

Written evidence submitted by The Wildlife Trusts (AB52)

1. The Wildlife Trusts believe there is much potential for the Agriculture Bill and we welcome its core focus on public money for public goods. In this evidence submission, we set out ways the Bill could be strengthened to deliver the step change that is needed in securing a sustainable future for farming, wildlife and the climate.

The Wildlife Trusts as land managers

2. The Wildlife Trusts protects, champions and acts for wildlife and wild places on land and at sea. We believe that people are part of nature; everything we value ultimately comes from it and everything we do has an impact on it.
3. The Wildlife Trusts are a UK-wide movement of 46 independent charities with more than 850,000 members and 35,000 volunteers. We manage over 100,000ha land over 2,300 nature reserves, own 29 working farms, and provide advice to more than 5,000 landowners each year on topics ranging from reducing pesticide use and restoring peatlands, to mitigating flooding and species reintroductions.
4. We want future land management policy and programmes to be a success. Currently, nine Wildlife Trusts across England are leading five Defra Environmental Land Management (ELM) Tests and Trials (see Annex 1) with a further ten in development for the second phase of Tests and Trials.
5. We are members of both [Greener UK](#) and [Wildlife and Countryside Link](#) and support the proposals¹ for the Agriculture Bill of both these groups.
6. The Wildlife Trusts believe that the Agriculture Bill is a once in a generation opportunity to move towards a more sustainable, agroecological food and farming system.

Farming and the climate and nature emergency

7. Awareness of the impacts of food production on the natural environment is higher than it has ever been. New statistics show that 9 out of 10 adults in England are concerned about the increasing threats to the natural environment, with nearly two-thirds specifically worried about biodiversity loss². This sits alongside a drop in the social acceptability of damaging farming practices. A series of reports published over the last few years, including the State of Nature and Intergovernmental Panel on Biodiversity and Ecosystem Services (IPBES), have shone a light on the urgent crisis facing both our climate and wildlife. Civil society movements, including the School Climate Network and Extinction Rebellion have joined an ever louder and strident call for urgent action.

¹ Greener UK/Wildlife and Countryside Link, 2020. Parliamentary briefing: Second reading of the Agriculture Bill: https://greeneruk.org/sites/default/files/download/2020-01/GreenerUK-Link_AgBill_2nd_reading_briefing_28Jan20.pdf

² Defra, 2019. Public concern for nature reaches all-time high: www.gov.uk/government/news/public-concern-for-nature-reaches-all-time-high

8. Farming is one of the main causes of wildlife declines³, but with management of over 70% of UK land, farmers can help provide the solution too. The Agriculture Bill is a landmark piece of legislation and - if accompanied by intelligent policy design and sufficient funding - could mark a step change in addressing the challenge. It must enable farmers and land managers to be supported to help to reverse the fortunes of wildlife and our shared natural environment. This is not just important to tackle the current ecological crisis; it is also essential to nurture a resilient and sustainable food and farming sector.

Rationale for incentivising the delivery of public goods

9. A thriving natural environment is fundamental to the security of the economy and wellbeing of society, but it is under strain. The majority of England's wildlife depends on the remaining areas of semi-natural habitat that are less intensively farmed within the countryside⁴. Yet pollinators and natural habitats are in decline; carbon is escaping from soils⁵ and rather than holding water, soils are washing into our rivers and flowing out to sea⁶. Society is bearing the costs of this. Soil degradation costs £1.2bn a year in England and Wales (80% of which is incurred by non-land managers)⁷. For every £1 spent on food there is 25.7p cost of natural capital degradation and a 10.6p biodiversity loss. These costs are passed on to society in a range of hidden ways – from water bills to insurance costs⁸.
10. The Wildlife Trusts believe that the health of the natural environment should be at the heart of future agriculture and land management policy – which means designing a new system based on environmental outcomes and public benefits. We believe that public money should be invested providing public goods which the conventional market will not pay for.
11. There is an economic as well as a social and moral imperative to improve and maintain our country's natural infrastructure – our rivers, woodlands, peat bogs and meadows – our natural capital. This cannot be done through the open market so there is a strong case for government intervention. Farmers can sell the food they grow through the market and this should be valued highly. Farmers need to be rewarded for the work they do that delivers other benefits or services they cannot sell but that society needs.

³ State of Nature, 2019: <https://nbn.org.uk/stateofnature2019/>

⁴ Defra, 2018. Future Farming and Environment Evidence Compendium. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683972/future-farming-environment-evidence.pdf

⁵ Stoate, C. *et al.*, 2001. Ecological impacts of arable intensification in Europe. *Journal of Environmental Management*, **63**: 337-365.

⁶ Boardman, J., Shepherd, M.L., Walker, E. & Foster, I.D.L. 2009. Soil erosion and risk-assessment for on- and off-farm impacts: A test case using the Midhurst area, West Sussex, UK. *Journal of Environmental Management*, **90**: 2578-2588.

⁷ Graves, A.R. *et al.*, 2015. The total costs of soil degradation in England and Wales. *Ecological Economics*, **119**: 399-413.

⁸ Sustainable Food Trust, 2017. The Hidden Cost of UK Food: <http://sustainablefoodtrust.org/wp-content/uploads/2013/04/HCOF-Report-online-version-1.pdf>

Paying for public goods - Agriculture Bill, Clause 1(1)

12. The public goods that farmers will be rewarded for are contained in Clause 1.1 of the Bill. Under this clause, we see the potential for the restoration and expansion of England's threatened habitats and the species which rely on them. However, **the provision is not sufficient in itself – it will need long-term targets, plans and funding.**
13. We **welcome the inclusion of soil** in the listed public goods. Farmers should be rewarded for best practice in building soil carbon and soil organic matter. **Integrated Pest Management (IPM)** is critical to helping improve both soil health and improving the fortunes of insects, which a recent report⁹ by Professor Dave Goulson for The Wildlife Trusts highlighted are in free-fall.
14. **Regulation** must also play a part in deterring poor soil management, as the January 2020 IEEP report, *Risks and opportunities of a post-EU environmental regulatory regime for agriculture in England*, commissioned by The Wildlife Trusts, RSPB and WWF outlines¹⁰.
15. It is imperative that the Bill includes a provision for **financial assistance programmes to complement rather than undermine each other** so that all spending on productivity measures contributes to the provision of public goods, securing win-wins for farming and the environment, and contributing toward more sustainable, humane food production. **Coherence and clarity are required in the interplay between different support schemes.**
16. A recent report for The Wildlife Trusts, National Trust and RSPB, illustrates how this can be done in the uplands, showing how reducing stocking levels combined with other measures can both improve profitability and environmental outcomes: *Less is more: Improving profitability and the natural environment in hill and other marginal farming systems*¹¹.

Long-term funding and planning to meet the climate and nature emergency

17. There is currently no long-term funding framework outlined in the Bill. The Wildlife Trusts want to see this addressed with a **long-term funding framework** in the Bill to build on the Conservative manifesto commitment to maintain funding for farming by providing the certainty that farmers need to have confidence in these reforms.

⁹ Goulson, D., 2019. Insect Declines and why they matter:

<https://www.flipsnack.com/devonwildlifetrust/insect-declines/full-view.html>

¹⁰ IEEP, 2020. Risks and opportunities of a post-EU environmental regulatory regime for agriculture in England:

<https://ieep.eu/uploads/articles/attachments/382e1f08-fa94-412a-9314-bbbfcf194d53/Post%20EU%20exit%20Regulatory%20Framework%20-%20Final%20-%20Jan%202020.pdf?v=63747936653>

¹¹ RSPB, National Trust and The Wildlife Trusts, *Less is more: Improving profitability and the natural environment in hill and other marginal farming systems*, 2019:

<https://www.wildlifetrusts.org/sites/default/files/2019-11/Hill%20farm%20profitability%20report%20-%20FINAL%20agreed%2015%20Nov%2019.pdf>

18. We welcome the inclusion of ‘Multi-annual financial assistance plans’ in the new Bill (Clause 4), but provisions for providing certainty of funding should be strengthened. Specifically, we want to see an amendment to require the Secretary of State to **set out the budget available for each financial assistance scheme created as a result of the Bill as part of the multi-annual financial assistance plans already provided for in the Bill.**
19. Alongside the Environment Bill, the Agriculture Bill should create a matching long-term Environmental Land Management (ELM) funding framework based on an assessment of environmental need and the contribution needed from the land management sector in meeting environmental targets¹². The Agriculture Bill should therefore also **make provision that the budget be based on an independent assessment of the scale of funding needed to achieve objectives related to the purposes set out in clause 1(1).**
20. The assessment of the scale of funding needed should connect directly to the targets set in the Environment Bill given that the ELM scheme is a key delivery mechanism for the Government’s environmental ambitions. One such ambition is to deliver net zero – and whilst climate mitigation is one of the public goods outlined in clause 1(1), The Wildlife Trusts would like to see the Bill place a **duty on the Secretary of State to set a net zero target for agriculture and related land use** and ensure that all financial assistance given as a result of the Bill is compatible with, and adequate to meet, this target.
21. Research released in 2019 showed that at least £2.5 billion is needed to support farmers and land managers to pay for ‘public goods’ such as creating and enhancing wildlife habitats, planting trees, protecting soils to enable farming to continue in the future, and to ensure clean water¹³. But more is needed: the research also asks about the costs of providing supporting advice, delivering public goods in places where the farming system itself is important for nature, such as in parts of the uplands, the costs to lock-in the public goods associated with long term land use change, and the role of alternative payment approaches. When these other costs are factored in, the estimated budget increases to at least £2.9 billion.
22. To support the delivery of both the Environment and Agriculture Bills, **Defra should create a decision-making framework setting out a spatially coherent vision for the recovery of the natural environment, to support access and connection with nature, landscape character and improve natural capital.** This should include the spatial expression of national targets (e.g. targets for peat restoration are not appropriate in Kent), how priorities will be harmonised across the range of public goods ELM seeks to

¹² Greener UK/Wildlife and Countryside Link, 2020. Briefing for Commons Second Reading of the Environment Bill: https://greeneruk.org/sites/default/files/download/2020-02/Greener_UK_and_Link_briefing_for_second_reading_of_the_Environment_Bill_February_2020.pdf

¹³ RSPB, National Trust and The Wildlife Trusts, Paying for public goods from land management: How much will it cost and how might we pay?: <https://www.wildlifetrusts.org/sites/default/files/2019-09/Paying%20for%20public%20goods%20final%20report.pdf> and Policy Briefing: Paying for Public Goods from environmental land management in England – an introduction: https://www.wildlifetrusts.org/sites/default/files/2019-09/Making%20Public%20Goods%20Pay_England%20Policy%20Briefing%20September%202019.pdf

deliver, and how trade-offs will be managed across national, sub-national and local scales.

23. Mapping a **Nature Recovery Network**, a joined-up system of places needed to allow nature to recover, is critical in mapping where to protect and manage existing important wildlife sites and where to restore or create new habitats to enable nature to be replenished back to healthy levels. It needs to be done nation-wide, using local data and a nationally consistent methodology throughout the country and integrated into ELM.

Trade

24. The Wildlife Trusts believe that it is essential that **future trade deals protect British farmers from being undercut by imports that do not meet UK standards**. The government has not yet set out the specifics of how it intends to ensure that environmental, animal welfare, and food safety standards will be maintained throughout all future trade deals. Nor has it made a commitment that imported produce will have to meet the same standards as UK produced food. **The Wildlife Trusts support amendments NC1 and NC4 which both place a requirement for imported produce to meet UK standards in law**, giving certainty to farmers that they have a level playing field, and to consumers that their food meets the basic standards we currently enjoy.

Regulation

25. A major gap in the Agriculture Bill is the absence of powers to protect the environment and animal welfare and better regulate farming and land management, building on our current baseline standards. The Wildlife Trusts encourage an amendment which would **confer a duty on the Secretary of State to establish a regulatory framework which sets a baseline of basic good practice over and above which farmers and land managers can be paid for delivering public goods**.

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Annex 1 – Wildlife Trusts Phase 1 ELM Tests and Trials

A facilitated, farmer-led approach to the delivery of environmental public goods on a landscape scale across	Gloucestershire Wildlife Trust Worcestershire Wildlife Trust Berkshire, Buckinghamshire, Oxfordshire Wildlife Trusts Hampshire and the Isle of Wight Wildlife Trusts
A natural capital base, farmer-led model of the delivery of environmental public benefit on a landscape scale in the uplands	Cheshire Wildlife Trust
Farmer-led collaboration to deliver a landscape plan	Staffordshire Wildlife Trust
Delivering ELMS at a landscape scale through Farmer Clusters	Kent and Sussex Wildlife Trusts
Assessing the natural capital value of Cornwall's nature reserves	Cornwall Wildlife Trust