

Nourish Scotland response to:

Health and Harmony: consultation

May 2018



About Nourish Scotland

Nourish Scotland is an NGO campaigning on food justice issues in Scotland. We believe tasty and nutritious food should be accessible to everyone, be sustainable, and be produced, processed, sold and served in a way that values and respects workers. We campaign for solutions that work across the board: we take a systems approach toward food and health, poverty, fairness, workers' rights, rural economy, environment, climate change, land use, and waste.

General comments

There is a great deal to welcome in this document, in particular the commitment to integrated pest management and high animal welfare. (We were also pleased to see the reference to CPD, which is an essential part of pulling our profession into the 21st century).

However, we have reservations about many aspects of the document and have set these out briefly below, recognizing that this is a paper for agriculture in England rather than Scotland.

Narrow scope

While we understand the urgency forced on the government by the decision to leave the EU, it's unfortunate that the policy has ended up with such a narrow scope. It's not just that after the title there is nothing about human health; there is next to nothing about food, and the environment is conceived quite narrowly as the farmed environment and the proximate impacts of farming activity. It's a CAP-shaped policy to fill a CAP-shaped hole, and to that extent a missed opportunity to develop a cross-cutting food policy. Agriculture policy should be secondary to policies on food and on the environment.

Multiple omissions

The document says almost nothing about organic production (which ticks most of the public good boxes and is of course the fastest growing sector in our main export markets), and nothing at all about agroecology and agroforestry.

It is silent on support for small farms and market gardens, and makes no specific proposals for horticulture, where the trade gap and the production opportunity is greatest.

While there is a welcome mention of vets being paid to advise on animal health, there is no broader discussion of the role of funded advisory services to assist farmers through the transition.

Nitrogen use efficiency (has stalled in the last decade: improving NUE should be a more explicit policy goal.

Direct payments reduction

The current Pillar 1 system is a wholly ineffective and unfair system, and it's good to see the government commitment to moving away from this.

But reducing direct payments in itself is not an agricultural policy goal – and it's not clear from the evidence compendium what change in farmer behaviour this is expected to deliver. The implicit hypothesis is that a loss of income will spur farmers to make efficiency savings or productivity improvements which they know how to make, and could have made, but somehow put off because of the cushion of direct payments.

There's not much evidence for this. If we want less efficient farmers to become more efficient, most of them will need tailored independent advice (which should be paid for by the transition fund) and many of them will need a loan or a grant for equipment or infrastructure.

The compendium shows the distribution of direct payments by payment size, with 50% going to the top 10% of recipients; and the geographical distribution of EBI dependence on subsidies, but not the geographical distribution of subsidies (which still largely go to the best agricultural areas in the south and east, which in general have the largest environmental externalities).

It would be helpful for the paper to be clearer about future scenarios, and say something like:

“We are no longer going to provide cash subsidies to large productive farms on good land. This will put downward pressure on land prices which are currently too high – and that is good news for tenant farmers and new entrants. These farms will only get public money for delivering public goods, and we will also be raising minimum standards to reduce the negative environmental impacts of some farming practices.

We are going to invest more in working with livestock farmers in the north and west to increase efficiency while also enhancing animal welfare and the farmed environment. Producer organizations would be a key element here, as the supply chain is poorly articulated; benchmarking and CPD will be part of the conditions for getting support. Direct payments will also reduce here over time, but these farms are well-placed to deliver a wide range of public goods.

We expect to see continuing consolidation in the sector as a whole.”

Role of regulation

Regulation is often the fairest and most effective way to raise standards. For example in animal welfare, it's essential to keep raising the floor. Paying farmers who go the extra mile in developing positive animal welfare and animal-centred farms should be rewarded both through special schemes and through a premium in the marketplace: but it's also important to start mainstreaming these practices over time.

Similarly, we can raise the floor on practices such as slurry-spreading by requiring injection or trailing shoes.

New delivery mechanisms

It would be helpful to use the transition fund to develop new ways of delivering financial support and advice – for example, regional land use partnerships to agree priorities for public goods provision, or even reviving the rural board structure from the 1967 Act.

Collaborative and landscape level environmental schemes should also become the norm over time, but they will need a significant investment in skilled facilitation to get the started.

Fairness in the supply chain

It is good to see a commitment to improving fairness, and the Groceries Code Adjudicator has made good progress on many supply chain issues. The recent EU proposals on banning the most egregious practices are also helpful.

Devolution

There is clearly value in continued co-operation between the four nations of the UK on a range of issues such as plant and animal health.

However, we argue that food, farming and the environment are all devolved to the Scottish Parliament and that they should stay devolved, with bottom-up agreements between the four nations of the UK on issues where a shared approach is needed. While in practice there will be continuing convergence and commonality on most issues, an element of divergence as at present can readily be accommodated and makes for healthy diversity.