

CONSULTATION

Response Document



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Environmental Land Management
(Department for Environment, Farming & Rural Affairs)

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Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

We welcome the opportunity to participate in the development of the Environmental Land Management Scheme and would be happy to be involved in the development process. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

Comments from CIEEM

6. Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

Overall, the design principles are sound and capture most of what would support both land managers and the environment. We have specific comments on principles a), b), d) and f).

Principle a) The elements are perhaps inevitably very broad and worthy. Although the term “land based business” has become almost a standard and general description, the business activity must be able to demonstrate genuine public benefits for any public money it receives.

Principle b) This is vital, but the wording would benefit from greater specificity. This is also a good place to include the need for clarity as a design principle. Whilst land managers understand the principles of public money for public benefits, it can be less clear what national policies and outcomes are relevant to their individual holding.

The public goods agenda needs to be set out spatially to enable the industry to align their business objectives with these outcomes. Guidance set out at a landscape-scale would radically improve communications and understanding, using existing frameworks, such as the National Character Areas, for individual Environmental Land Management Plans. Existing landscape-scale actors, such as National Parks, AONB Conservation Boards, local ecological networks, catchment partnerships, etc. have to play a role.

Principle d) Achievability is essential – however this should not necessarily be a barrier to ambition. Particularly in light of the fact that the new scheme should seek to widen its land coverage and be more inclusive of a broader range of actors, including those who will not have delivered similar schemes before.

This principle should therefore also look to address the existing skills gap which affect achievability, encouraging the growth of the sector. A proactive approach must be taken to addressing skills gaps, including outside the farming community. The level of ambition described in the command paper will not be met without investment in skills related to land management.

Principle f) Whilst we broadly agree with principle f, there is an important balance to be struck. There is broad support for schemes and agreements to be simple and easy to use, but we have seen that overly simple schemes have failed to deliver the right outcomes. Entry Level Stewardship whilst taken up in large numbers ultimately failed to deliver the environmental outcomes desired. Having skilled land managers and advisors to help deliver these schemes is therefore vital in increasing take-up and deployment. There may not be a one-size-fits-all administrative approach.

7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Objective 2 needs to be wider than limiting to agriculture only. It should be broadened to cover both the longer-term and beyond just agriculture. A commitment to helping transition wider land management practices towards sustainability would be preferable.

Both objectives are inherently linked; addressing the second with a holistic (or whole farm) approach will address short-term environmental issues whilst ensuring long-term environmental performance.

8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

- **Provide attractive financial incentives for land managers**

As 57% of farming profits originate from public investment the most obvious and efficient way of securing participation in ELMs is to ensure that the level of funding is sufficient to reward land managers for environmental goods which are not properly valued by the market, and at a level sufficient to make that work and investment worthwhile. At a minimum this would include assuring that the current level of national investment – £3.5 Billion – is maintained.

- **Highlight the success and importance of public goods**

Along with financial reward, there will need to be some elements that push participation, for example, in broader education and a recognition of the public benefits that they can provide.

More can be done to promote the benefits that public goods provide to all communities. ‘Public money for public benefits’ is a useful concept for doing so at a wider public level. Working to highlight the benefits of the scheme to land managers will also be important as previous reputational damage needs to be repaired.

Land managers will also need better information and advice on the importance of actions and activities within specific holdings or regions, for example, for participating farmers to more clearly understand the strategic importance as well as site specific importance of their participation in ELMs.

- **Ensure the scheme application process is streamlined**

The long and difficult application process made the Countryside Stewardship (CS) unattractive for many. Land managers need clarity about how the scheme will fit in with business planning.

- **Provide dedicated training**

Ultimately, the greatest determinant of success in delivering environmental outcomes is the skill, knowledge, and approach of the person(s) delivering it. Defra should work with professional bodies and others to ensure that the various professionals involved in delivery are highly-skilled and capable, and have access to the tools and training to do their job well. Professional bodies are already set up to accredit professional competence, deliver Continuing Professional Development (CPD), and publish best practice guidance. CIEEM’s Competency Framework can be adapted for this purpose, along with developing training that could be added to our existing CPD programme.

- **Provide access to dedicated advisors**

Access to appropriate advice is critical, both beforehand and in ongoing monitoring and management. Competent, professional advice and project management is vital in transitioning to the new system - and to meet other best practice standards and environmental targets. This should support ongoing adaptive management, which is key in light of climate change.

Advice must be accessible to all, appropriately funded, accredited, and supported by government (e.g. with clear guidance).

These measures must also be expanded to a wider sector to include all land managers. Recent communication on the development of ELMs has focused heavily on farmers, which could impede uptake amongst a wider cohort.

9. For each tier we have given a broad indication of what types of activities could be paid for. Are we focusing on the right types of activity in each tier?

The activities indicated are broadly acceptable, what is lacking however is detail about what individual activities will be under each tier. Understandably this is still at an early stage and these guiding principles are useful but further examination of what types of activities could be delivered by land managers is needed.

Resources are not unlimited and therefore need to be directed to where they can create the most environmental benefit.

We support the emphasis given to collaboration between land managers.

Tier 1. Must include nature recovery and the net zero target for all land (moved from Tier 3). These are part of the sustainable farming objective. Tier one should have a foundation option that transforms the health of all soils in a way that acts as a catalyst for nature recovery. This option should adopt the warnings of the Government's Chief Scientist that the country has failed to appreciate the unintended consequences of any of the pesticides – the precautionary principles must, in this case, prevail.

Tier 1 must include a broad forestry, agroforestry and management in its scope. Putting this area in Tier one will make it more accessible particularly for land managers with small holdings, where relatively simple interventions (such as stock exclusion, edge and ride management, etc.) can make a big difference. This can start a drive towards the governments ambitious tree targets.

Tier 2. There has to be a way of articulating spatially a joined-up agenda that integrates national and local policy outcomes. There is a potential conflict in the wording – 'local' in the heading and 'strategic' in the bullet points. It would be helpful for the reader if examples of the type of outcome for each tier were included.

Tier 3. Could this include building resilience to climatic events for specific towns and cities, restoring landscape scale ecosystems, for example to sequester carbon.

10. Delivering environmental outcomes across multiple land holdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in tiers 2 and 3?

The role of competent advisors, in particular, is crucial to the success of collaborations. Please refer to our answers to question 8 on the value and importance of advisors.

In addition, it will be important that there are strategic over-arching objectives at all relevant scales for implementing ELMs.

Support will need to be given to ongoing adaptive management, which is vital in light of climate change and other ongoing changes.

Land managers and their advisors will need access to sound environmental data and support with monitoring/evaluation.

11. While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

It is important for land managers to be able to determine site-specific priorities. However, such outcomes must be founded on consistent and detailed data which provide the most public benefits from public money. Enabling a consultative process with land managers at a landscape-scale will be important to allow collaborative work on delivering localised benefits. For example, multiple land managers in an AONB may want to prioritise enabling public access, this would be more effective with collaboration across multiple land holdings.

Local stakeholders should also be consulted on local public goods that they want, within the context of a national strategy. This could be through existing statutory and non-statutory platforms (e.g. National Parks, Local Nature Reserves, Conservation Boards, Local Nature Partnerships). There may also be opportunities for input at Parish Council level. Opportunity mapping should be considered, within the context of Local Plans and economic strategies.

12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

No comment.

13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

Blending public and private finance offers a range of opportunities, especially if these benefits are combined and stacked. For example, if private finance is invested in carbon storage of woodlands then the public payments may be attributed to the biodiversity gain.

14. As we talk to land managers, and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme participant?

The importance of access to environmental advice, from competent professionals, cannot be overstated. Given that intensive advice to every scheme will not be possible, there is a need to improve the quality of advice that is given to land managers. Please see our answers to Question 8 on advisors.

Government should consider how accreditation and training requirements for advisors can be provided to raise the standard and consistency of advice. This could include the identification of appropriate third-party standards and the accreditation of private sector advisors by professional bodies. CIEEM's Competency Framework can be adapted for this purpose, along with developing training that could be added to our existing CPD programme.

15. We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

Although we support self-assessment to a limited extent, environmental benefits need to be assessed by environmental professionals. Training could be provided in the use of methods such as survey forms, photographs, species recording, and ability to identify indicators of success. However, by themselves, these methods will not be sufficient to know whether public benefits are truly being delivered using public money. Professional accreditation will be needed at some stage in the process.

Self-assessment will work better within collaborative groupings and hence a further advantage to encouraging this way of working.

16. Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

A National Pilot ought to be spatially identified, covering the largest mix of habitat and soil types, catchment issues, urban needs, and intensive and extensive farming systems. This would enable various options under each tier to be trialed. Currently, for instance, the timeline for the pilot only refers to Tier 1 which includes no forestry actions.

Key elements that could be measured include biodiversity gain, suitability of tiers, ability to adapt, and use of advice.

17. Do you have any other comments on the proposals set out in this document?

The UK's departure from the Common Agricultural Policy represents a major opportunity to improve our landscapes and people's relationship with them.

There is much in the ELMS document that is very positive. We support the essential design principles underpinning this work, most especially that public money should be spent on delivering public benefits.

However, it is essential that the level of ambition on funding and coverage remains high. This means:

1. The UK's exit from the EU should not lead to a reduction in the overall financial envelope for the achievement of positive environmental outcomes, especially for the period of the 25-Year Environment Plan.
2. The new scheme(s) must have the ambition to improve a much greater extent of land than currently, and therefore to target investment where it will deliver the greatest benefits. This will mean ensuring that the scheme is open and appealing to anyone who owns or manages land, as well as increasing uptake amongst smaller sites, particularly in areas fringing towns and cities.
3. That any transition period begins with a fixed end date, after which point no public funds will support farming practices that lead to a decline in the quality of the natural environment.

We support the ongoing transition period to move from the existing system to the new. The UK must use this period to test, design and deliver the best system for improving our rural landscapes. Whilst there must be ongoing refinement after this period, the underlying principles should be put on a long-term statutory footing, to ensure there is no erosion of the standards on public money for public benefits.

The Environmental Land Management system can be the main delivery framework for transforming all land through investment and sustainable resource management. The initial focus of the system is to replace subsidy for farming as we leave the EU; however, we must not lose the wider ambition set out in the 25-Year Environment Plan.

Defra now has an opportunity with ELMs to develop a world-leading scheme that is far more ambitious than previous agri-environment schemes, and to transform the way we manage land. Getting ELMs right is vital to achieve conservation goals but also to restore the natural processes upon which the production of healthy food, timber, and other goods relies.

ELMs has, rightly, been developed with high hopes of innovation and impact, and we have ample information and evaluative studies on participation and outcomes from previous agri-environment schemes. There are therefore no excuses to reiterate or to make the same mistakes again.

The new ELM system should focus on delivering a resilient and functional natural environment, that works in harmony with sustainable land management. We must not forget that we are in the midst of a climate emergency and biodiversity crisis.