



AGRICULTURE BILL – PUBLIC BILL COMMITTEE WRITTEN EVIDENCE
06 November 2018

Executive Summary

Our overarching view is that the Agriculture Bill must ensure environmental protection goes hand in hand with sustainable, healthy food production and a thriving rural economy. This could be achieved by amendments in the following areas:

- A greater focus on **food and farming** – including a clear statement for a desired shift towards agroecology with a focus on improving soil health and increasing biodiversity 'in the middle of the field'.
- Recognising and rewarding the public goods delivered by **organic** farming and committing to a specific organic scheme.
- Including **public health** as a purpose of future financial assistance under clause 1.
- A stronger **climate change** focus including a goal for **net zero emissions** from agriculture.
- A new **definition of productivity** that incorporates social and environmental impacts and limits.
- Safeguards and reporting requirements to ensure the **transition period** works for both farmers and the environment including some element of cross compliance.
- An adequate **long-term budget** beyond 2022, both for farm payments and for research and innovation.
- Recognition of the need for a close **EU-UK relationship** and specific provisions to rule out any **trade deals** with non-EU countries that would undermine UK farming, food or environmental standards.

About the Soil Association

1. The Soil Association is a membership charity, formed in 1946 by a group of farmers, scientists, doctors and nutritionists who were determined to pioneer a world where we can live in health and in harmony with nature. Our vision is good food for all, produced with care for the natural world. Today, the Soil Association works to develop, innovate and scale-up solutions for sustainable food and farming - by collaborating with organic and non-organic [farmers](#), food procurers from schools to hospitals to restaurant chains, and others. Our [Food for Life](#) work with schools and nurseries to give children a happier, healthier relationship with food is commissioned widely by public health teams around the country. Through our trading subsidiary, Soil Association Certification, we work with over 6,000 businesses including [organic farmers and growers](#), caterers, food processors and manufacturers across more than 50 countries, and certify over 14 million hectares of [forest](#) globally.
2. The Soil Association coordinates the [Innovative Farmers](#) network, where groups of farmers work directly with researchers to design 'field labs' that can be set up quickly and are highly practical. We work closely with other farming organisations and in wider coalitions including: Sustain - the Alliance for Good Food and Farming; Greener UK; Eating Better; and the English Organic Forum. We are a founding member of the [Alliance to Save Our Antibiotics](#) and the newly-established Fruit and Vegetable Alliance.

SOIL ASSOCIATION PROPOSALS FOR IMPROVING THE AGRICULTURE BILL

3. The Soil Association welcomes much of the Agriculture Bill and the broad direction of farming policy set out by Defra ministers. In particular, we support the shift to a new payment system where *'farmers and land managers who provide the greatest environmental benefits will secure the largest rewards'*. This is the principle of [public money for public goods](#) – using funds to secure the delivery important outcomes such as healthy soils, climate mitigation and high animal welfare. However, it is essential that the government takes an **integrated approach to food production, environmental protection, animal welfare, and public health**.

Proposal 1: Focus more on food and farming

4. Many farmers already deliver public goods such as improved soil and water quality or increased biodiversity - at the same time as producing high quality food. However, the farming methods proven to deliver the greatest benefits to wildlife, soil health, or greenhouse gas emissions reductions are still not mainstream in the UK. We acknowledge the points made by the Minister in the recent Public Bill Committee debate [on the 30th October] that the desired goods, outcomes and overall purposes in the Bill have been “deliberately kept broad” in order that the Government “did not miss things out”. However, it is far from certain that the new schemes will provide the **comprehensive support farmers need to move from decades of overreliance on agrochemicals and cheap fossil fuels to a more ecological approach** across all our land. Ministers must provide greater certainty on this in the Agriculture Bill and to parliament.
5. In order to achieve this, the financial assistance provided for in sections 1 and 2 of the Bill should explicitly have an aim to **secure a transition to sustainable food production systems**, including prioritising the adoption of nature-friendly farming methods, undertaken by farmers themselves. At present, there are no guarantees that this will happen.
6. Policy and funding must **target what is happening ‘in the middle of the field’** as well as around the edges, for example, by encouraging the widespread adoption of systems of farming that promote in-field biodiversity, such as organic. The importance of this approach is illustrated by [research](#) into pollinator decline and pesticide contamination of wildflowers. This found that only about 5% of neonicotinoid pesticides applied to the crop seed were sucked up by the seedling as intended - with the remaining 95% going into the nearby soil and water.
7. Agroecological farming methods are considered to include organic farming as well as agroforestry, pasture-based livestock systems, integrated pest management, low input mixed farming, and biodynamic agriculture. Many of these were mentioned by the Minister in the recent debate [30th October] and we welcome the assurance from the Minister that these should be seen to be covered by subsection 1 (though we would argue that as well as paragraphs a and c, agroecological farming systems can be seen to provide the purposes of d, e, f, and g too). Nonetheless the Bill should include a **long-term goal of establishing agroecology as the**

underlying principle of farming in England. Currently there is no assurance that this is the desired aim.

8. The UN Food and Agriculture Organisation ([FAO](#)) describes agroecology as *'the basis for evolving food systems that are equally strong in environmental, economic, social and agronomic dimensions.... Agroecology is based on applying ecological concepts and principles to optimise interactions between plants, animals, humans and the environment while taking into consideration the social aspects that need to be addressed for a sustainable and fair food system. By building synergies, agroecology can support food production and food security and nutrition while restoring the ecosystem services and biodiversity that are essential for sustainable agriculture. Agroecology can play an important role in building resilience and adapting to climate change.'*
9. The [Ten Years for Agroecology in Europe](#) project, led by top scientific experts, shows that agroecology can address that apparent dilemma of producing adequate quantities of food whilst protecting biodiversity and natural resources, and mitigating climate change. It finds that a transition to agroecology, based on phasing out pesticides and synthetic fertilisers and redeploing extensive grasslands and landscape infrastructures, would:
 - feed the European population healthily;
 - maintain export capacity;
 - reduce Europe's global food footprint;
 - result in a 40% reduction in agricultural GHG emissions;
 - help to restore biodiversity and to protect natural resources.

Proposal 2: Recognise and reward the public benefits delivered by organic farming

10. The Bill should contain a specific provision to **support and expand the organic sector**. [Organic farming](#) is all about producing food in harmony with nature. Organic standards severely restrict pesticide use and prohibit the use of herbicides and manufactured fertilisers. As a result, organic farming delivers many of the 'public goods' that the government wants to pay farmers to provide, at the same time as producing food. Examples include:
 - Organic farms have on average 50% more [wildlife](#) than conventional farms.
 - Organic farms have [healthier soils](#) with, on average, 44% higher levels of humic acid - the component of soil that stores carbon over the long term.
 - Organic farming can help tackle [water pollution](#) - with 35-65% less nitrogen and no persistent pesticides leached from organic arable fields.
11. A [Natural Capital Balance Sheet](#) of an organic dairy farm, the Cholderton Estate, produced by EFTEC, further illustrates the importance of developing policies that can support both food production and the provision of public goods.
12. [Rushall Organics](#) in Wiltshire is just one example of a mixed (arable and livestock) organic farm where organic management is resulting in clear wildlife benefits—particularly for rare and endangered cornfield plant species. The results of a recent survey surprised even the ecological surveyors themselves – from the leading plant conservation charity, Plantlife. Their iconic

cornfield flowers—the familiar annuals traditionally found among wheat, barley and oat crops—include some of the most threatened plant species in Britain, such as corn buttercup, red-nettle hemp, field gromwell, narrow fruited corn salad, stinking chamomile and mousetail. These occur without any specific conservation efforts – demonstrating the inherent conservation benefits of organic arable management.

13. Expanding the organic sector should also be explicitly recognised as contributing to high [animal welfare](#), because organic livestock standards go beyond free range and cover living conditions, feed quality, transport and slaughter. More organic farming would contribute to the challenge of antibiotic resistance too, since organic standards prohibit the routine use of antibiotics, whilst optimising animal health and welfare to prevent disease.
14. At present there are over 3,500 organic farmers/growers in the UK (a total of over 6,500 producers and processors combined). Three percent of agricultural land is organic. Ministers should aim to get the UK to the top of the European [league table](#) of organic food and farming, rather than languishing near the bottom.
15. Going organic is a major opportunity for UK farmers too. Consumer demand for organic food is increasing steadily, globally and in Britain. The UK [organic market](#) is now worth more than ever at £2.2 billion, growing 6% in 2017. Meeting more of the UK organic demand with UK supply would be good news for soil health, wildlife and farmers alike.

Proposal 3: Public health as a public good

16. The Bill fails to reflect links between farming, food and [public health](#), despite calls for this to be a top priority from a [broad coalition](#) of food, farming and public health experts and practitioners – and, indeed, ‘Health and Harmony’ being the title of the Government consultation.
17. In April this year, the Rt Hon Michael Gove, Secretary of State, said: *‘Food production is ultimately about health. I want to ensure we have a food and farming policy that includes higher standards and ambitions, and that results in better outcomes, including for public health.’* In January 2018 the Secretary of State also stated: *‘...in this role now, I have a responsibility to ask if public money supporting food production is also contributing to improved public health.’*
18. **Public health should be included in the list in Clause 1**, which sets out the purposes for which, and in connection with which, the Secretary of State could provide financial assistance under the UK’s new agricultural policy. This would allow the introduction of [policies](#) linking public health and farming in the following areas:
 - *Diet*: Measures to increase the availability, affordability and accessibility of UK-grown and sustainably produced fresh fruit and vegetables, nuts and pulses, for example:
 - An equivalent to the EU Fruit and Vegetable Aid Scheme. As a member of the Fruit and Veg Alliance, we would like to see a replacement scheme more widely available, with a lower output threshold for entry so that smaller businesses can benefit too.
 - Public procurement standards should be strengthened, incorporating ‘less but better’ meat, and more local sustainably produced fruit and vegetables. The

Government should re-specify the School Fruit & Vegetable Scheme when it is due to be re-tendered in 2020 so that a higher proportion of the produce is British, local and organic, and is therefore fresher, tastier, of known provenance, and more enjoyable for children.

- *Antimicrobial resistance*: with livestock accounting for around 40% of UK antibiotic use, support is needed, alongside stronger regulation, for the improvements to hygiene, husbandry, and housing required to reduce the need for antibiotics, and to help farmers transition to extensive, high welfare farming systems such as organic, which use far fewer antibiotics
- *Nature-based health promotion*: supporting nature-based social prescriptions, including farm-based interventions, making additional funding available to farmers to host visits - including school visits, and visits through, for example, Care Farming UK.

Proposal 4: Net zero emissions from farming

19. The Agriculture Bill should include a **goal for agricultural emissions to reach net-zero before 2050**. This would be in line with the UK's commitments under the Paris Climate Agreement. Climate mitigation is included in Clause 1 as one purpose for which financial assistance could be available. This is inadequate. Climate disruption poses a major threat to farming and food production and UK farmers are increasingly struggling with the impacts of extreme weather.
20. However, the Committee on Climate Change 2018 [progress report](#) highlighted that there has been “no change in agricultural emissions since 2008” and found that in 2017 “44% of farmers took no action to reduce GHG emissions, and half of farmers did not think it was important to consider emissions when making decisions about farming practices”. This is not the fault of farmers, but of inadequate government policy. Farmers receive neither the advice nor the financial support required to make the [transition](#) to climate-friendly farming.
21. A net zero emissions goal is important but not enough. As the new [IPCC report](#) on 1.5 degrees underlines, policies must focus **on a step-change in climate action in the short term**. These should harness the potential of farmland to sequester carbon through trees and soil – including an ambition for [agroforestry](#) to become a mainstream practice. New farm support schemes must also fast-track a transition away from reliance on artificial nitrogen fertiliser and fossil fuel-based inputs towards wholly ‘renewable’ food production. [Research](#) has found that making 50% of EU farming organic by 2030 could cut greenhouse gas emissions by almost a quarter. Organic is not perfect and other measures are needed too, but it could be a major part of the solution. The new IPCC report also emphasises the importance of ‘*changes towards less resource-intensive diets*’. This should focus on ‘less but better’ meat and dairy production and consumption (and more fruit, vegetables and pulses) as championed by the [Eating Better](#) coalition, which includes public health as well as climate and environment experts and organisations.

Proposal 5: Redefine productivity

22. The Bill should commit to **adopting a new definition of agricultural productivity** before any financial assistance schemes for improving productivity are made available. Unless this happens,

the policies that flow from the part of clause 1 of the Bill concerned with productivity could directly undermine those that flow from other parts of that very same clause i.e. financial assistance for restoring and protecting the natural environment, tackling climate change, and improving farm animal welfare. This is because the government currently uses ‘total factor productivity’ as the key measure. Yet the Defra [webpages](#) on food chain productivity state clearly that this measure “*does not incorporate external effects on society and the environment.*”

23. Some farmers still see yield per unit area the ultimate success measure of their farm business, although an increasing number are recognising that lower yields, more wildlife, and a fairer share of the retail price is a preferable option for their business. As one farmer wrote in [Farmers Guardian](#): “*Our job as farmers is not to feed the world, despite what the ‘yield is king’ lobby might tell you. Our job is to feed our families, make a profit and produce food people want to eat.*”
24. A recent [expert report](#) for the UN entitled ‘Measuring What Matters In Agriculture And Food ‘ concludes: “*Applying today’s ‘productivity only’ metrics in agri-food system assessments ignores outcomes such as degraded ecosystems and alienated communities, with alarming impacts on health and the poorest segments of society.*”
25. A new definition of productivity that takes social factors and the environment fully into account is vital. Options include environmentally adjusted total factor productivity (see [OECD](#)) and/or measuring the nutritional quality of agricultural production. The government should consult on the most suitable measure.

Proposal 6: A secure future for farm assurance, inspection and regulation

26. We followed with interest the Public Bill Committee’s discussion ([01/11/18](#)) on the role of assurance bodies in the implementation of standards, farm inspection and regulatory compliance. While we recognise the Bill does not go into this detail, these practicalities will be vital to its success on the ground.
27. Assurance schemes align private spending and investment behind public goals such as sustainability and animal welfare, they represent an asset. **There is capacity and experience in the assurance bodies that could support implementation**, and shared ambitions both to support farms to improve performance, and to reduce the audit burden that is placed on them. We are proud of the role that organic assurance, our standards and Soil Association Certification has played in promoting effective and efficient delivery of a high standards food and farming sector, and we are keen to contribute further where we can. However, we are also alert to at least two areas of risk that warrant careful consideration.
28. Firstly, there is a risk to the assurance schemes themselves. There is scope for government to set overarching objectives to encourage a ladder of improvement in commercial performance. However, considering the markets for assurance are finely balanced, schemes will be highly sensitive to such intervention and potentially vulnerable to it, so developing such an approach will require close collaboration and solid understanding of the process of assurance.

29. Secondly, there is a risk to the public interest. While it is a strength that assurance schemes leverage the market to deliver public benefits, a regulatory approach that leans too heavily on those schemes will be vulnerable to the ups and downs of that market. Government will need to ensure adequate safeguards in the event that it becomes economically unviable for assurance schemes to play the part envisaged for them.
30. The second risk is structural. Private assurance schemes have evolved to address regulatory failure. If that failure is corrected, as we hope that it will be, their original rationale disappears. While retailers and market commentators portray assurance schemes as supporting ‘choice’ for customers who care about particular issues, the evidence shows that most shoppers simply expect their food to be produced sustainably and humanely, while most assurance schemes see their standards as covering essential requirements rather than trying to get one up on the competition.
31. To this end, we welcome Dame Glenys Stacey’s forthcoming report on Farm Inspection & Regulation. Her interim report brought welcome rigour to the debate and we expect her final report to develop this further. It will offer the appropriate lens through which to see the task of implementing improvements in agriculture, and the role of assurance schemes such as our own.

Proposal 7: A transition period that protects farmers and the environment

32. The extended transition period of 7 years is enough to give farmers time and motivation to adopt new approaches, although great care must be taken to ensure major progress towards nature friendly farming during and after this period is achieved, and to ensure that farmers are enabled to adapt their operations to quality for new public goods payments rather than being forced out of business. **Reduction of basic payments must be accompanied by new schemes** that farmers can readily access, to help them actively transition towards agroecological farming and the delivery of public goods whilst ensuring compliance with regulatory requirements.
33. There should be a requirement on the Secretary of State to report regularly to parliament on the **impact of the transition period on farmers and farming practices** – including any modifications to the Basic Payment Scheme. This must ensure full transparency on whether the adoption of environmentally beneficial farming practices and schemes is increasing, remaining stable, or decreasing. There are concerns that, in the face of so much uncertainty and problems with current programmes, some farmers may end up abandoning agri-environment schemes and environmentally beneficial practices during this period.

Proposal 8: An adequate long-term farm payment budget

34. There needs to be a much clearer indication of the level of **long-term funding** beyond 2022. We think investment should at least match the current farming budget – around £3.2bn per annum - although redirected to benefit the environment, nature, farm animal welfare and human health, and secure the viability of sustainable farming businesses.

35. We agree with other farming organisations that the Agriculture Bill should establish a **multi-annual budgetary framework** that provides certainty for farmers and allows them to plan and invest for the future, under clause 33 (Financial Provision). Budgetary cycles should be independent of the parliamentary cycle to reflect the need for long term planning and investment and to avoid the agricultural budget becoming politicised and subject to annual discretionary spending decisions. There should be scope within the Bill for ministers to “carry over” any monies left unspent at the end of a particular budget year for spending in subsequent years.
36. The Bill itself contains no clear provision on the future of funding for **research and innovation**. As a partner in the [Innovative Farmers programme](#), we would like to see a ringfenced budget for farmer-led innovation. Putting just 10% of the current total R&D budget towards such projects (around £45 million per year) could see upwards of 1,000 projects a year led by groups of farmers, working directly with researchers in on-farm experimentation and improvement. This would support many of the most active innovators and their peers in UK farming to team up and develop ideas that they have identified as priorities for the sustainability and resilience of their businesses, creating a powerful engine driving improvements across the sector. The Innovative Farmers approach works because the agenda is driven by real needs on the ground and not distant research agendas set in office buildings by non-farmers.

Proposal 9: No damaging trade deals

37. The Bill does nothing to address widespread concerns that a **no-deal or hard Brexit** would be catastrophic for food standards, farmers and the environment. Whether the UK stays in a customs union or similar will determine whether farmers have a viable economic future to produce public goods. Farmers need a level of certainty the government has so far failed to provide. Organic businesses would be particularly hard hit, as the [NFU](#) and [organic bodies](#) have highlighted.
38. There are also major risks to farmers, the environment and public health from potential **trade deals with non-EU countries**. These concerns are not addressed by the legislation. We agree with other farming organisations that the Bill should contain provisions to require all food imported into the UK be produced to at least equivalent standards, as they relate to animal welfare, environmental protection and any other legitimate public policy concerns associated with food production, as those required of producers in the UK.