

Written evidence submitted by key stakeholders on Dartmoor (Dartmoor Hill Pony)

(AB01)

Regarding: **Public Payment for Public Goods: Semi-wild Dartmoor Hill Pony herds**

1. Introduction

Public Payment for Public Goods as encapsulated in the Agriculture Bill, specifically paras 1(1)(c)&(g), provide a unique opportunity by which DEFRA could redress the current financial imbalance that disadvantages the semi wild Dartmoor hill pony herds roaming free on Dartmoor commons. Public Payment for Public Goods could, for the first time, recognise and support their national value to equid genetics and their central role in hill-farming culture and history.

2. Reason for Submitting

2 a) This submission fulfils 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.

Action 6 states: 'Ensure that the importance of ponies for conservation grazing is recognised in future management and funding'. Full Plan seen here:

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

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).

3. Executive Summary

3 a) Ponies are an iconic sight on Dartmoor. Though semi-wild, they are an agricultural animal, sold for food. They are directly impacted by Agriculture Policy and must therefore be considered under this new Agriculture Bill. The future and welfare of semi-wild ponies on Dartmoor is highly dependant on DEFRA policy, as the balance of incentives which DEFRA provides to farmers, will make the difference between their continued survival and potential extinction in the future. This means the Agriculture Bill 2019-20 is a watershed moment for these animals.

3 b) Semi-wild Dartmoor Hill Pony Herds on Dartmoor are a Public Good because of their central role in the hill-farming culture of the Dartmoor region.

3 c) Semi-wild Dartmoor Hill Pony Herds on Dartmoor are genetically rare but are not currently supported by DEFRA schemes supporting genetically-rare or numerically-rare native equines

3 d) Semi-wild Dartmoor Hill Pony herds on Dartmoor have been negatively impacted by agri-environment schemes.

3 e) Semi-wild Dartmoor Hill Pony herds on Dartmoor are not sustained by market alone.

- 3 f) Hill-farmers keeping semi-wild Dartmoor Hill Pony herds on Dartmoor commons currently have no specific access to financial support.
- 3 g) Semi-wild Dartmoor Hill Pony herds are crucial to Dartmoor because:
- ◇ they are central to the history and culture of hill-farming on Dartmoor.
 - ◇ they shape the landscape and biodiversity of Dartmoor in the way they graze alongside cattle and sheep.
 - ◇ of their contribution to tourism. (National Parks are targeted with increasing visitor numbers by 10%).
 - ◇ they are a living Stonehenge: they have been on Dartmoor since at least the Bronze Age.
- 3 h) Semi-wild Dartmoor Hill Pony herds are crucial to the UK because:
- ◇ they are genetically rare
 - ◇ they are in place to graze for biodiversity in upland regions where cattle may no longer be available.

4. Recommendations for Action

- 4 a) **The system of Public Payment for Public Goods proposed in the Agriculture Bill 2019-20 must be capable of recognising benefits of semi-wild animals whose status does not fit comfortably in either wild or farm animal status.**
- 4 b) **The continued survival of the Dartmoor Hill Pony must be recognised and valued as a Public Good attracting Public Money because of their central role in the culture of the Dartmoor region.**
- 4 c) **Our experience strongly suggests that a Public Good payment of £100 per year per semi-wild Dartmoor Hill Pony or breed society Dartmoor Pony grazing on Dartmoor commons could ensure their future. The estimated total cost of this would be very small - £120,000 per annum. The wider impact of this proposal would be minimal because the case of the Dartmoor Hill Pony is unique in England (particularly their unique genetic make-up).**

5. Detailed Discussion

5 a) IMPORTANCE TO DARTMOOR HILL-FARMING CULTURE

- i) The history of Dartmoor's semi-wild Dartmoor Hill Pony herd can be viewed here: <https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A9a4ed1ca-a818-472f-a17d-ae4ffd94d136>
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 in the 1860s. Despite the impact of recent agricultural policy, the majority of ponies seen on Dartmoor commons are semi-wild Dartmoor Hill Ponies.
- ii) **Para 1(1)(c) of the Agriculture Bill provides an opportunity to recognise these herds as a Public**

Good because they are central to Dartmoor's upland culture:

Pony herds have roamed the region of Dartmoor for 500,000 years. The first known reference to these wild pony herds being distantly farmed is dated from the AD900s. This wild farming of indigenous pony herds is deeply imbedded in the culture of, and is now unique to, the Dartmoor region. Recognition of Dartmoor's semi-wild pony herds as a Public Good would allow these regional traditions to continue and be passed on to future hill-farming generations, preserving an iconic part of the Dartmoor landscape.

The sight of semi-wild pony herds on Dartmoor uplands is ancient and is enjoyed in modern times by visitors who come to enjoy the landscape and biodiversity these herds help to create. Their story is an ideal vehicle for spreading understanding of the hill-farming which underpins the nature observed and the beauty of the landscape – which is always painted or photographed with a pony in the composition.

The culture of wild farming pony herds has its own language and set of hill-farming skills. The Drifting of herds from their Lears once a year is an annual event which started by Henry VIII. There are 25 Drifts, involving 25 different teams of ponykeepers, covering the total area of Dartmoor uplands. Ponies selected for sale from the gathered herds are auctioned at the annual Pony Drift Sale. Without the pony herds, this language, these skills, would be lost and could not be replaced or relaunched.

If we lose the few remaining herds (totaling only 1200 ponies today) we lose the distant co-operative relationship between Man and beast: for example, 30 ponykeepers can Drift in 200 ponies over an open upland area of 18 square miles only because the herds pass on to their youngest generation an understanding of the Drift routes.

The current herds, if lost, can never be replaced. Re-introducing a new herd into an empty Dartmoor upland would be disastrous – would they know how to find water in freezing temperatures? Would they grind and process prickly gorse with their hooves to make it palatable when it is the only fodder available in the winter? Would their digestive systems take such a nitrogen-high diet? Would they co-operate with ponykeepers to enable the annual Drift? Such inherent knowledge can only be passed on by herd grandmothers, who learned it from theirs. The Dartmoor Hill Pony herds have not only this inherent knowledge, but also the rare genetics which provide them with the physical wherewithal to survive the upland harsh climate.

- 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: <https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Acbf2c89b-21ec-422b-a119-1dd7d3a837c1>
- ii) The analysis showed that the Hill Ponies of Dartmoor are one distinct type of pony, distinct to all other UK native pony breeds; distinct even to the Dartmoor Pony breed.
- iii) The analysis also showed that Dartmoor Hill Ponies have an extremely rare genetic make up, seen in only one other UK pony type the semi-wild ponies of the Carneddau mountains in Wales. It is worth remembering that we are talking about only roughly 1,200 Dartmoor Hill Ponies and that these do not exist anywhere else in the World. 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. Links to the Yakutian horse in Siberia and the Preswalski are indicated. 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.
- iv) Dartmoor Hill Pony and Dartmoor Pony genetics have been included in a world-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: <http://orlandoludovic.wixsite.com/pegasus-erc>
First results published in the journal Cell, May 2018 hint at the international importance of the Dartmoor Hill Pony genetics (as this is one of very few cases in which Arab horse bloodlines have not been mixed in): <https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A10e2faf9-a3fd-494b-be6d-b2b2aada4fa8>

5 c) SEMI-WILD AND NATIVE BREED AT RISK (NBAR)

- i) The Dartmoor Hill Pony is classed as semi-wild. Officials confirmed at a 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'. Semi-wild ponies breed naturally, so the sire of a foal is not known. This excludes them 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 cannot access financial support through Native Breed At Risk payments.
- ii) Unlike Dartmoor Hill Ponies, the Dartmoor Pony can access such financial support where made available because it is entered on the Native Breeds At Risk register.
- iii) Excluding the genetically-rare Dartmoor Hill Pony from the Native Breeds At Risk register

distorts the market for selling ponies from Dartmoor for conservation grazing: organisations purchasing ponies for conservation grazing will choose to buy only those on the register. This has devalued the Dartmoor Hill Pony at market.

Para 1(1)g of the Agriculture Bill offers an opportunity to address this disadvantage.

5 d) NEGATIVE IMPACT OF AGRI-ENVIRONMENT SCHEMES TO DATE

- i)** The Higher Level Stewardship agri-environment scheme (2008-present) included an optional prescription (incentivised by extra payment) if a minimum percentage 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 unplanned impact of this prescription was to incentivise the culling of the pony herds to make way for cattle.
- ii)** In addition, 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 and farmers cannot afford to reduce their profit margins, resulting in herds being culled to make way for cattle and sheep.

Para 1(1)(g) of the Agriculture Bill provides an opportunity to address this disadvantage.

5 e) NOT SUSTAINED BY MARKET

- i)** The traditional markets for Dartmoor semi-wild pony herds are lost: working beasts on farms, quarries and mines; food to mainland European markets.
 - ii)** The modern market for Dartmoor's semi-wild ponies, as riding and driving ponies, is diminishing – a trend experienced across the UK for all equines.
 - iii)** The modern emerging market for Dartmoor's semi-wild ponies to be sold for their meat is growing but is, as yet, not big enough to sustain the moor-wide herds. See Dartmoor pony meat products here:
- <https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Ac0c363ce-ebec-458b-ac47-e465d5695ae1>
- iv)** 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:

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

And here:

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

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 suggests that sheep, cattle and pony herds are all similarly unprofitable.

- v) Cattle and sheep, however, are artificially made profitable by DEFRA farm payments. Pony herds on Dartmoor commons are not. They are therefore considered 'worthless'.
- iv) This submission argues that financial support must be allocated to ponies through Payment for Public Goods and proposes an annual payment of £100 per pony.
- v) A draft Pony Payment Scheme has been designed and agreed outlining the traditional responsibilities a pony-keeper agrees to undertake in return. It can be seen here:
<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A16d3cb0c-7783-4ddf-bec1-5711aad06813>
This draft scheme has been confirmed to be State Aid compliant:
- vi) <https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3A75ae6f4f-5e7c-4647-bfaf-01c4dd9ee836>
We believe the Pony Payment Scheme is suitable for use as Public Payment for Public Goods under the Agriculture Bill 2019-20 and would like it to be included in Tests and Trials.

5 f) CONSERVATION GRAZING

Semi-wild pony grazing has been shown to have major benefits for biodiversity.

Click here: <https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Aascds%3AUS%3Ac36ae776-e2eb-48bb-8d85-d55313ab52c3>

- i) The paper above, by Fraser, Stanley and Hegarty, outlines the value of semi-wild pony-grazing on the biodiversity of UK uplands. It is peer-reviewed and published in the scientific journal *Biological Conservation*, May 2018. It concludes that:-
- 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.
- 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.
- 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).
- 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.
- vi) Please click here:

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

and here:

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

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).

- v) Unlike sheep and cattle, ponies are not ruminants: this means they not only deliver the benefits of conservation grazing but also produce significantly lower volumes of greenhouse gases. Click to read the article in *Evolutionary Ecology Research, 2010*:

<https://documentcloud.adobe.com/link/track?uri=urn%3Aaaid%3Ausc%3AAdd2569ca-2aed-4286-9c90-df256c2ae368>

5 g) **CONSERVATION GRAZING WHEN CATTLE ARE NOT AVAILABLE**

- i) Increasingly, throughout the UK, where cattle are not available or public access requires gentle livestock through which the public are comfortable to walk, or there is a need for easily handled grazing animals, landowners use ponies for conservation grazing. Examples of organisations using ponies for conservation grazing are: Natural England, RSPB, National Trust.
- 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 published paper – see 5(f).
- iii) In the case of Dartmoor, financial support to ensure the future of semi-wild Dartmoor Hill Pony herds on Dartmoor’s upland provides an essential safety net of upland conservation grazing should, as feared, commons experience abandonment by tradition hill-farming and the removal of cattle.
- 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.
- v) The value of semi-wild ponies to conservation grazing already recognised by landowners and academics needs to be formally encapsulated and financially supported in UK Agricultural Policy.
Para 1(1)(g) of the Agriculture Bill provides an opportunity to do this.

5 h) **VALUE TO TOURISM**

- 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.
- 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:

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

UK National Parks are currently tasked by DEFRA to increase the number of visitors by 10%.

- iii) Ponies have a role to play in achieving this target for Dartmoor.
- 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.

CONCLUSION

The recognition of Public Payment for Public Goods in the Agriculture Bill 2019-20 is a rare opportunity to save the Dartmoor Hill Pony herds on Dartmoor. Doing so would be an early and clear proof of concept of this new basis of payment to farmers, provided that it can be applied to animals classed as semi-wild. If implemented quickly, it would reverse the effects of past DEFRA policy, which has created welfare issues for the semi-wild herds of Dartmoor that threaten their future existence:

- ◇ **past 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 has not been formally recognised by Natural England.** Their contribution to the benefits to upland biodiversity in the way they graze alongside cattle and sheep needs to be positively valued in future agri-environmental schemes through Public Payment for Public Goods.
- ◇ **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.** Recognising that Dartmoor Hill Ponies are a Public Good attracting payment compensates for the current refusal to recognise the status of Semi-Wild, supported by genetic analysis, as equally valued as Breed status.

Current DEFRA schemes and policy have inadvertently incentivised that semi-wild pony herds which have stood on Dartmoor for at least 4,000 years, be shot. Recognising Dartmoor Hill Ponies as a Public Good within the 'Beauty, heritage and engagement with the environment' theme puts this right.

Change is needed for semi-wild Dartmoor Hill Pony herds. 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.

A draft Pony Payment Scheme Contract has been designed and agreed, ready to engage with DEFRA's Test and Trial process for Public Payment for Public Goods. This draft scheme has been confirmed to be compliant with State Aid regulation. We believe the Pony Payment Scheme is suitable for use as Public Payment for Public Goods under the Agriculture Bill 2019-20 and we are ready to engage with the Test and Trial process.

Dartmoor's Commoners' Associations
Dartmoor Hill Pony Association
Pony Working Group
The Dartmoor Society
The Dartmoor Preservation Association
Dartmoor Commoners' Council
The All Party Parliamentary Group for the Horse

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