

Department for the Environment, Food and Rural Affairs

CAP Reform post 2013

Response Form

December 2011

Please use this form to answer the questions contained within the 'CAP Reform post 2013' discussion paper.

The closing date for the submission of responses is midnight 5th March 2012.

Responses can be returned by email (preferable) or post.

Email address: cap.reform@defra.gsi.gov.uk (clearly mark the subject field "Cap Reform post 2013")

Or by post to:

EU Agriculture and Budget Strategy Team
Department for Environment, Food and Rural Affairs
EU Budget and Agricultural Strategy Programme
Area 5D
9 Millbank
C/O Nobel House
17 Smith Square
London
SW1P 3JR

In order to help us analyse responses, please provide details of your organisation below.

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Organisation Size (no. of employees)	c 6,000 Professional Members
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Organisation Type	Please mark/give details as appropriate	
NGO	<input type="checkbox"/>	
Public Sector (eg, local / central government, hospitals, universities) (please give details)	<input type="checkbox"/>	
Retail Sector (eg, supermarkets) (please give details)	<input type="checkbox"/>	
Service Sector (eg, cinemas, hotel chains, banks) (please give details)	<input type="checkbox"/>	
Light Industry / Manufacturing	<input type="checkbox"/>	
Property Management	<input type="checkbox"/>	
Trader / Verifier	<input type="checkbox"/>	
Research Institute	<input type="checkbox"/>	
Other (please give details)	<input checked="" type="checkbox"/>	Professional Institute representing 6,000 Landscape Scientists, Landscape Planners, Landscape Architects and Landscape Managers.

N.B. on the form below, please leave the response box blank for any questions that you do not wish to answer. All boxes may be expanded as required.

1. What are your views regarding the direct payments proposals?

1. The Landscape Institute does not support the proposals to exclude people and organisations whose BPS payment is more than 5,000 euros which amounts to less than 5% of total income received from non-agricultural activities. The proposed capping of basic payments are also not supported.

REASON - The aim of public intervention systems for agriculture must be to secure sustainable food production: it must not attempt to direct the structure of public, private and voluntary mechanisms that can achieve that aim. Wealthy private individuals and companies ought to be actively encouraged into agriculture as they bring added financial investment, innovation and commitment to sustainability. At the same time many voluntary organisations such as the Wildlife Trusts and the Royal Society for the Protection of Birds farm sustainably, but would be excluded from the BPS direct payments changes, if they are implemented as currently proposed. There are also many places that are managed as multi-functional landscapes, where sustainable food production is being achieved along side other functions such as bird reserves, golf courses, airports, military establishments and others. The Common Agriculture Policy reform comes at a time when we all realise that food production levels are not meeting the demands of a rising world population. In addition farming is far too dependent on unsustainable energy sources. We need all land that can produce food sustainably to be producing food and not create more barriers by restricting eligibility for the BPS.

2. The Landscape Institute does support the proposals to include a Compulsory Additional Greening Payment. However such an approach must be highly disciplined to ensure that there is a clear vision of an integrated outcome for food production and natural systems, in which all sectors, private, public, voluntary organisations and individuals can collaborate in achieving. Such clarity must also embrace the urgent need for the wider public to understand and support the aims of the CAP. Most of Europe's diverse landscapes were formed by farming systems, but over the last hundred years the distinctiveness and variations in these landscapes have been eroded largely as a result of mechanisation and agri-chemical 'advances'. The European Landscape Convention provides a framework for the active management and conservation of the rich landscape variations across Europe, variations that have been formed by the close interaction between human activity and natural systems. This Convention could provide the rationale for the distribution and administration of the Compulsory Additional Greening Payment, specifically because of the links it has with sustainable land management.

3. The Landscape Institute supports the measures proposed for Permanent Grassland, crop diversification and organic farming. It also supports the proposals for an Ecological Focus Area per unit embracing at least 7% of land, excluding permanent grassland. However the way this proposal is described implies that there is no link with food production, that it is a constraint on food production and a burden on farming. The Landscape Institute believes that agriculture across Europe must be transformed to be more sustainable, starting with a more sensitive approach to nurturing the biodiversity of Europe's soils. More emphasis should be given to encouraging farmers to make use of systems like integrated crop management, such as the use of San Foin to fix nitrogen, resulting in benefits to soil quality, invertebrates and aquifers at the same time as avoiding over use of fossil fuels. An outstanding example of the benefits to both biodiversity and food production can be seen at the Cholderton Estate, on the Hampshire/Wiltshire border, run by Henry Edmonds. As described there appears to be no structure to support the various options set out in the proposals and this an example of where the European Landscape Convention approach could provide a rationale for the delivery of these new measures.

2. What are your views regarding the single common market organisation proposals?

The Landscape Institute is largely supportive of the measures contained in the common market organisation proposals for Safety Net, Competitive Food Chain and, in particular, Simplification. Public intervention as transposed into UK mechanisms are not clear, with a degree of duplication and lack of understanding across and throughout many levels of the public sector. Successive UK governments have criticised the principles of CAP and, as a consequence, have failed to ensure its delivery is fit for purpose, for example the current investment in the Single Payment Scheme lacks accountability and the implementation is fiercely guarded, justified by the dangers of disallowance of investment. One approach might be to use the European Landscape Convention to establish a rationale for delivery, where the policy for individual landscape types is consulted on and set for all levels of the public sector to deliver. At the same time this would provide clarity for a single vision, at a landscape scale, where none exists today, to enable the private, voluntary and public sectors to collaborate on delivery. The new imperative for sustainable food production as advocated by the Government's Future of Food and Farming would be effectively delivered in this way.

An example of where the UK system breaks down is the current relationship between the Single Payment Scheme and National Parks. Each National Park Authority (NPA) has a statutory obligation to produce a Management Plan for its area, but it is the Rural Payments Agency (RPA), not the NPA, that is the main source of funding for land managers. Farming practices are a major influence on National Park landscapes, but National Park Plans do not contain CAP objectives, or a plan for delivering them. This system secures a very poor relationship between the farming community and National Park Authorities, banishing those authorities to working on the margins of land management. This disfunctional relationship between public intervention and the farming community could be replicated across Europe as a result of these new proposals.

3. What are your views regarding the rural development proposals?

1. The Landscape Institute expresses qualified support for the changes to the Rural Development Programme. We assume that the Government will consult on its proposals emerging from the new freedoms given to member states to implement the objectives outlined in the consultation paper. However the programme for Innovation and Competitiveness should have an overarching ambition to reposition the agricultural industry to be more sustainable in light of its current reliance on non-renewable energy for its level of production. This should reference the importance of harnessing the power of natural systems as the platform for change. Intervention should also enable the farming industry being rewarded for the production of other public benefits than just food. For example it should be possible to see the farming industry being paid to secure clean water emerging from underlying aquifers rather than continuing to accept clean up costs away from the agricultural system of intervention.

The focus on ecosystems in the list of six rural development priorities is our main cause for only expressing qualified support for the rural development proposals. The Landscape Institute supports the continuation of the Environmental Stewardship Scheme - HLS and ELS. Currently our national objectives include landscape and the historic environment, which need to continue. The LI believes that Natural England is doing a good job in developing a strong and workable relationship with the farming industry in delivering the HLS and ELS. It would be a serious retrogressive step if the scope of the objectives for these schemes were to be narrowed. The LI supports the approach being taken on Areas Facing Natural Constraints in the consultation and for the proposals for managing Risk.

2. The Landscape Institute welcomes the new emphasis being given to Social Inclusion provided that this includes measures to help break down barriers between the farming industry and the rest of society. The general public has lost the connection with food production and as a consequence little political support is being given to our farmers, there is breakdown of understanding of the farming industry by the public, a failure by the industry to be more accountable in the use of public investment, a failure by the public to reduce food waste and a basic ignorance of the issues surrounding the security of food production systems. Food production should not be the sole preserve of the agricultural industry and the CAP should actively encourage public involvement in growing food. This observation is not designed to redirect public investment away from the industry, that investment is supported.

4. What are your views regarding the financing, management and controls proposal?

1. The Landscape Institute believes there is a lack of clarity over public intervention into land management between getting the right balance between Regulation and Financial Incentives, between advice and statutory compliance. This has become more complex as a result of previous reviews of the CAP. The proposed changes ought to require the public sector to set out clearly what the objectives are and set out the framework for delivering all of the public sector interventions. The decoupling mechanism resulted in Pillar 1 supporting a range of environmental objectives, some of which were being delivered by a range of separate public agencies and including local government, and some of which were being delivered through programmes in Pillar 2. Any simplification should bring together the SMR and GAEC standards into one regulatory framework and clarity of what is being delivered through Pillar 1 and what is being delivered through Pillar 2. The UK government must avoid expanding the Farm Advisory Service in parallel to its appointed agents Natural England. Natural England has invested heavily in building up a good working relationship with the farming industry. Any expansion in farm advice to place more emphasis on sustainable farming systems should concentrate either on Natural England expanding its services or on bringing the entire Natural England executive back in to the Department of Environment, Food and Rural Affairs.

2. For some time there has been talk of a clear 'golden thread', from the strategic vision for sustainable food production, through to the articulation of this vision at a landscape scale, down to the level of the individual holding, with its Whole Farm Plan. This would provide a clear contract between the private and public sectors, delivering sustainable food and a multi-functional landscape, integrating the full range of public benefits. It is time for that discussion to mature in the presentation of firm proposals, as a consequence of this review.

5. What are your views regarding the proposals fixing certain aids and refunds?

The Landscape Institute has no comments on these proposals.

6. What are your views regarding the transitional arrangements for direct payments in 2013?

The Landscape Insitute believes that the transitional arrangements should allow the current mechanisms to continue for a further year allowing for the new arrangements to be properly considered and implemented.

7. What are your views regarding the proposals to support vine growers?

The Landscape Insitute strongly supports these proposals because the UK has rightly supported land management and food production across all sectors.

8. Do you have views on any further areas you think we should consider concerning this package of CAP reform proposals?

The Landscape Institute supports the principal of continuing the full range of public intervention systems that are in place to support the farming community because the outcomes are crucial to society. Many of the products of the farming system can not be quantified in traditional cost benefit analysis terms and on a small island food security, sustainably produced, and multi-functionalism have to be the new imperatives. Food production is so seriously threatened by climate change, population growth, lack of energy security, ecosystems failure and changes in human behaviour, on issues such as food consumption, that the CAP needs to change direction to reflect the needs of a new agenda. It appears that each time a review of the CAP is undertaken it fails to have any long term vision of where each step is taking us. The CAP is not equipping the farming industry to transform its systems to being sustainable and too little attention has been paid to the devastating impact current systems have had on soil quality and its biological diversity.

The Landscape Institute is grateful for the opportunity to comment on the proposed reform of the Common Agricultural Policy and offers support to the Department of Environment, Food and Rural Affairs should further work or expansion in detail be required.