

Health and Harmony: the future for food, farming and the environment in a Green Brexit

Consultation questions and responses

This response is submitted by hill farmers in Cumbria who graze common land (commoners) as part of their overall farm business. This response has been collated by the Federation of Cumbria Commoners after a number of meetings and discussion with hill farmers about the questions in the Health and Harmony paper.

The Federation of Cumbria Commoners is a hill farmer owned and managed membership organisation and represent around 500 hill farmers who farm common land, mainly in Cumbria but also Northumberland, Lancashire and Durham. Our members look after some England's most designated and highly valued land - the common land of the Lake District and the Pennines. The majority of our members are in higher level agri-environment scheme agreement and they currently deliver an impressive array of public benefits (see www.cumbriacommoners.org.uk)

Chapter 2: Reform within the CAP

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*

Due to the complexity of land tenure, shared agreements on common land are by their nature more complex than agreements on sole occupancy land. The options offered above are based on sole occupancy land. We have always argued that common land needs its own options rather than trying to shoe horn common land into systems designed for sole occupancy land.

- a) Currently the "simplified" uplands options are not available to commoners. The government should consider developing packages relevant to managing common land that must include, and provide for, the additional costs of establishing and running commons agreements
- c) Would only be appealing if the RPA's computer system worked better for common land. Currently we can't view maps of our common on the RPA's system. Nor do we get a breakdown from the RPA on how our BPS is calculated for common land.
- d) We would like a proportionate approach to evidence requirements particularly as Commoners' Associations act as the umbrella claimant for agri-environment schemes rather than individual farm businesses.

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?

Countryside Stewardship does not work on common land and we do not support the scheme. Below are a number of suggestions to improve the delivery of schemes in general.

- All year round application process or at least quarterly application windows
- Guaranteed timeline for payments so that farmers can set realistic budgets and better manage their cashflow with the comfort that they know they will get paid in time
- More options that are attractive to commons
- Simplify identification of capital works on the maps and in the claim

- Increase area payment rates and more attractive capital works elements, including higher supplements for difficult sites
- Give ability to negotiate grazing calendar, so that it better fits with the farm enterprise
- Reduce current requirements for ongoing evidence. Contrary to what we have been told, CS requires an increase in the bureaucratic burden and red tape.
- Help with applying to the scheme from NE staff or advisers who have a credible understanding of commoning, commons land and the governance required to achieve the collective delivery of environmental outcomes
- Remove the landowner' right of veto to avoid commoners being held to ransom by them

Chapter 3: An Agricultural Transition

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

£25k threshold is too low for extensive hill farms with poor quality land. On hill farms direct payments make up a significant proportion of total farm income, which, according to the Farm Business Survey, is only about half the total income per farm of their lowland peers. Hill farmers' incomes will be hit disproportionately by a progressive reductions starting from relatively low threshold of payment bands and due the low productivity of their land they will be hard pressed to make up this loss of income. A threshold needs to take into account the quality and productivity of the land too, where farmers farming poor quality land are set a higher band before progressive reductions apply.

b) Apply a cap to the largest payments

Agree, especially cap payments to wealthy individuals, companies and charities.

If, in the future BPS or similar payments to common land are channelled through Commoners' Associations who then divided the monies up among a number of farm businesses, applying a cap to a large payment with multiple beneficiaries would not be fair or equitable.

c) Other (please specify)

Consider applying payments linked to labour units on a farm i.e. the more labour the smaller the Direct Payment reduction. Like all payments the design will need to find ways to stop people trying to get round the rules.

Consider a higher payment rate for the first 20 ha of land and then progressive reductions to payment rates according to size of land holding e.g. 20 – 50 ha; 50 –250 ha; 250 – 500 ha etc. Land quality needs to be taken into account when calculating overall ha of the holding before progressive reductions are applied using an agreed conversion rate. This would put farmers on a level playing field and be fairer to the hill farmer with an extensive land holding of poor quality land, including common land.

Payments to genuine active farmers only using a clear unambiguous, tight definition of active farmer and evidence to demonstrate this such as livestock/ crop sales through the farm business.

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

We do not have a preferred option, instead we will provide comments on relevant options

a) Retain and simplify the current requirements by removing all of the greening rules – not applicable on common land

b) Retain and simplify cross compliance rules and their enforcement – important to retain cross compliance to maintain high standards, but need to review and correct rules which are not appropriate and hence don't work on common land managed by shared grazing. E.g. livestock movements on and off commons and 6-day standstill periods and movement restriction. These do not make sense on common land as livestock from different holdings can be in contact with each other as they are managed using traditional collective systems.

c) Make payments to current recipients, who are allowed to leave the land, using the payment to help them do so We would like clarification of who is doing the "allowing" i.e. who makes the decision to allow current recipients to leave the land? If this is a voluntary decision on behalf of the person leaving the land then this could be a way to allow older farmers to retire with dignity and break log jam so new entrants can get land to start in farming. However, if this leaves land without BPS it is likely that only large farms can take over the land hastening farm mergers and reducing the opportunity for young farmers/new entrants to get into farming. While the suggestion is attractive it may have unintended consequences and deliver negative outcomes.

d) Other (please specify)

Recent new entrants to farming should not receive reductions to their Direct Payment.

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

Underpinning principle should be that the "profile" is informed by an understanding of the vulnerability of hill farming business, the dynamics of land tenure and how these farms make a living. Many hill farmers who farm common land as part of their overall farm business are tenant farmers. For most tenants the entitlements they hold to claim BPS are the only source of government support they can claim in their own right and independent of their landlord. Other funding sources such as agri-environmental schemes need the landowners' signature/ approval. Moving completely away from direct payments to payments for public good may take this autonomy away from tenant farmers and increase the landlord's hold over them.

We suggest that direct payments should not be reduced to zero, but should be capped to a level to provide a food security buffer through protecting farm production as the UK exits the EU and beyond. These payment should be conditional on delivering a standard of good farming practice agreed between the farming industry and government. In addition direct payments may be needed to provide a safety net for sheep farmers until trade deals for sheep meat are negotiated, decided and the consequences of the deal are understood. Unfavourable trade deals could turn the transition into a cliff edge, regardless of funding to pay for delivery of public goods

How long should the 'agricultural transition' period be?

The length needs to be as long as it takes to allow a smooth transition from one system to another and should be monitored carefully to avoid a cliff edge. It must be remembered that on common land it currently takes up to two years to negotiate and agree to enter a scheme by all parties. Therefore, for commons at least, the transition period needs cover an additional two years after the introduction of new schemes.

Chapter 4: A successful future for farming

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 - 1

b) Working with industry to improve standards and coordination - 2

c) Better access to skills providers and resources – depends on the quality of the skills providers

d) Developing formal incentives to encourage training and career development

e) *Making Continuing Professional Development (CPD) a condition of any future grants or loans* – could work if CDP is relevant to the farmer

f) *Other (please specify)* increase resources and support to Farmer Networks that are currently in existence so they continue delivering farmer-to-farmer research learning and knowledge transfer

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:

It is difficult to rank these issues in order of importance as much depends on the individual circumstances for the farmer and the stage they are at in their farming career. All equally important for productivity and resource efficiency, or will be in the near future

a) *Insufficient access to support and advice* – very important but needs to be good quality, relevant advice that is affordable and potentially free for certain issues

b) *Uncertainty about the future and where to target new investment* – clearly important to those farmers that have the resources to make significant new investments.

c) *Difficulties with securing finance from private lenders* – crucial issue for new entrants, young farmers and those wanting to expand

d) *Investments in buildings, innovation or new equipment are prohibitively expensive*

e) *Underlying profitability of the business* – this is a significant issue for hill farming as they are at the bottom of the supply chain

f) *'Social' issues (such as lack of succession or security of tenure)* – can be an important issue on some farms

g) *Other (please specify)*

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

Access to lower interest loans and offer a repayment holiday, if needed. Provide grants on machinery, buildings, livestock handling systems, measures to reduce diffuse pollution and renewable energy investments. No reductions in direct payments to new entrants over the transition period. Replicate the Scottish Young Farmers and New Entrants Schemes in England. Support for succession planning for farmers considering leaving farming by boost the end payments for 2 years before the farmer retires.

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

Yes, tenancies are too short for adequate management on common land. For those on 15 year FBT there needs to be a review at 10 years and a decision as to whether they can renew their tenancy at 15 years. This allows the tenant the confidence to plan and invest for the future, including considering innovation.

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* – sheep worrying, control of dogs

c) *Leadership*

d) *Engineering*

e) *Manufacturing*

f) *Research* – into upland farming and effects of climate change on vegetation and flood management, including Natural Flood Management. How does NFM fit into traditional farming practices, there is a need to document local knowledge and gather evidence, before wholesale introduction of these techniques on the hills.

g) *Other (please specify)*

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

Ease access to land/farm tenancies for new entrants/ young famers. Support big landowners and environmental charities to let a percentage of their farms to new entrants. Replicate the Scottish Young Farmers and New Entrants Schemes in England. Apprenticeship programmes. Work with schools to raise the profile of farming as a career choice. Support agricultural colleges to raise standards for all. Additional funding and opportunities for further professional development and training for young farmers.

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

Chapter 5: Public money for public goods

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 – also include maintain and sustain the biodiversity we already have on commons
- e) Climate change mitigation
- f) Enhanced beauty, heritage and engagement with the natural environment

All of these are essential environmental public goods and it is impossible to prioritise one over any other. Nevertheless the priorities for support will vary between areas depending on the most pressing issues for each locality. Farmers, land owners, environmentalists and government staff could benefit from working together to agree on local priorities with reference to national strategies and national and international designations.

Public payment for public goods raises the question - how is that value measured, understood and translated into monetary reward? We need some assurance that a first step is for Defra to demonstrate good practice, if indeed they can identify it. If not then what mechanism will form the process of negotiation that ensures equity and respects the legal rights of commoners. How will landscape be measured and evaluated - it has been by-passed in ES completely yet many of the schemes run in AONB and National Park areas where landscape is a key value.

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*

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

All the options listed above are important and difficult to separate out. But clearly as hill farmers grazing common land as part of our overall farm business preserving rural resilience, traditional farming and landscapes is high on our agenda.

Today around 1,000 commoning families with a long proud history of farming use their rights of common to graze the Cumbrian fells and produce naturally-reared meat and excellent livestock. But the vast majority of these farms cannot survive in their present form without public payments. We believe that maintaining traditional practices of commoning and hill farming that keep hefted self-maintained flocks grazing the common is a public good and needs a level of financial support. Initiatives could include financial support for farmers to keep hefted self-maintained flocks, prescribing a minimum stocking rate and minimum grazing period – similar to the previous Upland Entry level scheme (UELS). We also need to be part of an overall vibrant and healthy farming industry that thrives into the future.

Cultural Heritage should be as important as environmental goals especially as the Lake District is now a World Heritage site, in the past the cultural heritage has to a large degree been ignored by many of the agencies.

Commons provide free public access for recreation already. They are heavily used by millions of people and they contribute greatly to the health of the nation. This should be taken into account if public access is included payments for public goods. For example if the payments are for creating new public access only, then commoners will be disadvantaged.

Food production and food security are barely mentioned in the paper. As a nation, we are becoming increasingly less self-sufficient, with the latest figures showing that we import almost half of all our food. There seems to be no clear plan from the Government about how we carry on feeding ourselves. Food production and enhancing the environment should be integrated throughout policy making.

Chapter 6: Enhancing the Environment

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 of these outcomes are equally valuable and can be incentivised by farmers working together to develop all aspects of environmental management with food production. But some will be more relevant than others in specific locations. All are acceptable to most commoners, except perhaps woodlands and forestry on common land in inappropriate locations.

Many commoners have 30+ years experienced of delivering complex schemes on common land with their fellow commoners. Their experience and learning should be sought in the design of the new Environmental Land Management Schemes across a number of farms.

Commoners need schemes specifically designed for common land. Larger schemes, in particular, may require trained advisors/facilitators with credible knowledge of commoning to ensure the active engagement of commoners' associations and individual commoners in the co-design of local and practical schemes which address the real conservation needs of the common and yield real agricultural and environmental benefits. As the agriculture management of common land forms part of the overall farm business, conservation grazing activities on the common have to fit in with the rest of the farm business.

It is also important to note that actions on individual holdings will also provide important benefits and should not be forgotten.

Cultural heritage implies a shared bond, belonging to a community. Commoning represents part of our farming history and our identity; our bond to the past, to our present, and the future. It is a collective activity and passed down to us from our parent. Unesco has recognised the cultural heritage of Lake District farming is worthy of being preserved for the benefit of all and for future generations.

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

To work there must be a clear outcomes with little ambiguity that can be translated into achievable step-by-step results that farmers can deliver and get paid for. In this way conservation activities can become as much a product for the hill farmer/commoner as the livestock they produce. In addition to environmental outcomes we would like to see cultural heritage outcomes that maintain traditional practices of commoning and hill sheep farming and high quality meat and breeding livestock production.

The outcomes must be agreed and understood by the farmer and the agency administering the agreement. Regular monitoring, including farmer self-monitoring gives confidence to both parties that they are heading in the right direction – by delivering the required results that lead to the outcomes. The current approach to monitoring is to a degree flawed. Simply recording around the somewhat questionable principle of vegetation in favourable condition is not adequate for a number of reasons. Monitoring of any venture is to modify the predictions of modelling, so that management is refined as observations indicate whether changes are too slow, too rapid or just right. Therefore monitoring needs to address the needs of all key stakeholders. Commons are the habitat of sheep and cattle and livestock performance should be taken into account in monitoring and outcomes.

The time to achieve the outcome must be realistic, some can be achieved quickly (e.g. repairing boundary walls) and others take many years. This does not pose an issue if the time line is clear and achievable (moving towards establishing a specific type of vegetation rather than seeing it established). Enabling the farmer to be involved in setting the outcomes and the results needed to achieve the outcomes will increase ownership of the agreement and likely success.

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

Incorporate a process that genuinely includes co-production and agreement of locally specific environmental outcomes between farmers/ land managers and government agency staff. It is important that environmental land management systems support sustainable farm production systems as key to delivering environmental outcomes.

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

Through meaningful communications between all parties to achieve understanding of the issues and obtain an appropriate balance between agricultural and environmental interests. Up till now communication between farmers and government agencies has been inadequate. It can feel like two populations living on two planets operating in parallel without an effective means of communication.

Chapter 8: Supporting rural communities and remote farming

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

A more rounded approach is needed to support to commoning and hill farming. This should include the consideration of agricultural production as well as environmental benefits. Whilst change is inevitable and even desirable, there is the need to respect the role of hill sheep farmers as producers of food and cultural heritage. Otherwise, hill farmers will be replaced by “conservation graziers” who will probably not have the same skill and motivation, strength, stamina and local knowledge to effectively shepherd the high fells. There could be a level of abandonments of the high fells and weakening of the unique Lake District and Pennines farming system and diminishing the rich cultural heritage of the area. This means broadening the objectives of support payments to include a level of support to agricultural production and cultural heritage. We need viable farms to maintain the cultural heritage of common land.

This could be delivered through tailor-made, locally specific agreements on commons with a base universal scheme to pay for landscape and access plus additional payments for delivery of environmental benefits

Support to deliver practical on-farm training on common land management for: new entrants to commoning; agency staff; and officials.

Support for farmers and land managers to communicate and inform tourists, school children and the general public on hill farming and commoning via guided farm walks; farm open days; opportunities for volunteering (if appropriate).

Local government and national government to deliver on rural affordable housing policy; discourage (through taxation) second home ownership in protected landscapes; insist that house developers supply affordable eco-housing; support community housing and other innovative schemes such as rent to buy eco-houses; support housing associations to provide rental accommodation in rural areas.

Support to public transport so that people without cars - young people, old people who don't want to drive anymore, people who can't afford to run a car – can live in rural areas.

Proportionate regulation so that small local abattoirs so they can stay in business.

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

All are important, but in some locations some options may be more important than others

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?

Listen to local peoples' views. Well financed rural development schemes - including a new version, but much less bureaucratic version of LEADER funding.

Relax planning laws to make it much easier to convert redundant farm buildings/build low impact dwellings for family farm members and farm workers.