

**Written evidence submitted by Joss Hibbs (AB49)**

Written submission to: **HOUSE OF COMMONS AGRICULTURE BILL COMMITTEE**

Regarding: **Public Payment for Public Goods**

**Semi-wild Dartmoor Hill Pony herds**

1.	<b>Reason for Submitting</b>	
1	a)	<p>This submission is made to fulfil Action 6 of the Your Dartmoor Action Plan; a cross-agency strategic plan for Dartmoor National Park agreed by numerous partners including Dartmoor National Park Authority, Natural England, Dartmoor Commoners’ Council et al.</p> <p>Action 6 states: ‘Ensure that the importance of ponies for conservation grazing is recognised in future management and funding’. Full Plan seen here:  <a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Ausc%3Ae77a0cb4-7d1f-4d3f-8fbd-41c907686108">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Ausc%3Ae77a0cb4-7d1f-4d3f-8fbd-41c907686108</a></p> <p>This submission is the culmination of four years of discussions between Commoners’ Associations and Natural England (James Cross, CEO; Dr Pete Brotherton, Director; John Holmes. Director).</p>
2.	<b>Executive Summary</b>	
2	a)	<p>Ponies are an iconic sight on Dartmoor. They are an agricultural animal, sold for food. They are directly impacted by Agriculture Policy and must therefore be considered in this review of the Agriculture Bill. The future and welfare of semi-wild ponies on Dartmoor is firmly in DEFRA’s hands through the Department’s treatment of them under the Agriculture Bill.</p> <p>Semi-wild Dartmoor Hill Pony herds on Dartmoor have been negatively impacted by agri-environment schemes.</p> <p>Semi-wild Dartmoor Hill Pony herds on Dartmoor are not sustained by market alone.</p> <p>Hill-farmers keeping semi-wild Dartmoor Hill Pony herds on Dartmoor commons have no specific access to financial support.</p> <p>Semi-wild Dartmoor Hill Pony herds are crucial to Dartmoor because:</p> <ul style="list-style-type: none"> <li>◇ they are central to the history and culture of hill-farming on Dartmoor.</li> <li>◇ they shape the landscape and biodiversity of Dartmoor in the way they graze alongside cattle and sheep.</li> <li>◇ of their contribution to tourism. (National Parks are targeted with</li> </ul>

		<p>increasing visitor numbers by 10%).</p> <ul style="list-style-type: none"> <li>◇ they are a living Stonehenge: they have been on Dartmoor since at least the Bronze Age.</li> </ul>
2	e)	<p>Semi-wild Dartmoor Hill Pony herds are crucial to the UK because:</p> <ul style="list-style-type: none"> <li>◇ they are genetically rare</li> <li>◇ they are in place to graze for biodiversity in upland regions where cattle may no longer be available.</li> </ul>
3.		<b>Recommendations for Action</b>
3	a)	<p>Pay as a Public Good £78 per year per semi-wild Dartmoor Hill Pony or breed society Dartmoor Pony grazing on Dartmoor commons. Estimated total £93,600 per annum.</p>
3	b)	<p>Value pony-grazing for conservation and development of upland biodiversity as equal to cattle-grazing within agri-environment and SSSI schemes.</p>
4.		<b>Detailed Discussion</b>
4	a)	<b>Negative Impact of Agri-environment Schemes to date</b>
	i)	<p>The Higher Level Stewardship agri-environment scheme (2008-present) included an optional prescription (incentivised by extra payment) if a minimum of 50% of the grazing units allowed on Dartmoor commons were cattle. The intention of this prescription was to reduce the number of sheep grazing. On the few UK uplands where semi-wild ponies live, the impact of this prescription was to incentivise the culling of the pony herds to make way for cattle.</p>
	ii)	<p>The reduction of the number of animals allowed to graze Dartmoor commons under SSSI rule and agri-environment schemes over the past 25 years has led hill-farmers to choose animals reaching the highest market price. Semi-wild ponies have a lower market value than both cattle and sheep, resulting in herds being culled to make way for cattle and sheep.</p>
4	b)	<b>Not sustained by market</b>
	i)	<p>The traditional markets for Dartmoor semi-wild pony herds are lost: working beasts on farms, quarries and mines; food to mainland European markets.</p>
	ii)	<p>The modern market for Dartmoor's semi-wild ponies, as riding and driving ponies, is diminishing – experienced across the UK.</p>
	ii)	<p>The modern market for Dartmoor's semi-wild ponies sold as food is growing but is, as yet not big enough to sustain the moor-wide herds. See Dartmoor pony</p>

	iv)	<p>meat products here:</p> <p><a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Ac0c363ce-ebec-458b-ac47-e465d5695ae1">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Ac0c363ce-ebec-458b-ac47-e465d5695ae1</a></p> <p>Dartmoor calculated the cost of raising pony herds on Dartmoor, using the method used by the Agriculture and Horticulture Development Board (AHDB) to calculate the cost of production for cattle and sheep. The full report can be seen here:</p> <p><a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Ada3a1ad2-90df-49af-bb21-98f47c782527">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Ada3a1ad2-90df-49af-bb21-98f47c782527</a></p> <p>And here:</p> <p><a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Af400e3db-9617-4659-a02c-ff87070c2d25">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Af400e3db-9617-4659-a02c-ff87070c2d25</a></p> <p>It found that the cost of production for a pony on Dartmoor scored minus 78, compared to minus 88 for cattle and minus 1 for sheep on Severely Disadvantaged upland ground, where the minus indicates a cost greater than market price. This submission argues that financial support must be allocated to ponies in this ratio, through Payment for Public Goods. This submission suggests an annual payment of £78 per pony.</p>
4	<p>c)</p> <p>i)</p> <p>ii)</p>	<p><b>Semi-wild and Native Breed At Risk (NBAR)</b></p> <p>The Dartmoor Hill Pony is semi-wild. Officials confirmed at a recent meeting (Parke, 11 April 2017) that DEFRA’s definition of semi-wild status required that ‘animals must remain outside of human control for their survival and reproduction’. This excludes semi-wild ponies from being considered a breed, where the dam and sire of a foal must be known in order for pedigree status to be granted. This means that, in spite of their rare genetics and having only 1000 breeding mares, hill farmers owning Dartmoor Hill Ponies can not access financial support through Native Breed At Risk payments.</p> <p>The Dartmoor Pony is entered on the Native Breeds At Risk register and financial support can be accessed through this route where made available.</p> <p>Please see para 4d below to distinguish these two pony-types.</p>
4	<p>d)</p> <p>i)</p>	<p><b>Central to Dartmoor Hill-Farming History and Culture</b></p> <p>The history of Dartmoor’s semi-wild Dartmoor Hill Pony herd can be viewed here: <a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A79d8b60c-efd5-4fb8-9d44-50f84a8ae262">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A79d8b60c-efd5-4fb8-9d44-50f84a8ae262</a></p> <p>This lists historically documented and archaeological evidence demonstrating that they have existed on Dartmoor since at least the Bronze Age, probably earlier. Since at least 1086 (Domesday Book entries) these herds have been wild, but owned, defined by DEFRA today as semi-wild.</p>

	<ul style="list-style-type: none"> <li>ii) This timeline explains how Dartmoor has 2 pony types connected to the region: the semi-wild Dartmoor Hill Pony herds, and the Dartmoor Pony breed which was developed by the then Prince of Wales (Edward VII) in the 1860s.</li> <li>iii) Dartmoor Hill Pony semi-wild herds roam freely on the upland commons of Dartmoor, year round: as a rule, the pedigree Dartmoor Ponies graze the commons in the summer months only.</li> <li>iv) The majority of ponies seen on Dartmoor commons are semi-wild Dartmoor Hill Ponies.</li> </ul>
4	<p><b>e) Conservation Grazing</b></p> <p>Click here: <a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3AAscds%3AUS%3Aababb9e58-754a-456e-aaa4-1fdf0dc69d1e">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3AAscds%3AUS%3Aababb9e58-754a-456e-aaa4-1fdf0dc69d1e</a></p> <ul style="list-style-type: none"> <li>i) This paper is written by Fraser, Stanley and Hegarty outlining the value of semi-wild pony-grazing on the biodiversity of UK uplands. It is peer-reviewed and is due to be published after the deadline date for submission to the Agriculture bill committee. Please read a minimum of Abstract and sections 1-3. It concludes that:-</li> <li>ii) There is high ecological overlap between pony and cattle grazing reported in a range of studies; that semi-wild ponies should be considered as an alternative tool for conservation management.</li> <li>iii) Semi-wild ponies are useful grazers where there is a need to reduce the dominance of plant species avoided by small ruminants such as sheep.</li> <li>iv) Semi-wild ponies are particularly suited to conservation grazing because their genomes have been shaped by natural not artificial selection (such as a chosen height/shape/colour).</li> <li>v) Furthermore, it argues that as agricultural policy plans to deliver public goods rather than primary production, recognising the value of native ponies, and semi-wild ponies in particular, as grazers, achieves biodiversity whilst simultaneously supporting at risk equine genotypes.</li> <li>vi) Please click here: <a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3AAscds%3AUS%3A2f9c997c-6793-49f0-a3f1-5b29a3371dbc">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3AAscds%3AUS%3A2f9c997c-6793-49f0-a3f1-5b29a3371dbc</a> and here: <a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3AAscds%3AUS%3A38768662-c800-4873-941a-8af4a36b3cc8">https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3AAscds%3AUS%3A38768662-c800-4873-941a-8af4a36b3cc8</a> to see statements by Natural England and Butterfly Conservation (pony grazing is essential to supporting the rare Marsh Fritillary Butterfly: Dartmoor is consequently a stronghold for this butterfly).</li> </ul>

4	f)	<p><b>Value to Tourism</b></p> <p>i) ‘Ask any visiting tourist to describe Dartmoor and the word ‘ponies’ will be said within the first three sentences’, Peter Parsons, 25years the Landlord of Dartmoor’s famous Warren House Inn. Ponies are an icon of Dartmoor, they feature in the emblem of the Dartmoor National Park Authority: visitors come to the National Park to see them stood in the landscape of tors and streams. This is evidenced by the annual Park-wide appeal to not feed them or draw them to the roadside.</p> <p>ii) The value of semi-wild pony herds to Dartmoor tourism economy is currently being studied and quantified at Exeter University. Click here to see the scope of that study: <a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaid%3Ausc%3AUS%3A38c1085e-5ed7-4cda-bbd0-d18fc82cbaa6">https://documentcloud.adobe.com/link/track?uri=urn%3Aaid%3Ausc%3AUS%3A38c1085e-5ed7-4cda-bbd0-d18fc82cbaa6</a></p> <p>iii) UK National Parks are currently tasked by DEFRA to increase the number of visitors by 10%. Ponies have a role to play in achieving this target for Dartmoor.</p> <p>iv) Dartmoor’s pony herds are an ideal vehicle through which to introduce the visitor to the moor’s history and pre-history; it’s redundant centuries-old quarries and granite tramways which are now burgeoning with wildlife; the flora and fauna encouraged by how ponies graze; the tradition of hill-farming.</p>
4	g)	<p><b>Rare Genetics</b></p> <p>i) In 2017 the Institute of Biological, Environmental and Rural Science, Aberystwyth University, analysed the genetics of the Dartmoor Hill Pony herds. The full report can be read here: <a href="https://drive.google.com/open?id=1yvD_t0xTy_oj-wj4ivXzgjMfmSs6vsMB">https://drive.google.com/open?id=1yvD_t0xTy_oj-wj4ivXzgjMfmSs6vsMB</a></p> <p>ii) The analysis showed that the Hill Ponies of Dartmoor are one distinct type of pony, distinct to all other UK native pony breed; distinct even to the Dartmoor Pony breed.</p> <p>iii) The analysis also showed that Dartmoor Hill Ponies hold rare genetics, seen in one other UK pony type the semi-wild ponies of the Carneddau mountains in Wales. These rare genetics are related to their ability (known anecdotally for centuries) to tolerate cold and stay fat even when fodder is not available in the winter months. It is scientific confirmation that these semi-wild Dartmoor Hill Ponies are the correct type to thrive and survive Dartmoor’s harsh upland climate whilst conservation grazing year-round.</p> <p>iv) Dartmoor Hill Pony and Dartmoor Pony genetics have been included in a world-</p>

		<p>wide study known as Pegasus, led by Prof Ludovic Orlando, funded by the European Research Council, to understand the domestication of the horse in pre-historical times, using leading-edge genetic analysis techniques. For more information on the project, click here: <a href="http://orlandoludovic.wixsite.com/pegasus-erc">http://orlandoludovic.wixsite.com/pegasus-erc</a></p> <p>v) DEFRA committee, FAnGr, has been asked to comment on the best way to protect these rare genetics (January 2018).</p>
4	<p>h) <b>Conservation Grazing Where Cattle Are Not Available</b></p> <p>i) Increasingly, where cattle are not available; or public access requires gentle livestock through which the public are comfortable to walk; or there is a need to easily handle grazing animals, landowners use ponies for conservation grazing. Examples of organisations using ponies for conservation grazing are: Natural England, RSPB, National Trust.</p> <p>ii) The use and value of ponies for conservation grazing already implemented by landowners is confirmation of the academic view expressed in the report by Fraser, Stanley and Hegarty in their paper: <a href="https://documentcloud.adobe.com/link/track?uri=urn%3Aaid%3Ausc%3AUS%3Ababb9e58-754a-456e-aaa4-1fdf0dc69d1e">https://documentcloud.adobe.com/link/track?uri=urn%3Aaid%3Ausc%3AUS%3Ababb9e58-754a-456e-aaa4-1fdf0dc69d1e</a></p> <p>iii) Financial support to ensure the future of semi-wild Dartmoor Hill Pony herds on Dartmoor's uplands provides a Plan B for essential upland conservation grazing should, as feared, commons experience abandonment by traditional hill-farming and the removal of cattle.</p> <p>iv) As confirmed in their genetics, semi-wild Dartmoor Hill Ponies do not require feeding in winter like cattle or sheep. They are handled only once a year for a brief number of days.</p> <p>v) The value of semi-wild ponies to conservation grazing already recognised by major landowners and academics needs to be formally encapsulated and financially supported in UK Agricultural Policy.</p>	
		<b>CONCLUSION</b>
		<p><b>To date, DEFRA has created a welfare issue for the semi-wild pony herds of Dartmoor through the separate actions of its departments:</b></p> <ul style="list-style-type: none"> <li>◇ <b>agri-environmental schemes have incentivised the shooting of semi-wild ponies to make way for cattle. The semi-wild pony's contribution to grazing for the benefits of biodiversity is not formally recognised by Natural England.</b> Their contribution to the benefits to upland biodiversity in the</li> </ul>

	<p>way they graze alongside cattle and sheep needs to be positively valued in future agri-environmental schemes.</p> <ul style="list-style-type: none"> <li>◇ <b>protection of their rare genetics is refused by the FAnGr committee because, by Equine ID's definition, semi-wild ponies can not be recognised as a breed and are given no equivalent status.</b> The status of Semi-Wild, supported by genetic analysis, should be valued equally to Breed status.</li> <li>◇ <b>new passporting regulation has called the annual pony auction into question – the major route through which semi-wild ponies leave the moor (to comply with agri-enviro grazing numbers) to be domesticated.</b> 3 important changes are needed to the 2018 Equine ID Regulation.</li> </ul> <p><b>The result is that, whether standing on the moor, where they have stood for at least 4,000 years, or leaving the moor, DEFRA policies have previously incentivised that they be shot.</b></p> <p><b>This needs to be changed. The Agriculture Bill is the next and biggest opportunity to make that change. A first step would be to express their value through Public Payment for Public Goods.</b></p>
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**Cross Referencing the above information with the purposes for which The Secretary of State may give financial assistance (as summarised by the Foundation for Common Land):**

- ◇ Managing land or water in a way that protects or improves the environment: **4e, 4h, 4g(iii).**
- ◇ Supporting public access to and enjoyment of the countryside, farmland or woodland and better understanding the environment: **4di), 4e, 4f, 4giii),**
- ◇ Managing land or water in a way that maintains, restores or enhances cultural heritage or natural heritage and the associated farming systems that deliver them: **4d**
- ◇ Mitigating or adapting to climate change: **4g(iii), 4h**
- ◇ Preventing, reducing or protecting from environmental hazards: **4e, 4h**
- ◇ Protecting or improving the health or welfare of livestock: **4e**
- ◇ Protecting or improving the health of plants: **4e**
- ◇ Traditional farming systems on upland, commons, coastal and other challenged areas: **4d**
- ◇ Genetics and support for rare breed: **4g, 4c**

## LIST OF LINKS/APPENDICES

Eblex – Cost of Production

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3Ada3a1ad2-90df-49af-bb21-98f47c782527>

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3Af400e3db-9617-4659-a02c-ff87070c2d25>

Pony-grazing paper Aberystwyth and Chester Universities

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3Ababb9e58-754a-456e-aaa4-1fdf0dc69d1e>

Tourism

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3A38c1085e-5ed7-4cda-bbd0-d18fc82cbaa6>

Use of pony-grazing for Butterfly Conservation

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3A2f9c997c-6793-49f0-a3f1-5b29a3371dbc>

Use of pony-grazing by Natural England

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3A38768662-c800-4873-941a-8af4a36b3cc8>

Your Dartmoor Action Plan

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3Ae77a0cb4-7d1f-4d3f-8fbd-41c907686108>

Rare Genetics

[https://drive.google.com/open?id=1yvD\\_t0xTy\\_oj-wJ4ivXzgjMfmSs6vsMB](https://drive.google.com/open?id=1yvD_t0xTy_oj-wJ4ivXzgjMfmSs6vsMB)

Pony Meat Products

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3Ac0c363ce-ebec-458b-ac47-e465d5695ae1>

Pegasus Genetics Study

<http://orlandoludovic.wixsite.com/pegasus-erc>

Semi-wild ponies in Dartmoor hill-farming history and culture

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Asc%3AUS%3A79d8b60c-efd5-4fb8-9d44-50f84a8ae262>

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