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## **ABOUT THE COMMISSION**

The IPPR Environmental Justice Commission (EJC) is a landmark initiative building on IPPR's award winning work on environmental breakdown and its Commission for Economic Justice. The commission is co-chaired by Hilary Benn, Caroline Lucas and Laura Sandys, and they are joined by commissioners drawn from business, activism, academia, civil society, and trade unionism.

The central aim of the commission is to present an ambitious, positive vision shaped around people's experiences and needs, and develop a plan of action that integrates policy both to address the climate and environmental emergencies and to deliver economic and social justice.

The commission's final report will be published in 2021.  
Find out more at: <https://www.ippr.org/environment-and-justice>

## **NOTE**

This briefing is presented as a submission to the IPPR Environmental Justice Commission in order to stimulate vital public debate. The arguments and the proposals made are those of the authors only. Commissioners serve in an individual capacity, and no report of or for the Commission should be taken as representing the views of the organisations with which they are affiliated.

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# SUMMARY

Reforming our farming system is of critical importance if we are to rise to the challenge of the nature and climate crises. But farming in the UK is facing not one but several transitions. These include:

1. the advent of new agri-environment schemes
2. new trading arrangements
3. an increasing role for technology in farming
4. shifting demographics of the farming workforce
5. the impacts of a changing climate
6. a potentially protracted recovery from the Covid-19 pandemic.

These transitions present challenges and opportunities, both to overcome the environmental crises we face and to do so in a way that is economically and socially fair and contributes to solving many of our other shared problems. Given the challenges farmers face and the urgency with which we need them to deliver climate solutions, support the return of wildlife recovery, and contribute to more resilient landscapes and communities, now is the time to reaffirm the place of farming in national life.

This report proposes a **renewed social contract for farming**, which would set out the roles and responsibilities for farmers, the state, and the public in the shift towards a net-zero and nature-positive economy. We propose this comes in the form of six priority areas of action.

## 1. A STRATEGIC VISION FOR FARMING

The vision must provide a clear sense of where we are heading and what we expect farmers to contribute. This must include the following.

- A shared understanding of the food and farming system of the future.
- The expected contributions of the farming sector to new legally binding environmental targets, including a 'State of Nature' to halt and begin to reverse declines in biodiversity. It should also lay out how agriculture will contribute to achieving '30x30' commitments to protect and manage 30 per cent of the UK's land and seas for nature by 2030, as well other target areas including water, air, biodiversity, and waste and resources.

## 2. A ROADMAP TO REALISE THIS VISION AND TO DELIVER NET ZERO AND NATURE RESTORATION

A detailed roadmap, with milestones and priorities for delivery, which also sets expectations and responsibilities for the sector. This must include the following.

- **The design and implementation of ambitious agri-environment schemes that will transform the sector by rewarding farmers who deliver environmental public goods**, signalling a shift away from an approach that subsidises the status quo. These need the right level of support and guidance, especially for those caring for our most valuable and precious natural landscapes.
- **The reform of the farm regulatory system to support farm improvement and provide a trusted legal baseline.** This should be aligned to provide consistency and clarity, eliminate damaging practices and make the best use of data.
- **Enabling farmers to navigate the transition by developing new business models**, accessing finance, accessing land, opening new markets, making the most of technology, and diversifying the sector.
- **Establishing and embedding a world-leading trade policy that upholds and protects domestic environmental standards and producers**, addresses the UK's external impacts, and helps underline the UK as a global leader in food and farming.

# INTRODUCTION

Farmers and farming stand at the forefront of the climate and nature crises, not only in terms of the harms generated by food production but also the positive contribution they could make in addressing these issues. Meanwhile, farmers are also on the sharp end of the most immediate and direct impacts of a changing environment. Yet farmers should not stand alone in their responsibility for the state of our food system – we all contribute towards its precarity, its unsustainability, and its failure to properly value the environment, human health, and the people who produce it.

Change to our food and farming system is not only necessary but inevitable, and farmers are already facing transitions on several fronts. Planned reforms to agricultural payment schemes across the UK represent the biggest upheaval to farming in 50 years, while emerging UK trade policy and the pursuit of new free trade agreements will affect agriculture – and the food we eat – more profoundly than any other sector. Demographic shifts – an ageing workforce and more restricted access to labour outside of the EU – and a much-heralded future role for technology and innovation signal major shifts in who farms and how it is done. Furthermore, the challenges of maintaining food supplies in the context of Covid-19 and the UK's departure from the EU have offered a glimpse of both the future problems the system may face and the invaluable – and largely underappreciated – role that farmers and food workers play in sustaining the UK economy.

**“We need a renewal of the social contract between those who produce our food and those who eat it.”**



With all that in mind, the question is therefore what sort of change we wish to see, whose interests it will work in, and how to ensure fair outcomes for those most affected. Given the challenges we face and the fundamental changes involved, this report proposes a resetting of the relationship between farming and the rest of society; **a renewed social contract between government, those who produce our food, and those who eat it.** As our expectation of what farming is and what farmers do changes to include actions that address climate change and the recovery of nature – in addition to producing healthy, nutritious food – we must also update how we refer to, regulate, and reward farmers for their efforts. An important step towards this is to overcome the perceived and practical distance that our food system has created between

many people and where their food comes from. Building relationships with and between farmers, citizens, and consumers is a critical step towards a food system that delivers the outcomes we need it to.

As farming and environmental policy are largely devolved areas and covered by the Westminster government in England, progress has been expectedly uneven across the UK. There are differences in farming and land management between and within each of the countries, and it is sensible for each to pursue an agenda of transition best suited to the conditions faced locally. However, the urgency with which action is needed to deal with the climate and nature crises – and to do so in a way which is fair and includes communities – presents a cause of common concern. While the recommendations contained in this report will have some general relevance, they will require further consideration and adaptation to account for different local contexts. However, there are also areas – in particular, regarding international trade and internal markets – where a heightened spirit of collaboration and cooperation between governments would be of marked benefit.

# 1. OUR VISION FOR FAIR TRANSITION IN FARMING

The vision of the IPPR Environmental Justice Commission is of a vibrant, healthy society, and a clean, innovative economy, driven by the key principle of fairness. Delivering this in practice will require that all policies and programmes together address the climate emergency and restore nature; improve lives and offer opportunities for all in a transformed and thriving economy – leaving no-one behind.

It is through this framework that the commission is assessing whether individual policy proposals and policy programmes as a whole achieve our goals. It is also through this framework that we have considered the policy proposals for how we can achieve a fair transition for farming (figure 1.1).

**FIGURE 1.1: IPPR FRAMEWORK TO ASSESS HOW POLICY PROPOSALS CAN ACHIEVE A FAIR TRANSITION FOR FARMING AND A VIBRANT, HEALTHY AND EQUITABLE FOOD SYSTEM**



Source: Authors' analysis

Our vision for farming is one where farmers and land managers are empowered and incentivised to support climate and nature on their farms and produce healthy foods that are widely accessible. They will be rewarded fairly for the public goods they provide through the ways in which they manage their land, while being paid a fair market price for the produce they grow and sell. Farms of varying size are able to compete in a sector that is mixed and thriving, delivering diverse, healthy

and sustainable foodstuffs to the public. Consumers understand clearly where their food comes from and how it is produced and are reassured by credible systems of regulation that maintain high environmental, safety and welfare standards. A farming sector under transition will be supported by a whole food system approach,<sup>1</sup> which fairly rewards their efforts and internalises the true costs of production. Working towards a thriving farming sector and food system will have enabled the UK to have halted the declines in nature and will be seeing growing abundance of common and rare species, better connected landscapes, and increased opportunities for people to engage with nature.

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1 See our forthcoming report, *Building a food system that works for everyone*: <http://www.ippr.org/research/publications/building-a-food-system-that-works-for-everyone>

## 2. **FARMING, NATURE, AND A CLEAN ECONOMY**

With around 72 per cent of UK land under some form of agricultural management (Defra 2018a), how, what and where we farm is fundamental to a fair transition to a clean economy. There is a need to curb the significant environmental harms our agricultural system has wrought over the past several decades but also to secure the benefits that improvements can bring for the sector and society as a whole. These include using land to sequester carbon in ways that benefit biodiversity, improving the resilience of landscapes in the face of a changing climate, the introduction of agroecological practices that improve opportunities for species to thrive on cultivated land, and setting aside and restoring habitats on farms to support biodiversity in the immediate and wider landscape.

However, all these actions come with financial costs and farmers cannot be expected to bear these and deliver public benefits alone. This is especially significant in a system that often fails to reward farmers with a fair price for what they produce, where polluting and damaging practices can go unpunished, where unfair trading practices are common, and where farmers face pressure from competition with international producers not subject to the same high environmental standards. If farming is to be at the vanguard of the battle against climate change and in the recovery of nature, then responsible farming must be profitable, it has to offer good livelihoods for farmers and workers, and it has to do so for farms of different types and sizes. If we are to see this realised, we must also support current and future farmers through the many changes they are facing.

### **NATURE AND FARMING**

Globally, we are facing a crisis for nature, with over 75 per cent of global land significantly altered, an estimated 1 million species facing extinction, and continued loss of the world's most precious areas for diversity (IPBES 2016). The UK is no different and indeed is ranked as one of the least biodiverse countries on earth (Hayhow et al 2016). The latest State of Nature report (Hayhow et al 2019) found continuing negative trends, with 41 per cent of species in decline and 15 per cent threatened with extinction. This comes despite increased action and awareness of the threats facing biodiversity, including the global Aichi targets set in 2010, leading to what some have called a 'lost decade' for nature (RSPB 2020). These more recent declines come on top of the longer-term depletion of the natural world through habitat loss and degradation, species persecution and pollution.

Since 1970 (when systematic recording of wildlife populations began), agriculture has been the primary driver of biodiversity loss, in the UK and globally (Burns et al 2016, IPBES 2016, Hayhow et al 2019). Both habitat conversion and changes

in farmland management<sup>2</sup> are largely responsible for the detrimental impacts of agricultural on wildlife. These impacts have not come about as a result of farmers acting alone, but through longer-term policy and investment focussed on increased agricultural production, productivity, and yields.

From the 1940s onwards, the so-called ‘green revolution’ in agriculture introduced a range of techniques and technologies to meet growing global demand for and national self-sufficiency in food supply, including increased reliance on agri-chemicals, such as pesticides and fertilisers, and the removal of established, nature-supportive features such as hedgerows, to make way for production on a greater scale (CPRE 2011). Such practices were facilitated by measures such as the Common Agricultural Policy (CAP) (to which the UK was subject from 1973) that supported agricultural expansion, intensification, and production over environmental outcomes. While CAP reform in 2003 included conditions of payments depending on environmental management practices (‘cross-compliance’) and UK agri-environment schemes have delivered some benefits for nature, progress has been slow, beset by problems, and has so far failed to address the systemic issues holding the sector back.

## **CLIMATE AND FARMING**

In addition to its impacts on nature, farming holds a unique position in relation to climate change. It is, globally, a major contributor and driver of emissions, but also arguably the sector most impacted by climate change and related weather events, including through flooding, drought, increased temperatures and prevalence of pests and diseases. This presents farming with the twin challenges of mitigating climate change – through carbon capture and reducing emissions associated with agriculture – and adapting to differing climatic and environmental conditions to continue producing food, supporting nature on farms, and providing crucial ecological services to landscapes and communities, such as flood prevention and cooling.

Understanding the role of agriculture in both contributing to and combatting climate change is not a simple task, not least because the actions, impacts and solutions are spread unevenly around the world. A recent study (Crippa et al 2021) assessed the total greenhouse gas emissions (GHG) associated with global food systems – including production, consumption, and disposal – and found that they accounted for 34 per cent of total emissions. By far the largest contribution (71 per cent) was from agriculture, land management and changes in the status or use of land (such as deforestation); the impact of which is more heavily concentrated in developing economies than industrialised economies, and particularly associated with deforestation and soil degradation.

In the UK, the picture is more mixed, with agriculture contributing around 10 per cent of greenhouse gas emissions (Climate Change Committee 2020). In reality, this figure – which does not account for emissions associated with the production of agri-chemicals or the production of feed for livestock – is likely to be higher. It is also important to note that impacts of farming systems on emissions differs between the greenhouse gases in question. Farming contributes around 50 per cent of the UK’s methane emissions and 70 per cent of nitrous oxide emissions, predominantly from enteric fermentation in livestock and application of

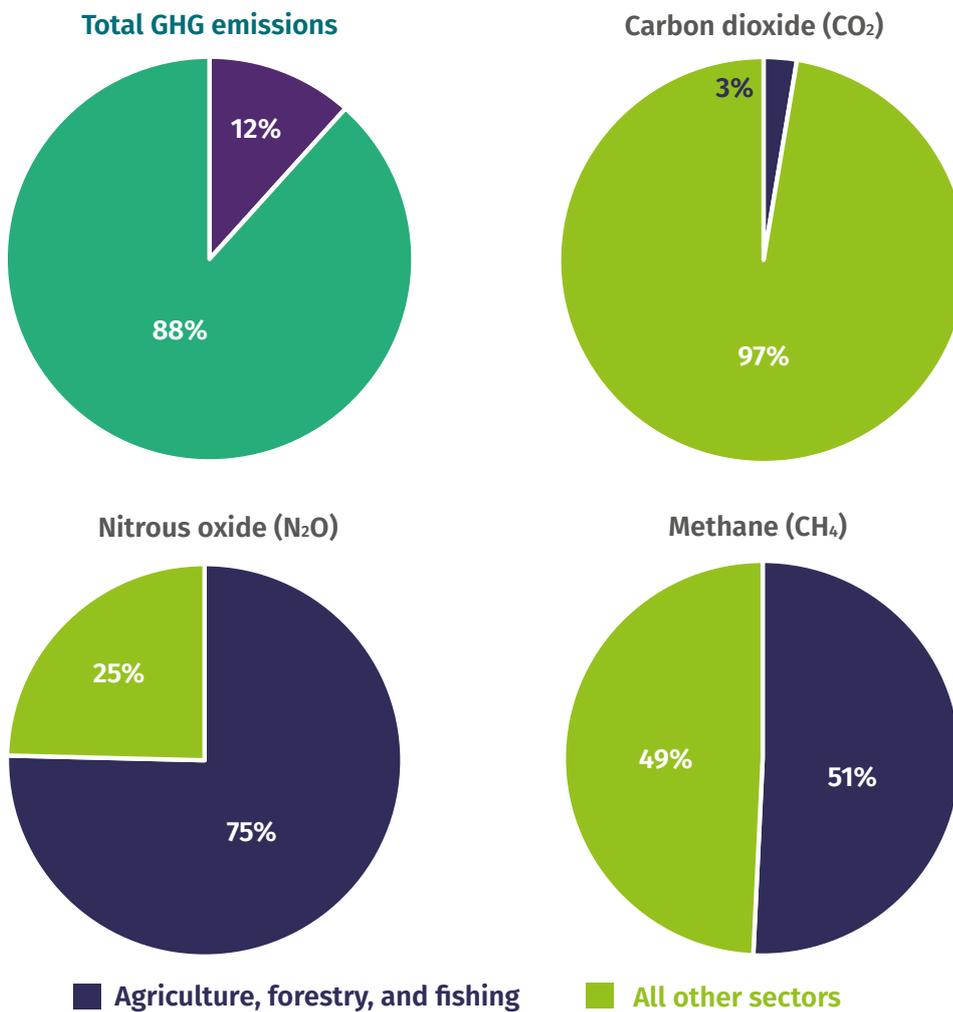
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<sup>2</sup> Those that have had the greatest impact on the UK’s nature include the increased use of pesticides and fertilisers; increased stocking rates, changes in crops and cropping patterns (such as grasslands managed for silage rather than hay production, with reseeding and drainage, and crops sown in the autumn rather than the spring); farm specialisation (for example, in either arable or livestock enterprises); greater mechanisation and increase in farm size; and loss of potentially nature-rich features such as field margins, hedgerows, wooded areas and farm ponds (Boatman et al 2007, Wilson et al 2009).

inorganic fertiliser respectively. The FAO (2013) estimates that 14.5 per cent of global GHG emissions are associated with livestock (meat and dairy) production. Methane is particularly potent in terms of its greenhouse effect but also remains in the atmosphere for a relatively short period: around 12 years (Jardine et al 2013). This means that, while increases in methane in the atmosphere are a cause for concern, in the longer term these are less likely to have cumulative climate effects than other gases such as carbon dioxide or nitrous oxide (Allen et al 2018).

**FIGURE 2.1: THE CONTRIBUTION OF AGRICULTURE, FORESTRY, AND FISHERIES GHG EMISSIONS IN COMPARISON TO ALL OTHER SECTORS**

Total and individual GHG emissions



Source: ONS (2020)  
 Note: Excluding consumer expenditure. Charts relate to 2018 figures.

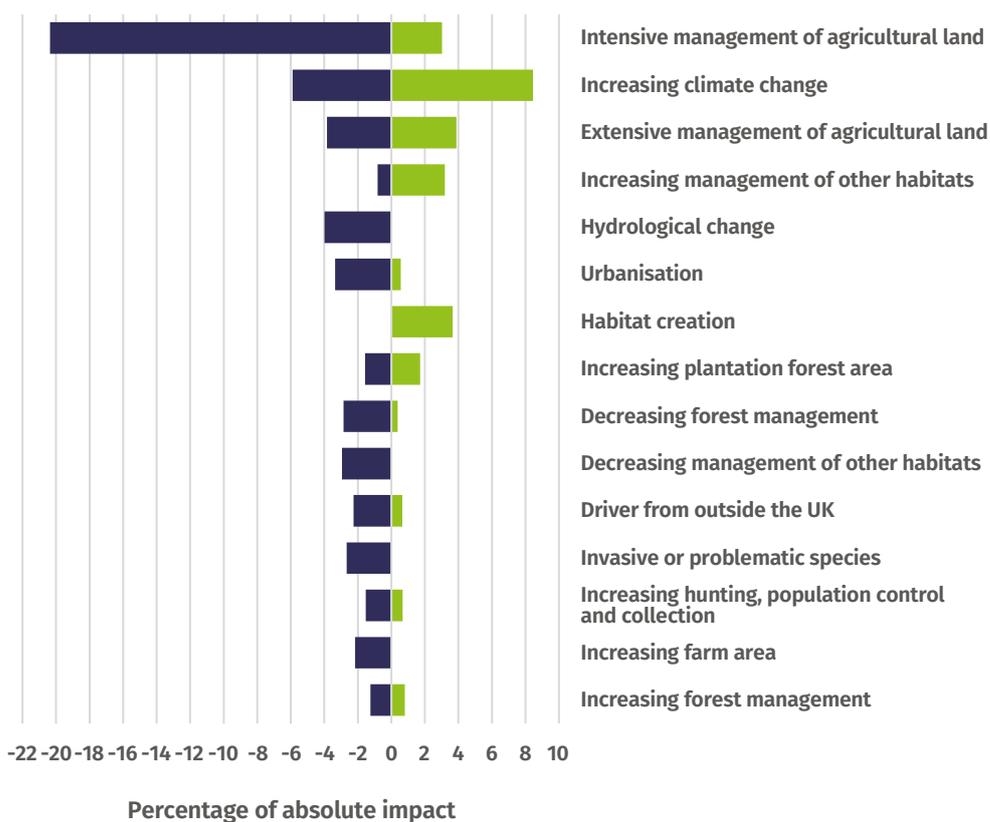
While it is increasingly clear we will have to reduce global demand and consumption of meat and dairy to tackle the climate and nature crises, there remains a role for better meat and dairy products in healthy and sustainable diets. In some areas of the UK, particularly the uplands, the terrain, vegetation, and weather mean livestock rearing is the only suitable form of agricultural production that can secure a more efficient use of land and resources. Rotational and conservation grazing and lower stocking rates can deliver positive nature

conservation outcomes, particularly for plant species and invertebrates, while helping to support local economies and livelihoods.

As the majority land use in the UK, agriculture has a critical role to play in delivering land-based mitigation measures, especially through the pursuit of nature-based solutions to climate change.<sup>3</sup>

**FIGURE 2.2: THE MOST IMPORTANT BROAD DRIVERS OF UK SPECIES' POPULATION CHANGES, 1970–2012**

Percentage of total absolute impact, positive (green) and negative (blue)



Source: Burns et al (2016)

<sup>3</sup> WWF (2020) defines nature-based solutions as: “Ecosystem conservation, management and/or restoration interventions intentionally planned to deliver measurable positive climate adaptation and/or mitigation benefits that have human development and biodiversity co-benefits managing anticipated climate risks to nature that can undermine their long-term effectiveness.”

### 3.

# THE MANY TRANSITIONS FACING FARMING

The multiple transitions that farming faces pose different challenges, opportunities, and some provide for uncertain futures.

#### **A CHANGING CLIMATE**

Climate change, and the necessary transition in response to it, will require major changes to existing approaches to farming in the UK. Aside from the need to use farmed land to help mitigation, farm management will have to adapt to changing temperatures and rainfall, changes in patterns of diseases and pests, and more frequent extreme weather events (POST 2019). Increased market volatility globally and less predictable yields will also impact the demand for and the prices of food produced in the UK. Technology, agroecology, and nature-based solutions offer some means for farms to adapt to a changing and less stable climate but the challenge is significant, as is the scale of investment required to meet it.

#### **NEW FUNDING MECHANISMS**

A much-vaunted benefit of the UK's departure from the EU has been the opportunity to replace the common agricultural policy (CAP) with agricultural payment schemes better suited to UK environmental ambitions and priorities. Plans are most advanced in England with the environmental land management scheme (ELM) and some clarity emerging regarding future direction in Wales. Irrespective of progress, the introduction of payment schemes that direct public money to towards paying for environmental public goods represents the largest upheaval in agricultural finance for half a century.

#### **NEW TRADING ARRANGEMENTS**

The UK government has signalled its intention to set a new direction for UK trade policy outside of the EU. In addition to the trade and cooperation agreement with the EU, a deal with Japan and a series of 'rollover' deals, this means pursuing free trade agreements with major agricultural exporters such as the US, New Zealand, and Australia, as well as joining the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP).<sup>4</sup> The absence of clearly articulated trade objectives or legal provision to prevent the import of agri-food goods that do not meet the level of environmental, food, and welfare standards applicable domestically represents a cause for concern and uncertainty for British farmers. The EU deal itself has generated major changes to existing agri-food supply chains arrangements, with disruption to export sectors and trade between Great Britain and Northern Ireland already significantly affected.

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<sup>4</sup> The CPTPP is a free trade agreement concluded between 11 pacific nations, following the withdrawal of the US from the agreement's predecessor the Trans-Pacific Partnership (TPP). The UK government has signalled its intent to join the agreement.

## **NEW TECHNOLOGY**

Growing financial, political, and research investment in agricultural technology has prompted some to frame the coming changes as the “fourth agricultural revolution” (Rose and Chilvers 2018). From artificial intelligence and machine learning to gene-editing and alternative proteins, the potential for technology to alter how farming is done and who farms is profound. Innovation on farm holds the possibility of improving climate and biodiversity outcomes as a complement to agroecology but could also bring downsides if not introduced responsibly. Those who might lose out include older farmers with lower digital literacy, smaller farms without capital to invest, or farm workers losing out to automation. It may also bring increasing farmer dependence on technology service providers, as well as fundamental shifts in power and interests in the sector.

## **A CHANGING WORKFORCE**

Farming is facing demographic challenges with the agricultural workforce skewing markedly older than the median national working age: the median age of farm holders is 60 years old, with 40 per cent aged over 65 (Defra 2016). Existing patterns mean many of those wishing to retire or leave the sector being ‘locked in’, and there are limited opportunities for new and younger farmers to enter the sector. In 2017, farming was ranked as the least diverse occupation in the UK, just one place below ‘environmental professionals’ (Norrie 2017). This is not only an issue of fairness, but also impacts the sector’s ability to access talented workers, new ideas, and innovation. Furthermore, the UK is likely to face challenges in accessing suitably skilled agricultural labour previously drawn from EU member countries (House of Lords 2017).

## **COVID-19 RECOVERY**

Food producers have played a critical role in the UK’s response to the Covid-19 pandemic, reaffirming their importance as ‘key workers’ in the UK economy. However, strains on farm businesses and physical and mental health and wellbeing brought by the pandemic – on top of the many facing the sector, including Brexit – are likely to have an impact in the longer term.

## 4.

# A NEW VISION AND SOCIAL CONTRACT FOR FARMING

With the challenges facing the UK's farming sectors and the critical role they will play in delivering a net-zero and nature-positive economy in mind, direction and action from government is urgently needed in several areas. This will be key to an effective transition, with fairness for farmers, communities, and wider society at its heart.

### A RENEWED SOCIAL CONTRACT FOR FARMING

A social contract is an implicit agreement between members of society and its government, setting out the rights and responsibilities different parties are expected to enjoy and provide in the long term – in short, the terms and conditions of how we live collectively in a modern society. With the governmental and societal demands placed on farmers fundamentally changing, it is only right that the social contract with farmers is renewed.

Importantly, a social contract is built on consent between the parties and not imposed by any one of them. This means including farmers in the design of new relationships from the outset and – given the significance of farming for our shared interests in land, food and rural economies – involving the wider public and civil society in the decisions shaping future farming. Such a contract need not be limited to the relationship between governments and farmers, but will also frame what the public can expect and the role citizens and consumers will have in supporting responsible farming.

A social contract is also for the long term, and should be renegotiable at every turn. To support necessary long-term decision-making for sustainable farming, this means providing farmers with certainty and clarity in how they will be funded in the decades to come. This cannot be limited by short-term policy imperatives, changing annual budgets, or electoral cycles.

### A JOINED-UP APPROACH AND VISION FOR FARMING POLICY

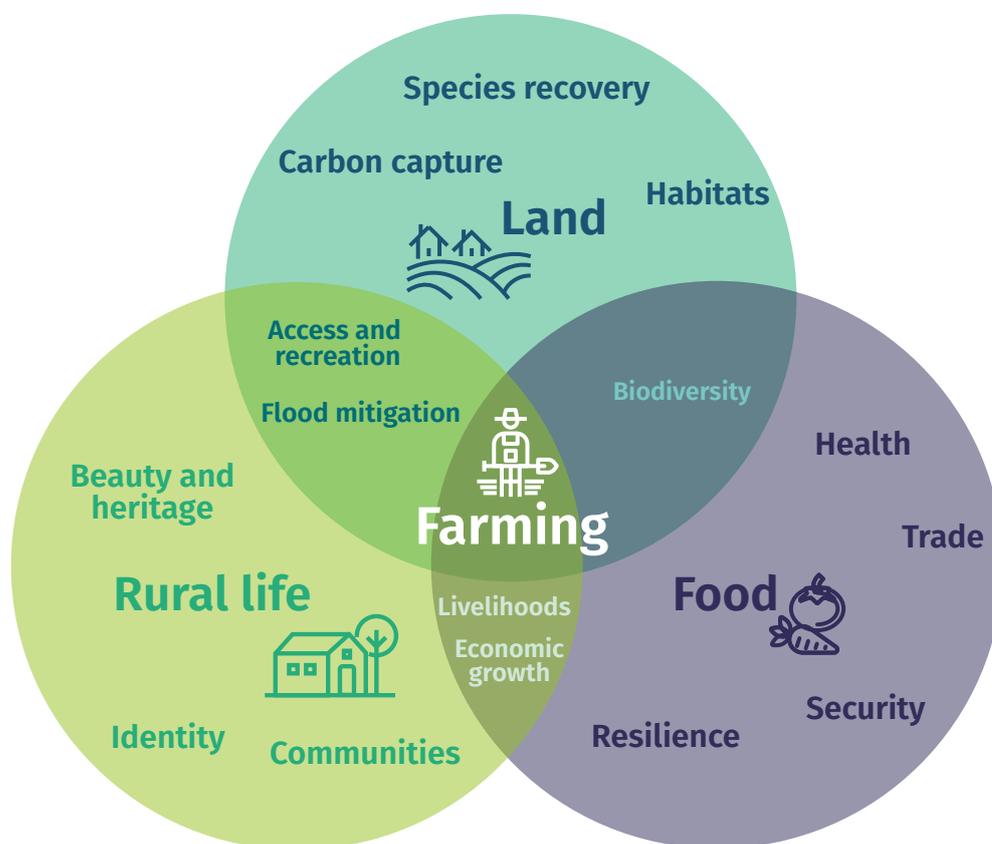
A vision for a farming sector that supports nature and our climate may seem an abstract idea but building consensus from all parties, setting clear expectations, and providing ambitious and achievable targets to work towards is a critical step in transforming the sector and the national environmental prospects. The UK government must lead the way in shaping this vision, but this must be done in coordination with devolved governments, local stakeholders (including farmers and communities), and civil society. While environment and agriculture are generally devolved policy areas and a singular framework is unlikely to be helpful or politically acceptable, approaches in the four countries must make sense to each other or else risk incoherence or, worse still, diverging outcomes.

Developing such a vision will require reaching into communities to help shape the hopes and expectations of the landscapes and places in which they live. Not only can communities take an active role in farming in the UK; they are impacted by the decisions made in the food and farming system in terms of the food they eat, the cost of land, their access to nature, and the impacts of pollution and climate change. Such a vision must address the three intersecting areas of life in which farming is inextricably involved: land-use, food, and rural life .

**Land:** Is a finite resource, critical for a vast array of environmental public goods and central to our collective identity and sense of place. To balance the multiple benefits we need land to provide - including housing, recreation, energy, food production, and nature – in ways that are socially just and inclusive, we need joined-up planning for how land is used and managed.

**Recommendation:** We support the Food, Farming, and Countryside Commission (2020) proposal for a strategic land use framework in England to help make the best use of land, resolve conflicts and competition, and deliver on government ambition. Equivalent approaches are required across the UK, such as the Scotland Land Use Strategy (2020).

**FIGURE 4.1: THE IMPORTANCE OF FARMING FOR OUR LAND, OUR FOOD SYSTEM AND FOR RURAL LIFE**



Source: Authors' analysis

**Food:** As suggested in a separate food systems report (Coleman et al 2021), the food we eat has major costs and benefits to society, the economy, and the environment. However, food cannot be understood only in macro terms as it also underpins communal life, identity, individual health and wellbeing, and enjoyment. Any flourishing future economy will depend on the health of the people and the environments that underpin it and the form and function of our food system are crucial to these. Disjointed food policy will only serve to entrench the negative outcomes from our food system.



**Recommendation:** We propose a ‘whole systems’ approach to food in the UK, underpinned by a new statutory body for overseeing the food system, a right to food and legally binding objectives and targets for food policy. This means taking a more deliberate approach to the food system the UK wishes to have and connecting this to systems of production and consumption. The details of such an approach are set out in an accompanying report (Coleman et al 2021).

**Rural life:** Farming is a traditional and integral element of rural landscapes, communities and economies. Whether using land for food production, nature conservation, or tourism and recreation, farmers and land managers will have a critical role to play in underpinning a green recovery in the countryside and depend on those self-same networks of support. Action is needed to ensure rural areas across the UK can recover and ‘level up’ as they help deliver net zero and the return of nature.



**Recommendation:** We endorse the CPRE (2020) demand for government to take decisive action to support rural economies after Covid-19, including establishing a rural taskforce, and investing in housing, transport, and digital infrastructure in rural areas.

## FARMING AND THE UK’S CLIMATE AND ENVIRONMENTAL AMBITIONS

As outlined in this report, farming will play a substantial role in addressing the climate crisis and repairing nature. By 2030, the prime minister has committed to protect and manage 30 per cent of the UK’s land and seas for nature. At the Convention for Biodiversity (CBD) later this year in Kunming, China, the UK government has stated its desire to be a global leader for the environment and will be expected to agree and sign up to updated global goals for the recovery of nature and biodiversity. The prime minister has already signed to the Leaders’ Pledge for Nature, which commits to reversing declines in nature by 2030, and has committed to protecting and managing 30 per cent of the UK’s land and seas for nature by the same date. As outlined in this report – and in the Leaders’ Pledge itself – reform of farming will play a substantial role both in addressing the climate crisis and meeting global and domestic targets on nature. However, neither promise has yet been placed in law. We urgently need both a ‘state of nature’ target (equivalent to net zero for carbon) included in the UK environment bill and a clear statement of how farming and farming policies will help meet this high level of ambition.

The environment bill has been described as a once in a generation opportunity to help nature (WCL 2020). It will serve partly to transfer over arrangements following the UK’s departure from the EU, and partly to set England (and to some extent Northern Ireland) on an ambitious path towards the recovery of nature.

It will set the UK government’s flagship 25 Year Environment Plan (25 YEP) on a statutory footing as the first ‘environmental improvement plan’, will create a new watchdog for overseeing environmental law (The Office for Environmental Protection), and will establish a framework for legally-binding environmental targets. There is much of value in the bill but a major omission to date – either within the draft legislation or surrounding policy – has been the interaction between agriculture and new legal provisions for the environment. Given the significance of farming for capturing carbon and bringing species back, this is a significant shortcoming.



### **FURTHER RECOMMENDATIONS TO GOVERNMENT ON ALIGNING ITS AGRICULTURE AND ENVIRONMENTAL POLICIES**

We recommend that greater clarity is provided to underline the relationship between agriculture and the environment by:

- establishing legally binding targets (on water, air, biodiversity, waste, and resources) and the role of agriculture and the alignment of new environmental land management (ELM) schemes in meeting them
- supporting the creation of local nature recovery strategies and clarifying how these will guide the development and delivery of new ELM schemes, as well as the extent to which farmers and land managers will be included in the process of developing the strategies
- extending the role of the new Office for Environmental Protection (OEP) in overseeing the environmental regulation of farming and in meeting legal environmental targets
- clarifying how ‘conservation covenants’ established in the bill will be utilised to secure nature and biodiversity protection agriculture in the long term.

There is a risk that new and emerging post-Brexit legislation and environmental policy (such as the 25 Year Environment Plan) will suffer from siloed working, lacking the necessary coordination to strategically deliver net zero and the recovery of nature.

## 5.

# A ROADMAP FOR CHANGE

As important and helpful as a vision for farming is, there is a more immediate need for practical information and direction from government as to the changes planned and expected over the coming months and years. At the end of 2020, the Department for Environment, Food and Rural Affairs (Defra) published *The Path to Sustainable Farming: An Agricultural Transition Plan 2021 to 2024*, which went some way towards outlining the approaching agricultural transition.

While helpful in some respects, the plan is lacking sufficient detail to understand the specifics of how farmers will have to adapt their practices, the actions they will have to undertake - individually and as a sector - and how these will connect to drive the recovery of nature and climate action across the country. The risk is twofold: that insufficient information provided now leaves farmers unable to plan and invest for the medium to long term; and that the practical challenges, lack of coordination within government, and unwillingness or inability to set a clear policy pathway results in future arrangements that favour 'accessibility' over 'ambition' and fail to deliver the step change needed in farming.

### **INCLUSIVE AND AMBITIOUS ENVIRONMENTAL SCHEMES**

Following the UK's departure from the EU, work is most advanced in England to develop a new system of farm payments to support farmers to deliver environmental public goods. In large part, this will replace the existing Basic Payment Scheme (BPS) – a core pillar of the Common Agricultural Policy (CAP) – which provides direct support to farmers and land managers through public subsidy. Direct BPS payments to UK land holders account for EUR 3.2 billion of the EUR 4.2 billion in total CAP payments per annum<sup>5</sup> to the UK and until now have been a critical source of income for farm businesses across the UK. The BPS has been based on area of land and meeting basic 'cross-compliance' (largely regulatory minimum) requirements. This has done little to incentivise improving the environmental impacts of land management, has ingrained farm dependence on subsidies without addressing the structural challenges of agri-food markets, and has represented poor return on public investment. A new ELM scheme – or set of schemes – is under development in England to ensure public money is used to support actions that deliver environmental public benefits, such as carbon capture, improving biodiversity, better soil management, flood management or preservation of key species and breeds. The Agriculture Act (2020) has set the legal foundation for such a scheme, but there is a great deal of more work to be done for it to meet the environmental ambition expected of the UK government's 'Green Brexit' (Gove 2017). What was once conceived as a singular environmental land management scheme, consisting of three tiers, is increasingly being framed as three distinctive schemes – the sustainable farming initiative (SFI), local nature recovery, and landscape recovery (Groom 2021).

A clear risk is that the bulk of government effort and funding is directed towards the SFI – the most accessible entry point for farmers – without sufficient support or incentive for farmers to move up through the schemes. There is a danger that this major source of funding, rather than being used to deal with the climate and

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5 Amounts relate to 2019 figures (Defra 2020b).

nature crises, ends up being used to fund business-as-usual and fails to bring about the necessary change. A striking failing would be if public money is used to enable farmers to comply with their minimum legal obligations.

### **Design**

New schemes need to be developed, so that they are accessible to the majority of the sector but have sufficient progress and ambition built in. This means a clear pathway and incentive structure for those entering schemes to improve their management and impacts over time. This must be carefully aligned with national and local priorities and targets – it cannot be a standalone scheme that fails to speak to wider policies.

The ‘co-design’ process the UK government has set out must be carried through in scheme development and delivery, meaning farmer views and insight are incorporated at every stage. Farming sectors across the UK are diverse and new payment schemes must not only serve the interests and capabilities of larger agri-businesses. The public goods that new schemes reward must also be informed by leading science and expertise to ensure that, collectively, actions taken by the sector will add up to the transformation we need to see. This would be helped greatly by a more strategic national and regional approach to land use to provide the necessary balance of actions for climate and nature, as well as growing healthy and nutritious food.

### **Management**

New schemes must be administered by appropriately resourced and staffed public bodies. This need not be a single agency, but those delivering different functions and tasks need to be equipped to do so and effectively coordinated with each other. For example, farm advice and support might be best provided through Natural England, whereas administering payments would be best done by the Rural Payments Agency. Ongoing monitoring will also be required in order to assess the actions taken by individual farmers and the success of the scheme as a whole. This is needed to ensure value for public money, but should be oriented towards improving performance and outcomes, rather than a tick-box approach based purely around compliance. Investment is also needed to ensure agencies have the appropriate capacity and IT systems to administer any scheme.

### **Training, support, and advice**

Critical to the success of any new environmental land management scheme is the provision of targeted, credible, and practical guidance and support to farmers and land managers. As such a scheme should be aiming to reach as large a proportion of farmers as possible (meaning it is not competitive), support from trusted and knowledgeable farm advisers must be part of the overall scheme provision, without excessive additional costs incurred for participants. This support will be particularly invaluable for smaller farms and those working in more challenging and marginal geographies, such as upland areas.

Advice on incorporating and managing nature on farms for the greatest positive impact on biodiversity, climate mitigation and adaptation, and water and soil management will need to be delivered alongside wider agronomic and business support. Importantly, this will need to be tailored to local and regional contexts (including local priorities for habitats, species, and carbon) and national environmental targets and scheme objectives. Prioritising different outcomes – whether nature, climate, or food production – in different areas will be supported by a strategic approach to land use management at the national level.

One trusted and cost-effective approach to delivering guidance and support is through investing in peer-to-peer networks and training, such as the Nature Friendly Farming Network. Landworkers' Alliance (2019) proposes a three-pronged approach to sharing agroecological knowledge, supplementing more formal agricultural educational routes. This would involve a traineeship programme, a mentorship programme, and farmer-to-farmer intergenerational exchange – all of which would provide different forms of farming knowledge and experience.



### Recommendations

- Significantly increase efforts to 'co-design' the new ELM for England, by including farmers and expert stakeholders in the process. Provide clear link-up and alignment with other critical environmental policy mechanisms and targets, especially in the environment bill and 25 Year Environment Plan.
- Invest in the information technology infrastructure required to effectively develop, administer, and monitor the new agri-environment scheme for England.
- Fund the development and expansion of peer-to-peer environmental farming networks to help facilitate the rollout of scheme advice and to ensure all farmers have access to locally relevant support.

### NATURE FRIENDLY FARMING NETWORK

The Nature Friendly Farming Network (NFFN) was launched at the beginning of 2018, and intended to foster a community of farmers dedicated to more sustainable agriculture and the recovery of nature on their land. The network has chapters across the four UK countries, covering all types of farming from arable lowland to hilltop pasture, and has grown to over 3,000 members.

The NFFN provides support and advice from peers, as well as connecting farmers to resources and opportunities for funding and training. As well as publishing case studies and examples of how nature-friendly farming can be done well, the network also offers a voice for sustainable farming to government and other stakeholders shaping food and farming policy. It is not only a forum for those already engaged in nature-friendly farming methods, but also open to organisations from the environmental sector and to farmers just starting out to understand what they can do to support wildlife.

The publications and resources the network has developed not only examine the difference farms can make for nature, but also how nature-friendly approaches can improve farm profitability: from improved productivity, to resilience in the face of weather events such as drought or floods, all the way to sales and marketing opportunities. For example, a recent report highlighted the many ways members were adapting to the challenges of Covid-19, while continuing to supply food to the country and support nature on-farms (NFFN 2020).

The NFFN provides a model for how to connect farmers with the right information, advice, and opportunities, in a cost-effective manner. This will become only more important during and after the end of direct payments, especially for harder to reach groups. Networks fulfilling these functions will need to cover the whole country, ensuring all farms can access support. For this to happen, government needs to recognise and support the rollout of such networks in the long-term.

## **A TRUSTED REGULATORY FLOOR**

The success of the new agri-environment schemes will depend not only on the level of ambition and progress they are pursuing but also the maintenance of a high floor of environmental regulation. While agri-environment schemes should help farmers to go ‘above and beyond’ to protect nature and tackle climate change, the mandatory legal requirements must also be properly monitored and enforced on all farms. Public money should not be directed towards farms only meeting a legal minimum, nor should actions be rewarded in some aspects of farm management when there is significant non-compliance in others. For example, there is no sense in rewarding tree planting with public money, when the same farm is failing to meet legal requirements in the management of slurry. The Stacey review (2018)<sup>6</sup> made it clear that reform of farm regulation is required, including the adoption of a more flexible, supportive and incentive-driven approach.

### ***Regulation for nature and climate outcomes***

Environmental regulation of agriculture is there to establish the appropriate contribution of farming to wider social objectives, establish a level playing field between farmers, increase transparency and public confidence, internalise the negative external costs of production, and establish a sufficiently clear baseline and reference point (Baldock and Hart 2020).

A farm regulatory system needs to be fair, effective, and transparent to all key stakeholders. Currently, farmers are subject to regulation from a range of sources, often leading to inconsistency, poor communication, overly burdensome inspection regimes, and mistrust. Good regulation should clearly establish agreed aims and pursue them in an appropriate and proportionate way. In the case of the pursuit of environmental aims, the sector would benefit from a shift away from a ‘compliance mindset’ to one focussed on improvement and outcomes. Such regulation needs to be able to differentiate between minor and more egregious regulatory breaches, with actions and sanctions proportionate to the harm caused.

Reform of farm regulation need not involve the establishment of a new statutory body, thereby risking increased bureaucracy and uncertainty and the loss of the specific knowledge and experience existing bodies hold. Instead, regulators need better defined powers and responsibilities, improved coordination, and greater independence from government to carry out their functions. Arguably the largest challenge to effective farm regulation is the reduced budgets and capacity that statutory bodies have faced over the past 10 years. The new Office for Environmental Protection will have an important role to play in overseeing the environmental outcomes of farm regulation.

### ***Sliding regulatory baseline***

We cannot afford the luxury of standing still, and the regulations of today will not be sufficient to meet the climate and nature challenges of tomorrow. This means we require a sliding baseline of regulations, rising in expectations and outcomes over time. This must not involve imposing arbitrary conditions; all regulations should correspond to a clear vision and roadmap for the sector. Expected changes need to be communicated well ahead of time in order for farmers to plan effectively in the medium and long term. A sliding regulatory scale, clearly mapped out and supported by the sector, will add coherence to environmental policy and targets that apply beyond agriculture, especially those established in the 25 Year Environment Plan.

In terms of substance, a logical starting point for rising ambition is requirements for soil management. Currently, sustainable soil management

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6 Also known as the Farm Inspection and Regulation review.

is not generally covered by UK farm regulation, but is a part of the ‘cross-compliance’ requirements needed to be fulfilled for farmers to access payment through the CAP. This makes sense as an area to raise regulatory expectations because farmers are likely to be actively managing their soil health or thinking about doing so. Communicating changes well ahead of time will help farmers prepare and will signal to researchers and product developers the need for cheaper and effective technologies and techniques.

### **Improving trust and data**

Some form of cross-compliance, better supported by farmers and oriented towards improvement, will help ensure that those applying for entry into an ELM scheme are also complying with minimum legal requirements. This can and should be integrated into improved monitoring and enforcement functions, rather than as a standalone system. This would be greatly supported by more reliable and comprehensive data acquisition and storage. As a sector critical for the UK’s health and security it is extraordinary that even basic reliable information on agriculture is unavailable.

With an estimated 107,000 commercial farm holdings in England, the paucity of information on who is farming, what is being farmed, how and where – along with a laissez-faire approach to land-use policy – is a major barrier to achieving net zero and nature recovery. A ‘land-keeper’ registration system – as proposed in the Stacey review – could help alleviate some of these shortcomings, enabling better regulation, more targeted support and guidance, and a clearer understanding of where action is needed nationally, without becoming too onerous either for regulators or farmers. There is also room for farm regulators to better align with and coordinate with voluntary assurance schemes active in the sector to support both regulatory outcomes and achieving the ambition of new agri-environment schemes.



### **Recommendations**

- Adjust and extend a ‘cross-compliance’ function to ensure that recipients of public money through ELM schemes are compliant with regulation.
- Respond to the Stacey review by reforming the regulatory functions of the Defra group, aiming to:
  - increase independence
  - shift focus from compliance to improvement
  - establish shared regulatory principles and approaches
  - increase cooperation and information sharing
  - rationalise inspections and reduce the burden on farmers
  - establish oversight function of the Office for Environmental Protection
  - improve channels for articulating policy direction.
- Introduce a ‘land-keeper’ registration system to improve information on agriculture and land management and to rationalise and coordinate regulatory functions.
- Through a farming roadmap, consult on and establish a sliding regulatory baseline in line with aims and targets for net zero and the recovery of nature on land.

## SUPPORT FOR TRANSITION

A fair transition and a new social contract for farming will not come about from better regulation and ambitious agri-environment schemes alone. Farming also needs support in other areas, new people and ideas to enter the sector, and opportunities for sustainably produced food to find new markets – all to help the sector navigate the challenges ahead. To deliver nature on farms, agriculture needs to be able to offer good livelihoods and rewarding work, not only to those already in the sector or who own land, but anyone who is skilled and enthusiastic about growing food and solving environmental problems. Flourishing farming sectors can help provide the bedrock of flourishing rural economies and places, and increasingly towns and cities too.

### *Financing the farming transition*

Urgent action is needed across farming to meet the nature and climate crises head-on, including a wholesale shift to agroecological farming models. However, transition comes at a cost and accessing finance is a particular barrier to investing in new ways of producing food.

The Food, Farming and Countryside Commission (FFCC) (2021) has proposed the creation of an Agroecology Development Bank (ADB) to meet this challenge. This would be a new, publicly-owned, mission-oriented institution, providing a full spectrum of finance to help overcome some of the gaps and lock-ins that inhibit the adoption of innovative approaches and limit opportunities for new entrants or tenant farmers to access agricultural finance. Agroecology may have a demonstrable business case, but existing finance for agriculture may not be structured to support the investments and actions it entails. As the FFCC proposal sets out, such a development bank could complement more established financial institutions, help signal new directions to financial markets, and help deliver public goods by linking conditions to the delivery of environmental outcomes.

Landworkers' Alliance (2019) has also highlighted the challenge of accessing finance for agroecology, especially in capital costs for new entrants. They propose a government supported farming start-up scheme, providing £5 million per year for 10 years to new entrants into the farming sector. They estimate this could generate 1,000 new farms over a decade, providing 2,500 jobs and – given a local economies multiplier effect of 2.5 – £125 million in local economic benefits. Such figures may be illustrative, but they indicate the significant added value to investing in new farming entrants delivering agroecology, while diversifying the farming sector.



### *Recommendations*

- Echoing the FFCC proposal, the UK government should establish a state-owned Agroecology Development Bank with a mission to accelerate the transition to agroecology.
- Pilot an initial £5 million new entrants' agroecology scheme, to provide 100 new agroecological farmers each with £50,000 in start-up costs.

### *Enabling retirement and new farmer access*

To succeed, farming needs to attract the best people from across society and provide them with livelihoods and rewarding work throughout the course of their lives. In an ageing sector, one key issue is enabling farmers to retire or leave the sector as they get older. For too many farmers, retirement is not a viable option, either because they have not been able to save for a pension or because there is no one to take on the running of the farm.

The Agriculture Act (2020) introduces the possibility of 'de-linked' lump sum payments to farmers, as part of the phase-out of the Basic Payment Scheme between now and 2027. This upfront payment could help contribute to the pension funds of retiring farmers or cover capital investments to upgrade and future-

proof farms. To ensure such one-off payments help deliver public goods in the long term, conditions to payments could require that land continues to be farmed or used for nature conservation purposes. Similarly, conditions applied to lump sum payments could enable long-term leasing for new farmers or community supported agriculture (Landworkers' Alliance 2020). These approaches could be complemented by the strategic use of 'conservation covenants' included in the Westminster environment bill to secure long-term legal agreements for nature conservation. These could in turn generate income through participation in new ELM schemes and help achieve national strategic objectives for land use, nature, and climate, while balancing the need for food production.

The cost and availability of land is a barrier to entry for new farmers. There are few simple solutions, but innovative approaches are emerging. The Soil Association's Land Trust is a model of land sharing that enables farmers to donate their land in trust for young or new farmers to work, ensuring the continued use of the land for food growing and environmental management, while avoiding farms being broken up. Alternatively, 'share farming' is an existing model where two farm businesses share resources, normally with one providing land and certain capital expenditure, while the other undertakes day-to-day farming activities. This can help new farmers access land and older farmers decrease workload, while providing experience and expertise.

From cooperatives to crowdfunding to Community Land Trusts (CLT) and Community Supported Agriculture (CSA), there are increasingly varied ways through which communities are accessing land for food production and security. These bring valuable diversity to land management models, and can help foster innovation and provide entry points for new farmers. County Farms have also been identified (Graham et al 2019, Sustain 2020) as strategic entry points for those without existing access to land and for providing platforms for new models and techniques. Established at the end of the 19th century to provide land to otherwise landless workers, they have declined by nearly half between 1977 and 2017, from 426,695 acres to 215,555 acres (Shrubsole 2018). Such farmland could provide a core element of a more networked farming landscape, strategically delivering solutions for nature and climate.

The pressure driving up land prices is partly generated by complex land tax systems and exemptions, including inheritance tax and capital gains tax, amongst others (People Need Nature 2019). While rate relief and exemptions can support the delivery of stated public policy objectives, it is unclear to what extent the existing tax system as applied to agricultural land is compatible with a net-zero and nature-positive economy. Indeed, such arrangements could well undermine wider objectives for nature and climate, while tax breaks associated with agricultural land largely benefit a minority of already wealthy landowners (Tax Justice UK). This system requires urgent review and reform if UK land is to deliver the many goods expected of it and be accessible to a wider set of stakeholders.



### Recommendations

- Design the de-linked basic payment scheme 'lump sum' payments for retirement so that they come with conditions related to facilitating new entrants to the sector and environmental land management.
- Support the growth of land sharing schemes and alternative ownership models by providing and publicising existing support, direct support to organisations to develop such schemes, and fiscal incentives for uptake.

- Secure and increase local authority budgets for county farm programmes and halt sales of county farmland.
- Commission a review of existing tax arrangements for agricultural land to assess their compatibility with a net-zero and nature-positive economy, UK food security and value for public money.

## FIGURES 5.1 AND 5.2: DEMOGRAPHICS - THE FARMING WORKFORCE IS AGEING AND LACKING DIVERSITY

**Figure 5.1: Proportion of farm holders in different age groups and median age of farm holders, between 2003 and 2016**

| Holder's age       | 2003 | 2005 | 2007 | 2010 (c) | 2013 (c) | 2016 (c) |
|--------------------|------|------|------|----------|----------|----------|
| Under 35 years     | 3    | 3    | 3    | 3        | 3        | 3        |
| 35–44 years        | 15   | 14   | 12   | 11       | 10       | 9        |
| 45–54 years        | 24   | 23   | 23   | 25       | 25       | 23       |
| 55–64 years        | 29   | 29   | 29   | 29       | 28       | 29       |
| 65 years and over  | 29   | 31   | 33   | 32       | 34       | 36       |
| Median age (years) | 58   | 58   | 59   | 59       | 59       | 60       |

Source: Defra et al (2018)

Notes: (a) The holder is defined as the person in whose name the holding is operated. The data in this table relate to all holders whether or not the holder is also the manager of the holding.

(b) Holdings run by an organisation (such as limited companies or institutions) do not have a holder and are therefore excluded from these figures.

(c) Figures from 2010 onwards relate to commercial holdings only for all of the UK. More information on commercial holdings can be found in the introduction section.

**Figure 5.2: The five most and five least diverse professions in the UK by diversity index**

| Rank                 | Occupation                                  | Diversity index |
|----------------------|---|-----------------|
| <b>Most diverse</b>  |   |                 |
| 1                    | Taxi and cab drivers and chauffeurs         | 0.72            |
| 2                    | Dental practitioners                        | 0.69            |
| 3                    | Packers, bottlers, canners and fillers      | 0.67            |
| 4                    | Medical practitioners                       | 0.65            |
| 5                    | Food, drink, and tobacco process operatives | 0.62            |
| <b>Least diverse</b> |   |                 |
| 197                  | Gardeners and landscape gardeners           | 0.11            |
| 198                  | Police officers (sergeant and below)        | 0.11            |
| 199                  | Animal care services occupations            | 0.11            |
| 200                  | Environment professionals                   | 0.06            |
| 201                  | <b>Farmers</b>                              | <b>0.03</b>     |

Source: Norrie (2017)

## MARKETS FOR SUSTAINABLY PRODUCED FOOD

Discussed elsewhere as part of the work of the IPPR Environmental Justice Commission (Coleman et al 2021), a key element of a just transition in food is fostering markets that prioritise and fairly reward sustainably produced food.

Stable and diversified markets can also support farm businesses when facing supply chain disruption. Scale, geography, and logistics often create barriers to farmers accessing markets directly, so opportunities where producers can capture more value are important for supporting on-farm actions for nature and climate and supplementing payments for public goods. Strategies for stimulating demand for sustainable food are varied but may also deliver on multiple public policy objectives, such as health, food security, local economic activity, and could include:

- using public purchasing spend to strategically support local food suppliers and the procurement of sustainably produced healthy food
- developing local food infrastructures such as food halls, farmers markets, and box schemes that provide direct sales opportunities for farmers producing sustainably and help to diversify and regenerate town centres
- scaling up community food hubs to better connect supply and demand for sustainably produced food, as well as provide a destination for surplus food to be redirected to combat household food insecurity (Guzman and Reynolds 2019).

## TECHNOLOGY TO SUPPORT FARMERS

Technology is playing an increasingly important role in how farming is being done and will be done in the future. As a policy area it is broad, potentially transformative, and arguably underappreciated for the impact it will have on food and farming systems. Three areas to highlight in the context of wider transitions for farming include the following.

### *Bridging digital divides*

As with many sectors, digital technology is a growing element of farm management. It is applied in contexts such as monitoring and data management, regulation and administration, and accessing grants and finance. Digital literacy among older generations (who are disproportionately represented in farming) and insufficient digital infrastructure provision across the country signal major barriers to fair access and participation. Improved broadband access and speeds in rural areas would not only benefit farmers but also the wider rural communities of which they form a part.



### *Recommendations*

- Speed up the roll out of superfast broadband access across the UK as part of the levelling-up agenda and to support the growth of rural economies.
- Ensure access to farming schemes, support, guidance, and consultation is available in both digital and analogue form to ensure all farmers can participate.

### *Social impacts of technology*

Vast sums of money – from various sources – is being directed into the research, development and roll out of agricultural technologies. Technology has an important role to play in increasing efficiencies and yields, better monitoring of environmental impacts, reducing workloads on farmers, and complementing wider agroecological approaches to farm management.

However, technology can generate winners and losers (for example, automation and farm labourers) and unforeseen consequences. It is critical that technologies are developed and implemented with farmers themselves in mind – how they work and how they wish to work, as well as their embodied and lived experiences of farming. Arguably too much emphasis is being placed on the scientific promise of agri-tech and too little on its social impact.



#### **Recommendation**

- Ensure sufficient public funds for research are directed towards the study of the social impacts and consequences of technological innovation for farmers and rural communities.

#### **Navigating controversial technologies**

Technologies applied to food production can generate a range of impacts and responses from farmers and the public. It is the task of government to properly listen to, account for and respond to public views on the role of technology.

Imposing technologies on farmers and the public, failing to build public understanding or not taking concerns seriously can undermine trust in new approaches and innovation, especially when it comes to food. This requires a longer-term view of introducing agricultural technology by government, especially with regards novel or controversial technologies. A recent example is a Defra consultation on the introduction of gene-editing technologies. Irrespective of the relative merits and safety of the technologies in question, the consultation language appeared to be pre-determinedly in favour, with the benefits presented more clearly and strongly, suggesting the decision had already been made and the consultation a formality. The title of the press release announcing the consultation read: “Gene editing creates potential to protect the nation’s environment, pollinators, and wildlife”.



#### **Recommendation**

- Commit to independent oversight and review of the introduction of new forms of agricultural technology to ensure safety, sustainability, and public trust.

### **TRADE FOR A NET-ZERO AND NATURE-POSITIVE ECONOMY**

Now outside of the EU, the UK government is pursuing a series of new free trade agreements, in addition to that already signed with the EU and the rollover deals transferred over from its membership of the bloc. As one of the sectors most sensitive to international trade, the ultimate shape of UK trade policy will have major implications for farming and food production. As a critical driver of biodiversity and climate impacts globally (Dasgupta 2021), trade policy will play a pivotal role in meeting or failing the government’s self-set ambition to be a global leader on the environment. To ensure trade policy fuels progress on nature and climate, it must follow agreed environmental targets and priorities, and not the other way around. Providing unfettered access to UK markets for food produced to lower environmental standards than apply to domestic farmers risks undermining climate and nature efforts domestically and exporting the UK’s ecological footprint elsewhere in the world. Polling has consistently indicated most of the British support the blocking of importing food produced to lower standards than domestic products (Conservative Environment Network 2020).

The Trade and Agriculture Commission report (2021), following the suggestion of the National Food Strategy (2020), has proposed the creation of so-called ‘core standards’ based on the compliance of traded agricultural goods with key environmental, animal welfare and safety requirements. If equally applicable to

domestic producers, set in pursuit of legitimate policy objectives and supported by scientific evidence, there is no reason why such an approach should fall foul of international trade rules. Such an approach would assure consumers and citizens about the environmental impact of their food, while also ensuring a level playing field for farmers taking the necessary steps for nature and climate. WWF (2021) has suggested that these core national standards should be accompanied by UK efforts on the global stage to agree international environmental standards to underpin a global trading system compatible with a net-zero and nature-positive economy.

The impact of the type of agreement the UK government sought with the EU is already being felt on domestic producers, especially those reliant on EU export markets or intra-UK agri-food trade between Northern Ireland and Great Britain. Export requirements (including sanitary and phytosanitary measures and rules of origin) agreed as part of the new relationship agreement are adding major costs to key agri-food sectors and preventing export altogether for some products. The impact of a fall-off in agri-food exports (exports to the EU in January 2021 were less than half their monthly average) is being disproportionately felt by the small businesses that make up the majority of the sector, as well as the regions in which they play a more significant economic role (Pope 2021). This is despite the full extent of new requirements not having yet come into force. Further cooperation is required as the UK-EU deal continues to be implemented that minimises the need for additional requirements, properly prepares businesses to cope, and assures both parties that agri-foods meet mutually high standards.

The failure thus far to convene key stakeholders - including farmers, civil society, and devolved governments – in the formation of UK trade policy represents a major shortcoming of the UK government's approach. The absence of sufficient scrutiny provisions and published impact assessments not only risks creating a democratic deficit and lack of trust but may also serve to undermine the UK's position in negotiating new agreements. Consensus around trade priorities and objectives, as well as opportunities to provide experience and understanding of how proposed arrangements will impact domestic sectors should be seen as a strength, not a weakness. The lack of formal ratification powers, either by the UK parliament in Westminster or devolved bodies, leaves the UK as an outlier in terms of democratic oversight of trade agreements among advanced nations.



### **Recommendations**

- Provide a comprehensive non-regression clause in UK environmental legislation that commits to maintaining at least current levels of environmental protection.
- Establish a set of core standards for environment, animal welfare, and food safety, based on stated policy objectives and scientific evidence, to which all food – domestic and imported – will be expected to comply.
- Provide opportunities for all four parliaments and the three devolved administrations to help shape UK trade policy and priorities, befitting of an advanced democracy. This includes setting trade objectives and negotiating mandates, scrutiny of negotiations and texts, and legal processes for ratification.
- Create an independent statutory food commission to monitor and hold government to account on the delivery of nationally food system objectives, including the development and rollout of trade policy aligned with these.

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