Rural Development Programme for England 2007 – 2013 Consultation response by Sustain: the alliance for better food and farming

1. Introduction

- 1.1 Sustain: the alliance for better food and farming advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national organisations working at international, national, regional and local level (www.sustainweb.org/member_details.asp).
- 1.2 Sustain is a registered charity (1018643) and a company limited by guarantee (2673194). Our membership meets biannually and, at the AGM, elects a governing council of trustees, who meet quarterly. (see www.sustainweb.org/about_council.asp).
- 1.3 This consultation response was compiled by officers of Sustain. It does not represent a full members' consultation response. Twelve organisations in our membership have been invited to respond in their own right and we have tried not to duplicate the issues they raise, especially on animal welfare and biomass crops.
- 1.4 We welcome the opportunity to respond and broadly agree with the four core principles, though with the following general qualifications:
 - Evidence. Some analyses of the sustainable local food sector which have tried to measure, say, efficiency¹, health benefits² and carbon emissions³ have not shown particularly clear and positive benefits. This has, in some cases, been because an inappropriate indicator was used, or due to inadequate or even absent supply chain infrastructure, rather than poor performance by the local food sector per se.
 - Sustainability. This criteria should precede all others and we welcome the strong emphasis on sustainability throughout the document.
 - ➤ Reasonable cost. We appreciate that this refers to costs of work supported by the ERDP funds. However, when considering what reasonable cost represents, Defra might like to consider the costs of public interventions by other departments, such as regeneration or public health, which may also have significant indirect effects on rural communities. Pilot projects to encourage local food trading with the public sector, or investments in training for farmers to find new urban and ethnic food markets may be good value ways of helping address costs across government as a whole.

¹ Food for Thought – A new approach to public sector food procurement. Case Studies. Welsh Assembly Government/Welsh Local Government Association, April 2005

² London Hospital Food Project http://www.sustainweb.org/hospital_index.asp

³ Garnett, T. *Wise Moves – Exploring the relationship between food, transport and CO2.* Transport 2000, November 2003

2. Policy context

2.1 We suggest adding the Sustainable Communities agenda to the list of policies on pp.10-11 of the consultation document. This agenda envisages major developments, sometimes in rural areas, with no planned sustainable food sector provision. At best this represents an under-exploitation of new markets which could support sustainable rural livelihoods. At worst it might lead to repeating previous mistakes in town planning which have led to the emergence of urban and rural food desserts. The ERDP has a role to play in supporting better planned producer-consumer links in these new settlements.

3. Strategy

3.1 We broadly agree with the strategy section of the consultation, though highlight the following:

3.1.1 Pesticide applications

There is a mismatch in the ERDP proposals to build on reducing the environmental impact of some agricultural practices and the obvious related gap in National Pesticides Strategy⁴, which does not advocate a reduction in overall pesticide application, nor does the NPS make a clear link between pesticides and human health. Furthermore, the positive proposals for water catchment ecology could be brought significantly nearer the Water Framework Directive targets by reducing pesticide applications. It is estimated⁵ to cost £2.3bn to clean up the annually applied 31,000 tonnes of pesticides applied every year.

3.1.2 Local distinctiveness, habitats and competitiveness

Some landscapes which significantly underpin local distinctiveness and represent valuable wildlife havens are economically marginal. Traditional orchards are a very good example of this and Sustain has supported English Nature's attempts to include traditional orchards as a new habitat in the revision of the national Biodiveristy Action Plan. It will be important that the drive for agricultural competitiveness does not adversely affect the viability of traditional and locally distinctive land uses which are increasingly valuable as habitats, and which offer potential for seasonal public access.

3.1.3 Public health

The NHS spends around £6bn⁶ each year on diet-related ill health. We are supportive of Defra's continuing efforts to lead work integrating sustainability into, for example, public food procurement. The ERDP presents a good opportunity to deepen these efforts, not least through the new auspices of Natural England, and the Leader+ mechanism. It seems very desirable nevertheless for the ERDP, through the work it supports in future, to be able to make the links between sustainable food production, the food chain and public health, which are currently weak within and across government.

⁴ Pesticides and the Environment – A strategy for the sustainable use of plant protection products. Defra 2006

⁵ Pretty, J. *Policy Changes and priorities for internalising the externalities of modern agriculture.* Journal of Environmental Planning and Management 44 no.2. 2001.

⁶ Obesity – Third Report of Session 2003/04, House of Commons Health Committee. London TSO. 2004

4. Theme 2 - More competitive and sustainable agriculture

- 4.1 It will be vital to invest systematically in rebuilding local, sub-regional and regional sustainable food supply chains. This can help improve the physical and commercial viability of the sector, for example through fostering collaboration between producers, developing distribution hubs or better facilitating integration of the attributes of local production (seasonality, quality, local distinctiveness, short supply chains) into purchasing decisions. If sustainable local food is to become a mainstream contributor to the domestic food economy, and move beyond highvalue niche marketing, then an investment in everyday, good quality local farm produce, will need to be embraced on a regional level. The most fragile parts of the farm sector, namely the small and middle-sized farm and processing businesses, will need to be supported and advised, rather than abandoned as failures in a global market. Patchy but increasingly successful pilot case studies are emerging from the Food Links federation⁷ and these types of organisations, which are normally non-profit-distributing, could be more generously supported to help the ERDP fulfil its aims around improving efficiency, in its broadest sense, and developing innovation in the sustainable food sector.
- 4.2 Using Somerset as an example⁸, the county has a struggling farm and food sector, with a low rate wage rate, a declining working age population and low skills in the sector. Relatively poor global market connections are mitigated by very good regional connections and the high market potential of Bristol and Bath. Somerset's farming sector is generally of high landscape value, and heavily dependent on small businesses, and sectorally on agriculture and tourism, for economic activity.
- 4.3 To address the issues of support for small businesses in the food and drink sector, the general agricultural decline, and the specific issues arising from the Foot and Mouth outbreak of 2001, Somerset Food Links has initiated a range of projects which assist local food and drink producers to reach wider markets. These projects have included:
 - ➤ The Exmoor and Quantock Local Food Ltd (an Independent Provident Society) supporting small scale producers in the area to widen their markets and improve their livelihood (RES funded)
 - > Selling the Levels developing products and markets for food and drink products from the Levels and Moors
 - Somerset Organic Links marketing and distributing produce from local organic fruit and vegetable suppliers in Somerset to a broad range of commercial and social customers (RES funded)
- 4.4 Additionally, a survey of local food businesses in the south west reported that 73.1% of local food businesses need marketing and promotion support; and 51.2% need help to collaborate with other businesses⁹. Research conducted in Somerset¹⁰ confirmed this, concluding: "The development of a well organised local infrastructure was well supported by both purchasers (99.2%) and producers (63.3%) to enable businesses to capitalise on the local market potential."

⁷ www.foodlinks-uk.org

⁸ Somerset Economic Strategy. Somerset County Council. June 2005.

⁹ Local Food Businesses in South West England. South West Local Food Partnership, 2003.

¹⁰ Somerset Food and Drink – An investigation of the local market potential for Somerset Food and Drink. Somerset County Council, April 2004

4.5 In summary, therefore, we urge the ERDP to focus on the significant economic, social and environmental potential for developing regional and sub-regional food supply chains. In supporting such food chains, ERDP should work with, and fund, third sector food and farming networks who are clearly dedicated to improving sustainability and quality in their increasingly successful supply chain brokerage and business support work.

5. Biodiesel

5.1 We will leave technical details concerning biomass to our qualified members. We would like to raise however, the relative simple and cost-effective opportunities for exploring on-farm biodiesel production, using waste food oil from catering, as an integral measure in investing in local food supply chains. This method seems to present a virtuous circle in terms of food transport, helps reduce emissions and positively tackles some of the more risky land-based or high-tech approaches presented by, say, biomass production or satellite farm vehicle guidance.

6. Leader

6.1 Leader has proved a useful way for local partnerships to develop their own priorities. Our experience of Leader + funding mechanisms as both a contracted body and as a partner in other, especially cross-border initiatives has, however, has been that the administrative process is arcane and unreasonably long (two years for cross-regional work is not uncommon). Given the massive changes and considerable set-backs the rural and farming communities have struggled to shoulder over the past decade, we would call for a significant streamlining of administrative processes to support local decision-making.

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