

Rt Hon George Eustice MP
Secretary of State for Environment, Food and Rural Affairs

22 September 2020

Future Farming and Countryside Programme

Dear Secretary of State,

For the first time in over 40 years, Defra is creating England's own domestic agriculture policy. We are energised and enthused by the Government's promise to reward farmers and land managers for the public goods they can deliver for society under the new system.

We are, however, concerned that policy development is both lagging behind schedule and drifting from the Government's commitment to introduce a new transformational programme through which public money for public goods can be delivered for farmers, people and the environment. This is creating uncertainty for farmers and land managers and risks jeopardising delivery of the 25 year environment plan. Further delay could undermine preparations for this long-overdue opportunity to address the nature crisis and climate emergency, enhance public access and animal welfare, deliver better value for taxpayers' money and secure a sustainable future for the farming sector.

We acknowledge the significant demands placed on Defra over the last year. However, with no announcements since Defra's [February policy progress statement](#), it is now urgent that land managers are given more concrete information about Defra's plans for the transition, so they can plan how to grasp the new opportunities that lie ahead. It is also critical that Defra remains focused.

To get the programme back on track, we propose: (1) a transition that focuses on adapting current systems to prepare farmers for the future, rather than an entirely new transition scheme; (2) Defra should set out its overarching objectives for ELM as a guiding star for system design; (3) the Department should publish a timetable for its ELM pilot; and (4) the Government should consult on the components of the Future Farming and Countryside Programme and how they join up.

Sustainable Farm Incentive

A future ELM scheme must be available to all farmers and land managers, including those currently not eligible for Basic Payments (such as less than 5ha and horticulture). However, Defra needs to manage the transition to ELM in a way that prepares farmers for a markedly different system and hardwires ambition into ELM.

The proposed Sustainable Farm Incentive (SFI) will achieve neither of these objectives and risks further complicating an already crowded policy and delivery landscape. We are concerned that early discussions about the design of the SFI with your Department have suggested a scheme that would serve as a means for farmers to recoup money from BPS reductions, rather than help to prepare them for ELM. Without a serious re-think, the SFI risks replacing one subsidy system with another, and diverting otherwise-critical monies from investment in ELM. It is absolutely essential that public money is not spent on paying farmers for "deadweight" actions that they ought to be doing anyway, such as proper nutrient management.

An SFI that paid for business as usual would undermine transition toward an ambitious ELM Tier 1 – and detract significantly from preparations for more ambitious delivery through Tiers 2 and 3, particularly important in the uplands where environmental delivery potential is high. Defra also needs to dispel growing fears amongst the farming community that they will only have access to Tier 1 in future. Many farmers and landowners are ready to deliver under tiers 2 and 3 now.

The following alternatives may prove more effective than the SFI:

- (a) **Increase the scale and ambition of the ELM National Pilot**, raising awareness and securing the buy-in to a progressive journey that will make ELM a success;
- (b) **Retain and grow participation in a simplified but expanded Countryside Stewardship scheme as a 'stepping-stone' to ELM**. Officials have described the SFI as plugging gaps in Countryside Stewardship with regard to 25 Year Plan delivery. These gaps would be more easily plugged by expansion of existing programmes than by creation of a whole new scheme such as the SFI.
- (c) **Support farmers to become 'future-fit' by rolling out a time-limited Future Farming Resilience Funding programme**, for example with training to support those who need it to better understand their business and environmental assets.

Vision and objectives for ELM

Whilst Defra has stated that ELM will contribute to the delivery of six broad goals of the 25 Year Plan, there is currently no articulation of the vision nor objectives that ELM will deliver. A clear vision and objectives are crucial to guide scheme design, ensure a successful national pilot and provide the clarity land managers need to plan for the new system. This missing link has created ambiguity in the ELM policy landscape. We ask you to clearly articulate the vision and objectives of ELM, thereby linking Government's ambitions for farming and the environment, critical for the Comprehensive Spending Review.

Readiness for the ELM National Pilot

Defra has a huge amount of work to do for the National Pilot to be ready to launch in a year, from designing ELM standards to developing guidance and setting scheme parameters. It is vital that the pilot is a success that builds trust with the sector, demonstrates Defra's credibility and, most importantly, ensures that these urgent reforms become a reality. We ask you to set out publicly the timeframe and ambitions for the National Pilot, including how farmers and land managers may take part in it, how farmer readiness for the more ambitious Tiers 2 and 3 can be made a reality, and what other complementary financial incentive schemes will be available to them in the transition period.

Integration of policy development across the Future Farming and Countryside Programme

There is a lack of policy coherence in the FFCP, with limited opportunities for public engagement beyond the ELM Policy Discussion Document in February. We urge Defra to consult as a matter of urgency on other financial assistance schemes (including productivity, animal welfare and tree health and resilience), regulation and the National Action Plan for the Sustainable Use of Pesticides. Without clarity and engagement opportunities across the FFCP, ELM is increasingly seen as the policy to address a range of issues that should not be in scope, thereby risking a watering down of its ambition, and undermining the need to regulate as well as incentivise.

We ask you to bring forward consultations on all elements of the FFCP and articulate how they join up.

We would be delighted to discuss these proposals with you in more detail.

Your sincerely

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Matt Shardlow, CEO, Buglife

Julie Williams, CEO, Butterfly Conservation

Steve Andrews, CEO, Earthwatch

Miriam Turner, Interim Co-CEO, Friends of the Earth
Shaun Spiers, CEO, Green Alliance
Hilary McGrady, Director General, National Trust
Kate Ashbrook, General Secretary, Open Spaces Society
Ian Dunn, CEO, Plantlife
Jill Nelson, CEO, People's Trust for Endangered Species
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