

Sustainability appraisal of policies for farming and food

01.12.01



Sustainable
Development Commission

Sustainability Appraisal of Policies for Farming and Food

A report for the Policy Commission on the Future of Farming and Food from the Sustainable Development Commission

December 2001

Contents

Summary	3
1. Introduction	5
2. Submissions and sustainability criteria	6
3.1 Redirection of funding	9
3.2 Consumer trends	9
3.3 Trade	10
3.4 Market power	11
3.5 Issues given surprisingly little attention	12
4. How the submissions deal with SDC's objectives for sustainable agriculture	15
4.1 Produce safe, healthy food and non-food products in response to market demands, now and in the future	15
4.2 Enable viable livelihoods to be made from sustainable land management, taking account of payments for public benefits provided	18
4.3 Operate within biophysical constraints and conform to other environmental imperatives	20
4.4 Provide environmental improvements and other benefits that the public wants - such as re-creation of habitats and access to land	22
4.5 Achieve the highest standards of animal health and welfare compatible with society's right of access to food at a fair price	24
4.6 Support the vitality of rural economies and the diversity of rural culture	26
4.7 Sustain the resource available for growing food and supplying other public benefits over time, except where alternative land uses are essential in order to meet other needs of society	28
5. Highlights from the submissions	30
5.1 Index of highlights from submissions	30
5.2 Further detail on Fontainebleau, Pillar 1 and Pillar 2	31
Appendix 1: Appraisal Matrices	33

Key to symbols	33
British Retail Consortium	34
Compassion in World Farming	37
Council for the Protection of Rural England	41
Country Land and Business Association	46
Countryside Agency	50
English Nature	55
Environment Agency	59
Food and Drink Federation	62
Friends of the Earth	65
National Farmers Union	68
National Federation of Women's Institutes	72
Regional Development Agencies	76
Soil Association	79
Sustain	83
Unilever	87
WWF	90

Summary

The Sustainable Development Commission, with assistance from consultants Levett-Therivel have developed a sustainability appraisal tool based on the objectives defined in *A Vision for Sustainable Agriculture*. The tool was used to appraise 16 submissions to the Policy Commission on the Future of Farming and Food. The submissions appraised are listed in section 2 below.

Big issues

Submissions, even from very different perspectives, often agreed about what the big issues are - but with strong differences about the appropriate response. Some of these recurring issues are:

- **a belief that current public funding of agriculture is failing to deliver value for money**, and an emphasis on redirecting expenditure rather than increasing or reducing it;
- **public ignorance** about how food is produced or how to cook it, and inconsistencies between people's preference as consumers for cheap, convenient food and their demands as citizens about animal welfare, environmental protection and quality;
- **the impact of trade policy**. Most of the submissions argue that current World Trade Organisation (WTO) rules mean higher environmental or animal welfare standards in the UK could give imports produced to lower standards a commercial advantage.

Three different kinds of response are offered

to this:

- acceptance that these rules constrain what can be achieved in the UK;
- reliance on more discerning consumers to buy higher standard UK produce in preference to imports (even where they are cheaper);
- demands to change the rules so that governments can set the same requirements about process and production methods for imports as for home production.

- **the concentration of power of large corporations, particularly supermarkets**
Many saw this as negative, but some viewed it as a positive driver for change.

There are some notable **gaps** in the submissions:

- No real sensitivity to regional differences or different farming practices;
- Little mention of rural culture or recreation, and relatively little on animal welfare;
- Few really radical suggestions;
- Little on the resilience of farming systems to climate change, petrol prices or changes in subsidies, for example.

The appraisals suggest that the most innovative and integrated submissions were by Sustain, Friends of the Earth, the Countryside Agency, the Worldwide Fund for Nature, and the National Federation of Women's Institutes.

How the submissions relate to the SDC's objectives for sustainable agriculture

Objective	How submissions deal with the objective
Produce safe, healthy food and non-food products in response to market demands, now and in the future	Great range of approaches, from continuation of large-scale farming to major shift towards non-food/organic products. Proposals promoting non-food products often constrain food production. Proposals promoting food safety often affect food affordability.
Enable viable livelihoods to be made from sustainable land management, taking account of payments for public benefits provided.	General support for Pillar 2 subsidies. Several submissions suggest radical changes that could have either great benefits or great costs in terms of rural livelihoods.
Operate within biophysical constraints and conform to other environmental imperatives	Generally positive. Several submissions make this their main plank. Shift to agri-environment schemes would promote production of biofuels and improve biodiversity. Traffic impacts mixed.
Provide environmental improvements and other benefits that the public wants - such as re-creation of habitats and access to land	Indirect but positive impacts. Shift to agri-environment schemes could improve landscape, access, etc.
Achieve the highest standards of animal health and welfare compatible with society's right of access to food at a fair price	Generally poorly dealt with, with positive exceptions. One submission argues that high animal welfare standards do not impede production of food at fair price.
Support the vitality of rural economies and the diversity of rural culture	Very poorly dealt with: lip service at best.
Sustain the resource available for growing food and supplying other public benefits over time, except where alternative land uses are essential in order to meet other needs of society	Indirect but positive impacts. Shift to organics and agri-environment schemes would improve water/soil/air quality. Very little mention of hard development, nor how to achieve balance of resource base v social needs.

1. Introduction

The Policy Commission on the Future of Farming and Food (FFC) was established with a remit which includes advising the Government on how we can create a *sustainable* farming and food sector. The Sustainable Development Commission's (SDC's) contribution to the FFC has been to consider what a sustainable food and farming sector could look like.

The SDC defines sustainable agriculture as agriculture that contributes to the overall objectives of sustainable development – “which meets the needs of the present without comprising the ability of future generations to meet their own needs”.¹ Our report *A Vision for Sustainable Agriculture* established seven objectives for sustainable agriculture, namely that it should:

- produce safe, healthy food and non-food products in response to market demands, now and in the future;
- enable viable livelihoods to be made from sustainable land management, taking account of payments for public benefits provided;
- operate within biophysical constraints and conform to other environmental imperatives;
- provide environmental improvements and other benefits that the public wants - such as re-creation of habitats and access to land;
- achieve the highest standards of animal health and welfare compatible with society's right of access to food at a fair price;

- support the vitality of rural economies and the diversity of rural culture;
- sustain the resource available for growing food and supplying other public benefits over time, except where alternative land uses are essential in order to meet other needs of society.

With consultants Levett-Therivel, we have developed an appraisal tool based around these objectives and have appraised the sustainability impacts of 16 submissions to the Policy Commission on the Future of Food and Farming.

The purpose of this sustainability appraisal is to highlight the links between the different dimensions of sustainable development with regard to food and farming, and to show the extent to which the proposed policies meet SDC's objectives for sustainable agriculture. It is not intended as a critique of individual organisations' submissions. The submissions come from organisations with a variety of different interests and expertise, and therefore may not have aimed to tackle all angles of the food and farming debate.

This report discusses:

- the submissions and the sustainability criteria used;
- broad themes from the submissions;
- how the submissions relate to SDC's objectives for sustainable agriculture;
- highlights from the submissions.

¹ "Our Common Future (The Brundtland Report)" 1987

2. Submissions and sustainability criteria

The choice of submissions appraised was designed to represent a range of views, particularly those of the key stakeholders and most innovative thinkers in food/farming and sustainability, within the constraints of getting hold of copies in the short time available.

Clearly the generalisations and conclusions drawn later in this report are only valid to the extent that the submissions are representative. The submissions appraised and their main messages are summarised below.

2.1 Submissions appraised

Submission	Main message
British Retail Consortium (BRC)	Regulation must be efficient and streamlined. Food chains should be shortened, e.g. through farmers working directly for retailers
Country Land and Business Association (CLA)	Farming/food sector is doing well. Farmers should be paid through public funds for producing environmental benefits
Compassion in World Farming (CIWF)	Animal welfare should be improved through more humane rearing practices on farms and less transport of animals
Council for the Protection of Rural England (CPRE)	Non-farming interests should be given greater weight in countryside management, ERDP should be greatly expanded
Countryside Agency (CA)	Subsidies should be completely moved from commodity support to investment in the environment and rural development
English Nature (EN)	Biodiversity should be promoted through subsidies and taxes, particularly a Basic Stewardship Scheme, revisions to national beef/sheep envelopes, and a move to Pillar 2 subsidies
Environment Agency (EA)	Farming's environmental contribution needs to improve. Promotes industry-led environmental standard and whole farm management
Food and Drink Federation (FDF)	Globalisation is here to stay. Food industry will abide by current and future regulations
Friends of the Earth (FoE)	Farming & food production needs to move away from current trends of concentrating power in large corporations, trade liberalisation, large-scale monoculture, unhealthy lifestyles.
National Farmers Union (NFU)	Farmers contribute to environmental quality but their income is abysmal. Exchange rates and Fontainebleau agreement are problems. Regulation should be reduced and the market encouraged
National Federation of Women's Institutes (NFWI)	Dogmatic promotion of free trade and competitiveness are unsustainable. Trade and markets should be treated as means rather than ends
Regional Development	Trends towards intensification are here to stay. Rural diversification,

Agencies (RDA)	retraining/education, and greater regional autonomy are needed to help achieve a living working countryside
Soil Association (SA)	A shift to more organic production would improve health and quality of food, safeguard the resource base, reduce environmental impacts, benefit rural employment, and avoid food crises such as BSE
Sustain	Farming should have fewer inputs, less environmental impacts, and less transport; and should produce healthier food with fair treatment for southern countries. Trade should be a means not an end.
Unilever	Unilever's pea project is a good example of careful use of agrichemicals and direct farm-processor links, which simplify the supply chain, give income security to farmers, and achieve high food standards
Worldwide Fund for Nature (WWF)	Ecological footprint of food consumed in UK must be drastically reduced, e.g. through shorter food chains, less air freight, input-output farm accounting, move to vegetarianism

2.2 Appraisal Criteria

The sustainability criteria¹ used for the appraisal were:

<p>1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone</p> <ul style="list-style-type: none"> • food security, incl. short chain between producer and consumer • food health and safety • food affordability • non-food products
<p>2. Enable viable livelihoods to be made from sustainable land management</p> <ul style="list-style-type: none"> • no./security of jobs in rural areas • value-added processing near producers • tourism • international competitiveness of UK farming sector
<p>3. Provide environmental improvements and other benefits</p> <ul style="list-style-type: none"> • access to countryside, recreation • landscape • public value placed on benefits provided by farming
<p>4. Minimise the total public funding needed</p> <ul style="list-style-type: none"> • opportunity cost of rural policies, e.g. subsidies
<p>5. Support the vitality of rural economies and the diversity of rural culture</p> <ul style="list-style-type: none"> • vitality of rural economies • economic autonomy/control by farmers/rural residents • education and training of rural workforce • vitality of rural communities, age balance • ability to sustain services, access to services • quality and affordability of housing • Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i> • (diversity of) rural traditions/cultures, diversity

¹ criteria in italics denote Government sustainability headline indicators

<p>6. Operate within biophysical constraints and conform to other environmental limits</p> <ul style="list-style-type: none"> energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i> transport: <i>road traffic</i> energy used/food unit produced/transported/consumed biodiversity: <i>populations of wild birds</i> populations of rare species
<p>7. Sustain the resource available for growing food</p> <ul style="list-style-type: none"> water quality and quantity: <i>rivers of good or fair quality</i> soil quality and quantity <i>waste arisings and management</i> air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i> genetic impacts
<p>8. Achieve high standards of animal health and welfare</p> <ul style="list-style-type: none"> animal health and welfare
<p>9. Allow use of undeveloped land for development that genuinely meets human needs</p> <ul style="list-style-type: none"> hard development: <i>new homes built on previously developed land</i>
<p>10. Be resilient to future changes</p> <ul style="list-style-type: none"> e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad

2.3 Key to symbols

The following symbols were used during the appraisal:

Impact of policies: ○ better than now ⊙ same as now ● worse than now

Significance: ⊙ High ⊙ medium ⊙ low

2.4 Distributional impacts

The distributional impacts of the submissions on the following stakeholder groups were also appraised for the categories shown below. The detailed appraisal results are shown at the Appendix.

farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture
farm sizes/types: family farm, agribusiness, alternative lifestyle
farm tenure: owner, tenant
other rural dwellers
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others
consumers (choice, empowerment, quality, affordability)
other interests: landscape, environment etc.
taxpayers
international: fair access to/from international markets, fair trade on equal terms
animal welfare

3. Broad themes from the submissions

It was striking that submissions, even from very different perspectives, often agreed about what the big *issues* are - but with

strong differences about the appropriate *response*. In this section we first offer an overview of these salient issues and the

different views about them. We then note some other issues on which the submissions have surprisingly little to say. (Of course we cannot be certain this sample is representative).

3.1 Redirection of funding

The agreed issue: Existing public funding could be spent much more effectively.

Many submissions say explicitly, and more imply, that money is currently being spent ineffectively or perversely, resulting in unacceptable externalities. They argue that much of current 'mainstream' funding would not be able to give a convincing answer to the first two questions of 'Best Value' - 'why are we doing this at all?' and 'what are we trying to achieve?', much less the subsequent question of 'is this the best way to do it?'

None of the submissions appraised argue explicitly for significant increases in overall public funding for food and agriculture. Most say that *redirecting* the same amount of money could achieve much more. Several submissions argue that the *externalities* resulting from funding food production currently impose heavy costs on *other* public budgets - e.g. groundwater and river pollution, flood damage, roads and traffic impacts, health care for victims of BSE, disaster management of first the FMD animal slaughter and then of tourism businesses - could be dramatically reduced as a by-product of better agriculture.

Many submissions, notably those by government agencies, argue for major redirection of existing spending away from

food production and towards land management. One submission argues that this could be achieved by inverting the national government match-funding requirements for Pillars 1 and 2. Another suggests that all subsidies for commodity production should be halted. Several submissions call for public procurement policies that promote locally produced and organic food.

3.2 Consumer trends

The agreed issue: Many people know precious little about how food is produced or how to cook it. People's current apparent preferences and demands as consumers are often inconsistent with their professed values and aspirations as citizens. Current food trends are not healthy or sustainable.

The submissions argue that on the one hand, most people want cheap, varied, convenience food that comes in nice plastic containers with no pools of blood. On the other hand, people say that animal welfare and the environment are important to them. Current over-consumption of fats and sugars, and under-consumption of fruit and vegetables is leading to "diseases of affluence" such as heart disease and obesity. These trends are, perversely, worst amongst the poorer sectors of UK society. Cookery classes in schools have been cut back. People do not realise that UK animal rearing standards are very high compared to other countries.

The submissions generally agree that the UK's (relatively) high standards of food

production should be maintained and enhanced. They agree that people need to be better educated about food production and cooking. Many also promote food labelling as a way of improving consumer choice and control.

However, different submissions use the trends in consumer demand to justify very different farming systems. Trends towards convenience foods, low cost and year-round availability of foods are used in the food manufacturer/processors' submissions to justify trends towards agri-businesses and globalisation. Trends to white (from red) meat, vegetarianism, local foods, and organics are used in the Non-Governmental Organisation's (NGOs) submissions to justify organic production and extensification. Several submissions propose that 30% of land should be under organic cultivation by 2010.

Several NGOs suggest that consumer demand should be redirected towards seasonality, less meat consumption, and increased consumption of fruit and vegetables as a way of improving health and reducing the ecological footprint of UK food consumption. Several also note that schools should re-emphasise issues of food production and cooking. Many of the submissions promote local foods (although several of these note that local foods will only ever be a small proportion of food consumed).

3.3 Trade

The agreed issue: The impact of trade policy. Current World Trade Organisation

(WTO) rules mean that higher environmental or animal welfare standards in the UK could give imports produced to lower standards a commercial advantage. In general, WTO rules do not allow countries to discriminate against imports on the basis of the process and production methods used. For example, the UK cannot prevent, or even impose a special tariff on, meat produced outside the UK using methods that are banned inside the UK on animal cruelty grounds. Imposing higher welfare or environmental standards within the UK may therefore make it harder for British farmers to compete against imports and result in more imports produced to lower standards, rather than producing an improvement in the UK.

The proposed responses to this issue fall into three clusters:

1. *'Market fatalism'*: the form of globalisation promoted by current WTO rules is unalterable: resistance is futile, domestic agriculture and food policies must work within global trade constraints. There are two subsets to this view. The most tough-minded, implicitly promoted by the Countryside Agency, is: if it will be cheaper, let bulk food production go overseas and find ways, other than farming, to provide whatever sort of countryside we want. The alternative response is: do not try to set standards that are so far in advance of world norms as to undermine the competitiveness of home producers. This would mean that the habits of the worst worldwide limit how UK agriculture can respond to the public concerns which, stepped up by the recent crises, led to the Commission being formed.

2. *'Discerning consumer'*: we can have free trade *and* higher farming standards in the UK if consumers are prepared to pay extra for them. Consumers need to be educated and empowered to buy environmentally and ethically superior home-produced foods despite the higher price. British producers should aim for quality produce (and image). More transparent labelling with details of origin and production method are needed to support this. Some responses comment on the anomaly of WTO rules, designed to defend free trade and market power, depriving consumers of the information which market theory insists is a precondition for effective markets.

Sustain note that it is the vulnerable sectors of the community, who need the best nutrition, but who tend to eat the worst food. This issue is poorly addressed elsewhere.

3. *'Change the rules'*: other submissions argue that governments have a right to apply the same policy choices to imports as to domestic production. How things are produced *is* part of what they are. If a government decides that a certain farm practice is unacceptable on welfare or sustainability grounds, that policy preference should take precedence over the freedom of farmers using that method to export to the UK. If free trade rules prevent this, the rules should be changed, not the policies. Several submissions strongly criticise the Food Farming Commission's (FFC's) limited remit.

3.4 Market power

The agreed issue: power is concentrated in the big corporations: supermarket chains, trading organisations, agrochemical firms etc. Some submissions argue that Government research funding generally promotes the interests of these organisations.

Some submissions perceive these trends as continuing the trend towards improved choice and quality of foods, and reduced food prices.

Others argue that concentration of food retailing has been a major anti-sustainable force through enforced standardisation, unsustainably low incomes for farmers, unnecessary waste, profiteering by artificially inflating the price of premium (organic, free range etc.) products, undermining of local stores, and increased transport. They also suggest that the increasing power of agrochemical companies and Genetically Modified Organism (GMO) producers threatens farmers' autonomy and genetic diversity, and is a particular threat to the organic food sector. They propose a range of mechanisms for curbing these powers, including codes of conduct for major supermarkets, international agreements on corporate accountability, a shift in publicly funded research funding, and strict control of GMOs.

Two submissions suggested that if farmers worked directly for processors/retailers this could mean more security for farmers and shorter food chains.

3.5 Issues given surprisingly little attention

Regional differences or different farming practices

The submissions' proposals tend to apply to the farming sector as a whole, and to England as a whole. However they can have quite different impacts on different regions/practices, for instance

- liberalisation/globalisation trends are likely to benefit larger agri-businesses;
- a move to local foods are likely to benefit those areas of the country that can diversify more easily;
- many agri-environment schemes are more likely to be taken up by, and benefit, owners rather than tenants.

A few submissions note that changes in farm subsidies and management regimes must be site-sensitive, or decided/controlled at a regional level to reflect this diversity. How this should be done is not discussed, except by one submission which promotes England Rural Development Programmes (ERDPs) which are region-sensitive, and by the Regional Development Agencies (RDA) which recommend greater regional autonomy in the application of the Common Agricultural Policy (CAP) framework.

Three submissions note the cumulative undermining of small-scale mixed farms caused by government/CAP policies that focus on efficiency, and specifically target this sector for increased support and funding. Not one submission deals with issues of owner *v.* tenant farmers.

Rural culture The submissions barely mention the vitality of rural economies and communities, the age balance of the farming sector, the ability of rural communities to sustain services, issues of deprivation and accessibility, and diversity of rural traditions. Interestingly, the NGOs deal with this issue better than the farmers/producers/retailers' organisations, but not one gave detailed recommendations for how to contribute to rural culture.

This is a key area that could profit from more analysis and research: what farming systems and other forms of rural development are most likely to promote vibrant rural cultures? What erodes rural cultures?

Animal welfare. Views about the UK's current animal welfare standards vary widely, from the National Farmers' Union (NFU) which argues that current farming practices "do not cause cruelty to animals" to the Soil Association which describes current standards as "appalling". Compassion in World Farming (CIWF) makes animal welfare the central 'driver' of a coherent wider programme. Friends of the Earth (FoE), Sustain, the Soil Association and others discuss the animal welfare problems resulting from current farming systems, and promote practices that would indirectly benefit animal welfare, e.g. extensification, local food economies, reopening of local abattoirs. However overall animal welfare is treated as a secondary issue.

Recreation This was given little attention beyond a general assumption that maintaining/re-establishing a more

'traditional' pattern of rural land use would be nice for visitors.

Resilience of different farming models

(with the exception of FoE and Sustain). Resilience means the ability to withstand and counter problems such as:

- climate change/floods/droughts, e.g. through tree planting, floodplain management, reduced use of fossil fuels;
- changes in petrol prices, e.g. through reduced need for transport, particularly by air (currently aviation fuel is untaxed) but also by road and rail;
- changes in subsidies and currency fluctuations, e.g. by increased diversification so that effects on one commodity are buffered by the relatively small market share that the commodity holds;
- availability of resources from abroad, e.g. through trade practices which encourage political stability, reduced reliance on inputs to agriculture which extends the lifespan of non-renewable resources;
- health crises, e.g. through less food contamination, increased robustness of animals to disease, more nutritious food.

This issue also relates to food "security". Shorter-term thinking about "security" implies that all products should be available at all times, regardless of seasonality, changes in annual yields, etc. Longer-term approaches to "security" focus on the need to maintain and enhance soil fertility, genetic diversity, resilience to diseases etc. through reduced use of pesticides and

antibiotics, composting of agricultural waste, etc.

Many submissions do not mention Genetically Modified Organisms (GMOs).

Attitudes towards GMOs vary from relatively positive (with constraints) to a proposed five-year moratorium on commercial GM crop production. The farmers' organisations want to ensure that other countries that do use GMOs do not gain undue market advantage. Some submissions note the potential for GMOs to offer spring crops would help to improve biodiversity. Several suggest that GMOs pose great threats to organic crops, and note trade rules which allow GMO producers to charge farmers for all GMO crops growing on their land, even where these were accidentally spread from elsewhere. In all cases, the need for appropriate safeguards was stressed.

The few really innovative and radical suggestions come from the Countryside Agency (CA) and NGOs.

Most of the submissions avoid making radical suggestions and prefer to talk about generic directions - FEWER agrochemicals, LOWER stocking densities etc. Several NGOs advocate a complete move from liberalisation of the markets. The CA calls for a complete move away from subsidising commodity production. Two NGOs advocate a strong decrease in our ecological footprint, including a move towards vegetarianism and much increased production of organics. One would strongly improve animal welfare.

4. How the submissions deal with SDC's objectives for sustainable agriculture

This section considers how the submissions deal with SDC's objectives for sustainable agriculture. For each objective, an overview

of the submissions is followed by a table summarising each submission's views. The table below summarises the results.

Objective	How submissions deal with the objective
Produce safe, healthy food and non-food products in response to market demands, now and in the future	Great range of approaches, from continuation of large-scale farming to major shift towards non-food/organic products. Proposals promoting non-food products often constrain food production. Proposals promoting food safety often affect food affordability.
Enable viable livelihoods to be made from sustainable land management, taking account of payments for public benefits provided.	General support for Pillar 2 subsidies. Several submissions suggest radical changes that could have either great benefits or great costs in terms of rural livelihoods.
Operate within biophysical constraints and conform to other environmental imperatives	Generally positive. Several submissions make this their main plank. Shift to agri-environment schemes could promote production of biofuels and improve biodiversity. Traffic impacts mixed.
Provide environmental improvements and other benefits that the public wants - such as re-creation of habitats and access to land	Indirect but positive impacts. Shift to agri-environment schemes would improve landscape, access, etc.
Achieve the highest standards of animal health and welfare compatible with society's right of access to food at a fair price	Generally poorly dealt with, with positive exceptions. One submission argues that high animal welfare standards do not impede production of food at fair price.
Support the vitality of rural economies and the diversity of rural culture	Very poorly dealt with: lip service at best.
Sustain the resource available for growing food and supplying other public benefits over time, except where alternative land uses are essential in order to meet other needs of society	Indirect but positive impacts. Shift to organics and agri-environment schemes could improve water/soil/air quality. Very little mention of hard development, nor how to achieve balance of resource base <i>v.</i> social needs.

4.1 Produce safe, healthy food and non-food products in response to market demands, now and in the future

- Great range of approaches, from continuation of large-scale farming to a complete change towards countryside management (and associated non-food products).

- Several interpretations of market demand. British Retail Consortium (BRC) emphasises a trend towards convenience foods, eating out, and price sensitivity. WWF, FoE and the Soil Association focus on a switch to organic, from red to white meat, to vegetarianism, to speciality foods.

- General consensus on the need to shorten food chain. CIWF/FoE/Sustain propose more local abattoirs. Unilever and BRC promote more direct links between farmers and retailers/processors.

- Different approaches to how to achieve safe, healthy foods: BRC and NFU endorse trends towards larger farms and greater efficiency as way of reducing food costs and most effectively complying with regulations etc. CIWF, CPRE, Countryside Agency (CA) and others emphasise smaller scale, more mixed farming.

- Approach to GMOs is generally cautious but not antagonistic. Advantages seen in

terms of potential for winter/spring crops, food security etc. but always coupled with need for careful management, installation of appropriate safeguards, confirmation of their lack of negative impacts etc. WWF/Sustain want ban/moratorium on GMOs.

- Some potential conflict between food affordability and food health/safety, as increasing regulations and/or move to extensification and organics are likely to make food more expensive. However several submissions note the longer-term food safety and security (by maintaining resource base, reducing possibilities of food crises etc.) arising from more extensive farm practices less reliant on drugs, petrol, agrochemicals.

- Range of approaches to non-food products. CA promotes most radical shift to non-farming activities in countryside, but WWF and others also support production of biofuels, value-added processing of products, other rural businesses. Generally little detail given on these.

Suggests a need to market regional/local foods as “the new exotica”, and for more education on food production, seasonality; more labelling of foods.

Submission	Appraisal "mark"*	Summary
British Retail Consortium	○	Emphasises need for shorter food chains and changing consumer patters. Unwilling to take on additional regulatory burden.
Compassion in World Farming	○	Strongly emphasises reducing transport and improving food safety through improved animal health. Food prices likely to increase.
Council for the Protection of Rural England	●/○	Proposes move away from industrial monolithic agriculture towards smaller scale and non-food products. Heavy emphasis on agri-environment scheme, woodland planting, alternative energy crops etc.
Country Land and Business Association	⊙	Suggests that food is safer and healthier than ever before. Does not suggest real changes.
Countryside Agency	●/○	Move away from commodity support to investment in the environment and rural development could completely undermine British food sector, but could engender range of new non-food businesses.
English Nature	⊙	Proposes higher standards of food safety, emphasises need for shorter food chain. Food costs likely to go up.
Environment Agency	⊙	Promotes better environmental management on farms, which would indirectly improve food safety.
Food and Drink Federation	⊙	Would continue current trends towards cheaper food and aims to meet consumer demands.
Friends of the Earth	○	Emphasises shorter food chains, and avoidance of pesticides, antibiotics and hormone disrupters. Likely to increase food prices in short term, but food security in long term.
National Farmers Union	⊙	Submission implicitly supports large-scale food production, which would decrease food costs. No mention of reducing length of food chain.
National Federation of Women's Institutes	○	Submission argues for integrated achievement of local processing, short supply links and healthier, safer food through conscious policy of promoting public goods instead of global trade.
Regional Development Agencies	⊙	Identifies problems with current production systems but suggests that changing existing trends would be infeasible.
Soil Association	●/○	Emphasises shorter food chains, greater food safety, avoidance of pesticides, antibiotics and veterinary drugs. Likely to increase food prices in short term, but food security in long term.
Sustain	○	Strongly promotes need for healthier diet through shorter food chains, more fruit/veg consumption, freedom from chemical residues, less meat. Notes that this would increase food prices in short term.
Unilever	⊙	Promotes shorter food chain through close links from farm to processing. No mention of health, safety, and affordability of food.
Worldwide Fund for Nature	?	Promotes extensification of farming, increased production of organic food, continued moratorium on GMOs. Promotes shift to vegetarianism. Emphasises tree planting.

*for key of symbols see 2.3. The mark is the rough average of results of criterion 1 from Appendix 1.

4.2 Enable viable livelihoods to be made from sustainable land management, taking account of payments for public benefits provided

- Several submissions propose that sustainable agriculture should be as economically viable as non-sustainable agriculture (in terms of income, job security, and international competitiveness).
- Under current system, different trends are likely to have different effects:
 - larger farms, agribusiness: fewer jobs but potentially more job safety;
 - diversification, smaller scale: more jobs, but salaries likely lower, job safety unclear (though health of workers likely to increase) but probably speculative in short term;
 - value-added processing: more jobs, potentially better paid;
 - shorter food chains: less jobs;
 - to Pillar 2: same level of public subsidy but more public benefits from it
- beautiful landscape, floodplain management, carbon fixing etc. But could seriously disadvantage farmers (NFU).
- General support for shift from Pillar 1 to Pillar 2 subsidies. Strong increase in Pillar 2 proposed by CPRE, English Nature (EN). CA proposes complete move away from subsidising food production. Country Land and Business Association (CLA) proposes to fund agri-environment schemes within Pillar 1 for exchequer benefits, which is probably at odds with the general assumption that Pillar 1 is restricted to production subsidies.
- Effect of subsidy structures depends on how well other EC countries take it up. WTO agreements vital if shift to more sustainable agriculture is to take off.

Submission	Appraisal "mark"*	Summary
British Retail Consortium	⊙	Promotes larger scale farms and reduction of subsidies
Compassion in World Farming	○	Promotes local value-added processing and diversity; redirection of subsidies to Pillar 2. Indirect costs to public of current farming practices (pollution, transport etc.) should be reduced
Council for the Protection of Rural England	●/○	Emphasises need for diversification, growth in speciality and value-added products. Argues that WTO is too lax. Promotes redirection to Pillar 2. Could make UK less internationally competitive
Country Land and Business Association	○	Promotes larger scale farms: more security for fewer farmers, and more jobs for land management projects. Proposes to fund agri-environment schemes within Pillar 1 for exchequer benefits
Countryside Agency	●/○	Complete change in subsidies from commodity support to investment in rural development could have strong negative effect on food producers, but strong positive effects on non-food "rural entrepreneurs". Likely to decrease international competitiveness in terms of food, potentially increase it in other sectors.
English Nature	○	Increased environmental work and local processing likely to increase number of jobs, though impact would depend

		on whether the UK can persuade the EC to take on board new subsidy structures
Environment Agency	⊙	Maintaining cherished landscapes and reducing pollution from agriculture would benefit tourism and reduce external costs of farming. Proposes redirection to Pillar 2
Friends of the Earth	○	"Competitiveness" and corporate power seen as problems. Small-scale mixed farms seen as providing more jobs per land area, reduction in corporate power as giving them more control/autonomy
Food and Drink Federation	○	Promotes increased trade liberalisation which would promote competitiveness of UK food suppliers. Proposes slight revamping of CAP but no Pillar 2
National Farmers Union	○	Promotes reduced regulation, greater food production efficiency, and income stabilisation scheme for farmers. These would probably lead to job losses but boost international competitiveness of UK farming
National Federation of Women's Institutes	● / ○	Argues that 'competitiveness' is a foolish goal which undermines sustainability. Emphasises local processing and added value, and protection of rural livelihoods from concentration of supermarket buying power and undercutting by imports from countries with lower production costs.
Regional Development Agencies	○	Aims for "living working countryside". Proposes redirection of Pillar 1 to Pillar 2 subsidies.
Soil Association	○	Promotes more labour-intensive farming as way of encouraging job creation. Uneasy approach to international competitiveness: UK organic products could be sold internationally, but also most appropriate for local markets. Organics seen as avoiding many indirect costs of agriculture
Sustain	● / ○	Argues that 'competitiveness' is a foolish goal which undermines sustainability. Promotes more jobs in the UK horticultural sector, reduction in meat/dairy farming, better public food procurement policies. Smaller, mixed farming with fewer inputs seen as way of reducing externalities of food production
Unilever	⊙	Not discussed
Worldwide Fund for Nature	○	Move to more organic and away from technology-driven change likely to increase jobs. Promotes increased budget for ERDP

*for key of symbols see 2.3. The mark is a rough average of results of criteria 2 and 4 from Appendix 1.

4.3 Operate within biophysical constraints and conform to other environmental imperatives

- WWF/FoE promote reduction of the ecological footprint of food consumed in the UK.
- **Energy balance, energy used/unit produced.** General support for biofuels and (in some cases) production of other forms of renewable energy in the countryside. CLA encourages the use of renewables for transport and heating as well as production of electricity. None of the submissions link renewable energy production to its *use* in rural areas.
- **Transport.** Varied impacts. Larger scale, globalised agricultural systems likely to lead to more distance travelled, longer food chains. But emphasis on rural enterprises (e.g. by CA) also likely to lead to lots of traffic in rural areas. WWF/Sustain identify low aviation tax as leading to greater food miles. Sustain also proposes resumption of fuel tax escalator.
- **Biodiversity.** General support for agri-environment scheme, many of which are likely to improve biodiversity. Proposals for “wide and shallow” or “basic” environmental stewardship schemes (Council for the Protection of Rural England -CPRE-, EN) would particularly benefit general biodiversity and educate farmers about biodiversity, though would not necessarily benefit populations of rare species.

Submission	Appraisal "mark"*	Summary
British Retail Consortium	○	Shorter food chains and shorter trips to abattoirs would reduce traffic. Other issues not mentioned.
Compassion in World Farming	○	Promotes less intensive inputs (e.g. concentrated foodstuffs), less pollution from concentrated animal wastes and agrochemical run-off, and less traffic from shorter food chains.
Council for the Protection of Rural England	○	Promotes "wide and shallow" environmental stewardship which should improve biodiversity. Encourages production of biofuels but says nothing about their use in rural areas.
Country Land and Business Association	○	Promotes development of renewables for heat and transport, not just electricity, but does not deal with other issues and proposals could increase transport.
Countryside Agency	◉	Shift to rural development should increase production of biocrops, although could also increase traffic and use of electricity in rural areas. No real mention of other issues.
English Nature	○	Strongly encourages actions that would improve biodiversity, including reduction in use of pesticides and fertilisers which would also reduce energy/unit produced. Promotes Basic Stewardship Scheme. Mentions biofuels but not links to their rural use.
Environment Agency	○	Environmental management on farms advocated as a way of improving biodiversity. It could also reduce energy use, although this is not explicitly addressed.
Food and Drink Federation	◉	Promotes efficient use of resources. Larger scale food production could lead to increased traffic.
Friends of the Earth	○	Would reduce use of agrochemicals, transport; promote smaller, mixed farms.
National Farmers Union	◉	Mentions agri-environment schemes including production of biomass, but no real change proposed.
National Federation of Women's Institutes	○	Strongly emphasises reduction in travel and energy intensity of agriculture, and food processing/distribution through local, low energy methods.
Regional Development Agencies	●	Accepts trend towards large scale, intensive farming though it also promotes local food. "Living working countryside" likely to lead to more traffic.
Soil Association	○	Would reduce the use of artificial fertilisers and other agrochemicals, so reducing energy used per unit produced. Re-opening of local abattoirs and promotion of local food economies would reduce transport.
Sustain	○	Promotes shorter food chains, more local food supply, reduced use of oil/energy in food production.
Unilever	◉	No mention.
Worldwide Fund for Nature	○	Focuses on need to reduce ecological footprint of food consumed in UK. Promotes wildlife corridors, more forests, large areas of wilderness. Identifies cheap air freight as leading to unsustainably energy-intensive food imports. Promotes biomass, mentions need for appropriate sites for wind turbines, promotes organics and extensification.

*for key of symbols see 2.3. The mark is a rough average of results of criterion 6 from Appendix 1.

4.4 Provide environmental improvements and other benefits that the public wants - such as re-creation of habitats and access to land

- Generally, submissions are in favour of land managers providing environmental improvements, and of funding this through Pillar 2 and other public subsidies. WWF mentions afforestation targets; EN proposes a detailed Basic Stewardship Scheme to promote biodiversity; CPRE lists range of environmental improvements. NFU, the

Food and Drink Federation (FDF), CA and others note the need to gain more public support and appreciation for benefits provided by farming, but no-one gave detailed proposals for how this should be done. Government is seen as having a key role in promoting public confidence in UK food production.

Submission	Appraisal "mark"*	Summary
British Retail Consortium	⊙	No real mention. Notes that consumer confidence is poor, but proposes no changes.
Compassion in World Farming	⊙	No mention.
Council for the Protection of Rural England	○	Proposes to reward farmers for preserving the landscape, managing the floodplain and other public benefits.
Country Land and Business Association	○	Proposes multifunctional farm management, and contracts for land managers to include explicit provision for recreational access.
Countryside Agency	○	Strong emphasis on enhancing (perceived) public benefits from farmers, but no real mention of access to countryside and improvements to landscape.
English Nature	○	Mentions "Natural Areas" and landscape-level planning, aims to engender change in social attitude to farming.
Environment Agency	○	Notes benefits to tourism from agriculture's contribution to maintaining cherished landscapes.
Friends of the Earth	○	Promotes integrated farm management for multi-use countryside.
Food and Drink Federation	⊙	Emphasises need for government and consumers to appreciate benefits of farming, but does not explain how this should happen, and makes no mention of access, landscape etc.
National Farmers Union	⊙	Habitat creation, access etc. should be seen in context of public "respecting and preserving the rural environment" and appreciating the benefits provided by farmers.
National Federation of Women's Institutes	○	Promotes protection and restoration of diverse farm landscape, and management for biodiversity.
Regional Development Agencies	○	Switch to Pillar 2 would help to support recreation and improve the landscape.
Soil Association	⊙	Hardly mentioned.
Sustain	⊙	No mention.
Unilever	⊙	No mention.
Worldwide Fund for Nature	○	Proposals for GMO labelling, more organics etc. are in line with perceived customer demand. Wants to develop common coherent landscape vision.

*for key of symbols see 2.3. The mark is a rough average of results of criterion 3 from Appendix 1

4.5 Achieve the highest standards of animal health and welfare compatible with society's right of access to food at a fair price

- Overall this topic was very poorly dealt with by most of the submissions. CIWF, Sustain and the Soil Association promote the re-opening of local abattoirs, a reduction in transport of live animals, and a reduction/ban on the use of antibiotics, hormone disrupters etc. Moves towards extensification, organic food, shorter food chains, and improved environmental management are also likely to improve animal welfare indirectly.

- CIWF argue that the increased cost of producing food with higher welfare standards is often very small, and imply that processors/retailers create a misleading

picture of the cost of good food by artificially inflating prices for premium (free range, organic etc.) produce. They also argue that public costs related to current farming practices (e.g. water pollution and transport) would be reduced if higher animal welfare standards were applied. They suggest that we are spending a smaller proportion of income on food and that most people could easily afford to pay a bit more.

CIWF's arguments are very cogent, and could form a useful base for FFC to argue for improved animal welfare standards even in the absence of changes to WTO/EC rules

Submission	Appraisal "mark"*	Summary
British Retail Consortium	○	Proposes reductions in animal movements.
Compassion in World Farming	○	Wants more humane rearing practices on farms and less transport of animals.
Council for the Protection of Rural England	⊙	No (real) mention.
Country Land and Business Association	⊙	
Countryside Agency	⊙	
English Nature	⊙	
Environment Agency	⊙	Animal welfare could improve through better farm management, but no clear proposals.
Food and Drink Federation	⊙	No mention.
Friends of the Earth	○	Promotes local food economies and extensification of food production, though makes little direct reference to animal welfare.
National Farmers Union	⊙	Submission notes that current farming practices "do not cause cruelty to animals" and compares them positively with practices elsewhere. No change proposed.
National Federation of Women's Institutes	○	Less emphasis on competitiveness likely to improve animal welfare.
Regional Development Agencies	⊙	No mention.
Soil Association	○	Promotes extensification and local food economies.
Sustain	○	Promotes reopening of local abattoirs and ban on long-distance animal transport, as well as local food economies and extensification of food production which would indirect benefit animal welfare.
Unilever	⊙	No mention.
Worldwide Fund for Nature	⊙	

*for key of symbols see 2.3. The mark is a rough average of results of criterion 8 from Appendix 1.

4.6 Support the vitality of rural economies and the diversity of rural culture

- Generally little covered, with perhaps a nod towards the need to maintain vibrant rural economies and communities, but little detail. Most of impacts were indirect results of other proposals rather than specific proposals relating to rural economies/cultures. This is understandable given the remit of the FFC, but nevertheless a shame.

- Emphasis is more on rural economies than on rural services, housing, cultures/diversity which were hardly covered. The RDA mentioned the need for site-specific application of national/EC policies.

- National government agencies and NGOs score better on this than organisations of farmers/producers/retailers.

- Several submissions mention need for more training of land managers/farmers, but most of training would be in business skills as a way of taking best advantage of proposed shift to Pillar 2.

Definitely a weak part of the submissions, particularly the more social side. FFC could consider commissioning research on this if not dealt with well in other submissions.

Submission	Appraisal "mark"*	Summary
British Retail Consortium	⊙	Strong farmer-retailer links proposed. Could make farmers very dependent on retailers. Proposes business skill classes.
Compassion in World Farming	⊙	Greater on-farm employment and more local value-added activities likely to improve vitality of rural economies, but possible loss of rural traditions.
Council for the Protection of Rural England	⊙	Discusses need to halt exodus from the countryside and "rural-proofing". Emphasises rural foods and value-added products. Services mentioned as a problem but no real solution proposed.
Country Land and Business Association	⊙	Promotes better incomes for farmers, commercial competitiveness, affordable housing provision.
Countryside Agency	○	Move to rural development should mean increased economic autonomy by rural residents. Promotes training in business skills, support for village shops, weekly farmers markets.
English Nature	○	Strong support for advisory services for land managers, and improving farmers' perceptions towards provision of not just food but range of other services.
Environment Agency	○	Stable farm incomes viewed as prerequisite for farmers' ability to manage the environment effectively.
Food and Drink Federation	●	Emphasis on large scale production/processing and liberalisation likely to reduce economic autonomy, number of jobs, rural diversity.
Friends of the Earth	○	Promotes reduction in power of large corporation as a way of improving farmers' economic autonomy. Encourages 'succession' of farmers.
National Farmers Union	⊙	Calls for more autonomy and less regulation for farmers.
National Federation of Women's Institutes	○	Strong emphasis on giving farmers more autonomy.
Regional Development Agencies	○	"RDA vision for rural areas" would promote more viable rural communities. Supports training for farmers.
Soil Association	○	Encourages farming to be a secure and respected occupation attractive to new entrants and young people.
Sustain	○	Promotes increased local processing and higher proportion of income from food going to farmers.
Unilever	⊙	Farmers growing under contract to processors (rather than for sale in market) increases security and predictability of income within each year, but at the expense of less autonomy for farmers longer term.
Worldwide Fund for Nature	○	Mentions need for vital rural economies, more training in agricultural systems, rural isolation, but few clear solutions offered.

*for key of symbols see 2.3. The mark is a rough average of results of criterion 5 from Appendix 1.

4.7 Sustain the resource available for growing food and supplying other public benefits over time, except where alternative land uses are essential in order to meet other needs of society

- Submissions generally favourable.
- The submissions make a range of proposals for *sustaining the resource base*, including need to reduce water abstraction and management for improved water and soil quality. Most of these improvements were not directly stated, but would be an indirect benefit from other measures proposed, e.g. Basic Stewardship Scheme, promotion of organics, less intensive farming.
- Only three submissions mention *hard development*. CLA promotes a “predict and provide” approach. CA and CPRE promote “discerning development” that meets rural needs and does not undermine rural potential.
- *Balance between resource base and needs of society* poorly covered. Only two submissions really deal with this:
 - WWF emphasises the need to reduce the ecological footprint;
 - CA proposes that the land use planning system should clearly state local needs, welcome development that meets them, and cover agricultural activities.

Submission	Appraisal "mark"*	Summary
British Retail Consortium	⊙	No mention.
Compassion in World Farming	○	Promotes animal rearing/transport methods that would reduce pollution. No mention of hard development.
Council for the Protection of Rural England	○	Proposes a model of "discerning development" supported by expanding the ERDP and strengthening land use planning controls, that would reject development that undermines rural potential.
Country Land and Business Association	⊙	Resource base hardly mentioned. "Predict and provide" attitude to urban exodus with support for new social housing.
Countryside Agency	○	Mentions enhancing the rural environment. Suggests that planning system should express local needs and welcome proposals that meet them. Would make agricultural activities subject to planning controls.
English Nature	○	Offers many suggestions for sustaining resource base, including more controlled water abstraction, improved vegetation cover that would help to prevent erosion etc. No mention of hard development.
Environment Agency	○	Resource base likely to be much enhanced through whole farm environmental management approach. No mention of hard development.
Food and Drink Federation	⊙	Limited improvements to resource base in terms of waste recover/reuse, efficient water use, non-ozone depleting coolants. Would abide by environmental regulations. No mention of hard development.
Friends of the Earth	○	Promotion of smaller, mixed, organic farms would help to redress current problems caused by farming, e.g. water, air and soil pollution.
National Farmers Union	⊙	Limited improvement to resource base. No mention of hard development.
National Federation of Women's Institutes	○	Precautionary principle approach to GMOs. No real mention of other environmental resources, although submission likely to improve these indirectly. No mention of hard development.
Regional Development Agencies	⊙	No mention.
Soil Association	○	Switch to organics aims to improve soil, air and water quality, and reduce waste.
Sustain	○	Strong promotion of lower inputs, fewer agrichemicals, reduced use of antibiotics. Promotes 5-year ban on GM for precautionary reasons. Promotes genetic diversity e.g. rare breeds. No mention of hard development.
Unilever	○	"Pea project" working to improve water and soil quality. No mention of other aspects of resource base or of hard development.
Worldwide Fund for Nature	○	Promotes reducing ecological footprint, including careful water abstraction and improved water quality; notes decline in soil quality. No mention of hard development.

*for key of symbols see 2.3. The mark is a rough average of results of criteria 7 and 9 from Appendix 1.

5. Highlights from the submissions

This section provides an "index" of the more interesting arguments put forward by the different submissions. It also briefly

discusses the Fontainebleau agreement and Pillar 1/2 funding, which were key arguments in several submissions.

5.1 Index of highlights from submissions

General sustainability issues

- overall sustainability:
WWF/FoE/Sustain on ecological footprint, externalities of unsustainable agriculture, need for sustainable agriculture to be economically viable, need to increase aviation fuel tax;
CLA on using renewables for heat and transport not only electricity;
EA/Sustain/FoE on externality costs of agriculture;
NFWI on reducing travel/energy intensity of agriculture.
- arguments against globalisation/liberalisation/ competitiveness and large corporations:
NFWI, NFU, FoE, Sustain
- promotion of shorter food chains: BRC, CIWF, CA, NFWI, FoE, Sustain
- need for resilient food/farming sector: FoE, Sustain

Jobs, social

- links between increased mechanisation of agriculture and fewer jobs: WWF, SA
- benefits of closer links of farmers to processors/retailers: BRC
- local foods, farmers markets, retailers providing village shops with low-price goods: CA, CPRE, Sustain, FoE
- promotion of non-food products: CA, CPRE
- calls for farmer training and support, but not just in business skills: CA, CPRE, EN
- need for site/region-specific approaches: mentioned by RDA, WWF, but no detail given

Consumer trends, health/safety

- consumer trends: FDF, WWF, FoE
- health impacts of food, pesticide residues, diet-related diseases, food poverty, food labelling: Sustain, FoE

Economic issues

- Fontainebleau agreement, financial implications of move from Pillar 1 to Pillar 2, euro/pound exchange rate problems: NFU (see detailed explanation below.)
- need for any UK regulatory/fiscal changes to also be made at the EU level: CA
- government funding bias towards larger farms, intensive agriculture: Sustain

- need for streamlined regulation: FDF
- procurement policies should encourage purchase of British food: CA, Sustain

Ecology, animal welfare

- ecology/biodiversity: EN generally, particularly the proposed Basic Stewardship Scheme; CPRE “wide and shallow” agri-environment schemes; CPRE arguments for more modulation
- animal welfare: CIWF, particularly lack of economic costs associated with improved animal welfare standards; indirectly through extensification, less transport, less use of hormones etc. FoE, Sustain, SA
- need to maintain genetic pool: SA, Sustain

Other issues

- need for more research: FDF, BRC
- better land use planning system: CA
- reviving consumer confidence: CA
- balance between benefits and costs of GMOs: NFWI
- North/South issues: Sustain

5.2 Further detail on Fontainebleau, Pillar 1 and Pillar 2

Fontainebleau

The NFU submission explains an often-forgotten point. In 1986 the Government then negotiated a rebate on British contributions to the EU to reflect the fact that the UK’s different economic structure meant we gained less from EU funding programmes than many other countries. The rebate is based on 66.6% of the difference between Britain’s contributions to the EU and EU funding spent in the UK. This has the perverse result that if the UK draws down an extra £1 from some EU scheme, our rebate is reduced by 67p- in other words a notional £1 of European funding is only worth 33p net. To give UK agriculture an extra £1 using a European scheme, effectively the Treasury has to put in 67p while Europe contributes 33p. Thus even European schemes which on

paper look as if they are providing 100% funding are in practice only providing 33%: the rest has to come from the Treasury in the form of rebate foregone.

If the EU scheme requires a matching contribution from the member state government, the result looks even worse from the Treasury’s point of view. For example, in a 50:50 matching scheme the Government has to spend an extra £1 directly on the scheme as well as the 67p lost in rebate to get a net EU contribution of £33p - in other words an actual gearing of £5 of UK spend to get £1 of real extra money from Europe instead of the 1:1 intended.

European schemes are still additional money for the UK economy. But unlike other countries, because of the Fontainebleau

formula the UK can only bid where the Treasury is willing to forgo the money in other forms.

Pillar 1 vs. Pillar 2

The NFU submission also gives a reminder that £1 of public funding under pillar 2 is worth much less to a farmer than £1 under

pillar 1 because the farmer (generally) has to do something extra (e.g. habitat management, agri-environment schemes) to get money, whereas production subsidies give the farmer extra money for what s/he was doing anyway.

Appendix 1: Appraisal Matrices

The following can be found below for each of the 16 submissions analysed:

- summary of the submission
- appraisal against the objectives
- appraisal of impacts upon different interest groups.

Key to symbols

Impact of policies: ○ better than now ⊙ same as now ● worse than now

Significance: ⊙ high ⊙ medium ⊙ low

British Retail Consortium

This submission's main emphasis was on streamlined regulation, increased competition, and working with the market. The BRC is very aware of consumer requirements for cheaper and safer foods, and other trends in food consumption. As such it emphasises the need for shorter food chains, more competition, farmers working directly for retailers, contract growing, and other ways of enabling the food industry to be more responsive to customer needs.

The submission does not cover most of the other topics appraised below, including environmental and welfare issues. Essentially it would favour large food producers because these would be more able to link up with retailers as contract growers.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	Submission strongly emphasises short food chain, and gives cogent arguments about how longer food chains add costs. It also stresses the advantages of direct farmer-retailer links.
food health and safety	○	Mentions need for food safety several times, though unwilling to take on additional regulatory burden.
food affordability	○/●	Removal of output-based subsidies, but shorter food chain.
non-food products	⊙	No real mention, though talks about environmentally sensitive farming practices.
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○/●	Would increase job security because it would guarantee a market for produce and promote coops. However it would not directly create of rural jobs. Shorter food chains could reduce rural employment.
value-added processing near producers	⊙	No real mention.
tourism	⊙	
international competitiveness of UK farming sector	○/●	Submission works within paradigm of competitive market, including removal of output-based subsidies. Big farms would be able to compete but not small ones.

3. Provide environmental improvements and other benefits		
access to countryside, recreation	⊙	
landscape	⊙	
public value placed on benefits provided by farming	⊙	Notes that consumer confidence is currently poor, but does not propose how to deal with this.
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	?	Submission proposes that subsidies for food production should be reduced, so Exchequer costs would be reduced. However it also supports payments towards environmentally sensitive agriculture. It is unclear whether the cost of environmentally sensitive agriculture would be greater or less than reduced food subsidies.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	⊙	Supports shorter food chains, but unclear about whether this would mostly affect rural or urban areas. Large farms would do well from this, smaller ones less well.
economic autonomy/control by farmers/rural residents	⊙	Farmers could become completely dependent on retailers. This could reduce risk to farmers if relations with the retailers are good, but could also reduce economic autonomy/control by farmers by forcing them to take retailer's prices, holding them to retailer's contract etc. Submission opposes licensing of businesses.
education and training of rural workforce	○	Proposes business skill master classes.
vitality of rural communities, age balance	⊙	No mention.
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	⊙	No mention.
transport: <i>road traffic</i>	○	Shorter food chains and reduced trips of animals to abattoirs likely to reduce lorry movements.
energy used/food unit produced/transported/consumed	⊙	
biodiversity: <i>populations of wild birds</i>		
populations of rare species		

7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	⊙	Surprising that retailers don't mention waste or packaging.
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	○	Reduced animal movements would improve animal welfare.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	⊙	
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○	Proposes reduced subsidies for food production, more for agri-environment schemes. This is likely to increase resiliency re. floods/droughts. Fewer animal movements would reduce dependence on petrol.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	⊙	No particular subsectors disadvantaged.
farm sizes/types: family farm, agribusiness, alt. lifestyle		Large farms advantaged, small farms expected to provide niche/specialised food.
farm tenure: owner, tenant	⊙	No particular disadvantage.
other rural dwellers	⊙	
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	⊙	
consumers (choice, empowerment, quality, affordability)	○	Does not propose real changes in terms of choice, but farmers would be expected to produce what consumers want and retailers sell. Reduced subsidies could potentially raise prices, but middlemen would be reduced and food quality could go up.
other interests: landscape, environment etc.	⊙	
taxpayers	?	Would reduce subsidies for food and increase those for agri-environment schemes.
international: fair access to/from international markets, fair trade on equal terms	⊙	Difficult to disentangle different elements, but overall unlikely to change much from current situation.
animal welfare	⊙	Fewer animal movements and consumer demands for animal welfare likely to improve this.

Compassion in World Farming

The core concern of this submission is better animal welfare through more humane rearing practices and less transport of animals, especially to markets and for export. Not surprisingly, the biggest 'plusses' in the appraisal are for animal welfare. However this produces spin-off benefits for several other areas of appraisal. More 'natural' rearing and less transport also mean less resource consumption, pollution, traffic and energy use. Less transport of livestock also implies more local 'value added' processing - good for rural economies and security/resilience, and increasing opportunities for local diversity and distinctiveness (although possibly losing chances for farmers to build 'social capital' meeting at markets).

Consumers will benefit from higher quality and healthier food. While acknowledging it may cost more, the submission argues that the actual production cost increases are often very small (even where not completely offset by increases in quality and reductions in other costs to farmers). This implies that processors and retailers are currently often creating a misleading picture of the cost of good food by artificially inflating prices for premium (e.g. free range, organic) produce. The submission also argues that in any case we

spend a smaller proportion of income on food, and most people could easily afford a bit more. But this leaves a problem for people on low incomes.

Public costs related to current farming practices (e.g. water pollution, transport) will be reduced. There could be small indirect benefits for landscape and rural recreation from maintenance of 'traditional' farm landscapes.

Distributionally, the recommendations will favour those farmers in all livestock sectors willing to change in the directions advocated; consumers (with a need to protect those on low income against artificial, opportunist price increases not related to actual production costs) and exporters of meat produced to high welfare standards. The main losers will be farmers (both in the UK and abroad) who wish to maintain lower-welfare methods, and hauliers.

The potential costs of the increased regulation, workability of the proposed farmer licensing scheme, and incentivising / disincentivising effects of the proposed integration of different agri-environment schemes would all need to be considered carefully.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	Strong emphasis on reducing transport (especially animals) and cross-exporting (e.g. UK currently both imports and exports 100,000 tonnes of sheep meat each year).
food health and safety	○	Especially through animal health, and maintaining it through natural rearing methods rather than depending on use of prophylactic drugs and veterinary care.
food affordability	●	Acknowledges that recommendations would slightly raise some production prices (though not all). But argues that in many cases higher quality / reductions in inputs and wastage will offset the cost increases; that the increases are often very small (e.g. 2p / kilo for pig meat, 10p / dozen eggs) - inflated by retailers.
non-food products	⊙	
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○	More local value-added processing and diversity. Maintenance of 'traditional' landscape. Suggestion that more local abattoirs would provide local jobs, stimulate local economies and reduce animal travelling times.
value-added processing near producers		
tourism	⊙	
international competitiveness of UK farming sector	●	Will tend to increase costs of food in UK relative to other countries, especially under the current WTO rules.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	⊙	None of these were addressed explicitly.
landscape		
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	○	Main argument is for redirection rather than reduction of subsidies. (The shift of resources advocated from 'pillar 1' to 'pillar 2' in CAP could have perverse UK exchequer consequences under the Fontainebleau agreement - see the NFU submission). Proposals would reduce both commercial risks currently bankrolled by public sector (e.g. FMD) and indirect public costs (e.g. of water pollution, road transport). But proposed new regulation could be expensive.

5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	○	Likely to have mild benefits through greater on-farm employment, more local value-added activities, more local abattoirs, and calls for better educated / trained farming profession, but not a major concern of this submission.
economic autonomy/control by farmers/rural residents		
education and training of rural workforce		
vitality of rural communities, age balance		
ability to sustain services, access to services	⊙	Not addressed.
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>	●	Possible loss of social capital / networking / solidarity functions of local markets if animals viewed on video as opposed to physically being taken to market (which CIWF feel should be stopped).
(diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○	Suggested farming methods will reduce energy intensive inputs (e.g. concentrated pig and poultry foodstuffs), traffic, pollution (e.g. concentrated animal waste, agrochemical run-off).
transport: <i>road traffic</i>		
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>		Not addressed.
populations of rare species		Not addressed.
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	○	Suggested more extensive agricultural methods likely to reduce pollution from concentrated animal waste, agrochemical run-off), and reduce nuisance odours from very large pig & poultry farms. Genetic issues were not addressed.
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	○	The main concern of the submission.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	⊙	

10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	<input type="radio"/>	Increased local food networks, better food standards and decreased animal disease hazard would improve the resilience of the livestock sector.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	<input type="radio"/> / <input checked="" type="radio"/>	Will favour farmers who go with the trends advocated across these categories. Good for livestock farmers willing to move to lower intensity, more humane, lower input methods - tending to be smaller, owner-managed and 'alternative', and not larger, agribusiness? Especially good for small mixed farms. Problems for the 'factory' end of the pig & poultry sector - they may not be able to afford to buy the extra land required to reduce stocking densities without shrinking the business, or the investment needed for different methods of keeping livestock.
farm sizes/types: family farm, agribusiness, alt. lifestyle	mixed	
farm tenure: owner, tenant	mixed	
other rural dwellers	<input type="radio"/>	Increase in employment and local economic opportunity from more labour intensive, local processing?
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	<input type="radio"/>	Small benefit from maintenance of 'traditional' farm landscapes?
consumers (choice, empowerment, quality, affordability)	<input type="radio"/>	Big improvement in access to higher quality, healthier (and more healthily produced food). But slight increase in cost?
other interests: landscape, environment etc.	<input type="radio"/>	Maintenance of 'traditional' farm landscapes; less pollution?
taxpayers	<input type="radio"/>	More redirection than reduction – but possibly less risk.
international: fair access to/from international markets, fair trade on equal terms	<input type="radio"/>	If 'equal terms' is taken to include process and production methods. Proposals would correct current distortion under which UK can't exclude imports which are cheap because they use production methods banned in the UK on animal welfare grounds.
animal welfare	<input type="radio"/>	The biggest benefit of this submission.

Council for the Protection of Rural England

The focus of this submission is on enhancing the role of the countryside in providing an attractive landscape, and on supporting a more diverse food and farming sector. Its general tenor is that non-farming interests should be given more weight in countryside management, citing particularly the rural landscape's value for tourism, and tourism's value for rural employment. It notes that "there are four main routes available to farmers" (bulk commodities, value added products, alternative land uses, countryside management), and suggests that the last three should be given more prominence in the future.

It advocates a strong shift away from the current Pillar I subsidy system and towards a ten-fold increase in the agri-environment schemes of the England Rural Development Programme. It also stresses the importance of local and speciality foods in supporting rural incomes. It encourages a strengthening, and wider remit, for the land use planning system.

The submission is ambivalent about rural communities and rural culture. On the one hand it emphasises the need for thriving, self-reliant rural communities with a strong local identity, but on the other hand it does not want urban dwellers to move to the countryside. It avoids discussion of how farm businesses link to the rural community, of social mix, and of the need to attract young people to the countryside.

On the other hand, the submission is particularly strong on improving the robustness of the farming sector to risks such as climate change, changes in subsidies, petrol prices etc. It would also strongly improve environmental conditions by providing more subsidies to farmers for environmental services. It would probably mean more subsidies, but these would be used to provide social benefits such as flood protection and carbon fixing.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	●	Greater emphasis on agri-environment schemes, landscape conservation etc. likely to reduce amount of food produced overall. Little detail provided, so not possible to determine degree to which whether proposed changes would reduce production. Submission encourages local processing of food, but gives no details.
food health and safety	⊙	Increased production of organic food and reductions in pesticide use should help to improve food safety, but only indirectly.
food affordability	●	Proposal suggests a move away from industrial monolithic agriculture and towards a smaller scale. This would probably decrease efficiency of food production and thus increase cost of food.
non-food products	○	Submission very strong on this. Want much more forestry/woodland, alternative energy crops, management of floodplain, payment for carbon storage etc.

2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	⊙	Submission proposes developing rural businesses and training farmers in business skills as ways of addressing shortage of trained labour, but nothing specific about creating more jobs
value-added processing near producers	○	Proposes to increase amount of speciality value added products and local foods because of "huge potential for growth" and opportunity for increasing incomes, but overall market for such foods perceived as remaining small.
tourism	○	Tourism's economic role (particularly in comparison with farming) emphasised, as is role of landscape as basis for tourism. Suggests that farmers should be paid for providing landscape. No real emphasis on farm diversification.
international competitiveness of UK farming sector	●	WTO perceived as being too lax; Government encouraged to better protect UK agriculture from imports. This would probably make food more expensive: even proposed growth in speciality sector is unlikely to balance that out.
3. Provide environmental improvements and other benefits		
access to countryside, recreation		No mention of access, nothing specific about recreation
landscape	○	Detailed coverage. Strong emphasis on regional differences and different regional prescriptions/practices through ERDP.
public value placed on benefits provided by farming	○	Proposes to give better financial rewards to farmers for preserving the landscape, managing floodplains, and other public benefits.
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	●	Does not propose more subsidies as such, but indirectly encourages subsidies through the ERDP (including match-funding). This would cost more to taxpayers under the Fontainebleau agreement.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	○	Submission suggests that subsidies should be directed towards wider rural development, particularly improvement of landscapes as a competitive advantage for many rural businesses. However no direct mention of rural economies, nor any detail about how this will be achieved.
economic autonomy/control by farmers/rural residents	⊙	Emphasis on rural foods and value added products would encourage local autonomy, but strengthening of the land use planning system would reduce it
education and training of rural workforce	○	Submission proposes training farmers in business skills to address shortage of trained labour and improve sales of local foods. No mention of training for enhanced animal welfare, improved organic production, agri-environment schemes etc., nor about training wider workforce other than farm managers

vitality of rural communities, age balance	●	Discusses the need to halt the exodus from the countryside and “rural-proofing” of all Government policies. However rejects development that accelerates “exodus of people from town to country”. Unclear what this would mean in practice, but does suggest internal contradictions.
ability to sustain services, access to services		Services mentioned as a problem but no real solution proposed
quality and affordability of housing		No mention
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		No mention
(diversity of) rural traditions/cultures, diversity		Encourages regional diversity, but no real discussion of rural culture besides links to varied landscape and food
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	⊙	Submission encourages production of biofuels, but says nothing about their use in rural areas, nor anything about windfarms or other forms of rural energy production.
transport: <i>road traffic</i>	⊙	No mention.
energy used/food unit produced/transported/consumed	⊙	Submission mentions “four main routes available to farmers” (see above), but does not propose a specific mix of “routes” beyond a general emphasis on value added production, alternative forms of land use, and countryside management. Does not propose a real change in the way that people buy food.
biodiversity: <i>populations of wild birds</i>	○	Extra funding proposed for environmental stewardship, although no detail is provided about how the extra money should be spent. “Wide and shallow” agri-environment schemes would provide area-wide benefits and encourage a general awareness amongst farmers of land management for biodiversity.
populations of rare species	⊙	Emphasis on “wide and shallow” agri-environment schemes implies that second tier schemes would receive less funding, so unlikely to lead to significant improvements for rare species.
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	○	Submission suggests that farmers should be paid for maintaining floodplains, and for agri-environment schemes that would probably reduce agricultural pollution. No discussion of water abstraction, or of matching supply and demand.
soil quality and quantity	⊙	No mention.
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare		No mention
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	○	Proposes a model of “discerning development”, supported by expanding the ERDP and strengthening land use planning controls, that would reject “development that undermines rural potential [and] damages the environment”

10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○	Proposes to pay farmers for flood control and carbon banks, so encourages robustness in terms of climate change and its impacts. Suggests a wider variety of income streams for farmers, so more robust in terms of subsidies. Encourages local foods, value added close to source, and less emphasis on agribusinesses, so would reduce reliance on cheap petrol. Encourages alternative crops (so greater variety, more robustness). However also promotes organic food, which traditionally has had high variability of output, so less robust re. food production.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	○/●	Overall mixed bag of winners and losers, depending on the scheme in question: <ul style="list-style-type: none"> Not all English regions are equally able to benefit from <i>local food production</i> because not all of them can produce the entire range of local food. For instance, areas presently under horticulture could be turned into sheep grazing land but not necessarily vice-versa. So could discriminate against farmers with grazing land. "Wide and shallow" <i>agri-environment schemes</i> are unlikely to substantially benefit pig and poultry farmers, or horticultural farmers. Emphasis on <i>high quality landscapes</i> would benefit some areas (e.g. Cornwall) over others (e.g. East Anglia) Submission does not include enough information to be able to distinguish. Recognises diversity but does not clearly promote one over the others.
farm sizes/types: family farm, agribusiness, alt. lifestyle		No specific distinction in the submission.
farm tenure: owner, tenant	Mixed	Tenant farmers have traditionally been less likely to take up agri-environment schemes, so may lose out if these are increased. However the emphasis on "wide and shallow" schemes may be more attractive to tenant farmers.
other rural dwellers	Mixed	Submission encourages "rural proofing" of government policies and initiatives, and promotes the idea of prosperous and high quality living in rural areas. However the reluctance to encourage migration from town to country would limit the number of rural dwellers who could benefit from this.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	⊙	Little mentioned, no distinction made between them.
consumers (choice, empowerment, quality, affordability)	Mixed	Wider choice and better labelling would help to empower consumers. However food affordability would probably go down, and the rural poor would be likely to lose out.

other interests: landscape, environment etc.	<input type="radio"/>	The landscape and environment would clearly benefit from this submission.
Taxpayers	<input type="radio"/> / <input checked="" type="radio"/>	Submission would involve more payment of subsidies to farmers, but taxpayers would get more community benefits in return: carbon locked up, floodplains managed, biodiversity improved etc.
international: fair access to/from international markets, fair trade on equal terms	<input type="radio"/>	Advocates more protectionism of high quality UK goods against cheaper imports.
animal welfare	<input type="radio"/>	No mention.

Country Land and Business Association

The submission strongly defends the record of the farming and food sector in producing most of the nation's food with high levels of variety, quality, consistency and reliability. It argues that none of the crises that have hit British agriculture in recent years are unique to Britain or even exceptional in world experience: the only thing unusual about Britain is that they have all come over a short period. This is seen as sheer bad luck: the submission rejects the idea that they might be symptoms of a systemic crisis calling for radical reform.

However it does acknowledge that change and improvement are necessary and possible. Its main argument is that many environmental benefits of the countryside (on which recreation and economic benefits from tourism depend) are 'co-produced' with food production; that the market mechanism does not pay farmers and land managers for producing these public goods; that they should be explicitly paid for by public funds (on the same principle that doctors or teachers are paid) through a land stewardship programme - not sought indirectly through production subsidy. This approach is intended to secure the public goods and farm livelihoods without radical change to current

patterns of production, processing, distribution or trade which, the submission argues (perhaps a bit complacently?) are basically fine.

The submission takes a complex and not altogether consistent approach to trade. On the one hand it asserts that the trend to open markets and more international trade is a 'given' which cannot be challenged, and that British farmers should seek 'niche' quality / distinctiveness markets to make up for their higher production costs. On the other hand it aggressively rejects the logical corollary of this, that Britain should abandon mass food production because it would be cheaper to import. It seeks to square this circle by asserting at a few points (inconsistently with most of the rest of the argument) that British farmers will be able to get 'acceptable international market prices for bulk commodities'. But the main argument appears to be that payments for public goods (under the land stewardship programme described above) would give farmers enough non-production income to make agricultural production viable.

The submission is strong on the needs for a secure rural *economy* but indifferent to rural *community* and also to animal welfare.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	●	Endorses increases in specialist processing and packaging.
food health and safety	◎	Emphasises that food is safer and healthier than ever before. (Complacent?)
food affordability		
non-food products	○	Support for multifunctional countryside, especially trees.
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○/●	More <i>security</i> for farmers (though fewer of them - trend to bigger farms supported). More <i>jobs</i> by implication in land management / environmental projects - but these will be insecure and low quality.
value-added processing near producers	○	Advocating a bit more on-farm processing.
tourism		
international competitiveness of UK farming sector	?	Complex and not entirely consistent argument. (See commentary)
3. Provide environmental improvements and other benefits		
access to countryside, recreation	○	Contracts for land management to include explicit provision for recreational access. Importance of country sports recognised.
landscape	○	Multifunctional farm management.
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	◎	Argues for redirection. No explicit suggestion of either increase or decrease. Proposes funding agri-environment schemes within Pillar 1 for exchequer benefits - at odds with the general assumption that Pillar 1 is restricted to production subsidies and anything else must be Pillar 2.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	○	Better incomes for farmers.
economic autonomy/control by farmers/rural residents	○	Competition policy should not obstruct formation of large farmer cooperatives to counterbalance distributor power.
education and training of rural workforce		Emphasis on commercial competitiveness likely to further erode rural social capital.

vitality of rural communities, age balance	●	
ability to sustain services, access to services		
quality and affordability of housing	⊙	Argues for affordable housing provision to ensure that continued urban exodus does not displace rural people. (But the exodus is not opposed).
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>	●	No mention.
(diversity of) rural traditions/cultures, diversity	●	No mention.
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○	Develop renewables for heat and transport, not only electricity.
transport: <i>road traffic</i>	●	No criticism of transport intensity of current methods; larger farms likely to further increase it. Says Planning Policy Guidance note 13 should not resist rural businesses where traffic would be less than for the farms they replace (spurious comparison: farming is intrinsically and necessarily transport intense since it is about primary production which has to take place in the country to serve population concentrated in towns, whereas many proposed farm diversifications are only transport intense because they are (unnecessarily) remote from users / markets).
energy used/food unit produced/transported/consumed	●	Recommendations accept current trend to increase.
biodiversity: <i>populations of wild birds</i>		Enhanced through wider environmental schemes and more woodland.
populations of rare species	○	
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	⊙	Hardly mentioned.
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	Hardly mentioned.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	●/⊙	'Predict and provide' attitude to urban exodus undermines regeneration. But support for new social housing will prevent loss to rural people.

10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	●	Complacent defence of current transport intensity and trends to greater trade will increase rather than reduce insecurity.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	○	
farm sizes/types: family farm, agribusiness, alt. lifestyle		
farm tenure: owner, tenant		
other rural dwellers		
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	○	
consumers (choice, empowerment, quality, affordability)	○	Recognises need for both affordable food for the poor and variety / distinctiveness for the rich
other interests: landscape, environment etc.	○	
taxpayers	⊙	
international: fair access to/from international markets, fair trade on equal terms	○	Says trade rules should reward better environmental performance.
animal welfare	⊙	

Countryside Agency

This is one of the most radical submissions, as it advocates “a complete move from commodity support to investment in the environment and rural development”: in other words, a move from farming to non-farming activities in the countryside. On the one hand this could lead to a vibrant, productive countryside supporting a range of new businesses, including some in which Britain could become a world leader. On the other hand it could mean a complete demise of indigenous food production.









The submission does not give much detail on what TYPES of new rural businesses would be formed, nor whether a market exists for these businesses. However it does note the need to create new markets, and to provide a range of business training. What is less clear is whether the markets, infrastructure and training could be put in place in time to take full advantage of the new financial structures that the submission proposes. In that sense the submission carries high risks.

The submission’s proposals would probably benefit those people who are educated and enterprising enough to take advantage of the new swathe of

support mechanisms proposed, but could lead to a large hinterland (both physically, in areas with more limited potential for new business ventures, and socially for people currently engaged in farming but who would not take up the new schemes) that loses out and that does not have an adequate safety net.

The submission makes some very positive and innovative suggestions on support for good quality food from other sectors. These include government revision of its public procurement policy, further promotion of farmers’ markets, retailers providing village shops with goods at low prices, and promotion of full traceability and branding initiatives.

However there is little reference to environmental and social safeguards. The new rural businesses should be sustainable, not just economically robust. The submission says little/nothing about social aspects of the rural environment, animal welfare, and GMOs.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer		Complete move from commodity support could completely undermine food sector. Good emphasis on shortening food chain.
food health and safety		Mentions that consumers expect safe food, but no real change proposed.
food affordability		UK food likely to become more expensive, food from abroad - no change.
non-food products		Lots of emphasis on non-food products.
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas		Emphasis on new markets, free advertising, more investment in rural jobs.
value-added processing near producers		Heavy emphasis on helping farmers capture value from food chain, strengthened business advice and support.
tourism		No mention of increasing tourism, though mentions role of tourism in supporting farmers
international competitiveness of UK farming sector		Strong decrease in international competitiveness in terms of commodity food-stuffs. Potential benefits in terms of international market for regionally diverse food, and possibly other products (e.g. biofuels) IF UK gets in early and gets market edge.

3. Provide environmental improvements and other benefits		
access to countryside, recreation	⊙	No real mention.
landscape	⊙	No real change proposed.
public value placed on benefits provided by farming	○	Strong emphasis on enhancing (perceived) public benefits from farmers and reviving consumer confidence.
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	○	Replaces current subsidies with those that give wider range of benefits. No increase in subsidies. It is unclear what the countryside would look like under this submission, and it therefore difficult to estimate the public benefits that would flow from the countryside.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	○	Likely to improve economic benefits to rural areas, though not necessarily to food producing farmers.
economic autonomy/control by farmers/rural residents	○	Move from commodity support to rural development -- and to cooperatives, direct selling, and farmers' markets -- would mean move away from dominance of supermarkets and towards economic autonomy by rural residents.
education and training of rural workforce	○	Training promoted, although this is related specifically to business skills, not general skills improvement.
vitality of rural communities, age balance	⊙	No mention.
ability to sustain services, access to services	○	Support for village shops, weekly farmers markets etc., also indirect benefits from a livelier countryside.
quality and affordability of housing	⊙	No mention.
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>	⊙	
(diversity of) rural traditions/cultures, diversity	⊙	

6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○/●	Shift to rural development would help to produce more biocrops. No mention of windfarms or other forms of renewable energy. More diversification could encourage more use of electricity than at present (processing, alternative use of buildings etc.), i.e. more direct and less indirect energy use. No mention of using locally produced energy in the new rural businesses.
transport: <i>road traffic</i>	●	More rural entrepreneurs and more local value-added processing could lead to a generally busier rural environment and more transport in <i>rural</i> areas, although traffic/item processed could go down.
energy used/food unit produced/transported/consumed	⊙	No real vision about how people in food sector would produce food.
biodiversity: <i>populations of wild birds</i>	○	No clear mention of improving biodiversity, though likely indirect beneficial impacts.
populations of rare species	⊙	No mention.
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	○	Mention enhancing rural environment but no details given.
soil quality and quantity		No mention.
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	No mention.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	○	Suggests that the planning system should "provide guidance and leadership for rural areas" consistent with rural needs, and that agriculture should be made subject to planning controls.
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○/●	Wider variety of rural enterprises is probably more robust in terms of dependence on subsidies, as all financial eggs would not be in one basket. Nothing could really be as dependent on subsidies as sheep farmers currently are. Ditto likely effects of climate/flooding/drought. Rural enterprises would be very dependent on a good transport system. Overall would become much more dependent on overseas food, which could make system vulnerable, both in terms of import capabilities (strength of pound etc), and in situations of world food shortages.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	Mixed	More subsidy-dependent farmers (sheep) will be most affected.
farm sizes/types: family farm, agribusiness, alt. lifestyle	Mixed	Big farms more likely to lose out than smaller ones because they are more affected by modulation.
farm tenure: owner, tenant	Mixed	Tenants less likely to be able to take advantage of emphasis on rural entrepreneurs.
other rural dwellers	○	More vibrant economy overall, more subsidies for non-farming enterprises.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	⊙	No mention.
consumers (choice, empowerment, quality, affordability)	●	Likely to decrease production of UK food, so consumer choice becomes more limited. Food boxes, direct sales etc. good for consumers, but could disadvantage farmers who have limited scope for producing a variety of foods.
other interests: landscape, environment etc.	○	Indirect benefits.
taxpayers	?	No direct effect on taxpayers, but potentially lots of indirect effects in terms of changed countryside, changed range of products available etc. Some would love the new-look England, others would hate it.
international: fair access to/from international markets, fair trade on equal terms	○/●	Removal of subsidies for food production would benefit food producers in other countries, but would disbenefit many UK food farmers. Those UK farmers who can compete without subsidies and/or who establish a niche position for new products (e.g. biofuels) would probably win out, but many UK farmers (e.g. hill farmers) would lose out.
animal welfare	⊙	No mention.

English Nature

This submission focuses almost exclusively on biodiversity and the factors that support it (e.g. water quality, pesticide use). It strongly advocates measures to reduce the use of pesticides and nutrients; to control water abstraction; to change the current subsidy system so as to better promote biodiversity (e.g. move to Pillar 2 subsidies, Basic Stewardship Scheme, revisions to the national beef/sheep envelopes); and to support farmers in making optimum use of these changes to the policy context, including investment in infrastructure and R&D. It describes the proposed Basic Stewardship Scheme in considerable detail.

Surprisingly, the submission makes little/no reference to recreation/tourism, animal welfare, or social aspects of rural life, whose strengthening and good

management could have many indirect benefits to wildlife (e.g. tourism benefits from diverse landscapes; animal welfare benefits of extensive farming practices which also have biodiversity benefits).

The submission deals with water abstraction, which no other submission does, and which is likely to become a growing problem especially in the South East of England. The submission proposes the use of economic instruments such as taxes on pesticides and fertilisers, but no detail is given on their implementation or their expected impact on food production and farm profits. It is also unclear how such taxes implemented in England would affect Wales, Scotland and Northern Ireland, and how revenue from these taxes would be used (whether hypothecated or not, how, etc.).

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	⊖	Mentions need for short chain between producer and consumer, but the suggested move to diversification doesn't guarantee food security.
food health and safety	○	Farmers expected to go beyond minimum standards of food safety. Reduction in pesticides should bring indirect benefits in terms of health/safety.
food affordability	●	Higher environmental standards are likely to increase production costs.
non-food products	○	Non-food products mentioned, but no detail provided.

2. Enable viable livelihoods to be made from sustainable land management

no./security of jobs in rural areas	<input type="radio"/>	Increased environmental work and local processing would increase number of jobs in rural areas, though they would not necessarily be high quality jobs.
value-added processing near producers	<input type="radio"/>	Mentions value added, but no details given.
tourism	<input type="radio"/>	No mention.
international competitiveness of UK farming sector	<input type="radio"/> /●	Depends on whether UK can persuade EC to take on board proposed subsidy structures, more stringent regulations etc. If yes, then benefits; if no, then costs. Also depends on whether consumers preferentially buy British food.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	<input type="radio"/>	Mentioned, but no details given.
landscape	<input type="radio"/>	Mentioned "Natural Areas" and landscape level planning.
public value placed on benefits provided by farming	<input type="radio"/>	Submission tries to engender change on social attitude to farming.
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	<input type="radio"/>	Submission does not propose to increase subsidies, but would lead to better return for money spent because taxpayers would get higher quality environment and safer food.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	<input type="radio"/>	Mentions farmers' self-perception changing away from food production and towards provision of range of functions. Mentions viable communities and economies of rural areas, but no detail given. Indirect benefit from nicer countryside and more jobs.
economic autonomy/control by farmers/rural residents	<input type="radio"/>	Being closer to real market could improve autonomy/control by farmers.
education and training of rural workforce	<input type="radio"/>	Submission strongly supports advisory services for land managers.
vitality of rural communities, age balance	<input type="radio"/>	No mention.
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity		

6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	<input type="radio"/>	Mentions biofuels and the need to cut down fossil fuel inputs, but no mention of windfarms and other forms of renewable energy. Does not mention rural/local use of biofuels/renewable energy.
transport: <i>road traffic</i>	<input type="radio"/>	No explicit mention of transport, but this seems likely to decrease with local trading etc.
energy used/food unit produced/transported/consumed	<input type="radio"/>	Reduction in use of pesticides and fertilisers, and production of local foods would reduce energy/food unit produced.
biodiversity: <i>populations of wild birds</i>	<input checked="" type="radio"/>	Whole aim of submission.
populations of rare species		
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	<input checked="" type="radio"/>	Mentions the need to control abstraction, especially from rivers, as well as water quality.
soil quality and quantity	<input type="radio"/>	Not mentioned specifically, but better vegetation cover would help to prevent erosion, and reduced pesticides would improve soil quality.
<i>waste arisings and management</i>	<input checked="" type="radio"/>	No mention of waste, although fewer livestock would produce less waste, and greater extensification would impose less stress in terms of waste disposal.
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>	<input checked="" type="radio"/>	
genetic impacts		Mentions advantages as well as disadvantages of GMOs; sees potential benefits if properly managed.
8. Achieve high standards of animal health and welfare		
animal health and welfare	<input checked="" type="radio"/>	Mentioned, but no real change proposed.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	<input checked="" type="radio"/>	No mention.
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	<input type="radio"/>	Submission proposes managed retreat of coastlines, encouragement of local economies, and using the same amount of subsidies allocated over wider range of schemes: all would lead to greater resilience.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	⊙	Agri-environment schemes would not apply to farmers outside current subsidy scheme, so pigs and poultry farmers would not gain benefits. Biggest positive impact on arable, beef, sheep. Basic Stewardship Scheme would apply to most/all farmers.
farm sizes/types: family farm, agribusiness, alt. lifestyle	⊙	No size particularly advantaged/disadvantaged.
farm tenure: owner, tenant	?	If schemes were mandatory, then tenant farmers should not be disadvantaged. If voluntary, tenants are often discouraged from taking up agri-environment schemes.
other rural dwellers	⊙	No real change.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	○	Submission not actively encouraging tourism, recreation etc., but would benefit recreational users because of nicer landscape.
consumers (choice, empowerment, quality, affordability)	○/●	Quality up, affordability down.
other interests: landscape, environment etc.	○	Whole point of the submission.
taxpayers	⊙	No increase in subsidies proposed. Change to Pillar 2 could raise issues re. Fontainebleau agreement.
international: fair access to/from international markets, fair trade on equal terms	●	Disadvantage in terms of international competitiveness unless WTO is changed.
animal welfare	⊙	

Environment Agency

The Environment Agency concentrates almost exclusively on the need to improve the environmental contribution of farming, especially reducing pollution, conserving soil and supporting biodiversity, and on two *processes* - a new industry led environmental standard, and whole farm environmental management - for delivering this. Problems and impacts are discussed in much more detail than solutions and proposals. Apart from these environmental benefits, the only area of the appraisal criteria explicitly given much attention is the benefits for tourism dependent on maintenance of the

managed landscape the Agency seeks. There is little mention even of climate change, energy and transport issues.

Other social potential and economic benefits are only inferred indirectly, except that the submission emphasises that economic security and reasonable incomes for farmers are a precondition for success in environmental regulation and management, and recommends redirection of subsidies to reward good stewardship.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	⊖	Some implicit benefits from better farm environmental management, but issues of food production and quality are not dealt with. Non-food crops are not mentioned in detail.
food health and safety		
food affordability		
non-food products		
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○	Benefits for tourism from supporting and enhancing agriculture's contribution to maintaining cherished landscape. But as with all environmental schemes, very few of these are high quality jobs. International competitiveness would decrease due to increased restrictions imposed through environmental protection.
value-added processing near producers		
Tourism		
international competitiveness of UK farming sector		
3. Provide environmental improvements and other benefits		
access to countryside, recreation	○	Benefits for tourism from supporting and enhancing agriculture's contribution to maintaining cherished landscape, but no vision of linking tourism to rural development.
landscape		
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	○	Major reduction in 'externality' costs of agriculture from pollution. Recognition that the new management approaches will require considerable funding, but implies that this should be achieved by redirection of existing funding.
5. Support the vitality of rural economies and the diversity of rural culture		

vitality of rural economies	○	Submission argues that stable farm incomes are a prerequisite for farmers' ability to manage the environment effectively - though does not say how this stability can be achieved. There is no discussion of other rural issues.
economic autonomy/control by farmers/rural residents		
education and training of rural workforce		
vitality of rural communities, age balance		
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○	Environmental management standard may reduce energy use, though energy use is (surprisingly) not one of the resource issues highlighted. Also surprisingly, no mention of action to reduce transport impacts.
transport: <i>road traffic</i>		
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>	○	Biodiversity enhancement an important aspect of farm environmental management.
populations of rare species		
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	○	All likely to be much improved through the recommended whole farm environmental management approach (but genetic impacts not mentioned.)
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	May improve through better farm management – but no details are given on this
9. Allow use of undeveloped land for development that genuinely meets human needs.		
hard development: <i>new homes built on previously developed land</i>	⊙	Not mentioned .
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○	Surprisingly little mention, especially of climate change, and flooding.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	○/●	Likely to have more impact on livestock farmers than arable as many of the problems of concern to the EA relate to pollution from fertilisers and animal wastes. Longer term investment may be a problem for tenant farmers (and landlords may resist tree planting).
farm sizes/types: family farm, agribusiness, alt. lifestyle		
farm tenure: owner, tenant	●	
other rural dwellers		
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	○	
consumers (choice, empowerment, quality, affordability)	○	
other interests: landscape, environment etc.	○	
taxpayers	○	
international: fair access to/from international markets, fair trade on equal terms	○	
animal welfare	○	

Food and Drink Federation

This submission focuses on ensuring that British food producers are able to be competitive in the global marketplace, and on large-scale industrialised food production. It emphasises that FDF members abide, and would continue to abide, by environmental and safety regulations, but suggests that much current UK regulation is unnecessarily complex with considerable “goldplating” by the government. Much of the submission is about the need to rationalise and streamline regulation.

The submission focuses heavily on existing problems and provides very little in the way of vision. It does comment on the industry’s moves in terms of packaging/waste recovery, reuse, and disposal.

The submission’s approach to GMOs is unclear. In particular, it is not clear whether “reassurance that the technology is safe” means that the FDF would like to be reassured that GMOs are safe, or that the FDF would like government to reassure the public that the technology is safe.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	Submission aims to increase market shares, and ensure a safe supply of food. It does not mention short food chains.
food health and safety	⊙	No change proposed.
food affordability	○	Would continue with trend towards cheaper food.
non-food products	⊙	No mention.
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	⊙	No mention, but would tend to discourage processing near producers.
value-added processing near producers		
tourism		
international competitiveness of UK farming sector	○	Submission assumes, and buttresses, trends towards increased trade liberalisation. It aims to maintain and promote the competitiveness of UK food suppliers.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	⊙	No mention
landscape	⊙	
public value placed on benefits provided by farming	○	Emphasises the need for government and consumers to appreciate the (side-)benefits of farming

4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	○/●	Promotes closer links to the market, but does not promote a reduction in subsidies. Does not mention Pillar 2, although it promotes a slight revamping of CAP and an increase in publicly-funded research. It would reduce regulation, which might lead to some reductions in costs. It would maintain export refunds
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	⊙	Rural economies not mentioned. Trends toward globalisation would not increase local economic activity
economic autonomy/control by farmers/rural residents	●	Emphasises large-scale production and processing, and trade liberalisation. This runs counter to autonomy/control by rural residents.
education and training of rural workforce	○/●	Not mentioned; we feel that things would get worse.
vitality of rural communities, age balance		
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○	Mentions need to use all resources efficiently.
transport: <i>road traffic</i>	○/●	Not directly addressed but likely to lead to increased traffic due to larger scale, food processing etc.
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>		
populations of rare species		
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	⊙	Mentions need to use water efficiently, although it shows no clear proposals or commitment for improvements. Submission claims that industry has “low pollution potential” (we would query this).
soil quality and quantity	⊙	No mention.
<i>waste arisings and management</i>	○	Emphasises waste recovery, reuse and disposal in line with EU Directives.
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>	⊙	Mentions climate change, non-ozone depleting coolants etc., but basically only proposes to adhere to regulations and does not propose changes.
genetic impacts	⊙	No mention.
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	No mention.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	⊙	No mention.

10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	●	Trends towards large scale would increase dependence on centralised processing and long distance transport. In turn this would increase dependence on petrol, subsidies, transport infrastructure etc.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	⊙	Nobody particularly advantaged/disadvantaged.
farm sizes/types: family farm, agribusiness, alt. lifestyle	○/●	Big farms would benefit.
farm tenure: owner, tenant	⊙	No difference.
other rural dwellers	⊙	No mention.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	⊙	No real change.
consumers (choice, empowerment, quality, affordability)	○/●	More global variety but not necessarily local variety. Food costs likely to go down.
other interests: landscape, environment etc.	⊙	No change.
taxpayers	⊙	No overall change to tax burden.
international: fair access to/from international markets, fair trade on equal terms	○	Main point of submission.
animal welfare	⊙	No mention.

Friends of the Earth

This submission presents a fully integrated approach to sustainable agriculture. It focuses on the problems caused by large corporations, which protect their own profitability at the expense of farmers (no control by farmers), local food shops (closed down), and consumers (unable to choose on the criteria they really want, or to avoid hormone disrupters or GM).

It also strongly criticises the trade rules and European/UK funding biases that bolster this power and prevent more sustainable practices, e.g. labelling, requirements for standards on imports. It highlights the centrality of trade in

the debate, and expresses concern over the narrow remit of the FFC in this respect.

Friends of the Earth promote a resilient, low resource, locally based, lower-trade regime and an increase in smaller-scale, mixed, and organic farming. They promote increased consumption of fruit and vegetables, and a reduction in food poverty. To this end, they propose that the CAP should be replaced by a rural sustainable development strategy; that the food trade regime should be taken away from the WTO; and that UK government funding should move from price support to agri-environment.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	Strong emphasis on shorter food chains. Discusses reasons for non-security of current systems (e.g. over-dependence on oil).
food health and safety	○	Especially through avoidance of pesticides, antibiotics and hormone disrupters.
food affordability	⊙	Cost of food likely to rise, but submissions makes concerted efforts towards alleviating food poverty.
non-food products	○	Little mention, though submission does mention renewable energy on farms, and the integration of farming and forestry.
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○	Better incomes for farmers through reduction in corporate power, smaller farms provide more jobs per land area.
value-added processing near producers	○	
tourism	○	Recognition of farmers' role in maintaining the countryside visitors want.

international competitiveness of UK farming sector	●	'Competitiveness' seen as the problem, not the solution.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	○	Implicit in calls for integrated farm management for multi-use countryside.
landscape		
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	◎	Calls for shift rather than increase or reduction: implications is that total public expenditure: will stay about the same.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	○	Reduction in power/control by corporations and more local food systems promoted as ways of increasing farmers' autonomy and improving the vitality of rural economies.
economic autonomy/control by farmers/rural residents		
education and training of rural workforce	○	
vitality of rural communities, age balance	○	Concern to ensure 'succession' of farmers (currently breaking down). Notes current trends of increasing size/efficiency of farms going against this.
ability to sustain services, access to services	◉	Hardly mentioned.
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity	○	Concern to maintain farmers' tacit knowledge of local environment.
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○	Promotes reduction in energy-inefficient use of agrochemicals; more local food economies so less transport more mixed, small and organic farms with higher proportion of hedgerows and other field margins, fewer inputs of pesticides and fertilisers, and so higher biodiversity.
transport: <i>road traffic</i>		
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>		
populations of rare species		
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	○	Discusses problems to water/soil/air/genetic bank resulting from current farm practices. Promotes organic etc. farming which would help to prevent these.
soil quality and quantity		
waste arisings and management		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		

genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	<input type="radio"/>	Promotes free range farming; higher animal welfare generally through protection from imports of meat produced using lower welfare standards; less long distance transport of animals.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	<input type="radio"/>	No mention.
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	<input type="radio"/>	Explicitly mentions vulnerability of current farming systems to potential changes in subsidies and currency fluctuations. Promotes more robust, less petrol-intensive farming systems.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	<input type="radio"/> / <input checked="" type="radio"/>	Promotes small mixed farms; would disadvantage big specialist ones.
farm sizes/types: family farm, agribusiness, alt. lifestyle		Promotes family farms and succession in farming.
farm tenure: owner, tenant	<input type="radio"/>	no mention.
other rural dwellers	<input type="radio"/>	no mention.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	<input type="radio"/>	More agri-environment schemes would implicitly benefit other users.
consumers (choice, empowerment, quality, affordability)	<input type="radio"/>	Increased choice, empowerment and quality. More mixed in terms of food affordability, but calls on Government to tackle food poverty as a priority.
other interests: landscape, environment etc.	<input type="radio"/>	
taxpayers	<input type="radio"/>	Better value for same money.
international: fair access to/from international markets, fair trade on equal terms	<input type="radio"/>	Proposes that global food trade should be reformed to make it more sustainable and just.
animal welfare	<input type="radio"/>	

National Farmers Union

This submission is primarily about how economic systems can be readjusted to better support farmers, whose “income situation is abysmal”. It identifies the current £/€ exchange rate and the Fontainebleau Rebate as being key contributors to the current problems with farming incomes, and includes detailed proposals for how to deal with these problems. It also advocates reduced regulation and market-based instruments, and is deeply wary of shifts in funds from Pillar I to Pillar II unless compensatory measures are put in place.

Annex 9 of the submission mentions paying farmers subsidies in euros at their request. This would have several benefits, listed at Annex 9, notably farmers being able to buy resources from the Eurozone in euros. Farmers’ co-operatives would be particularly well set up to take advantage of this. However, overall the submission does not give much detail about *how* the proposed economic systems should be implemented

The submission highlights farming’s contribution to environmental quality, and suggests that “given proper management our current farming systems and practices are environmentally sustainable”. It does not clearly propose changes that would further improve environmental quality, and does not suggest win-win (environment-economy) solutions.

Surprisingly, the submission does not address rural culture, traditions, and ways of life at all. Its proposed measures would generally support agri-businesses over family farms or alternative farming systems. It also notes that “current farming systems and practices... do not cause cruelty to animals”, and does not propose any changes in terms of animal welfare

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	⊙	The whole aim of the NFU/farming is to produce food. However submission does not mention reducing food chain length or improving farmer-consumer links through direct sales, which should be in farmers’ best interest.
food health and safety	⊙	Submission mentions biosecurity. Assuming that proposal means that food is safe when it leaves the farm gate, it is still unclear how safe it would be when it gets to the plate: the complexity of the market system could worsen food security.
food affordability	⊙	Cost at the farm gate, and thus presumably to consumer, likely to become cheaper due to larger scale and increased effectiveness of production, but subsidies will certainly not decrease. No reduction in food production.
non-food products	○	Submission mentions potential of industrial crops.
2. Enable viable livelihoods to be made from sustainable land management		

No./security of jobs in rural areas	●	Greater food production efficiency likely to lead to job losses, which would probably only be partly offset by increased food processing.
value-added processing near producers	⊙	No clear vision, no implementation measures, no guarantee it would happen in rural areas, though acknowledged as important.
tourism		Nothing about tourism or farm diversification.
international competitiveness of UK farming sector	○	Submission clearly aims to improve this, primarily through reduced regulation.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	●	Very limited mention at page 8 of submission: people are to be given rights of way but must respect and preserve rural environment.
landscape	⊙	No shift in proposed management regime.
public value placed on benefits provided by farming	○	Would like more public appreciation of benefits provided by farming, with a proactive role taken by Government. No clear plan for how this would be done.
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	●	Submission proposes government supported income stabilisation scheme and “new income schemes” in the form of expanded agri-environment schemes, sources of finance outside the CAP/ERDP, and “other forms of partnership and contracts”. There may be government savings due to reduced regulation.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	⊙	Not addressed at all, except that submission calls for more autonomy and less regulation for farmers.
economic autonomy/control by farmers/rural residents		
education and training of rural workforce		
vitality of rural communities, age balance		
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity		

6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produced (biomass, wind farm etc.) minus energy used): <i>emissions of greenhouse gases</i>	⊙	Mentions production of biomass, but not necessarily to be used on farm. Submission mentions improved efficiency, but energy efficiency is not directly proposed.
transport: <i>road traffic</i>	⊙	No mention.
energy used/food unit produced/transported/consumed	⊙	No mention.
biodiversity: <i>populations of wild birds</i>	⊙	Want to develop agri-environment schemes, but no real change from current system, i.e. reversal of past bad trends but no proposals for improvements.
populations of rare species	⊙	
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	⊙	Mention NFU Water-wise campaign, but no detail given. No mention of further improvement in farmer/NGO communication.
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts	⊙	In favour of exploring GMO as way forward because of potential of opening new markets, but only with appropriate safeguards.
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	Submission notes that current farming practices “do not cause cruelty to animals” and compares them positively with practices elsewhere. No improvements proposed.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>		No mention.
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	●	Submission gives strong arguments and good ideas for how farming could become more resilient to currency changes. No mention of other risks. Reduced regulation could allow for faster changes and greater resilience in farming practices, but could also lead to worse hygiene, energy efficiency etc.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture		No mention.
farm sizes/types: family farm, agribusiness, alt. lifestyle	Mixed	Support agri-business, not others.
farm tenure: owner, tenant		No mention, but no extra support for tenants.
other rural dwellers		No mention.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	⊙	No change.
consumers (choice, empowerment, quality, affordability)	○	Want to see quality and choice to market.
other interests: landscape, environment etc.	⊙	No change.
Taxpayers	●	Want more subsidy: slightly worse.
international: fair access to/from international markets, fair trade on equal terms	○	Want to see improvement. Submission notes that the UK has the best animal welfare systems, and that imported meat -- often cheaper -- normally comes from worse systems. Submission argues that WTO allows unfairly open access to other countries' farmers, and that consumers need to get this message more clearly.
animal welfare	⊙	No change.

National Federation of Women's Institutes

The pivotal argument of this submission is the dogmatic promotion of free trade and competitiveness, and the detailed policies flowing from them, are the main drivers of unsustainability in agriculture in the UK and abroad. The submission argues that if trade and markets are treated as means rather than ends, and WTO agreements reformed to support rather than erode public policy goals, it would become possible to provide better food, more affordably, with lower resource consumption and environmental impacts, better stewardship of an ecologically richer countryside, security and a decent living for farmers and their dependants, and rural economies all together.

These policies would also increase the UK's resilience and security in the face of both climate and geopolitical uncertainties and risks.

There are no explicit proposals for either increases or reductions in public funding: it is implied (though not demonstrated) that the programme could be achieved by redirection (albeit radical) of existing public funding. There is little on the detail of rural social conditions or recreational use of the countryside.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	Submission argues for integrated achievement of local processing, short supply links and healthier, safer food through conscious policy promoting public goods instead of global trade.
food health and safety		
food affordability		
non-food products		
2. Enable viable livelihoods to be made from sustainable land management		
No./security of jobs in rural areas	○	Emphasises local processing and added value, and protection of rural livelihoods from both concentration of buying power in supermarkets and undercutting by imports from countries with lower production costs (NFWI says often due to unsustainable, unhealthy or cruel production methods) .
value-added processing near producers		
tourism	○	

international competitiveness of UK farming sector	<input checked="" type="radio"/>	Submission argues that 'competitiveness' is a foolish goal, and pursuing it undermines genuine sustainability objectives while achieving nothing.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	<input type="radio"/>	
landscape	<input type="radio"/>	Protection / restoration of traditional diverse / mixed farm landscapes, and management for more biodiversity.
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	<input checked="" type="radio"/>	Argument is for more intelligent use of public money: subsidies and support to achieve, rather than undermine, sustainability. Major realignment of public funding proposed - but does not explicitly propose either increase or decrease in funding.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	<input type="radio"/>	Strong emphasis on giving farmers better autonomy and keeping farms and rural enterprises serving food and agriculture viable.
economic autonomy/control by farmers/rural residents		
education and training of rural workforce	<input type="radio"/>	Whilst being supportive of the rural economy, the submission does not deal in specifics with any of these social issues.
vitality of rural communities, age balance		
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i> (diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	<input type="radio"/>	Strong emphasis on reducing travel and energy intensity of agriculture and also food processing and distribution through local, low energy methods.
transport: <i>road traffic</i>		
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>		General environmental improvements are encouraged.

populations of rare species	<input type="radio"/>	
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	<input type="radio"/>	
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts	<input checked="" type="radio"/>	Argues for ban on commercial growing of GMOs until enough research has been done to show conclusively that they will not cause genetic pollution / undermine organic systems. A pragmatic but still firm position: no dogmatic or absolutist opposition to GMOs, but an insistence on making sure they will not irreversibly undermine sustainability objectives.
8. Achieve high standards of animal health and welfare		
animal health and welfare	<input type="radio"/>	Argues that welfare improvements are needed and would be beneficial.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	<input checked="" type="radio"/>	
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	<input type="radio"/>	Wise emphasis on resilience, security, self-sufficiency, robustness and precaution throughout.
Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	<input checked="" type="radio"/> / <input type="radio"/>	Neutral between sectors, except for strong support for mixed farms.
farm sizes/types: family farm, agribusiness, alt. lifestyle	<input type="radio"/> / <input checked="" type="radio"/>	Proposed rearrangement of subsidies would be (intentionally) good for smaller (including family) farms and bad for big 'agribusiness'.
farm tenure: owner, tenant		

other rural dwellers	<input type="radio"/>	More local employment.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	<input type="radio"/>	
consumers (choice, empowerment, quality, affordability)	<input checked="" type="radio"/>	Better quality and health, better labelling allowing informed consumer decision, loosening the grip of supermarkets.
other interests: landscape, environment etc.	<input type="radio"/>	
taxpayers	<input type="radio"/>	Better quality of life value for money - though probably no less money.
international: fair access to/from international markets, fair trade on equal terms	<input checked="" type="radio"/>	Re-engineering trade regimes to promote rather than undermine sustainability at home and abroad.
animal welfare	<input type="radio"/>	

Regional Development Agencies

This is a short submission with less detail. It highlights many problems that result from current forms of agriculture -- decline in biodiversity, reduction in agricultural employment etc. -- but notes that it "is unrealistic" to expect trends towards larger field size, intensification etc. to be reversed. It promotes local foods but also transport links between urban and rural areas. It notes that the trend to larger farms has a detrimental effect on communities and that this trend must be arrested in remote areas, but does not explain how this should be done.

The submission promotes variety in management styles and production systems. It proposes that national/ European policy frameworks should be implemented differently in different areas of the country (e.g. through greater regional autonomy in application of CAP framework).

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	⊙	Promotes local food supply chains (with the proviso that farmers markets will remain a niche sector) and greater integration of supply chain, but also implicitly assumes that most food production will remain large scale and intensive.
food health and safety	⊙	Highlights problems with "how consumers deal with food", including lack of skill in food preparation and low awareness of dietary issues, but gives no indication of how this should be tackled.
food affordability	⊙	Notes consumer preference for cheap food, but makes no recommendations on this issue.
non-food products	○	Promotes "multifunctional agriculture and rural diversification" through the planning system, and encourages non-food uses of agricultural crops, but no detail given on how this should happen.
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○	Aims for a 'living working countryside'. Notes that agricultural jobs are often unskilled, with low pay and health/safety problems. Suggests that short-term problems of FMD need to be dealt with (though does not link this with more sustainable practices).
value-added processing near producers	○	Notes that "the food sector" encompasses all the downstream business activity between primary produce and consumer. Highlights opportunities to add value to primary production (though not necessarily locally), but gives no detail.
tourism	○	Mentions need to manage the environment to support tourism.

international competitiveness of UK farming sector	○	Implicitly suggests that UK farming must remain large scale and intensive to maintain its competitiveness.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	○	Promotes policies to keep the countryside open, and shift in funding from food production to environmental management.
landscape	○	highlights economic value of landscape, promotes landscape diversity, notes role of farmers in managing land.
public value placed on benefits provided by farming	⊙	no direct mention.
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	⊙	Suggests that "intervention [has] created a dependency culture for farmers". Would redirect subsidy from agriculture to economic restructuring (in short term) and economic objectives (long term).
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	○	Suggests that ERDP should be reviewed to ensure that a greater proportion is dedicated to economic development.
economic autonomy/control by farmers/rural residents	⊙	Notes retailers' downward pressure on food prices, but gives no suggestions on whether/how to tackle this. Promotes cooperation between farmers and food sector businesses.
education and training of rural workforce	○	Promotes training and business support for farmers.
vitality of rural communities, age balance	○	Suggests that trend to larger farms has had a detrimental effect on communities, and that this should be countered in remote areas (though it gives no details on how). Includes appendix on "RDA vision for rural areas" which would help to lead to more viable rural communities, though it does not explain link between this and main submission.
ability to sustain services, access to services	⊙	no mention.
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity	○	Stresses need for different approaches in different areas, and promotes greater regional autonomy to achieve this.
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	⊙	no mention.
transport: <i>road traffic</i>	●	Policies to promote "living working countryside" including continuation of intensive farming and promotion of non-food production activities, likely to increase traffic.
energy used/food unit produced/transported/consumed	●	Notes trends towards intensification and suggests that "it is unrealistic to expect this trend to be reversed. Without the unit cost reductions these policies have achieved no farm businesses could have survived".
biodiversity: <i>populations of wild birds</i>	⊙	one of broad aims of submission, though no detail given on how to achieve this.
populations of rare species		

7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	⊙	no mention.
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	no mention.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	⊙	Implies diversification but following market demands rather than to meet needs.
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	⊙	Mentions need for government-underwritten "price stabilisation systems" and farmer training in managing market risk, but this does not clearly translate into more sustainable systems.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	⊙	No clear trends (see below).
farm sizes/types: family farm, agribusiness, alt. lifestyle	⊙	Supports both agribusiness (implicitly, by assuming that trends towards large scale etc. will continue) and small-scale businesses in rural areas that would otherwise become cultural deserts (though no detail is given on this). No clear trends.
farm tenure: owner, tenant	⊙	no mention.
other rural dwellers	⊙	no real suggestions.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	○	Emphasis on farmers diversifying and becoming land managers implies better future recreational facilities only an implication.
consumers (choice, empowerment, quality, affordability)	○	Would lead to both cheap, large scale food production and more local foods (though whether these trends are compatible with each other is unclear). Stresses that farmers should be responsible for risk, which could lead to better farm practices and greater food safety.
other interests: landscape, environment etc.	○	Emphasis on farmers becoming land managers implies better landscape, environment etc.
taxpayers	○	Subsidies would change from food production to land management, i.e. better use of same amount of subsidy.
international: fair access to/from international markets, fair trade on equal terms	⊙	no mention.
animal welfare	⊙	no mention.

Soil Association

The main theme of this submission is the benefits a shift to more organic production and the need for policy to encourage and support rather than obstruct this. The main benefits would be health and quality of food, maintenance and safeguarding of the resource base (especially soil and water), reduction in environmental impacts (especially oil consumption in agrochemicals), improved animal welfare, increased genetic diversity, increased rural employment (because organic farming is more labour-intensive), and a net reduction in public costs through reducing externalities (including the costs of sorting out crises such as BSE).

The submission proposes that 30% of farmland should be under organic production by 2010, buttressed by public purchasing policies on food, "polluter pays" charges on environmentally harmful farming practices, the re-opening of smaller abattoirs, a ban on unnecessary drug use in livestock production, and reform of Government/CAP funding policies (but not trade rules). It implies that we should simply pay more for food, and does not discuss the effects of this on the poor. However it does point out that more domestic organic production should reduce currently high level of imports, and create opportunity for organic exports.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	●/○	Notes that yields for organic farming are 20-40% lower than for conventional farming, and year-on-year variability in yields is higher. But cites existing over-production of food, and over time would lead to more consistent long-term maintenance of agricultural base. Calls for fewer food miles.
food health and safety	○	Much emphasis on food safety. Submission promotes removal of pesticides and ban on routine use of antibiotics and veterinary drugs.
food affordability	●	Implies we should be willing to pay more for food. Affordability recognised as one of the (few) benefits of current system.
non-food products	⊙	Not discussed.
2. Enable viable livelihoods to be made from sustainable land management		

no./security of jobs in rural areas	<input type="radio"/>	Organic farming is more labour intensive, so would provide more jobs
value-added processing near producers	<input type="radio"/>	Specific call for reopening small abattoirs, but food generally less likely to be less processed
tourism	<input type="radio"/>	Mentioned in passing
international competitiveness of UK farming sector	<input checked="" type="radio"/>	Notes that "the UK is in a prime position to be a major supplier of organic food on the world market", but this goes counter to much of the thrust of the rest of the submission, e.g. "because it is usually more small scale and diverse, organic production is ideal for supplying local food economies" (the bullet point following directly after that on world markets)
3. Provide environmental improvements and other benefits		
access to countryside, recreation	<input type="radio"/>	Hardly mentioned but implicitly positive
landscape		
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	<input type="radio"/>	Submission's proposals would avoid many indirect costs of agriculture, e.g. pollution, disasters such as BSE
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	<input checked="" type="radio"/>	Not mentioned, except for wish for farming to be a secure and respected occupation attractive to new entrants (including young people.)
economic autonomy/control by farmers/rural residents		
education and training of rural workforce		
vitality of rural communities, age balance		
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i> (diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, wind farm etc.) minus energy used): <i>emissions of greenhouse gases</i>	<input type="radio"/>	Emphasises energy balance of artificial fertilisers and food production. Promotes local food economies and reopening of local abattoirs so reducing transport.
transport: <i>road traffic</i>		
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>	<input type="radio"/>	No direct mention, but implicitly beneficial
populations of rare species		
7. Sustain the resource available for growing food		

water quality and quantity: <i>rivers of good or fair quality</i>	○	Biggest benefits of more switch to organic
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts	○	Promotes genetic diversity in crops and livestock
8. Achieve high standards of animal health and welfare		
animal health and welfare	○	Promotes move away from intensive to more extensive farming with better animal welfare, and less shipping of live animals. Unclear about use of prophylactic medicine
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	⊙	No mention
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○	By maintaining soil and water resources, genetic diversity, reducing trade volumes and transport, and especially fossil fuel dependence.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	○/●	Horticulture and arable win because they can diversify to livestock (needed for mixed farming organic farming systems) more easily than livestock can diversify to horticultural (though this would be easier for dairy than for others). Organic sector would win.
farm sizes/types: family farm, agribusiness, alt. lifestyle		Implicitly promotes smaller, more diverse farms.
farm tenure: owner, tenant		Unclear what impacts would be.
other rural dwellers	○	No direct mention, though likely to benefit from shift to organic.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others		
consumers (choice, empowerment, quality, affordability)	○/●	Choice, empowerment, safety, quality improved. Confidence likely to increase a lot. But implication is that we just have to pay for it.
other interests: landscape, environment etc.	○	Improved biodiversity, smaller-scale and more varied landscape.
taxpayers	○	Submission notes that organic production has "the potential to reduce the total costs of food production to the state, when indirect and direct costs are considered together", though it makes no comprehensive cost-benefit analysis.
international: fair access to/from international markets, fair trade on equal terms	⊙	No mention.
animal welfare	○	Improved animal welfare through less intensive farming, less long-distance transport of animals, reduction in non-essential drug use.

Sustain

This submission proposes an integrated approach to food and farming: lower inputs, lower environmental impacts, lower trade and transport linked to better food, a better 'deal' for farmers, healthier food and fair treatment of southern countries. Resilience is emphasised, and is to be achieved through greater diversity, shorter transport links including a ban on long-distance transport of live animals, lower dependence on oil, and a reduction in the use of antibiotics, biocides, artificial fertilisers, and non-essential drugs.

The submission argues that trade should be seen as a means towards improvements in quality of life, not an end in itself.

Sustain's proposals are mixed in terms of affordability. The submission acknowledges that food prices will go up under its recommendations. However it emphasises the need for affordability of healthy foods (and the paradox that 'diseases' of affluence - obesity, unhealthy high salt and fat diet

- actually worst afflict the *poor* in rich countries), although it does not mention the mechanisms for how higher food prices would be offset for people on low incomes. Its proposals would expect to reduce many of the external costs of food production - pollution, disease, etc. -- so the overall cost to society may go down.

The submission makes specific recommendations for more support for fruit and vegetable production; for public (esp. education and health sector) procurement of organic/local foods (and critiques the current school fruit scheme for sucking in more imports); and for more education on food, nutrition, and cookery.

The submission is particularly strong on issues of resilience in terms of sustainability, health, and livelihoods. It makes little mention of non-food aspects of agriculture, e.g. tourism, landscape.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	Emphasises short links, simpler food chain, less vulnerability, organics, reduced use of antibiotics etc. Could lead to short-term blips in production of specific foodstuffs, but would lead to improved long-term food security.
food health and safety	○	Strong links to healthy diet: availability / affordability of fruit and vegetables; freedom from chemical residues and (especially) unnecessary antibiotics. Welcome recognition that 'healthy' doesn't mean 'sterile'. Lower-meat diet.
food affordability	●	Mixed picture - see overall comments. Food likely to get more expensive at the shop.
non-food products		Not mentioned
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○	Propose more labour-intensive farming systems, particularly more jobs in fruit/veg production.
value-added processing near producers	○	Big emphasis on catering using local foods, and on re-opening local abattoirs.
tourism	◉	not mentioned.
international competitiveness of UK farming sector	●	Argues that this is a foolish goal.
3. Provide environmental improvements and other benefits		
access to countryside, recreation	◉	No mention. Unlikely to change radically.
landscape		
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	○	Argues for internalising externalities. Some direct costs (e.g. food prices) would increase, but submission points out huge externalities (e.g. disease, pollution) avoided.

5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	<input type="radio"/>	Implicitly supported by call for more value added processing locally and higher proportion of total value added going to farmers.
economic autonomy/control by farmers/rural residents		
education and training of rural workforce	<input type="radio"/>	Training supported.
vitality of rural communities, age balance	<input checked="" type="radio"/>	Not mentioned.
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	<input type="radio"/>	Strong on all these resource issues: shorter food chains, more local food supply, reduced use of oil in food production, less transport.
transport: <i>road traffic</i>		
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>	<input type="radio"/>	Implicit
populations of rare species		
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	<input type="radio"/>	Lower inputs, agrichemicals, antibiotics are a main theme.
soil quality and quantity		
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>	<input checked="" type="radio"/>	Not mentioned
genetic impacts	<input type="radio"/>	Ban on commercial GM for 5 years; sceptical and precautionary approach. Promotes rare breeds/species.
8. Achieve high standards of animal health and welfare		
animal health and welfare	<input type="radio"/>	Through more natural, extensive systems; less transport of live animals.
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	<input checked="" type="radio"/>	Not mentioned.

10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○	Emphasised through shorter travel, less trade, less petrochemical dependence.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	○/●	Explicit move of investment / support to fruit and veg and away from livestock.
farm sizes/types: family farm, agribusiness, alt. lifestyle	○/●	Implicitly better for small family vs agribusiness.
farm tenure: owner, tenant	⊙	No mention.
other rural dwellers		
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others		
consumers (choice, empowerment, quality, affordability)	○	Better quality, safety and choice through labelling, improved animal welfare etc. Affordability of food would get worse overall, though submission promotes idea of credit system to help out worse off.
other interests: landscape, environment etc.	⊙	No mention
taxpayers	○	Avoidance of costly externalities (crises), more jobs.
international: fair access to/from international markets, fair trade on equal terms	○	Strong emphasis on <u>fair</u> trade - meaning equal environmental / health/ animal welfare standards, end to hypocrisy of dumping of subsidised northern overproduction on poor countries while obstructing their value added exports.
animal welfare	○	More natural, extensive systems; less transport of live animals.

Unilever

This was a less detailed submission, so it was not possible to draw conclusions for all points of the appraisal. In the appraisal, we also drew on information about Unilever's pea project, which the submission points to. It is seeking a middle way: much more sparing and careful use of agrichemicals than conventional practice, but not seeking total elimination; and with tight and direct links between the farm and the processing company (Birds Eye Walls).

Unilever believe this is good for sustainability because it shortens and simplifies the supply chain, enables the processors to specify and secure high standards and, and gives farmers more income security. However this comes at the price of less autonomy and more dependence on (much larger) processor companies.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance*	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	Potential reduction of chain through close links from farm to processing co which their pea pilot is applying.
food health and safety	⊙	Not discussed
food affordability		
non-food products		
2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	⊙	Not discussed
value-added processing near producers		
tourism		
international competitiveness of UK farming sector		
3. Provide environmental improvements and other benefits		
access to countryside, recreation	⊙	Not discussed
landscape		
public value placed on benefits provided by farming		
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	⊙	Not discussed

5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	⊙	Farmers growing more directly under contract to processors (rather than for sale in market) increases security and predictability of income within each year, but at the expense of less autonomy for farmers longer term. Pea project includes experimental mutual support arrangements between farmers to protect each other against failure of crop on one farm.
economic autonomy/control by farmers/rural residents		
education and training of rural workforce		
vitality of rural communities, age balance		
ability to sustain services, access to services		
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i> (diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○	Their proposed idea of 'sustainable agriculture' includes lower inputs; direct contact with farmers may reduce transport.
transport: <i>road traffic</i>		
energy used/food unit produced/transported/consumed		
biodiversity: <i>populations of wild birds</i>	⊙	Not discussed.
populations of rare species		
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	○	Pea project working to improve these specifically.
soil quality and quantity		
<i>waste arisings and management</i>	⊙	Not discussed, except for 'in principle' support for new technology including GM.
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>		
genetic impacts		
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	⊙	
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○	Their 'sustainable agriculture's model should slightly improve resilience through better protection of soils and watercourses.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture		Insufficient material to support any reliable conclusions.
farm sizes/types: family farm, agribusiness, alt. lifestyle		
farm tenure: owner, tenant		
other rural dwellers		
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others		
consumers (choice, empowerment, quality, affordability)		
other interests: landscape, environment etc.		
taxpayers		
international: fair access to/from international markets, fair trade on equal terms		
animal welfare		

WWF

This submission proposes a series of radical and innovative approaches to enhance the sustainability of agriculture. They include strongly reducing the ecological footprint of food consumed in the UK; introducing input-output accounting for farms; devising an EU-wide rural policy; imposing an aviation tax that would help to discourage the importation of food from abroad; establishing large areas for wildlife; encouraging vegetarianism; and a one-stop shop advice for farmers. It also calls for agriculture to be sensitive to the peculiarities of sites.

The submission is particularly good on the sustainability principles underpinning agriculture. It also notes consumer trends that would reduce the

impacts of agriculture, including the move to organics and from red to white meat.

The submission is better on principles than on practicalities. For instance it mentions site-specific farming practices, and the need to improve social and economic conditions, but does not mention how this should be done. Overall, however, it does a good job of proposing solutions that aim to deal with the causes of unsustainable farming practices, rather than just fine-tuning the symptoms.

Criterion <i>italics</i> = Government headline indicator (1) = component of objectives for sustainable agriculture	+/-, significance	Comments
1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone		
food security, incl. short chain between producer and consumer	○	a. Want more land for conservation/forests/wetland, more extensification and mixed farming, and 30% organic. b. Want to reduce imports. c. Want to increase the proportion of diet that is vegetarian. What is unclear is how these different trends would affect food production. a. and b. imply more land needed to grow same amount of food. c. suggests that less land would be needed. Would current land area of UK be enough to fulfil this vision? Mixed farming in currently arable land wouldn't necessarily square with more vegetarian diet. Growth in organics would also require more livestock which doesn't square with vegetarian diet. Promotes shorter food chains.
food health and safety	○	Opposed to GMOs, in favour of organic and greater accountability in the food chain.
food affordability	●	Move to organic food and extensification likely to increase cost of food.
non-food products	○	Submission mentions alternative energy, but does not give details of how this should be brought about. Strongly promotes the idea of farmers growing trees, with challenging targets.

2. Enable viable livelihoods to be made from sustainable land management		
no./security of jobs in rural areas	○	Move to more organic and away from new technology likely to lead to more jobs. Makes very cogent arguments for reducing reliance on technology.
value-added processing near producers	○	Promotes shorter food chain, and a diverse food and farming sector.
tourism	○	Would lead to much more woodland, and “significant areas of these forests should be accessible to people”, but tourism is not a major thrust of the submission.
international competitiveness of UK farming sector	●	
3. Provide environmental improvements and other benefits		
access to countryside, recreation	⊙	No real mention.
landscape	○	Proposes the development of a common coherent landscape vision.
public value placed on benefits provided by farming	○	Notes consumer trends towards organics, from red to white meat, to local foods, in favour of GMO labelling: proposals would follow these trends.
4. Minimise the total public funding needed		
opportunity cost of rural policies, e.g. subsidies	● / ○	Proposes an increased budget for ERDP, plus more government-funded advice for farmers.
5. Support the vitality of rural economies and the diversity of rural culture		
vitality of rural economies	⊙	Mentioned but no real vision presented.
economic autonomy/control by farmers/rural residents	○ / ●	Proposes a move away from globalisation, but farmers could become more dependent on providing environmental goods.
education and training of rural workforce	○	Promotes more training for farmers, particularly in traditional/sustainable farming systems.
vitality of rural communities, age balance	⊙	Submissions mentions isolation as a problem, but no real solution offered.
ability to sustain services, access to services	⊙	No mention.
quality and affordability of housing		
Index of Local/Multiple Deprivation; <i>indicators of success in tackling poverty & social exclusion</i>		
(diversity of) rural traditions/cultures, diversity		
6. Operate within biophysical constraints and conform to other environmental limits		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse</i>	○	Gives much emphasis to the production of biomass; mentions needs for appropriate sites for wind turbines; wants to “cut net production of greenhouse gases”. Also proposes to reduce use of

<i>gases</i>		pesticides and fertilisers etc., which are very energy-intensive to produce.
transport: <i>road traffic</i>	○	Identifies cheap air freight as encouraging an increase in food miles. Suggests taxing it.
energy used/food unit produced/transported/consumed	○	Reduced use of pesticides and fertilisers and extensification of food production should reduce energy used per unit produced.
biodiversity: <i>populations of wild birds</i>	○	Promotes wildlife corridors, more forests, large areas of wilderness.
populations of rare species		
7. Sustain the resource available for growing food		
water quality and quantity: <i>rivers of good or fair quality</i>	○	Mentions water abstraction, as well as quality.
soil quality and quantity	⊙	Soil erosion/contamination mentioned as a risk.
<i>waste arisings and management</i>	⊙	
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>	○	Less intensive farming and more trees should help to reduce air pollution etc.
genetic impacts		Opposed to GMOs “until proven to be safe.”
8. Achieve high standards of animal health and welfare		
animal health and welfare	⊙	
9. Allow use of undeveloped land for development that genuinely meets human needs		
hard development: <i>new homes built on previously developed land</i>	⊙	
10. Be resilient to future changes		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○	Proposes more forests and so more carbon-fixing; managed coastal retreat; less dependence on imports and on petrol.

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	○/●	Farming enterprises that are heavily dependent on nitrogen and phosphorus would struggle, so would affect the dairy industry the most. Emphasis on reduction of pollution would also affect intensive livestock industries.
farm sizes/types: family farm, agribusiness, alt. lifestyle	⊙	No real difference. Organic food would probably just become another part of agribusiness.
farm tenure: owner, tenant	○/⊙	Owners would be better set up than tenants to profit from woodland planting.
other rural dwellers	○	More jobs from managed woodland, environmental management, etc.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	○	Minor benefits from increased woodland planting.
consumers (choice, empowerment, quality, affordability)	Mixed	Affordability down, confidence up, less international food but more organic and local food
other interests: landscape, environment etc.	○	Great improvements for wildlife from afforestation, extensification, organic food production. Landscape plan would help to improve landscape.
taxpayers	○/●	More subsidies, but could get more public benefits (e.g. floodplain management, CO2 fixing etc.) in return.
international: fair access to/from international markets, fair trade on equal terms	●	Submission would restrict markets for international goods and increase aviation tax.
animal welfare	⊙	No mention.