



**Health and harmony: the  
future for food, farming  
and the environment in a  
Green Brexit**

**Joint response from  
Cumbria County Council  
and Cumbria Local  
Enterprise Partnership**

## **Health and harmony: the future for food, farming and the environment in a Green Brexit**

### **Joint response from Cumbria County Council and Cumbria Local Enterprise Partnership**

#### **Key Overall Messages**

Cumbria is the second largest county in England covering a large sparsely populated rural area. As such future food and farming policy has significant implications for the longer term economic performance of Cumbria and the sustainability of our rural communities.

The proposals in this consultation to re-base the farm payments system around environmental improvement and the delivery of public goods represents the biggest change to farming subsidies since 1945.

It is a once in generation opportunity but any change should be implemented and delivered in such a way that fully recognises and takes account of the unique nature of farming in Cumbria. With such a diverse mix of farming practice from the arable lowland coastal plains to the highest upland farms in the country Cumbria faces a unique challenge.

Farming sits at the core of the rural economy and supports a large downstream supply chain and upstream activity. Almost 12,000 people in Cumbria work in farming on a full or part time basis and the output from our farms helps sustain many parts of the rural economy both directly and indirectly. The crucial role of agriculture in continuing to shape and manage the natural environment of Cumbria also cannot be understated, nor can the role farming and farmers in providing critical social glue in our rural areas.

The farmed environment also underpins the visitor economy in Cumbria – indeed it is farming that has shaped the landscape to which 45 million visitors are attracted to annually. Thus, any changes in how farming is supported and practiced will have an inevitable effect upon the visitor economy.

Cumbria County Council is working with the Borderlands Partnership to develop a Borderlands Inclusive Growth Deal. The Borderlands area includes the areas of Dumfries and Galloway, Scottish Borders, Cumbria and Northumberland that all share a common agenda in terms of their rural economy and characteristics. As such the contents of this response are aligned with the wider objectives of the Borderlands Partnership.

Cumbria County Council and Cumbria LEP welcome the opportunity to contribute to the development of the UK's new agricultural policy. It is recognised that further detail is to be developed around how some of the proposals will be implemented. As proposals are developed and details continue to emerge further involvement in the process and the opportunity to comment would be again be welcomed.

Rural communities and rural businesses need certainty and support to plan and secure future economic productivity and growth. The length of the 'agricultural transition' period following the UK's exit from the EU should be confirmed as soon as possible.

Certainty of funding and resources will be critical to delivery of the proposed new agricultural policy and environmental land management system. The design of the proposed new approach will require some levels of local management to enable locally responsive solutions.

The new policy direction also needs to be considered as part of the wider picture which includes other post-Brexit opportunities, e.g. UK Shared Prosperity Fund and provision of replacement for EU funding streams.

The approach and timescales in respect of the phasing out of Direct Payments must be planned for carefully. It should be integrated with the plans for implementation of the new framework and replacement funding arrangements to ensure that the sectors and areas most in need of support do not lose out.

The principle of payments of public money for the provision of public goods has potential to drive an effective new approach which fully recognises the contribution that rural areas offer to the UK's economy and population. This contribution is wide ranging and includes critical provision of energy; water; food; stewardship of landscapes with significant benefits for the economy, public health, flood-protection, culture and heritage, and quality of life; i.e. natural and social capital. In Cumbria the landscape created by agriculture, forestry and fishing underpins the visitor economy which attracts 45 million visitors annually and contributes £890m GVA (2015).

The 'choose the top 3' approach and selection of priorities used in the consultation questions fails to recognise the complexity of the issues and challenges faced by rural communities and their economies. Asking for priorities from a list also fails to recognise the complexity and inter-dependency of natural environment systems. A long-term, holistic approach to supporting rural communities and economies is needed from the Government.

Appendix 1 to this document provides some statistics and context of the agricultural sector in Cumbria.

#### Cumbria and current funding arrangements:

Cumbria has been allocated €91 million of EU Structural Funds for the programme period 2014-2020. NOTE - Depending on the exchange rate, calculated annually, this is between £78m and £81m. The drop in the pound since the referendum has actually increased the Sterling value of the funds.

The EU Structural Funds are split between

- European Social Fund (ESF) with an allocation of £34m
- European Regional Development Fund (ERDF) with an allocation of £44m

Additionally there is a further £9.2m allocated to the European Agricultural Fund for Rural Development (EAFRD).

In addition to the funding allocated to Cumbria from EU Structural Funds Cumbria's agricultural economy benefits from direct payments under Basic Payment Scheme (BPS). For the years 2015 to 2017 it is estimated by the Rural Payments Agency that £221m has or will be paid to Cumbrian farming enterprises, with an average annual value of £73.37m.

This subsidy to Cumbria's farms has an intrinsic link to and helps shape the landscape, which in turn supports the Visitor economy underpinning 45 million visitors annually and £2.72bn visitor spend, £890m GVA to the economy in Cumbria and providing around 63,000 jobs.

The County Council is the Accountable Body for the 2014 – 20 LEADER programme in Cumbria. Both the Cumbria Fells & Dales and Solway, Border & Eden LEADER programmes support a wide range of activity covering farm productivity, SME development, farm diversification, tourism, rural services, culture and heritage and forestry productivity.

Grants have been awarded to farms to increase productivity and/or improve animal health and welfare. This funding was made available prior to the Rural Payments Agency launching the Countryside Productivity Small Grants Scheme.

As part of 2008-13 EU Programming Round, Cumbria LEADER programmes funded Rural Skills Cumbria, a £1.5m extensive partnership project designed to deliver a suite of training, development and knowledge exchange across the needs of individuals and businesses within the target land based sectors, including:

- Technical training (e.g. vehicle/equipment use; pesticide use; food handling);
- Vocational courses (e.g. apprenticeship);
- Land management (e.g. landscape management; woodland management);
- Resource management (e.g. wood fuel, energy use);
- Business management (e.g. information technology; health and safety); and
- Demonstrations (e.g. practical demonstrations of dry stone walling at agricultural shows; demonstration farm events). There is a detailed evaluation available for this programme.

The 2014-20 programmes are now closed to new projects as the pipeline of projects exceeds remaining funds. The Local Action Groups (the groups that provide the strategic direction for the programmes) are looking to Government for additional LEADER funding to help facilitate the delivery of the pipeline and maximise the benefits to Cumbria.

Since the current LEADER allocation will be committed before the end of the programme in 2020 it is imperative that a replacement scheme features as part of the Government's post-Brexit offer and this should be part of any transition arrangement.

## **Consultation Questions**

### **2. Reform within the CAP**

**Please rank the following ideas for simplification of the current CAP, indicating the three options which are most appealing to you:**

- a) Develop further simplified packages**
- b) Simplify the application form**
- c) Expand the online offer**
- d) Reduce evidence requirements in the rest of the scheme**

**How can we improve the delivery of the current Countryside Stewardship scheme and increase uptake by farmers and land managers to help achieve valuable environmental outcomes?**

#### **RESPONSE:**

It is imperative that farmers are supported through the transition with timely guidance and clear information. Re-basing the payments around the delivery of environmental goods represents a complete shift in the structure of subsidies. The idea of linking farm payments to productivity should also be considered. This can help to stimulate farm investment and the adoption of productivity enhancing modern and efficient technology which can also be of benefit to the environment.

Delivery of the new scheme, along with a smooth transition should be aided by appropriate enforcement processes and monitoring of new arrangements. The use of pilot projects may assist with this. There are pilot programmes already running in Cumbria. The Cumbria Strategic Flood Partnership shares the vision of the Defra 25-year Environment Plan by supporting the Cumbria Catchment Pioneer programme. This is one of 4 UK Pioneer projects that explore the benefits from developing natural capital approaches across our river catchments. Cumbria LEP's Rural and Visitor Economy Growth Plan identifies the opportunity to develop Cumbria as a test bed for the application of new technologies in rural areas.

The schemes must be flexible to maximise their relevance to individual farmers and land managers and provide for ongoing business planning to help increase take-up of the schemes. The level of input required by individual farmers and land owners in completing the applications should be proportionate to the levels of grant requested.

### **3.0 An Agricultural Transition**

**Please provide views on the payment bands and percentage reductions we should apply.**

**What conditions should be attached to Direct Payments during the 'agricultural transition'? Please select your preferred options from the following:**

- a) Retain and simplify the current requirements by removing all of the greening rules
- b) Retain and simplify cross compliance rules and their enforcement
- c) Make payments to current recipients, who are allowed to leave the land, using the payment to help them do so
- d) Other (please specify)

**What are the factors that should drive the profile for reducing Direct Payments during the 'agricultural transition'?**

**How long should the 'agricultural transition' period be?**

**RESPONSE:**

The period should be long enough to allow for a smooth and well supported transition for farmers and farming communities and given the need to phase out BPS and replace with payments for public goods this period will need to be significant. Certainty is required to support the agricultural sector to innovate and plan. Support must be targeted effectively at the communities and sectors which need it most and those individuals that face the greatest challenges. Support should be directed primarily to farming business and producers and not solely the landowner.

All areas will be affected by the changes in Direct Payments but particular focus should be on the farming sectors and regions which will be most affected by reduction in Direct Payments which include uplands areas and grazing livestock such as Cumbria.

**4.0 A successful future for farming**

**How can we improve the take-up of knowledge and advice by farmers and land managers? Please rank your top three options by order of preference:**

- a) Encouraging benchmarking and farmer-to-farmer learning
- b) Working with industry to improve standards and coordination
- c) Better access to skills providers and resources
- d) Developing formal incentives to encourage training and career development
- e) Making Continuing Professional Development (CPD) a condition of any future grants or loans
- f) Other (please specify)

LEP Employers are generally satisfied with the skills training provision availability in Cumbria but employers do say that what is available could be more widely marketed and promoted. However there is concern that accessibility to learning can be problematic due to poor infrastructure in roads/and public service transport options.

People working in the rural environment are 'time poor'. If learning can be completed at their place of work or home facilitated by fast broadband and mobile connectivity then the chance to improve their skills is greatly enhanced.

Cumbria's population is super aging and this is very evident within the farming sector and many farms are managed by people older than state pension age. In many

case family members who have traditionally taken over the running of farms are no longer taking this route. Those that do often bring new ways of working learnt at college into the farm but there are also issues in some case with a reluctance to adopt modern working practices.

Points a), d) and e) above are all industry standards in other sectors. This should be applied in agriculture.

The sector requires certainty about its funding future. European funding packages that are currently levered into the agricultural sector will need to be replaced and at least matched at the current levels. If this does not happen other funding programmes of support should be made available through the transition period.

**What are the main barriers to new capital investment that can boost profitability and improve animal and plant health on-farm? Please rank your top three options by order of the biggest issues:**

- a) Insufficient access to support and advice**
- b) Uncertainty about the future and where to target new investment**
- c) Difficulties with securing finance from private lenders**
- d) Investments in buildings, innovation or new equipment are prohibitively expensive**
- e) Underlying profitability of the business**
- f) 'Social' issues (such as lack of succession or security of tenure)**
- g) Other (please specify)**

**What are the most effective ways to support new entrants and encourage more young people into a career in farming and land management?**

**RESPONSE:**

Lack of succession is an issue especially in areas such as upland farming where incomes are low and is recognised in the Cumbria LEP Rural & Visitor Economy Growth Plan which aims to facilitate the process of succession in our farms to provide opportunities for young people.

There is insufficient income generated unless the farm has diversified to support more than one generation. These farms require capital grants, advice and guidance to support farm diversification, succession planning and to introduce additional income streams. As part of managing the change to a new payments system it will be critical that the right type and level of capital grants are available as well as low interest loans. The most effective way to support new entrants is to ensure a well-respected, profitable and sustainable industry.

Uncertainty about the future and where to focus investment has been highlighted as an issue by farmers. There needs to be a clear process around post Brexit scenario planning to provide support and guidance for the development of whole farm management plans and individual farms/areas.

The new payments system will need to be designed to ensure people are incentivised to join the farming, food/drink, and energy sectors. Cumbria faces

significant workforce challenges to attract the working population that will be needed by the local economy in the future and to enable economic growth.

Cumbria County Council is the Accountable Body for the LEADER programme in Cumbria and has almost committed all £5.2m of its current allocation for the 2014-2020 programme. The current pipeline of projects would require an additional £2.3m funding thus demonstrating the needs for a small grants programme to enable rural businesses (including farming) to grow, diversify, innovate, increase productivity and improve animal welfare. The provision of the grant levers the investment that otherwise may not take place.

The LEADER programme provides small capital grants to farming businesses for equipment that can increase productivity and improve animal welfare. With an intervention rate of 40% this can help make a capital investment viable, effectively de-risking it and improve confidence in making such investments. These can help create resilience to fluctuations in the costs of inputs (energy, feed stuffs etc.) and against price fluctuations at market. It is however a very prescriptive scheme and so a replacement scheme would benefit by being more flexible and allow for local decisions to be made based upon locally identified needs and opportunities.

### **Does existing tenancy law present barriers to new entrants, productivity and investment?**

Tenancy law and high land prices are barriers across all levels of farming, including for new entrants, hindering progression within individual businesses and reducing overall productivity. The structuring of certain farm tenancies, i.e. short term and inflexible does not encourage investment, nor provide long term security for investment.

### **Agricultural Technology & Research**

**What are the priority research topics that industry and government should focus on to drive improvements in productivity and resource efficiency?  
Please rank your top three options by order of importance:**

- a) Plant and animal breeding and genetics
- b) Crop and livestock health and animal welfare
- c) Data driven smart and precision agriculture
- d) Managing resources sustainably, including agro-chemicals
- e) Improving environmental performance, including soil health
- f) Safety and trust in the supply chain
- g) Other (please specify)

**How can industry and government put farmers in the driving seat to ensure that agricultural R&D delivers what they need? Please rank your top three options by order of importance:**

- a) Encouraging a stronger focus on near-market applied agricultural R&D
- b) Bringing groups of farms together in research syndicates to deliver practical solutions

- c) **Accelerating the ‘proof of concept’ testing of novel approaches to agricultural constraints**
- d) **Giving the farming industry a greater say in setting the strategic direction for research funding**
- e) **Other (please specify)**

Innovation is already taking place on farms in Cumbria through improving farming techniques, reducing costs and seeking new ways of working and is essential to improving productivity. Cumbria is also exploring catchment based farming programmes that looks at managing land in ways that reduces flood risk. More details on these projects is contained in this consultation response at question 1, *Reform within the CAP*, with regards stewardship and environmental outcomes. The voice of the farmer will be important in taking new schemes forward and the appropriate mechanisms and lines of communication should be put in place to allow farmers views to be taken into account early in the process.

The nature of Cumbrian livestock farming often operates along traditional avenues (e.g. – trading between one farm and another), thereby missing the opportunity to add value and increase profitability, leading to lower incomes. There is a need to invest in developing and adding value to products *locally* and a better understanding of local markets (i.e. - visitor economy, public procurement etc.) so that farmers receive higher prices for their products and are able to shorten supply chains. The Cumbrian brand is strong and should be developed further with the appropriate support and marketing strategies. This approach will also lead to environmental benefits such as reduced food miles and reduced packaging.

**What are the main barriers to adopting new technology and ideas on-farm, and how can we overcome them?**

Adoption of new technology and techniques is linked to the profitability of the farming business, its confidence to invest and the knowledge it has to make the appropriate investment. Investments in technology and new techniques often take time to produce results which can limit confidence. The availability of finance, including grants can mitigate risk, build confidence and encourage adoption.

**Labour: A skilled workforce**

**What are the priority skills gaps across UK agriculture? Please rank your top three options by order of importance:**

- a) **Business / financial**
- b) **Risk management**
- c) **Leadership**
- d) **Engineering**
- e) **Manufacturing**
- f) **Research**
- g) **Other (please specify)**

Any reduction in funding available for farming enterprises will reduce the levels of investment in new technologies and practices and result in more sustainable farming techniques being adopted more slowly. A grants programme based upon the LEADER model will encourage adoption of new technologies.

There also exists a threat to farming post-Brexit as EU nationals return to their home countries and will result in a labour shortage and an increased skills gap. This is a major challenge across the rural economy in Cumbria and it is essential that Government recognises the issue and is willing to work with local partners to address this. Incentives to attract more young people into agriculture, such as on-farm apprenticeships, assistance with college fees and living expenses (e.g. - fully funded courses and a return of maintenance grants) would help attract local young people and may tempt some people from more urban areas into the industry.

Schools need to be engaged with early intervention so that farming and food production features within the curricula of primary and secondary education and not just the tertiary sector. There is a need for industry recognised qualifications, ideally modular so that youngsters in agriculture can build up a set of skills and can evidence their training.

In farming there are often early adopters of technology. Others will not invest until the technology is well proven and issues with early models have been ironed out. Providing capital grant support to reduce the risk of adopting new technology helps to overcome barriers as does the provision of more peer to peer workshops, farm visits and demonstration events.

It will be important to understand and respond to the impacts and difficulties caused by gaps in the local workforce skills and availability.

Developing and creating an appropriately skilled workforce should apply across the agricultural sector and not be limited to 'on-farm' skills alone. There is a need to improve skills across the supply chain and recognise and support skills development in ancillary businesses. The farming sector is employing new technologies all the time. The availability of a specialist workforce around engineering and electronics to support farms will become increasingly important. The level and type of courses and apprenticeship places offered should reflect this.

ICT and technical innovation is linked to farm productivity and welfare. With the lack of fast universal broadband and 4G+ mobile connectivity in Cumbria farmers will continue to struggle to modernise where coverage is poor or non-existent. This also impacts upon "digital by default" grant and payment systems. No farming business should be disadvantaged by the lack of complete rural connectivity.

Agricultural colleges will need support to re-design their course offer and provision, and explore the merits of bringing in experts on ecological practice, such as the Centre for the Uplands or Centre for Ecology and Hydrology.

Auction markets in Cumbria should be recognised for the role they play in productivity and competition as well as places where ideas and skills are shared, developed and exchanged.

## **What can industry do to help make agriculture and land management a great career choice?**

There is a need to provide potential staff with good quality advice and guidance about the wide range of careers and work opportunities. This can only be achieved with an easily accessible careers information system, which supports not only young people in schools but also adults looking to enter the rural economy sector.

The countrywide young farmer network should be utilised to bring together the farmers of the future and begin to engage the next generation.

## **How can government support industry to build the resilience of the agricultural sector to meet labour demand?**

It is vital that the skills system is flexible and responsive to the changing needs of the sector, which includes upskilling the existing staff and also assists in the use of new technology to drive productivity and profitability. There are wide ranging rural networks such as business suppliers, vets, hauliers which support the sector. Unless a future is seen for the sector then there will be gradual rural decline, with the associated social and health related problems. Therefore Government policies regarding matters such as housing, health and infrastructure should all have a rural proofing risk assessment conducted.

## **5. Public Money for Public Goods**

**Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:**

- a) Improved soil health**
- b) Improved water quality**
- c) Better air quality**
- d) Increased biodiversity**
- e) Climate change mitigation**
- f) Enhanced beauty, heritage and engagement with the natural environment**

### **RESPONSE:**

Ranking by order of importance is unhelpful and doesn't recognise the inter-related nature of the factors that drive environmental and economic outcomes for rural communities. Ecological systems are made up of complex processes and co-dependent factors. Affecting change to one aspect of a system can have positive or negative effects on others and this should be recognised when the payments structure is re-designed. The shift to more environmentally sustainable practice will be delivered most effectively as part of a whole-farm approach.

A better approach might be to deliver across a range of public goods, looking for 'multiple wins' and viewed as an inter-related collection of net-benefits for a more sustainable approach to land management. Education, guidance and support to farmers and land owners will be crucial here.

Local Authorities have statutory responsibilities in respect of the protection and management of the natural environment, biodiversity, climate change, and managing flood risk. A shift towards environmentally based farm payments could help reduce flood risk through less intensive practice, the application of synthetic chemicals and a reduction in damage to soils. Government support should be balanced covering these wide ranging responsibilities.

**Of the other options listed below, which do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance:**

- a) World-class animal welfare**
- b) High animal health standards**
- c) Protection of crops, tree, plant and bee health**
- d) Improved productivity and competitiveness**
- e) Preserving rural resilience and traditional farming and landscapes in the uplands**
- f) Public access to the countryside**

As above, ranking by order of importance is unhelpful and doesn't recognise the inter-related nature of the factors that drive environmental and economic outcomes for rural communities.

Public health is closely linked to standards of environmental quality. There is an opportunity here to promote good health through the procurement of local fresh food for schools and hospitals as well as boosting local horticultural production. Quality food production and access to the countryside are both critical to the health of everyone in the UK. Resilient rural communities and agricultural sectors are vital to this and without them, the countryside and landscape will not be managed effectively and accessibility and environmental amenity will be reduced as a result.

Rural businesses need to be productive and competitive to survive. It is important that this consultation takes account of the potential knock on effects of re-basing farm payments on the viability of some farm business. There will be implications for the broader agricultural and land management supply chain as well as interdependent sectors such as the visitor economy. The right level of investment will be required for the whole sector that takes account of the implications right across the supply chain and rural economy.

The Government's new approach to support and funding must not be based on a ranking of issues as set out in this consultation. Support must be targeted at communities and sectors which need it the most and where there is the potential to unlock growth. Taking a holistic view it must be recognised that in the UK we live in a managed, farmed environment. Policy is needed that will support farm businesses and land owners to manage the environment in a sustainable fashion. The most effective way of doing this is to ensure that this activity is profitable.

Thus, all of the above options are important to supporting the UK and Cumbria's vibrant visitor economy. The specific sectors and areas in need of support will be different in one part of the country than another. That is why flexibility in the new approach to allow solutions to be locally responsive will be important.

The University of Cumbria suggest that farming enterprises need to undertake a full Livelihood Asset Assessment taking into account physical, natural, human, social and financial attributes of the business to better understand the contribution the sector currently makes to national wellbeing and wealth. A mechanism to facilitate this will be required, one that is accessible, easy to conduct and deliver and free to use.

**Are there any other public goods which you think the government should support?**

By taking a full ecosystems services approach and viewing the environment as a collection of inter-dependent systems a more sustainable agriculture sector will be supported.

The sustainable production of food should be recognised as a public good. Food security is an important national issue.

## **6. Enhancing our environment**

**From the list below, please select which outcomes would be best achieved by incentivising action across a number of farms or other land parcels in a future environmental land management system:**

### **a) Recreation**

A land management system that better protects rights of way across managed farmland is supported. Incentives should support landowners and tenants to look after assets such as footbridges, walls, gates and stiles.

### **b) Water quality**

A clean river and lake system is vital for good human health and wildlife conservation. Intensive application of slurry and inorganic fertilisers can severely impact river health, damage soils, increase flood risk and increase the cost of water treatment. The focus should be on reducing intensive farming practice to one that takes account of and supports a catchment wide approach to water management and flood risk reduction.

Cumbria Strategic Flood Partnership has adopted 5 working principles developed through the 25 year Cumbria Flood Action Plan. The 2nd principle is the Catchment Based approach – improving what we know about river catchments and taking actions that manage water quality and flood risk from source to sea.

This approach is covered in detail on the website:

<http://www.cumbriastrategicfloodpartnership.org/>

A clean river, lake and coastal water system is also vital with regards to the visitor economy. Clean coastal environments and lakes with safe bathing water are key assets for Cumbria. In the Lake District National Park in particular, nutrient enrichment of our lakes poses a genuine threat to the environment, which if not mitigated would have serious consequences.

### **c) Flood mitigation**

As Lead Local Flood Authority (LLFA), Cumbria County Council is required to implement a local flood risk strategy through building partnerships and ensuring effective multi-agency working. Partnership working and developing shared objectives are both key to managing flood risk in the future, funding future flood schemes and helping communities to become more resilient to flooding. A strategy that supports farming businesses and land owners to manage land more sustainably in a way that reduces flood risk would be welcomed.

This should include innovative payment mechanisms to reward farmers to make their land available for flood storage, whilst minimising loss of agricultural production. Making land available for upstream flood attenuation measures should not necessarily mean it is removed completely from production.

Incentives for naturalisation of watercourses should be provided allowing for the re-establish of routes across farmland. This should include the removal of extensive lengths of culverts across open agricultural land which are a maintenance liability and increase flood risk.

Such initiatives should be supported by the availability of training initiatives and encouragement for farmers to engage with local networks that seek to reduce flood risk, improve water quality in our rivers and increase local biodiversity. This will improve soil and water quality as well as reducing the risk of homes flooding in extreme weather events.

### **d) Habitat restoration + e) Species recovery**

Local Authorities have a duty to protect and enhance biodiversity. Cumbria has a wealth of rich habitats and unique environments. Cumbria County Council supports three Areas of Outstanding Natural Beauty (AONB) Partnerships to conserve these special area and landscapes.

Cumbria County Council works with organisations across the county to manage and conserve forests and woodlands as well as giving support to nature conservation organisations helping to enhance knowledge and understanding of habitats and species such as the Cumbria Wildlife Trust.

Restoring habitats can have multiple benefits from reducing carbon emissions and flood risk to protecting our special landscapes. A balanced approach to land management policy that supports Cumbria County Council and other organisations to protect the Cumbrian environment would be welcomed.

### **f) Soil quality**

The Cumbria Strategic Floods Partnership was formed following the devastating floods that affected Cumbria in 2015. The condition of soils in our river catchments is hugely influential in determining rates of run-off and flood risk. Cumbria County Council is already working through the partnership with land owners and farming businesses to explore better ways of slowing the flow in heavily farmed catchments.

A shift in approach that better supports farmers and land owners to reduce surface water run-off from fields and helps to protect communities from flooding would be welcomed.

### **g) Cultural heritage**

In 2017 the Lake District National Park was designated as a World Heritage Site, being recognised as a cultural landscape of international significance. Policy is required to sustain the agricultural and land-management practices that shape this environment.

Cumbria County Council would support policy that helps land owners limit and manage the adverse impacts of agricultural activity on sensitive archaeological sites in the county.

### **h) Carbon sequestration and greenhouse gas reduction**

Cumbria's uplands provide a vast carbon sink. Maintaining the integrity of peatland bogs and reducing drying from drainage and poor management is essential to manage carbon emissions, reduce flood risk and enhance and conserve rare habitats.

### **i) Air quality**

The agricultural sector accounts for about 10% of UK carbon emissions. As part of reducing emissions a more sustainable approach to land management that reduces carbon emissions and other pollutants would be welcomed as part of carbon reduction efforts across the county.

### **j) Woodlands and forestry**

Increasing woodland cover in appropriate locations could help reduce the risk of flooding as part of catchment wide management plans. Supporting landowners to plant trees and adopt new land management practice that holds water on land for longer would be welcomed.

The value of wooded areas in terms of recreation activities such as walking and mountain biking must be fully recognised. Again, it is essential that the right level of support and incentives are provided to maintain footpaths, gates, styles and fences to maintain recreational resources.

### **k) Other (please specify)**

Implication for the management of common land. Cumbria County Council is the Commons Registration authority – new farm payment regimes could have the biggest impact on small upland farms and therefore change the nature of farming on the Commons. Possible impacts – people could stop farming, sell the land, changing ownership/commoners rights – all this could change the landscape and affect the current successful approaches to conservation.

### **What role should outcome based payments have in a new environmental land management system?**

Through a realistic transition period that takes account of the upheaval for both individual farmers and farming communities, support for land owners and farm businesses should look to deliver outcomes including:

- flood protection and catchment management.
- habitats and species - Protection of red list and other vulnerable species.
- energy - Using waste to generate energy – anaerobic digestion/biogas etc.
- restoration of soils - Reduction on slurring and use of inorganic fertilisers.
- improving water quality – as with soils, requires a reduction in the intensity of synthetic compounds and over slurring.

**How can an approach to a new environmental land management system be developed that balances national and local priorities for environmental outcomes?**

Local and national priority outcomes on environmental protection/improvement and sustainability should not be mutually exclusive. A new system should be based upon evidence gained through testing and trialling (trying new things, scaling up current innovative approaches) and piloting (live trialling of delivery of a draft scheme) which could prove mutually beneficial.

**How can farmers and land managers work together or with third parties to deliver environmental outcomes?**

Cumbria has already established flood partnerships such as the Cumbria Strategic Floods Partnership (including the Catchment Management Groups) and Lake District National Park Authority Post CAP Working Group. Projects led by these groups are taking a new approach to catchment management that seeks to follow a natural capital approach to reducing flood risk downstream.

Good principles of environmental management should be taken up across all farmed land and not just focus on isolated patches of good practice. This is good for the industry as well as the environment and will make it more resilient to future challenges such as climate change. A new environmental land management framework needs to be developed in collaboration with farm businesses once a common goal has been established.

**7 Fulfilling our Responsibility to Animals**

**Do you think there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare?**

**Should government set further standards to ensure greater consistency and understanding of welfare information at the point of purchase? Please indicate a single preference of the below options:**

- a) Yes
- b) Yes, as long as it does not present an unreasonable burden to farmers
- c) Perhaps in some areas
- d) No, it should be up to retailers and consumers
- e) Other (please specify)

**\*if you answered ‘perhaps in some areas’, please elaborate.**

**RESPONSE:** – covered below

**What type of action do you feel is most likely to have the biggest impact on improving animal health on farms? Please rank your top three choices from the below list, in order of importance:**

- a) Use of regulation to ensure action is taken
- b) Use of financial incentives to support action
- c) Supporting vets to provide targeted animal health advice on farm
- d) Making it easier for retailers and other parts of the supply chain to recognise and reward higher standards of animal health
- e) An industry body with responsibility for promoting animal health
- f) Research and knowledge exchange
- g) Transparent and easily accessible data
- h) An understanding of animal health standards on comparable farms
- i) Other (please specify)
- j) N/A – Cannot rank as they are all equally important.

**Note: the consultation says the Government wants a new, fairer enforcement system. A comprehensive review of the inspection regime will be carried out – with a view to removing, reducing or improving inspections to lessen the burden on farmers.**

The UK already has a strong regulatory framework in place to make sure health and welfare standards are maintained. The post Brexit legal framework should be set as soon as possible. Local authorities play a key role in animal welfare. Primary responsibility for enforcement of welfare during transport rests with Local Authority trading standards functions.

A commitment to a more simple, effective and improved approach to enforcement would be welcomed.

In particular we would like to see proposals that:

- assist with the protection of public and animal health.
- improve animal welfare.
- promote and support a joined-up approach between all agencies involved in animal health and welfare.
- improves provision of management information to local and national Government on the delivery of animal health and welfare services.

We also note the possible future consultation on the transportation of live animals.

There is a great deal of efficiency still to be achieved by improving the health status of our food-producing animals – this is multi-faceted;

- Improved understanding of endemic disease but more importantly facilitation to help get health schemes underway. Farmers are relatively well informed but lack the impetus to start making the changes – so pump-priming, (for example) blood or milk sampling. The industry states that many of these diseases are an “industry problem” but the industry is ill-defined and not very well joined up compared with Europe. Some support around this would be welcomed.

- Data is key – the UK is still some years away from having a joined up animal health database. There are many animal health initiatives underway that are currently falling well short of optimum because of the lack of access to animal movement data. Cumbria is home to the British Cattle Movement Service (Cattle Tracing System) BCMS/CTS in Workington. Cumbria is well placed to lead on this work and to be the hub for industry data.
- Any enforcement system should be farmer-led recognising their experience and expertise. Farmers learn best in small peer-to-peer, outcome based learning. This approach should be tested and championed.
- There is an increasing focus on antimicrobial use, and albeit there is little evidence that extensive systems of animal rearing have any impact, there is a need to demonstrate responsible use. The need for medicine is greatly reduced by having healthy animals.
- Animal breeding – using the latest innovative technologies such as genomics and ovum pick up/*in-vitro* embryo production (OPU/IVP) to identify those animals with the desired health and production traits and then to amplify those traits into the national herds and flocks.

### **How can the government best support industry to develop an ambitious plan to tackle endemic diseases and drive up animal health standards?**

There is an implication that current animal welfare standards in the UK are poor across the board. This is not the case, and whilst there is always room to improve good practice, the UK does have some of the highest welfare standards in the world and this in itself is something we should promote and build on.

Areas which could be focussed on in the future for improvement programmes include breeding, nutrition and endemic disease eradication. Simply seeking a more joined up approach to welfare would be a sound starting point.

There is a need for better understanding about what welfare actually means and to develop the ability to compare welfare across different systems.

Standards must be clear and any change well communicated and consulted on. Farmers must not be overly burdened with red tape and financial pressure but instead be supported to deliver profitable and sustainable businesses where the welfare of the animals is put first. A level playing field will be critical here.

Access to correct, reliable information is key to the buying public's ability to understand the value of animal welfare. Government has a key role to play in helping to facilitate the communication of this information.

## **8 Supporting rural communities and remote farming**

**How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?**

### **RESPONSE:**

There will be particular challenges for the uplands but not all of these difficulties are unique to upland farming. Challenges will be faced across all types of farms and levels of support should reflect this. Farm businesses and land managers maintain unique upland environments and play a vital role in shaping the wider landscape. Their activities need to be profitable to sustain this role. Managed and delivered in the right way the public goods approach could help these marginal farmers deliver better outcomes for the areas they live in as well as securing a more sustainable future for themselves.

LEADER capital and revenue funding has supported rural businesses, the land-based sectors and rural community projects in the past to improve quality of life in rural areas, reduce poverty and provide environmental benefits. LEADER type approaches which are place based, flexible, accessible and locally developed and managed should be piloted as part of future support given to the uplands.

**There are a number of challenges facing rural communities and businesses. Please rank your top three options by order of importance:**

- a) Broadband coverage**
- b) Mobile phone coverage**
- c) Access to finance**
- d) Affordable housing**
- e) Availability of suitable business accommodation**
- f) Access to skilled labour**
- g) Transport connectivity**
- h) Other, please specify**

It is impossible to choose three options or rank them. These are all challenges faced by rural communities and businesses, and are often intrinsically linked. Different communities and different sectors face different mixes of the options above.

High-speed internet is now essential for all. A reliable and effective connection should be seen as a fundamental utility for all rural businesses. A broadband solution may not be possible or cost-effective for some of the most remote areas, and these areas will explore alternative mobile solutions. Universal coverage is needed whilst recognising that Government intervention is needed to deliver this. The same opportunities should be afforded to rural businesses as those located in urban areas.

Digital coverage is often a critical factor in investment decisions, or decisions to locate a business in a particular place but this is one factor amongst other equally important factors including, access to the appropriate skilled workforce, access to finance, and to transport connectivity. Individual businesses and individual communities may have different challenges, and different options open to them to overcome them. A flexible approach which can be locally responsive is critical.

Given the importance of the visitor economy to rural communities, a successful tourism sector is vital to creating employment and prosperity in rural areas. The Government should continue to work with the Department for Digital, Culture, Media and Sport, and organisations such as Visit Britain and Visit England, to support the vitally important visitor economy through mechanisms such as a Tourism Sector Deal.

**With reference to the way you have ranked your answer to the previous question, what should government do to address the challenges faced by rural communities and businesses post-EU Exit?**

As above – there are no single priorities due to the interrelationship of factors. Rural proofing will be critical. A proper understanding of the unique challenges that rural areas face is very important in setting policy direction. Early and clear communication will also allow rural businesses to be more confident in their future and take investment decisions.

## **9. Changing Regulatory Culture**

**How can we improve inspections for environmental, animal health and welfare standards? Please indicate any of your preferred options below:**

- a) Greater use of risk-based targeting**
- b) Greater use of earned recognition, for instance for membership of assurance schemes**
- c) Increased remote sensing**
- d) Increased options for self-reporting**
- e) Better data sharing amongst government agencies**
- f) Other (please specify)**

**Which parts of the regulatory baseline could be improved, and how?**

**How can we deliver a more targeted and proportionate enforcement system?**

This is covered in the section above in Section 7

## **10. Risk Management and resilience**

**What factors most affect farm businesses' decisions on whether to buy agricultural insurance? Please rank your top three options by order of importance:**

- a) Desire to protect themselves from general risks (e.g. – revenue protection)**
- b) Desire to protect themselves from specific risks (e.g. – flooding, pests or disease)**
- c) Provision of government compensation for some risks**
- d) Cost of insurance**
- e) Complexity and administrative burden of insurance**
- f) Availability of relevant insurance products**

**g) Other (please specify)**

**What additional skills, data and tools would help better manage volatility in agricultural production and revenues for (a) farm businesses and (b) insurance providers?**

**How can current arrangements for managing market crises and providing crisis support be improved?**

All of the factors listed above are important to farmers when assessing risk and the appropriate levels of farm insurance.

Flood protection is important to farmers in Cumbria. Flooding can adversely impact farm properties, livestock and communities and can have affects on economy, environment and people.

### **11.0 Protecting crop, tree, plant and bee health**

**Where there are insufficient commercial drivers, how far do you agree or disagree that government should play a role in supporting:**

- a) **Industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?**
- b) **Landscape recovery following pest and disease outbreaks, and the development of more resilient trees?**
- c) **The development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?**

**Where there are insufficient commercial drivers, what role should government play in:**

- a) **Supporting industry, woodland owners and others to respond collaboratively and swiftly to outbreaks of priority pests and diseases in trees?**
- b) **Promoting landscape recovery following pest and disease outbreaks, and the development of more resilient trees?**

**What support, if any, can the government offer to promote the development of a bio-secure supply chain across the forestry, horticulture and beekeeping sectors?**

No Response.

## **12. Ensuring Fairness in the Supply Chain**

**How can we improve transparency and relationships across the food supply chain? Please rank your top three options by order of importance:**

- a) **Promoting Producer Organisations and other formal structures?**
- b) **Introducing statutory codes of conduct?**
- c) **Improving the provision of data on volumes, stocks and prices etc.?**

**d) Other (please specify)?**

**What are the biggest barriers to collaboration amongst farmers?**

Farms are in competition with each other and there is a lack of support to facilitate collaboration. Incentives and support that can help build a more collaborative approach between farms would be welcomed.

**What are the most important benefits that collaboration between farmers and other parts of the supply chain can bring? How could government help to enable this?**

Collaboration between farmers and other parts of the supply chain can improve the return for crops by adding value to primary products. Creating and stimulating demand in this way for primary products will expand existing markets and exploit new ones, including for export.

Opportunities for joint-ventures and partnerships, can link producers with processors so that resources and experience can be shared and so improve the profitability, transparency and efficiency of the supply chain;

This could include shared risk and reward schemes or paying price premiums to suppliers.

**13. Devolution, maintaining cohesion and flexibility**

**With reference to the principles set out by JMC(EN) above, what are the agriculture and land management policy areas where a common approach across the UK is necessary?**

**What are the likely impacts on cross-border farms if each administration can tailor its own agriculture and land management policy?**

This may have significant implications for auction marts which deal with livestock from both sides of the Border – Carlisle Auction Mart is a prime example of this.

Seamless cross border working between administrations for the agriculture sector is essential for the industry post Brexit. A clear framework should remain in place with agreed common principles that work across the devolution administrations that allows for cross border trade to continue to operate as it does today.

**14 International trade**

**How far do you agree or disagree with the broad priorities set out in the trade chapter?**

**How can government and industry work together to open up new markets?**

**How can we best protect and promote our brand, remaining global leaders in environmental protection, food safety, and in standards of production and animal welfare?**

This will depend upon the deal (or no deal) we get post-Brexit with EU trading partners. If we go to WTO then not only will tariffs have an impact, but we become open to worldwide imports in meat/milk with possibly lower welfare standards, that are cheaper and thus edge-out UK/Cumbria production. We would therefore point again to our comments re: welfare at question 7, *Fulfilling our Responsibility to Animals*.

The implications of no deal will cause significant uncertainty for the agricultural sector. This should be planned for and communicated at the earliest possible opportunity should it arise.

In looking to secure new trade deals there needs to be recognition of the high quality produce and excellent welfare standards in the U.K. However, work needs to increase productivity within the farming sector if we are to be competitive within a global market place.

Greater exports and new markets could be based upon highest standards of welfare/quality and by locality/protected status or our own "Terroir".

## **APPENDIX 1 – CUMBRIA AGRICULTURAL CONTEXT**

### **Agriculture**

In 2016 Defra reported that there were 5,135 farm holdings in Cumbria, 4.8% of the England total. The highest percentage of Cumbria's holdings (39.3%) were grazing livestock holdings in Less Favoured Areas which is 3 times higher than for England (11.8%). Cumbria also has a higher proportion of dairy holdings (12.1% v 6.1%) but lower proportions of cereals, general cropping, lowland grazing livestock and mixed farming.

The total farmed area in Cumbria was reported as being 508,000 hectares in 2016, 5.6% of England's total. Just over half of the farmed area in Cumbria (54.1%, 274,959 acres) was accounted for by grazing livestock holdings in Less Favoured Areas. This represents 22% of the total LFA in England.

Defra reports that in 2016 there were 12,395 people engaged in farm work, 4.1% of the England total. 42.7% of these were full time farmers, partners, directors or spouses (England average 29.5%).

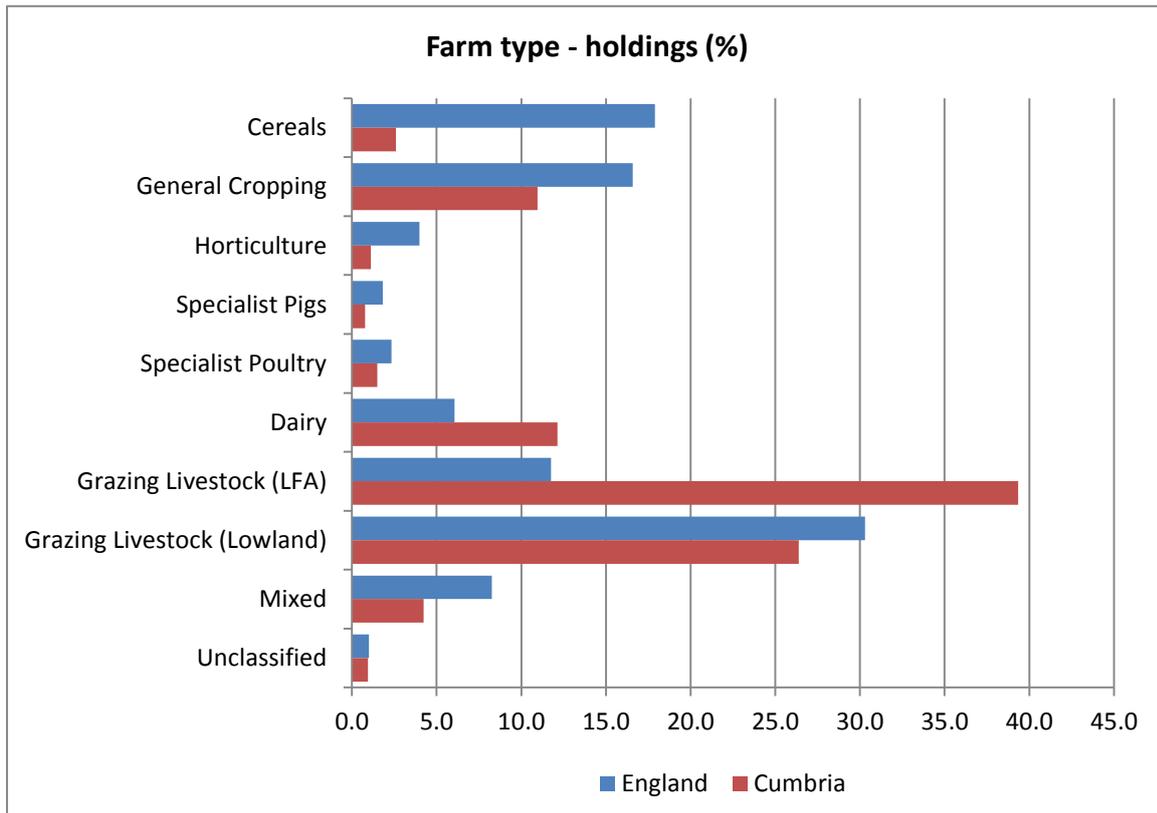
According to ONS data, the agriculture, forestry and fishing sector in Cumbria generated £250m in Gross Value Added (GVA) in 2016 which is 2.1% of Cumbria's total GVA and represents 3.2% of England's GVA generated by the sector.

In 2016 CAP payments totalling £107m were made to beneficiaries in Cumbria.

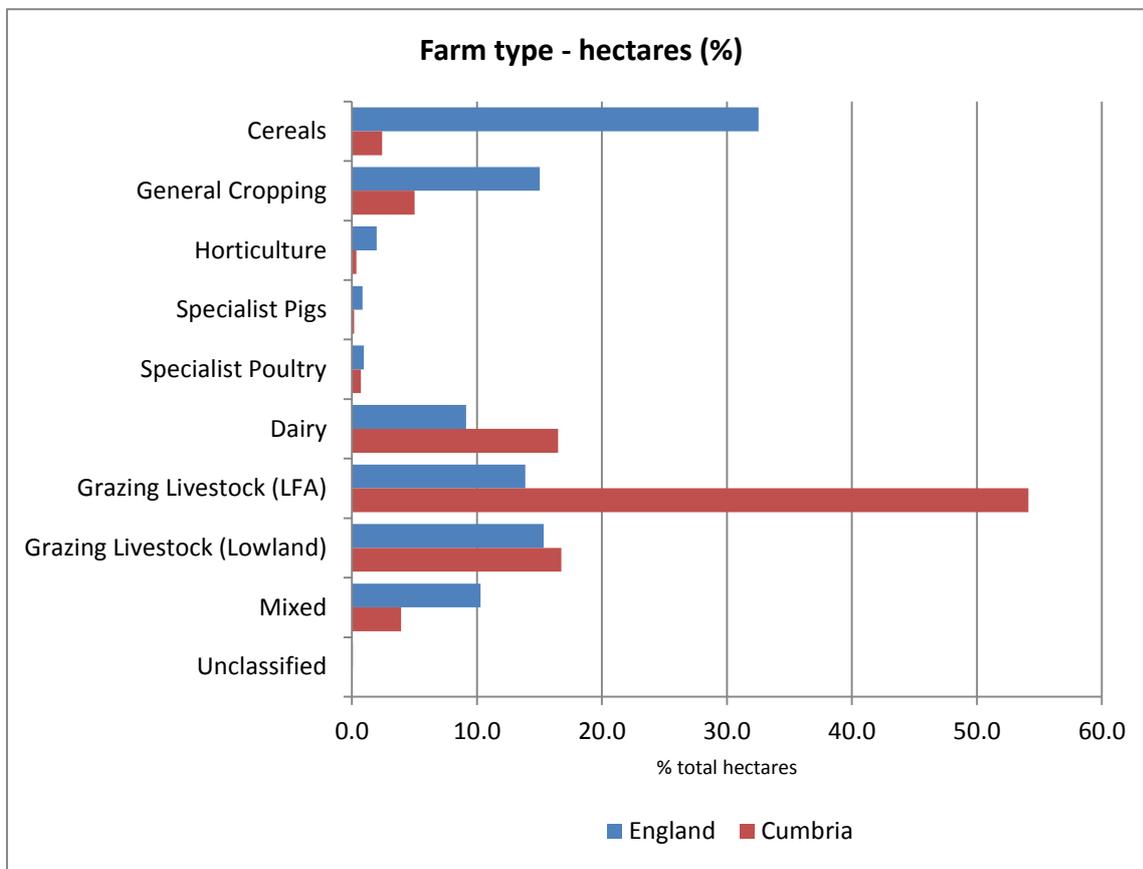
### **Food Processing**

According to ONS data, the manufacture of food, beverages and tobacco sector in Cumbria generated £335m in Gross Value Added (GVA) in 2016 which is 2.8% of Cumbria's total GVA (compared to 0.5% for England) and represents 1.6% of England's GVA generated by the sector.

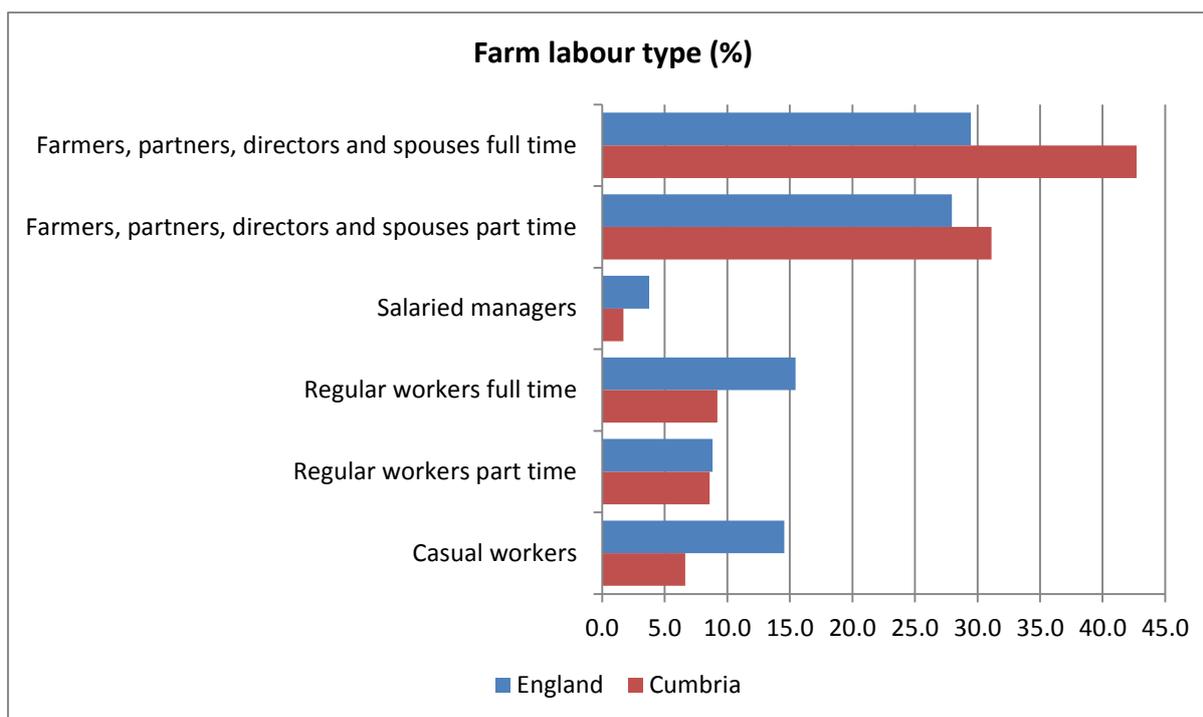
According to ONS data, the manufacture of food, beverages and tobacco sector in Cumbria employed 6,075 people in 2016 which is 2.5% of Cumbria's total (compared to 1.3% for England) and represents 1.8% of all employment in the sector nationally.



Source: Defra Farm Business Survey 2016



Source: Defra Farm Business Survey 2016



Source: Defra Farm Business Survey 2016

<b>CAP Payments in Cumbria 2016</b>	<b>£</b>
<b>Market Schemes</b>	4,935.61
School milk scheme	4,935.61
<b>Direct Aids</b>	68,443,962.00
Basic payment scheme	46,532,391.32
Greening: practices beneficial for climate and environment	20,880,613.47
Reimbursement of financial discipline	782,357.29
Payment for young farmers	184,954.39
Single payment scheme	63,645.53
<b>Rural Development Measures</b>	38,752,841.69
Agri-environment-climate	32,187,071.01
Restoring agricultural production potential destroyed by natural disaster	1,528,549.06
Investment in forest area development and improvement of the viability of forests	1,098,502.54
Investments in physical assets	3,732,179.68
Knowledge transfer and information actions	10,072.00
Forest environmental and climate services and forest conservation	47,095.50
Support for Leader local development	138,102.69
Modernisation of agricultural holdings	561.25
Cooperation	10,227.96
Encouragement of tourism activities	480.00
<b>Total CAP 2016</b>	<b>107,201,739.30</b>

Source: Defra CAP Payments database 2016