system?**

By inspection based on pragmatism, understanding of different farm enterprises (Brussel sprouts are harvested in winter and animals lose ear tags) and moving away from the aggressive approach that's seems to be currently taken.

Processing of inspections needs to be speeded up significantly. Currently, inspections can take a year or more to be completed. Anomalies within the Rural Land Registry mapping system often complicate matters further. Payments are frequently withheld until all issues have been resolves, causing severe difficulties to farming businesses. Under the new enforcement system, payments should not be withheld from land managers until proceedings have been concluded.

**10. Risk management and resilience**

**What factors most affect farm businesses' decisions on whether to buy agricultural insurance? Please rank your top three options by order of importance:**

- a) Desire to protect themselves from general risks (e.g. – revenue protection)**
- b) Desire to protect themselves from specific risks (e.g. – flooding, pests or disease)**
- c) Provision of government compensation for some risks**
- d) Cost of insurance**
- e) Complexity and administrative burden of insurance**
- f) Availability of relevant insurance products**
- g) Other (please specify)**

Our preferred options are:

- d) Cost of insurance**

- e) Complexity and administrative burden of insurance
- b) Desire to protect themselves from specific risks (e.g. – flooding, pests or disease)

**What additional skills, data and tools would help better manage volatility in agricultural production and revenues for (a) farm businesses and (b) insurance providers?**

Government could provide seed-funding to facilitate cooperative risk-pooling arrangements between farmers.

**How can current arrangements for managing market crises and providing crisis support be improved?**

By ensuring that mechanisms exist to distribute emergency funds/loans in a timely manner

**11. Protecting crop, tree, plant and bee health**

**Consultation questions**

**Where there are insufficient commercial drivers, how far do you agree or disagree that government should play a role in supporting:**

**a) Industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?**

Agree. Phytophthora ramorum is a good example of a disease that spread quickly through larch across large swathes of the country. The imposition of restrictions and the expertise and support of the Forestry Commission were vital in tackling the disease and in follow up restoration work.

**b) Landscape recovery following pest and disease outbreaks, and the development of more resilient trees?**

Agree but this does not apply just to disease and pests in trees.

A precautionary approach should be adopted when introducing non-native tree species to sensitive landscapes. The emphasis should be on encouraging genetic diversity and resilience within native species.

**c) The development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?**

Agree. Prevention of disease is better than dealing with outbreaks and follow up restoration. Health inspections at port of entry is vital to keep pests and disease out of the country. Countries such as Australia and Canada have much stricter biosecurity rules that are enforced.

**Where there are insufficient commercial drivers, what role should government play in:**

**a) Supporting industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?**

- Coordinating and supporting surveys for the disease or pest
- Coordinating and supporting intervention measures
- Provision of information and guidance to woodland owners and if necessary, the public.

**b) Promoting landscape recovery following pest and disease outbreaks, and the development of more resilient trees?**

- Coordinating and supporting restoration programmes such as re-stocking
- Provision of guidance appropriate to the area requiring recovery
- Research and development of resilient trees
- Promotion of provenance, particularly the inclusion of southern provenance stock in planting and schemes to increase resilience to climate change.

**What support, if any, can the government offer to promote the development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?**

- Supporting legislation to prevent importation of diseased material
- Development and promotion of industry standards
- Development and promotion of information and guidance
- Independent peer reviewed research and development into disease and pest resistance and treatment
- Responding to international scientific evidence of the adverse impact of neonicotinoid insecticides on bee and other beneficial insect populations
- Recognise and reward good practice
- Requiring importers to record the full provenance of imported plant material

## **12. Ensuring fairness in the supply chain**

### **Consultation questions**

**How can we improve transparency and relationships across the food supply chain? Please rank your top three options by order of importance:**

**a) Promoting Producer Organisations and other formal structures?**

**b) Introducing statutory codes of conduct?**

**c) Improving the provision of data on volumes, stocks and prices etc.?**

**d) Other (please specify)?**

Our top three options are:

- b) Introducing statutory codes of conduct
- a) Promoting Producer Organisations and other formal structures
- d) Other (please specify) - review of currently restrictive aspects of sales contracts, testing regimes and payments.

Statutory codes remain weak and thought is required to strengthen them.

### **What are the biggest barriers to collaboration amongst farmers?**

Traditionally farm businesses keep things to themselves, particularly when considering diversification schemes that may give the edge over their neighbours, particularly schemes to add value to their products. This attitude is, however gradually changing. There are good examples of farmers developing new practises and being willing to contact the agricultural press. Whilst collaboration through cluster and facilitation fund groups to tackle issues such as flooding is proving successful, collaboration in business terms may be difficult to tackle. There is a long way to go to adopting the same approach as our European neighbours in the setting up of co-operatives.

### **What are the most important benefits that collaboration between farmers and other parts of the supply chain can bring?**

Opportunities for new businesses and entrants into farming and food. Collaboration between existing farmers can, however, be a barrier to new entrants, particularly if seeking to take a non-traditional approach or seen as potential competition.

Better traceability and marketing opportunities including local products

Adaptation and increased resilience to business and trading conditions post EU exit

### **How could government help to enable this?**

One approach is to provide a 'neutral' service that talks to individual farm and producer businesses across an area and identifies and facilitates opportunities for business collaboration. This type of approach was taken by the funded Rural Enterprise Gateways

## **15. Legislation: the Agriculture Bill**

### **Consultation questions**

#### **How far do you agree with the proposed powers of the Agriculture Bill?**

We agree with the listed objectives.

#### **What other measures might we need in the Agriculture Bill to achieve our objectives?**

Under the third objective, we would like to see the inclusion of Rural development schemes to support and assist rural business growth, skills and training and job creation.

If you wish for further clarification on any of the points above, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in purple ink that reads "M. A. Connelly". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Mark Connelly

Land Management Officer