

# From vision to action - SDC's perspective on the work of the Curry Commission

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**Sustainable**  
Development Commission

# From Vision to Action: SDC's perspective on the work of the Curry Commission

## Contents

<b>EXECUTIVE SUMMARY</b>	<b>2</b>
<b>PART 1: SUSTAINABLE FOOD AND FARMING – OUR VIEW</b>	<b>4</b>
Why another definition of sustainable agriculture?	4
Objectives for sustainable agriculture	5
Sustainability appraisal of submissions to the Curry Commission	6
<b>PART 2: ANALYSIS OF CURRY COMMISSION RECOMMENDATIONS</b>	<b>8</b>
Overview	8
Highlights	8
Gaps	9
How the Curry Report compares to SDC's objectives for sustainable agriculture	11
Conclusion	12
Annex: The appraisal matrix	13
Appraisal against objectives for sustainable agriculture	13
Appraisal of impacts upon different interest groups	14

## Executive Summary

In the wake of BSE and the foot and mouth crisis, the language of sustainable development has moved firmly into the food sector. We need a better understanding of the impact of our food production and consumption on energy use, pollution, biodiversity, rural communities and other sustainable development issues.

This report is the third in a series by the Sustainable Development Commission (SDC) aimed at assisting the Government to put sustainable development at the heart of food and farming policy. Our first report, *A Vision for Sustainable Agriculture*, outlined seven objectives for sustainable agriculture. In our second report *Sustainability Appraisal of Policies for Farming and Food* we presented an appraisal system based upon our objectives for sustainable agriculture. This was used to analyse 16 contributions to the Policy Commission on the Future of Farming and Food (the Curry Commission).

This report summarises our earlier work, and analyses the recommendations of the Policy Commission on the Future of Farming and Food, set out in *Farming and Food: A Sustainable Future* (the Curry Report) using the same appraisal system developed in our second report.

Essentially, the vision set out in the Curry report is a good one. Many of the recommendations are excellent, and most will promote sustainability.

The Curry Report:

- recognises the multipurpose nature of food and agriculture policy - to produce good food, environmental stewardship and farm livelihoods simultaneously;
- calls for a move away from production subsidies towards payments for other public wants, along with a suite of other measures to support this;
- thinks public funding should pay for public 'goods' (including good environmental management);
- recognises the need for stronger regulation and management, but in more coherent and rationalised forms: 'Current assurance schemes need to be rationalised behind the Red Tractor mark'.

The clear and unflinching call for fundamental reform of the Common Agricultural Policy and total redirection of public funding to buying public goods is outstanding.

Under this vision, we suspect that food production will become more extensive and more environment-friendly, consumer confidence will rise and local food production will be encouraged.

There are, though, some limitations to the vision. It particularly neglects the global resource impacts of food production and the need for resilience in food production systems.

### The challenges

- Government needs to look further down the food chain, beyond the narrow food production focus of the Curry Report. Retailers and consumers must lead rather than follow the drive towards more sustainable food.

- Government needs to take more account of the interests of other rural stakeholders, particularly rural businesses based on tourism, which were at the periphery of the Curry Commission's remit.
- The remit of the Curry report covered England only. However, we believe the same broad principles apply to food production in Wales, Scotland and Northern Ireland. Some of the Curry Report's recommendations will require Devolved Administrations to take action in parallel with the UK government if they are to be implemented. We urge the Devolved Administrations to take up the view of a sustainable farming and food sector promoted by the Curry Report.

*“We need a better understanding of the impact of our consumption on energy use, pollution, biodiversity, rural communities and other sustainable development issues.”*

## **Part 1: Sustainable food and farming – our view**

### **Why another definition of sustainable agriculture?**

1. In the wake of BSE and the foot and mouth crisis, the language of sustainable development has moved firmly into the food sector. When we look at the food on our plate, whether at home or in a catering establishment, how much do we know about the way it was grown, processed, distributed and retailed? What have been the environmental and social costs and benefits at each stage? Whether the food product started its life in the UK or overseas, we need a better understanding of the impact of our production and consumption on energy use, pollution, biodiversity, rural communities and other sustainable development issues.
2. The Sustainable Development Commission (SDC) is uniquely positioned to suggest a more coherent view of sustainable food and farming than has so far been developed. We are an independent advisory body, set up by the Prime Minister to promote the delivery of sustainable development across all sectors of society. A major part of our role is to scrutinise the Government’s policies and judge how far they promote sustainable development.

### **Purpose of this report**

3. This report is the third in a series aimed at assisting the Government to put sustainable development at the heart of food and farming policy. In our first report, *A Vision for Sustainable Agriculture*, we outlined seven objectives for sustainable agriculture. In our second report, *Sustainability Appraisal of Policies for Farming and Food*, we presented an appraisal system based upon our objectives for sustainable agriculture. This was used to analyse 16 contributions to the Policy Commission on the Future of Farming and Food (the Curry Commission). Both reports are available on our website: [www.sd-commission.gov.uk](http://www.sd-commission.gov.uk).
4. In this report we summarise our earlier work, and analyse the recommendations of the Curry Commission using the same appraisal tool.

*“Agriculture could make a major input to a sustainable economy and society.”*

## Objectives for sustainable agriculture

### What is sustainable agriculture?

5. As used, the term “sustainable agriculture” or “sustainable farming” has embraced a wide range of issues and objectives, including the role of farming in rural communities; the need for greater protection of the environment; concerns about rural land use; animal welfare; reducing “food miles”; and the need for farming to support other sectors of the economy, such as tourism.
6. SDC defines sustainable agriculture as agriculture that contributes to the overall objectives of sustainable development – to meet the needs of the present without compromising the ability of future generations to meet their own needs.<sup>1</sup> Our objectives for sustainable agriculture, in the box below, develop this definition further. By meeting all these objectives at the same time, agriculture could make a major contribution to quality of life – in the UK and overseas.

<sup>1</sup> World Commission on Environment and Development (1987) *Our Common Future* (The Brundtland Report)

### Box 1: Objectives for sustainable agriculture

#### Sustainable agriculture must:

- 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.

## Sustainability appraisal of submissions to the Curry Commission

7. The Sustainable Development Commission has developed a sustainability appraisal tool based on the objectives outlined above.<sup>1</sup> The tool was used to appraise 16 submissions<sup>2</sup> to the Policy Commission on the Future of Farming and Food (the Curry Commission). It involved testing the submissions against the objectives which had been developed by SDC, as set out in the previous section. Full details are available in *Sustainability Appraisal of Policies for Farming and Food*.
8. Despite their very different perspectives, those submitting evidence to the Curry Commission often agreed about the big issues - but expressed strong differences about the appropriate response. Key recurring issues are outlined below:
  - **a belief that current public funding of agriculture is failing to deliver** what the public expects from its investment. Yet even so, those sums should be retained in the sector and redirected, rather than being increased or reduced;
  - **public ignorance** about how food is produced or how to cook it. There are 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 a commercial advantage to imports produced to lower standards. They offered three different kinds of response 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.
9. There were some notable **gaps** in the submissions:
  - No real sensitivity to regional differences or different farming practices;
  - Little mention of rural culture or the recreational potential of farmland, 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.

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<sup>1</sup> This appraisal tool was developed with assistance from consultants Levett-Therivel.

<sup>2</sup> British Retail Consortium, Country Land and Business Association, Compassion in World Farming, Council for the Protection of Rural England, Countryside Agency, English Nature, Environment Agency, Food and Drink Federation, Friends of the Earth, National Farmers Union, National Federation of Women’s Institutes, Regional Development Agencies, Soil Association, Sustain, Unilever and Worldwide Fund for Nature.

## 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 a shift towards subsidies not linked to production. 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 biodiversity, 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 organic production and agri-environment schemes would improve water/soil/air quality. Very little mention of hard development, nor how to achieve balance of resource base as against social needs.



*“The Curry Report recognises the multipurpose nature of food and agriculture policy - to produce good food, environmental stewardship and farm livelihoods simultaneously.”*

## Part 2: Analysis of Curry Commission recommendations

### Overview

10. In this section, we look at the recommendations of the Policy Commission on the Future of Farming and Food, chaired by Sir Donald Curry. The recommendations are set out in the report *Farming and Food: A Sustainable Future* (the Curry Report). The report is analysed using the same appraisal system developed in part 1.
  11. Right at its start the report claims that ‘Sustainable development has been our guiding principle’ (p6) and the report largely lives up to this. Several strong themes of the report are very good in this respect. These are summarised below.
- this scheme would be potentially aimed at all land managers.

### Highlights

12. The overarching idea is *reconnection*: ‘The key objective of public policy should be to reconnect our food and farming industry: to reconnect farming with its market and the rest of the food chain; to reconnect the food chain and the countryside; and to reconnect consumers with what they eat and how it is produced’ (p6) and again the recommendations would largely deliver this;
13. The Curry Report recognises the **multipurpose nature of food and agriculture policy** - to produce good food, environmental stewardship and farm livelihoods simultaneously.
14. The report unambiguously calls for **a move away from production subsidies** towards payments for other public wants, along with an associated suite of other measures (pp. 75-88) to support this. Existing schemes would become the higher tiers of a single new stewardship scheme. Lower tiers of
15. **Public funding** should pay for public ‘goods’ (including good environmental management): ‘[Production] subsidies are part of the problem, not the solution’ (p 110): ‘We therefore want to see the current regime of price supports and production subsidies dismantled as quickly as possible. Public money has to be refocused on real social and environmental public benefits’ (p110). In the meantime, the report recommends 10% modulation and more support for agri-environment schemes.
16. The report recognises the need for **stronger regulation and management**, but in more coherent and rationalised forms: ‘Current assurance schemes need to be rationalised behind the Red Tractor mark ... We think that the Red Tractor should be a baseline standard that all food produced in England should attain. Without attempting to turn the scheme into a ‘premium’ mark, the Red Tractor should be extended to cover environmental standards — consumers already think it does — and welfare standards should be reviewed’ (p117).
17. The report recognises that **not all farms are the same**, and provides specific measures to help hill farmers (p.85) and tenant farmers (57). Some of the positive and innovative specific measures proposed in the report include:
  - providing partial business rate relief for traders who provide more than a certain percentage of local foods (p45);

*“The Report does not consider the possible increase in reliance on imports, and therefore decrease in food security, arising from its vision”.*

- a robust suite of measures aimed at encouraging new entrants in the farming sector (p59);
- consideration of food sourcing in public procurement (p104);
- providing direct support payments to farmers in euros (p25).

## Gaps

### 18. **‘Trade liberalisation is not going to go away’.**

There are a few references to the negative aspects of international trade - for example (in the context of risk of importing illnesses such as foot and mouth disease): ‘Controls that are considered necessary for food safety in England should be enforced on imported food’ (p116). The report also urges the Government to ensure that payments for environmental benefits are not struck down by WTO rules (p73). But the report fights shy of the general point - made very strongly in several of the submissions we reviewed - that the UK should be able to apply consistently to imports *all* kinds of standards - health, animal welfare, environmental - that are applied to home production.

19. As a consequence of this, many of the recommendations are about how to equip farmers better to survive and make a living in a global economy whose unsustainable trends and forces are taken as ‘given’. Pages 112-116 give much attention to better training and capacity building for farmers in business management and skills such as marketing, use of benchmarking, demonstration farms, training, apprenticeships, and institutions to promote cooperation and collaboration between farms, and up and down the food chain. Much of this may well be desirable (indeed necessary) remedial action, and in particular, it will help potentially disadvantaged farmers make the difficult transition from production subsidies to payments for other public

wants (Pillar 1 to Pillar 2). But it does not address the wider issues around world trade.

20. **Food security.** The report does not consider the *possible* increase in reliance on imports, and therefore decrease in food security, arising from its vision. It is possible that higher standards of home grown produce could lead to an increase in their price, leading more people to buy imported food. More extensive food production, stricter enforcement of import controls and higher standards of food quality *can* all cost more particularly if improved standards were also adopted for imported food. This could potentially have the worst effect on the poorest sectors of society.

21. **Global resource impacts.** There is brief mention of biofuels and combined heat and power. The recommendations for reducing agrochemical use would tend to reduce the energy intensity of farming. So would moves to more local sourcing and less animal transport. However the links between these and climate change are not made. Nor is the need to reduce mechanisation and road transport throughout the food chain - including processing, distribution and shopping.

*“The report does not clearly identify many of the externalities of intensive farming - water pollution, high energy intensity of fertilisers etc. – and thus the extra costs that society pays for such production.”*

22. **Externalities.** The report does not clearly identify many of the externalities of intensive farming - water pollution, high energy intensity of fertilisers, flooding from more rapid rainwater run-off etc. – and thus the extra costs that society pays for such production. It also makes no mention of the transport and other environmental impacts of importing food, particularly by air. Nor does it address the issue of supermarkets charging (arguably unfair and inequitable) premiums on organic and other speciality foods.
23. **Resilience.** There is an excellent acknowledgement of the importance of food security right at the start: ‘but land and expertise remain available if greater quantities of home-produced food are suddenly needed’. But beyond this there is almost no mention of the need for resilience to potential risks from climate change, global resource (e.g. oil) disruption, transport breakdowns etc. Increases in local sourcing and distinctiveness are seen as cultural benefits; shorter supply chains as a way to cut costs. None of them are recognised as prudent ways to increase security through diversity.
24. **Organic farming.** Several submissions to the Curry Commission called for targets to be set for organic food production, and such farming has clear sustainability benefits. However the report opts to simply consider organic food production under the heading of 'broad and shallow' environmental scheme and proposes the development of "a strategy" for organic food production (p88). This seems to miss an opportunity to promote a rapidly-growing and more sustainable form of food production.
25. **Other users of the countryside.** The report focuses strongly on farmers, but makes virtually no mention of the business sector that lost the most during the foot-and-mouth crisis - tourism. Nor does it explicitly address the many other rural businesses that are influenced by policies on farming, many of them operated by farmers as part of a diversified business.

## How the Curry Report compares to SDC's objectives for sustainable agriculture

SDC objective	How the Curry report deals with the objective
Produce safe, healthy food and non-food products in response to market demands, now and in the future	Generally good: Red Tractor scheme, promotion of short food chains and healthy food etc. Unclear about food security and cost.
Enable viable livelihoods to be made from sustainable land management, taking account of payments for public benefits provided.	Good: shift away from production subsidies towards payments for other public wants, along with an associated suite of support measures, should provide more benefits at same cost. More advice and support to be offered to farmers, and measures taken to bring in new blood. But focus very much on farmers not rest of rural economy.
Operate within biophysical constraints and conform to other environmental imperatives	Indirect benefits from shift in subsidies etc., but no clear indication of biophysical constraints and whether/how they will be met
Provide environmental improvements and other benefits that the public wants - such as re-creation of habitats and access to land	Yes: a key focus of the report
Achieve the highest standards of animal health and welfare compatible with society's right of access to food at a fair price	Red Tractor scheme to be expanded to include animal welfare issues, EC to be pushed to improve animal welfare. So improvements, but not necessarily "highest standard"
Support the vitality of rural economies and the diversity of rural culture	Supports vitality of farm enterprises, but says little about other aspects of the rural economy. Diversity seen primarily as food diversity.
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	Should help to improve air, water and soil quality; public access to farmland encouraged. Some encouragement for organic food. Does not address GMO policy.

*“The Government needs to take more account of the interests of other rural stakeholders, particularly rural businesses based on tourism, which were at the periphery of the Curry Commission’s remit.”*

## Conclusion

26. The vision set out in the Curry report is a good one, though lacking in some aspects of sustainability (global resource use, rural communities, resilience). Many of the recommendations are excellent, and most will promote sustainability. The language is admirably clear and free from euphemisms and evasions. The clear and unflinching call for fundamental reform of the Common Agricultural Policy and total redirection of public funding to buying public goods is outstanding.
27. Under this vision, we suspect that food production will become more extensive and more environment-friendly, consumer confidence will rise and local food production will be encouraged.
28. However there are some limitations, particularly the neglect of global resource impacts of food production and of the need for resilience in food production systems.

### SDC’s future work

29. One issue raised by the Curry Commission is the role of Government policies on food procurement. We will be carrying out a series of project on sustainable food procurement, looking at how the public sector can promote sustainable development in the way that it buys food. To start we are looking at the NHS, but we hope that many of our findings will be relevant to all public bodies. Later, we hope to work with contractors and producers to promote sustainable food procurement at all levels of the foodchain.

30. Government needs to look further down the food chain, beyond the narrow food production focus of the Curry Report. Retailers and consumers must lead rather than follow the drive towards more sustainable food.
31. As this exercise moves into the implementation stage, Government needs to take more account of the interests of other rural stakeholders, particularly rural businesses based on tourism, which were at the periphery of the Curry Commission’s remit.

### The challenge to Devolved Administrations

32. The remit of the Curry report was England only. However, we believe the same broad principles apply to food production in Wales, Scotland and Northern Ireland. Some of the Curry Report’s recommendations will require Devolved Administrations to take action in parallel with the UK government if they are to be implemented. We urge the Devolved Administrations to take up the view of a sustainable farming and food sector promoted by the Curry Report.
33. We hope that DEFRA will take forward the Curry Report to create a genuinely sustainable farming and food sector.

### The challenge to Government

## Annex: The appraisal matrix

### Key to symbols:

The symbols used in the table show both the impact (positive or negative) and the significance of the Curry report recommendations against a range of criteria. Impact is shown by colour, and significance is shown by size.

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

Significance: ○ high    ○ medium    ○ low

### Appraisal against objectives for sustainable agriculture

Criterion <i>italics</i> = headline indicator (1) = component of “principle of sustainable farming”	+/-, significance	Comments
<b>1. Produce safe, healthy food and non-food products; make a healthy, nutritious and enjoyable diet available and affordable to everyone</b>		
food security, incl. short chain between producer and consumer	●/○	Good on shorter chains: Food Chain Centre (p.32); retailers with >x% local goods to receive business rate relief on that % (45); reduce animal transport (93); labelling by country of origin (97); promotion of move to assured food chain, though no obvious statements about how to do this (100).  However very little/nothing on food security.
food health and safety	○	Controls on imported foods (p.37), Red Tractor Scheme expanded (40). Good emphasis on nutrition: good nutrition strategy and advertising of healthy foods (103), government food procurement (104).
food affordability	●	A few references to its importance but no concrete proposals to ensure it. Suspect that food would get more expensive under proposed scenario: less supply, more controls on imports (though some submissions to the FCC argued that foods produced with high welfare standards have virtually same overall cost as intensively raised food, and that it is retailers who slap on extra charges).
non-food products	○	Move from Pillar I to Pillar II, expansion of Rural Enterprise Scheme (p.44), DETR/local planning authorities to give proactive advice on diversification (54), promotion of non-food crops (55), reduced duty on biofuels (55).

<b>2. Enable viable livelihoods to be made from sustainable land management</b>		
no./security of jobs in rural areas	○	Code of Practice on Supermarkets' Dealings with Suppliers (p.33), Collaborative Board (35), safety nets for farmers once CAP supports are removed (37), disease insurance group (37). However these seem to be primarily back-stop measures to stop large-scale economic floundering rather than active promotion of rural jobs.
value-added processing near producers	○	£15M over three years additional funding for Processing and Marketing Grants (p.43), RDA promotion of regional processing (44).
Tourism	⊙	No mention, though could benefit indirectly from shift to Pillar II and more access to countryside.
international competitiveness of UK farming sector	○	Farmers to get paid subsidies in euros (p.25); measures to reduce risk of currency movements (25); stricter enforcement of controls on imported foods (37); Food From Britain initiatives (46).
<b>3. Provide environmental improvements and other benefits</b>		
access to countryside, recreation	○	Farmers "should embrace" right to access (p.98).
landscape	○	Indirect benefit from shift to Pillar II.
public value placed on benefits provided by farming	○	Red Tractor scheme as formally approved quality assurance scheme (p.40), strong government support for British farming (70), provision of environmental goods should not be seen as a substitute activity for something else (87).
<b>4. Minimise the total public funding needed</b>		
opportunity cost of rural policies, e.g. subsidies	○	CAP subsidies should be abolished (p.23), replaced with rural development measures that would provide what the public really wants. Promotes quite a lot of new boards – priorities for strategic research, Applied Research Forum, Food Chain Centre, English Collaborative Board, working group on disease insurance, strategy on healthy eating etc. -- but also promotes rationalisation, e.g. of food standard schemes, Agricultural Wages Board, environmental stewardship schemes.
<b>5. Support the vitality of rural economies and the diversity of rural culture</b>		
vitality of rural economies	○	Supports vitality of farm enterprises, but says little about other aspects of the rural economy.
economic autonomy/control by farmers/rural residents	?	Much more farming should be contracted, closer farmer-retailer links promoted, but unclear about how this should be achieved, and impact on farmers' autonomy etc. unclear. Code of Practice on Supermarkets' Dealings with Suppliers promoted (p.33).
Education and training of rural workforce	○	Clearer website of DEFRA information (p.49); more distance learning courses, continuing education etc. (61); Farming Advice hotlines (63); accreditation of advisers (63).
vitality of rural communities, age balance	○	Impressive suite of measures aimed to bring in more farmers, make it easier for them to get a toehold in the industry etc. (p.59-61).
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 &amp; social exclusion</i>		
(diversity of) rural traditions/cultures, diversity	○	Some limited mention of local diversity, but mostly in the context of provision of local foods, and

		certainly not a key theme of the report.
<b>6. Operate within biophysical constraints and conform to other environmental limits</b>		
energy balance (energy produce (biomass, windfarm etc.) minus energy used): <i>emissions of greenhouse gases</i>	○	Biofuels promoted, along with admonishment to transport them in an environment-friendly manner, and proposals for reducing duty on them to make them more attractive (p.55). Local CHP plants promoted (55). However no real emphasis on reducing the use of fertilisers, transport, etc.
transport: <i>road traffic</i>	⊙	No real mention.
energy used/food unit produced/transported/consumed	○	Some encouragement (but no specific proposals for funding for) organic farming and shorter food chains, but nothing really more than that.
biodiversity: <i>populations of wild birds</i>	○	Strong support for "broad and shallow" agri-environment schemes (p.84), Red Tractor scheme to include environmental standards (40).
populations of rare species	○/○	Bulk of new resources to be spent on "broad and shallow" schemes (p84), less likely to benefit rare species. Could be greater benefits, depending on where funding for "higher tier" schemes is directed.
<b>7. Sustain the resource available for growing food</b>		
water quality and quantity: <i>rivers of good or fair quality</i>	○	Farmers to be paid for instituting flood management schemes (p.55), implement EU Directives on e.g. water quality (72).
soil quality and quantity	○	Implement EU environmental Directives (p.72); payments to create markets in environmental goods should not be struck down by WTO rules (72); transfer resources to Pillar II (74); beef and sheep envelopes (75); modulation to 10% from 2004, possibly up to 20% by 2006/7, matched by funds from Exchequer (77); strong support of agri-environment schemes, including pilots of such schemes (87).  ... but landfill tax "to be kept under review" (93), no real change in approach to pesticides (91).
<i>waste arisings and management</i>		
air pollution, odours, nuisance, acidification: <i>days when air pollution is moderate or higher</i>	○	
genetic impacts	⊙	AEBC is the right body to determine GMO issues (90), nothing on GMO labelling (97).
<b>8. Achieve high standards of animal health and welfare</b>		
animal health and welfare	○	DEFRA/industry to devise and implement comprehensive animal health strategy (p.50); animal transport to be reduced (93); supply chains to be shortened (100); EU-wide health standards should be promoted (100); low/no drug approaches to farming and reduction of use of antibiotics to be supported (102).
<b>9. Allow use of undeveloped land for development that genuinely meets human needs</b>		
hard development: <i>new homes built on previously developed land</i>	⊙	No mention.
<b>10. Be resilient to future changes</b>		
e.g. climate/ flooding/drought, subsidies, petrol prices, availability of resources from abroad	○/●	Shift to Pillar II, less direct support for food production, and thus dependence on that support. No real attempt to reduce transport, dependence on fossil fuels etc. Better flood management, more robust natural systems etc. under Pillar II.



## Appraisal of impacts upon different interest groups

Interest groups	winner/ loser, importance	Comments
farming sub-sectors: pig & poultry, dairy, beef & sheep, arable, horticulture	○/●	Some farmers will win and some will lose. Arable farmers likely to lose out. Separate Hill Farm Allowance for upland farmers.
farm sizes/types: family farm, agribusiness, alt. lifestyle	⊙	No clear support (or obvious hurdles) for any of these.
farm tenure: owner, tenant	○	Encourages longer lets, sensible diversification, reinvestment relief (p.57).
other rural dwellers	⊙	No real mention.
recreational: walkers/cyclists/horse riders, drivers, hunters, fishermen, foreign tourists, others	⊙	No real mention.
consumers (choice, empowerment, quality, affordability)	○	Better labelling, more information, wider choice, higher safety standards.
other interests: landscape, environment etc.	○	Shift to Pillar II.
taxpayers	○/●	Shift from Pillar I to Pillar II should give taxpayers benefit that they want at same cost as before, so big benefit.  Some proposed measures would cost more, e.g. more funding for Rural Enterprise Scheme (p.44), Processing and Marketing Grants (43), other rural development measures (74); business rate relief for traders selling certain levels of local food (45); water management included in funding schemes (55); reinvestment relief where land is let (57); etc.
international: fair access to/from international markets, fair trade on equal terms	○	Stricter enforcement of controls on imported foods (p.37); WTO negotiations to create a market for environmental goods (72).
animal welfare	○	See 8 above