

## Soil Association response to the Bright Blue call for evidence for a “conservation manifesto”, submitted 4/12/2018



1. The Soil Association welcomes this opportunity to submit evidence to this Bright Blue manifesto process. We are a membership charity, formed in 1946 by a group of farmers, scientists, doctors and nutritionists who were determined to pioneer a world where we can live in health and in harmony with nature. Our vision is good food for all, produced with care for the natural world. Today, the Soil Association works to develop, innovate and scale-up solutions for sustainable food and farming - by collaborating with organic and non-organic [farmers](#), food procurers from schools to hospitals to restaurant chains, and others. Our [Food for Life](#) work with schools and nurseries to give children a happier, healthier relationship with food is commissioned widely by public health teams around the country. Through our trading subsidiary, Soil Association Certification, we work with over 6,000 businesses including [organic farmers and growers](#), caterers, food processors and manufacturers across more than 50 countries, and certify over 14 million hectares of [forest](#) globally.

Evidence strongly suggests that voters care deeply about the natural environment, over sustainable production of food and agricultural products, limiting the damage caused by climate change, and people’s ability to engage with their local environment, including the production of local, sustainable food. We strongly support the intention of Bright Blue to ensure that the manifesto offer from political parties reflects this interest. As a charity, we remain strictly neutral over matters of party politics, but we understand that our charitable objectives can only be realised with the right public policies being adopted by governments. It should also be noted that this submission is made in the context of manifesto formulation for the next Westminster General Election, but in the knowledge that many of the issues raised here can only be implemented by the devolved administrations; and so the manifestos of the parties in the UK countries will also be vital in setting the context for successful delivery of these issues.

Our submission focusses on the “rural” questions in the call for evidence, but we note in passing that most of the population lives in urban areas and therefore in addressing the issue of sustainable food and farming it is vital to engage that portion of the electorate; and that the consumption choices of UK citizens has a massive global impact on the environment so future trade and food and farming policy must be addressed on a global as well as a local and national basis. We have answered the questions in a sequence which we hope better reflects the overall narrative of the Soil Association approach to these issues, and would welcome the opportunity to explore them with Bright Blue face to face and to provide further information as needed.

### **What are the most important public goods provided by the agricultural sector which should be rewarded through government funding?**

2. The UK’s new agriculture policies should prioritise farming methods that deliver the following public goods: wildlife and biodiversity, soil health, improve air and water quality, climate mitigation, and ensuring all farm animals can live a good life, with low levels of anti-microbial drug use. In addition, the government should include public health as a public policy objective that should be delivered by farming and food policy.

3. This requires an overwhelmingly positive transformation to the way the UK produces and consumes food; towards a widespread adoption of integrated approaches to farming and conservation across the whole farm. **A long-term goal of establishing agroecology as the underlying principle of farming** in the UK is therefore necessary. Agroecological farming methods are considered to include organic farming as well as agroforestry, pasture-based livestock systems,

integrated pest management, low input mixed farming, and biodynamic agriculture. The [Ten Years for Agroecology in Europe](#) project, led by scientific experts, shows that agroecology can address that apparent dilemma of producing sufficient quantities of food whilst protecting biodiversity and natural resources, and mitigating climate change. Establishing a goal to transition to agroecology is a key government policy move that fulfils many of the issues also discussed below.

4. To deliver the public health strand of public goods, the government should harness the power of public procurement to stimulate demand for higher quality, fresh British produce, including organic, and particularly vegetables, pulses and fruits – supporting British farmers to produce more and British citizens to eat more healthily. New farm policy should prioritise horticulture, and the planting of orchard and nut crops, by encouraging farmers to move into or start horticultural production, particularly those employing ecological production methods such as organic, and those selling as directly as possible to the public. This should be accompanied by measures to increase the diversity of diets, reduce the consumption of ultra-processed foods, and ensure that fresh whole foods are as accessible and attractive as less healthy choices. The benefits of this will be repaid many times over in the reduction of spend on non-communicable diseases like diabetes and obesity. Part of this requires a ‘less but better quality’ approach to meat and dairy consumption, as championed by the [Eating Better coalition](#).

## 8. Should organic farming be better supported?

5. We welcome the specific question around [Organic farming](#). Organic practices are at the heart of agroecology. Specific provision is needed to **support and expand the organic sector** which focusses on producing food in harmony with nature and around which there is currently market failure. Organic standards severely restrict pesticide use and prohibit the use of herbicides and manufactured fertilisers. As a result, organic farming delivers many of the ‘public goods’ that the government wants farmers to provide, at the same time as producing food. Examples include:

- Organic farms have on average 50% more [wildlife](#) than conventional farms.
- Organic farms have [healthier soils](#) with, on average, 44% higher levels of humic acid - the component of soil that stores carbon over the long term.
- Organic farming can help tackle [water pollution](#) - with 35-65% less nitrogen loss and no persistent pesticides leached from organic arable fields.

6. The natural capital approach can be adopted to better reflect the true externalities of agriculture, and a [Natural Capital Balance Sheet](#) of an organic dairy farm, the Cholderton Estate, produced by EFTEC, has illustrated the importance of developing policies that can support both food production and the provision of public goods.

7. [Rushall Organics](#) in Wiltshire is an example of a mixed (arable and livestock) organic farm where organic management is resulting in clear wildlife benefits such as rare and endangered cornfield plant species. The results of a recent survey surprised even the ecological surveyors themselves – from the leading plant conservation charity, Plantlife. Their iconic cornfield flowers—the familiar annuals traditionally found among wheat, barley and oat crops—include some of the most threatened plant species in Britain, such as corn buttercup, red-nettle hemp, field gromwell, narrow fruited corn salad, stinking chamomile and mousetail. These occur without any specific conservation efforts – demonstrating the inherent conservation benefits of organic arable management.

8. Expanding the organic sector should also be explicitly recognised as contributing to higher [animal welfare](#), because organic livestock standards go beyond free range and cover living conditions, feed quality, transport and slaughter. More organic farming would contribute to the challenge of antibiotic resistance too, since organic standards prohibit the routine use of antibiotics, whilst optimising animal health and welfare to prevent disease.

9. At present there are over 3,500 organic farmers/growers in the UK (a total of over 6,500 producers and processors combined). However, only three percent of agricultural land is organic. A Conservative manifesto should commit to getting the UK to the top of the European [league table](#) of organic food and farming, rather than languishing near the bottom.

10. Going organic is a major opportunity for UK farmers too. Consumer demand for organic food is increasing steadily, globally and in Britain. The UK [organic market](#) is now worth more than ever at £2.2 billion, growing 6% in 2017. Much of this growth is being satisfied through imports so meeting more of the UK organic demand with UK supply should be an objective, and would be good news for soil health, wildlife and farmers alike.

11. Reward for the public goods provided by organic farmers cannot be solely delivered by an 'organic market premium'. This often largely accrues to the retailer and neglects the negative externalities caused by "conventional" agriculture. It is not effective economics to expect a minority of consumers to continue to effectively take full responsibility for paying for the public benefits delivered to all.

### **Where is there scope for the agricultural sector to assist in mitigating carbon emissions (for example, through carbon sinks)?**

12. The Committee on Climate Change 2018 [progress report](#) highlighted that there has been "no change in agricultural emissions since 2008". This is not the fault of farmers, but of inadequate government policy to provide farmers with sufficient advice and financial to [transition](#) to climate-friendly farming.

13. A net zero emissions goal is important but not enough. As the new [IPCC report](#) on 1.5 degrees underlines, policies must focus on a step-change in climate action in the short term. These should harness the potential of farmland to sequester carbon through trees and soil – including a government ambition for [agroforestry](#) to become a mainstream practice. New farm support schemes must also fast-track a transition away from reliance on artificial nitrogen fertiliser and fossil fuel-based inputs which results in high embedded emissions in food production, towards wholly 'renewable' food production. [Research](#) has found that making 50% of EU farming organic by 2030 could cut greenhouse gas emissions by almost a quarter. Largescale conversion to organic production is not the whole solution and other measures will be needed too, but it could be a major part of the solution.

14. The new IPCC report also emphasises the importance of 'changes towards less resource-intensive diets'. This should focus on 'less but better' meat and dairy production and consumption (and more fruit, vegetables and pulses) as championed by the [Eating Better](#) coalition, which includes public health as well as climate and environment experts and organisations.

### **What measures or practices can the agricultural sector engage in to best protect or enhance biodiversity in rural Britain? How can pollinator decline be halted and reversed?**

15. Policy and funding must target what is happening 'in the middle of the field' as well as around the edges, for example, by encouraging the widespread adoption of systems of farming that promote in-field biodiversity, such as organic. The importance of this approach is illustrated by [research](#) demonstrating that around 95% of neonicotinoid pesticides applied to crop seed ended up, not in the intended seedlings, but nearby soil and water, wildflowers and hedgerows. Similarly, [research](#) from Germany finding a 75% decline in flying insect biomass on nature reserves suggest that 'land sparing' approaches alone are not enough. Organic farms on the other hand have 75%, 50% and 30% more species of plants, pollinators and overall species respectively.

16. An ambitious pesticide reduction target and monitoring of toxic load is now a necessity. Whilst farmland wildlife continues to decline, pesticide use is still increasing. The effect of pesticide mixtures is unknown. Our own analysis of government data estimates that the average hectare of wheat, onions and potatoes now receive four, eleven and three times as many types of pesticides respectively than in the late sixties and seventies. The average orchard now receives around 40 different pesticide actives.

#### **4. What measures or practices can the agricultural sector engage in to best protect or enhance soil quality in rural Britain?**

17. Several policy options are available to deliver soil health as a public good. These include: stronger support for organic conversion and maintenance – recognising that organic farming methods significantly improve levels of soil organic matter and soil carbon; a consistent monitoring framework for measuring soil organic matter and soil carbon; making soil protection and monitoring a requirement of short term tenancies, and incentives for longer term tenancies; bold intervention over synthetic nitrogen fertiliser use (through instating national or catchment level nitrogen budgets, or fiscal interventions).

18. Support is also needed to help non-organic farmers adopt practices that enhance levels of soil organic matter. These include; use of legumes, composts and composted animal wastes instead of nitrogen fertilisers, use green winter cover crops, use of trees through agroforestry, reduced use of pesticides, diversified rotations and use of grass leys and clover. There may also be benefits from minimal or no-till soil [management](#) , however further work is needed in this area.

18. Commitment is needed to special measures for climate and soil protection in the 20,000 hectares of remaining deep peat in the Fens, with a target of eliminating greenhouse gas emissions from the area by 2050 (in line with legally binding climate targets), by introducing a mix of measures, including: further management of land for the public and wildlife; farming systems to conserve rather than degrade peat; and alterations in the drainage systems to help safeguard peat soils.

#### **Are there any nascent developments in the agricultural sector which could reduce the sector's environmental footprint? If so, should they be recipient to government funding?**

19. It is crucial to multiple environmental aims, from climate to soils and wildlife, to put farmers themselves at the heart of agricultural research and innovation. [The Innovative Farmers Network](#) is a successful model for this, where organic and non-organic farmers work together through field labs to find solutions to shared challenges, with support and input from specialists from the UK's leading agricultural research institutions. It has set a clear precedent for the 'innovation accelerator' funding that Defra is developing. Field labs are being on multiple tricky issues, from the use of lupins to help tackle the issue of domestic protein feed, to biochar in cattle to reduce emissions.

20. We suggest a commitment to allocating of at least 10% of the current R&D budget for such farmer led innovative projects. On current figures, this would amount to a minimum £45 million per year going into farmer-led research and innovation. This would translate into 1,000 projects a year led by groups of farmers and would support many of the most active innovators in UK farming to team up and develop ideas that they have identified as priorities for the sustainability and resilience of their businesses, creating a powerful engine, driving improvements across the sector.

21. There are many other nascent developments, including Community Supported Agriculture, which reduces waste and potentially transportation and brings physical and mental health benefits to those involved, through volunteering and improved diet; and the Farm Carbon Cutting Toolkit,

helping farmers reduce their contribution to greenhouse gas emissions. We would welcome further discussion to explore further innovative approaches that could be included in manifestos including further ways to support farmer-led innovation.

**What regulatory approach should the UK adopt on genetic modification and genetic editing in food production after it leaves the EU?**

22. All forms of genetic engineering, including genome editing should be regulated in the same way as established GM techniques. Gene editing is not a silver bullet and its ramifications are not yet well understood. For example, [research](#) recently found that the most high profile technique, CRISPR, produces a much higher level of unwanted DNA deletions than previously thought.

23. Strong regulation, based on the precautionary principle, recognise the powerful potential of these techniques and ensure that they will only be used in instances where their application has been proven to be safe, responsible and fair. The authorisation of GM crops for cultivation or import as food or feed must follow a robust, transparent and consistent process that encompasses social and ethical impacts alongside safety concerns and consistently enforced measures to prevent GM contamination.