

The Agriculture Bill:
Sustainable Food Trust's ambition for the future of food, farming and the environment

The Sustainable Food Trust welcome the UK Government's introduction of the Agriculture Bill to Parliament and the adoption of a whole-farm approach to farm policy, which integrates efficient and sustainable food production with practices that maintain and enhance natural and human capital. We support their objective to design a new agriculture support system that corrects the economic distortions that currently exist within food and farming and reintegrate food systems in harmony with the natural environment. Such an approach could have multiple benefits, including climate change mitigation, improvements in biodiversity and encouraging better diets and public health outcomes.

To achieve the systemic shift towards more sustainable farming methods, we need to unlock the barriers to change since the current business model means that most farmers have no option but to employ agricultural practices that do not serve the public interest in terms of its impacts on environment and public health. Through the new Agriculture Bill framework, the UK Government has the opportunity to create the economic conditions where farmers are financially supported for adopting sustainable practices, which can then emerge as the most profitable and economically-viable way of producing food.

The Value of Area-Based Payments

One of the key provisions includes phasing out Pillar I area-based payments. We recognise the logic associated with this proposal on the basis that current eligibility for such support requires little more than adherence to minimum environmental standards. However, one of our core concerns is that by taking this action, the 'baby' of area-based payments will be thrown out with the 'bath water' of the social security element of the existing Common Agriculture Policy scheme. Instead, we believe that many of the desired changes in farming practice would be most effectively delivered through a whole farm support package, much of which should be based on land area. Such a scheme could include a number of options - some applicable on a field scale, some on a whole farm scale, and some of a more tailored stewardship nature, which together would ensure a systemic, rather than piecemeal, adoption of more sustainable farming practices.

Strengthening the Environmental Land Management Scheme

To achieve the systemic shift that is needed, we would advocate using the proposed Environmental Land Management Scheme to challenge the current business model that most farmers (quite understandably) follow that pushes them towards industrialised agriculture that does not operate within the best interests of the environment and public health.

However, it is critical that the entirety of the farm be managed in a sustainable manner if farmers are to receive payments. If farmers enter only part of their farm into an Environmental Land Management contract while continuing to manage large areas of farmland in a business as usual, highly intensive way, they should not be eligible for payments. By allowing a piecemeal approach of greening only the edges of fields and isolated areas of good practices within deserts of intensive agriculture, we will not achieve the systemic shift in farming that is needed to reverse the catastrophic declines in wildlife and other aspects of natural capital. Producing high quality, health-promoting food from production systems that avoid damage to the environment while maintaining and building natural capital, should be the prime objective of a reformed agricultural support package. This should not be eclipsed by piecemeal environmental measures.

Proposed policies to be implemented under the Environmental Land Management Scheme

To enable the widespread shift towards a **food production system that is truly integrated and functions in harmony with nature**, the Sustainable Food Trust recommends that the Government introduce a suite of sustainable farming policies that could transform UK food and farming, acting as a beacon for others to follow. These should include:

- Rewarding farming systems that build and maintain **soil carbon** through crop rotations that include a soil fertility building phase, usually with clover/grass to reduce inputs and improve long-term soil health.
- Incentivising the maintenance of holistic systems of **grassland management** that deliver greenhouse gas reduction, carbon sequestration, improved water management and increased biodiversity above and below the soil line.
- Applying the '**polluter pays principle**' to ensure financial accountability for practices that negatively impact environmental and public health so that those whose practices have negative impacts bear the financial costs of that damage with the money raised being used to help support good farming practices.
- Supporting **small-scale regional horticulture** with an emphasis on investment in vertically-integrated supply chains that focus on provenance and increase public access to nutrient-dense food.
- Developing **regional infrastructure** for localized food systems to tackle the move towards centralized supply chains and supermarket dominance, including local abattoirs since the closure of **local abattoirs** undermines the ability of farmers to diversify and sell meat locally.
- Rewarding high standards of **animal welfare** to ensure a good life for farm animals where they can express their natural behaviour and be raised in an ethical way to create a better-quality product.
- Reducing the use of **chemical inputs** including artificial nitrogen fertilisers and pesticides, which have damaging effects on water quality, biodiversity and public health. By reducing high input farming systems, the level of agrochemicals in the environment could be dramatically reduced.
- Employing **public procurement** and purchasing targets for local producers, as opposed to local wholesalers, to provide key food staples to schools, hospitals, government offices, and prisons.
- Incentivising farming practices that incorporate **positive in-crop biodiversity** to dramatically reverse UK species loss through a whole-farm landscape-based approach that requires more than simply greening the edges of fields and creating isolated areas of natural habitats.
- Supporting **employment-based incentives** for jobs both in primary agriculture and value-added production, helping to revitalize the rural economy and bring life back into rural communities.
- Supporting farmers who introduce **public access** to farms through education programmes to better educate the urban population (specifically children) on the realities of agriculture and rural life.
- Enhancing human capital and encouraging the next generation by increasing **skills** and a system of **apprenticeships** on farms to provide added entry points for young people looking to enter the sector.

- Improving **mental and public health** through increased access to the countryside, farm animals, food opportunities and improving diets, which would help to tackle increasing concerns of mental health and reduce non-communicable diseases.

Monitoring and Managing the Public Goods Outcomes

To monitor the impact of these schemes, Defra should require all farmers to submit an annual sustainability assessment using a framework of harmonised metrics and units of measure. The data derived from such an assessment could serve multiple functions: for government and government agencies to monitor eligibility and the impact of public purse support, for certification schemes to collect data they require, for consumers by providing more information about their food, and most importantly, for producers as a farm management tool.

To demonstrate eligibility for Government support and to enable the delivery of public goods effectively, we recommend that the Government introduce a **sustainability assessment** that farmers would have to complete **annually**. This assessment could provide the necessary data needed to determine the level of support each farmer receives as well as helping Government to understand and monitor successes and failures.

The benefit of the assessment would be three-fold:

1. The reporting of farm data would allow the Government to have a better understanding of the **national situation** for each specific public good (such as biodiversity and net carbon emissions) which would allow for more targeted interventions to help meet stated goals. For example, if the goal is reducing antibiotic usage, a common framework to measure on-farm usage would allow comparison of farm data.
2. By using a harmonised framework, farmers could **benchmark** themselves to show that they are delivering on their commitments and provide evidence of the improvement. Farmers should be encouraged to progressively increase their environmental commitments since all farms can become more sustainable, and the annual sustainability assessment would provide the necessary information and incentive to improve.
3. By implementing this annual sustainability assessment, trade organisations and certification bodies (Red Tractor, Leaf, Soil Association, et al.) could draw on the data to help with decision making, as opposed to conducting all their own assessment on each farm. This will save time and paperwork for farmers, allowing them to concentrate on growing food in a sustainable manner, and would **streamline the delivery process** for certification bodies.

We would recommend that this could (at least in part) be effectively delivered through an **online system** (similar to the model for the online system for filling in your tax return) that would enable farmers and land managers to easily and efficiently upload the necessary information as a management tool. While backup and spot inspections would still be necessary, particularly in higher risk cases (i.e. involving livestock), shifting the responsibility over to farmers would help them to better understand and appreciate the impact that making small changes can have, both to the land and to their business models. For the assessment to be comprehensive, there needs to be a **blend of specific targets, proxies and hard data collection methods**. These would include (but not be limited to) monitoring:

- Soil organic carbon levels and microbial life
- On-farm educational courses for new entrants and apprenticeship offers
- Acreage of forage legume crops
- Levels of on-farm biodiversity
- Quantity of agrichemical application
- Hedgerow mileage and quality
- On-farm nutrient cycling
- High welfare management of livestock
- Cultivation of heritage and local breeds
- Greenhouse gas emissions
- School visits
- Water infiltration rates
- Antibiotic usage

Transition Period

We are pleased to see the Government recognize the need for a long transition period. We would suggest that **smaller farms that are at greater economic risk** from volatility in the market should continue to receive their payments during the transition period while larger farms that have better economic resilience should have their payments reduced more rapidly. Additionally, during the transition period, the **payments should be directly linked to public goods** so that only farmers delivering ecosystem services will receive support.

Proposed Amendments

While we welcome the overarching direction of the Agriculture Bill put forward by the Department of Environment, Food and Rural Affairs, we would suggest that there are key interventions that would significantly strengthen the Bill. These would include the following;

- **Purpose of Bill** - Amend to include reference to *the environment, animal welfare and public health goals*.
- **Principles of the Bill** - At present, the Bill contains no requirement for the Secretary of State to consider or demonstrate explicitly how new regulation or policy helps the UK to meet national or international agreements and other specific domestic policy goals and legislation, on issues such as the environment, antimicrobial resistance, animal welfare, conservation of biodiversity, dietary health, modern slavery and climate change.

The Bill has no specific reference or link to the proposed Food Strategy objectives or likely outcomes for instance in improving the nutritional security of the nation, ensuring that food procured for public purposes supports local producers and is of the highest environment, labour and animal welfare standards and enhancing availability of nutritious local and regional food. This needs to be added and may require a specific clause.

- **Duties of the Bill** - At present, the Bill contains no requirement, nor any timeline, for the Secretary of State to act on many of the issues such as enforcing supply chain fairness. It provides powers to act not duties. This leaves much of it vulnerable to political priorities.