



5th May 2018

□ This is George Monbiot's response to the government consultation document *Health and Harmony: the future for food, farming and the environment in a Green Brexit*

## Payments for not Mugging Old Ladies

Submitted to the Department of Environment, Food and Rural Affairs, 29th April 2018

□ I am a journalist, author and environmental campaigner. I am contracted by The Guardian to write a weekly column. I have no landholding or other direct financial interest in the questions addressed here.

### Response to Chapter 2: reform within the CAP

> The consultation asks: 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?

I am concerned by the policy aim in the consultation document of “cutting red tape by reducing evidence requirements to the minimum necessary, to lessen burdens on the customer while continuing to make sure we achieve our environmental outcomes.” There is plenty of evidence to suggest that regulations, enforcement and monitoring are woefully lacking in several crucial areas.

The Rivers Trust has shown how infrequent soil inspections by the Rural Payments Agency are, and how feeble their powers of investigation and enforcement<sup>1</sup>. For example, if RPA inspectors wish to determine whether soil compaction is taking place, they need to dig holes in the fields with a spade, to look at what has happened to the soil layers. But they do not possess the power to conduct an “invasive investigation”, which is the official term for digging a hole. So they are not permitted even to detect, let alone enforce, a breach of the compaction rules.

In 2015, I came across a severe pollution incident in the River Culm in Devon, in which almost all lifeforms other than sewage fungus had been wiped out by continuous pollution from a dairy farm over several months<sup>2</sup>. After I reported this to the Environment Agency, it told me that it would be taking no action against the farmer, because

“the long-term ecological impacts on the environment were fortunately low”.

It made this assessment on the grounds that there was “no evidence of a fish kill”.

<sup>1</sup> The Rivers Trust, 2011. Defra Strategic Evidence and Partnership Project. On [randd.defra.gov.uk/](http://randd.defra.gov.uk/), check 9850\_TheRiversTrustDSEPPReport.pdf

<sup>2</sup> <https://www.theguardian.com/environment/2015/oct/05/think-dairy-farming-is-benign-our-rivers-tell-a-different-story>

Of course there was no evidence of a fish kill: after several months of chronic pollution, there were no fish left to kill.

After relating this astonishing decision in the Guardian<sup>3</sup>, I was contacted, separately and confidentially, by two staff members at the Agency. They told me they had been instructed to disregard all incidents of this kind. The cause, they believed, was political pressure from the government.

Regulation, monitoring and enforcement of environmental damage caused by farming are patchy, feeble and in some policy areas almost non-existent in this country. To reduce them further would be reckless.

### Response to Chapter 3: An 'agricultural transition'

> The consultation asks: What is the best way of applying reductions to Direct Payments?

Of these proposals, the simplest, most just and most transparent is a cap on the amount that anyone can take in total farm subsidies. I believe this cap should be set at the same level as the cap imposed on other recipients of public benefits, namely £20,000 a year for a couple living outside London<sup>4</sup>. It is hard to see why the public money received by the poorest people in the nation should be capped at one level, while the public money received by some of the richest people in the nation (namely large landowners) should be capped at quite another. The onus should be on those who believe that there should be a higher cap for farm subsidy recipients than for ordinary benefit recipients to explain the principles that justify this difference.

### Response to Chapter 4: A successful future for farming

> The consultation asks: What are the priority research topics that industry and government should focus on to drive improvements in productivity and resource efficiency?

There has been a marked bias in research funding towards projects that benefit a particular model of farming: namely chemical- and capital-intensive agriculture. I believe this imbalance should be redressed with more research into organic and permacultural techniques.

### Response to Chapter 5: Public money for public goods

While I believe that public money for public goods is a considerable improvement on the current dispensation – which in many cases amounts to public money for public harms – the principle still troubles me. Many of the public goods discussed here should be protected whether or not money changes hands. An adequate regulatory regime would defend them without the need for public payments.

Broadly speaking, subsidies are what governments use when regulatory policy fails. But ideological opposition to effective regulation, strongly reinforced by the lobbying activities of farming and landowning groups, ensures that public payments in some instances are the only remaining policy

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<sup>3</sup> <https://www.theguardian.com/environment/georgemonbiot/2015/nov/12/toothless-environment-agency-is-allowing-the-living-world-to-be-wrecked-with-impunity>

<sup>4</sup> <https://www.gov.uk/benefit-cap/benefit-cap-amounts>

available instrument. While this is so, it is better that they be used for the purposes discussed in the consultation document than to inflict further environmental harm. But in the long run, the best solution remains strong public protections, set by government and properly monitored and enforced.

There is, I believe, a gap in the consultation document. It discusses only subsidies of the kind currently provided by the Common Agricultural Policy and their possible replacements, rather than other perverse incentives dispensed by the UK government.

For example, the subsidy scheme for the production of biogas through anaerobic digestion, sold to the public on the grounds that it would incentivise the use of crop wastes, slurry and sewage, immediately created, with the government's blessing, a perverse incentive to produce virgin feedstocks. In particular, it has led to a boom in the growing of maize varieties bred for anaerobic digestion, with catastrophic impacts on soil health<sup>5</sup>. As these maize varieties can be grown only on the best arable land, this amounts to a financial incentive to compromise our future food security.

Another subsidy overlooked in the consultation document is the Renewable Heat Incentive payment used to great effect by broiler units. In some cases, this payment, which is often disproportionately lucrative, makes the difference between profitable and unprofitable operations, and as such should be considered an agricultural subsidy. The RHI represents poor value for public money and creates a perverse incentive for deforestation, in and beyond the UK, often causing net environmental harm.

## Response to Chapter 6: Enhancing our environment

There are some good principles in this chapter. It is reassuring to see that the government wishes to improve the health of our soils and the water quality of our catchments. I support its proposal for buffer strips next to waterways, multi-annual agreements and schemes open to nearly all land managers.

In particular, I support the notion of funding for collaborative projects at landscape and catchment level. I would go so far as to suggest that river catchments should become the unit of administration for environmental services. Currently, with catchments split between local authorities and other regulatory bodies, policy can often be fragmented and mutually contradictory. This can lead to negative outcomes, such as destructive floods. The authority responsible for ensuring that towns at the bottom of the catchment are not damaged by floods should be the same authority responsible for ensuring that natural flood management at the top of the catchment makes them less likely.

But two issues in this chapter concern me.

It claims that capital grants for sustainable practices and the reduction of negative environmental impacts helps to introduce the “polluter pays principle”. But this is not polluter pays; it is *polluter no longer gets paid*. In other words, rather than being fined for breaking environmental regulations, land managers would forfeit public payments which would have been received for not causing environmental harm. This is an important distinction, that the consultation paper repeatedly fudges. It takes us back to the point I made about regulation versus subsidies in my response to Chapter 5.

While I agree that the current regulatory regime governing Pillar II payments is often prescriptive, restrictive and perverse, I would caution that the “user-friendly design” with which the government aims to replace it should be clearly and transparently regulated, and effectively monitored and enforced. It is crucial that the resources dedicated to monitoring and enforcement, which have been cut to the bone in recent years, are enhanced, in order to support the credibility of the scheme.

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<sup>5</sup> <https://www.theguardian.com/environment/georgemonbiot/2014/mar/14/uk-ban-maize-biogas>

## Response to Chapter 7: Fulfilling our responsibility to animals

> The consultation asks: Do you think there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare?

It proposes

“pilot schemes that offer targeted payments to farmers who deliver higher welfare outcomes in sectors where animal welfare largely remains at the legislative minimum.”

This preposterous suggestion falls clearly into the “payments for not mugging old ladies” category. It reveals that the government believes that the welfare of farm animals established by the legislative minimum is inadequate, and should be enhanced. If this is the case, the inadequate welfare standards should be raised through legislation, rather than left to the economic calculations of the farmer. The government’s proposal would create a lottery for farm animal welfare, rather than the high and consistent standards it should seek.

While better and more consistent labelling should be introduced and enforced through regulation, to rely on this mechanism for enhanced animal welfare also creates a lottery. Even with better information, consumers are often poorly equipped to decide: rushed, distracted and likely to choose on the grounds of cost above other considerations. Again, if the government wants higher standards of animal welfare – as it should – it should set these standards, rather than leaving them to chance.

## Response to Chapter 8: Supporting rural communities and remote farming

> The consultation asks: How should farming, land management and rural communities continue to be supported to deliver environmental, social and cultural benefits in the uplands?

While both traditional farming cultures and enhanced environmental quality are worthy values, this chapter makes the mistake of assuming that these values are in harmony. In reality, some traditional farming practices, such as extensive grazing in the uplands, are highly detrimental to environmental quality. There is scope for a robust debate about the best balance to be struck between these different goods, but this debate cannot happen if we continue to pretend that the two values are aligned.

Sheep grazing in the uplands inflicts environmental harm out of all proportion to the amount of food it produces. My own rough estimates (there are no official or academic figures) suggest that around 4 million hectares of land in the UK are grazed by sheep<sup>6</sup>, an area roughly equivalent to all our arable and horticultural land. Yet they produce, in terms of calories, 1.2% of our food (imports and exports are closely balanced<sup>7</sup>).

Across much of this land, almost all the bird and wild mammal species that would otherwise live there have been extirpated through grazing and predator control, vegetation structure is extremely poor and invertebrates remarkably sparse. A study in the Cairngorms found that wooded habitats are eleven times richer in nationally important species than grassland, and thirteen times richer than

<sup>6</sup> <http://www.monbiot.com/2017/01/11/explanation-of-the-figures-in-grim-reaping/>

<sup>7</sup> <http://beefandlamb.ahdb.org.uk/wp/wp-content/uploads/2015/07/UK-Yearbook-2015-Sheep-200715.pdf>

moorland<sup>8</sup><sup>9</sup>. The figures are even starker when you consider creatures found nowhere else in Britain. There are 223 such species on the Cairngorms massif. One hundred of them are associated with woodland or trees. But just one (a fungus that lives on bilberry leaves) requires moorland for its survival.

Sheep are a fully automated system for environmental destruction, selectively grazing out tree seedlings and all other edible plants, leaving behind a highly impoverished and restricted flora, offering very few niches for animals. Were these 4 million hectares not grazed to the quick to produce a remarkably small amount of meat, they could otherwise become our great wildlife preserves, and would be likely also to have a greatly enhanced capacity to store carbon and hold back floodwater.

I am not proposing that sheep be removed from the entire upland area. I am proposing that we have an honest and well-informed discussion about the balance to be struck between protecting traditional sheep farming culture, which is valuable, and protecting and enhancing ecological integrity, which is also valuable. This discussion should be informed by the recognition that there is a conflict between these objectives.

### Response to Chapter 11: Protecting crop, tree, plant and bee health

- > The consultation asks: 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?

It cites the creation of the UK Plant Health Risk Register as an example of strengthening bio-security. But this is a feeble measure by comparison to the scale of the threat we face from diseases such as *Xylella fastidiosa*. New hosts for this disease are being discovered all the time, to the extent that the only safe assumption is that almost any species could be a potential carrier. By the time a full list of hosts is added to the register, the disease will almost certainly have arrived here.

Even in economic terms, let alone in ecological and aesthetic terms, the scale of the losses that can be inflicted by the import of novel plant pests and diseases greatly outweighs the value of the cross-border horticultural trade. There is a simple and proportionate solution: a moratorium on the import of all live plants other than those grown through tissue culture (propagation in sterile conditions).

This would stimulate the domestic nursery sector, and avoid absurd situations such as the mass import of ash seedlings from the Netherlands (often grown from seed exported from the UK), bringing into this country *Chalara dieback* (*Hymenoscyphus fraxineus*). This is likely to require negotiation with the World Trade Organisation. Shakespeare remarked that these islands are a “fortress built by Nature for herself against infection”. We should endeavour to keep them that way.

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<sup>8</sup> “Despite being the main habitat for some 39% of important species, woodlands cover only about 17% of the land area of the Cairngorms. In contrast, moorland appears to support only 3% of the Cairngorms’ important species, but covers some 42% of its area.”

<sup>9</sup> P.Shaw and DBA Thompson, 2006. The nature of the Cairngorms: diversity in a changing environment. TSO: Edinburgh. 444 pp. ISBN: 9780114973261- <http://www.tsoshop.co.uk/bookstore.asp?FO=1160013&ProductID=9780114973261&Action=Book>