



COUNTRYSIDE ALLIANCE SUBMISSION

CLIMATE CHANGE, ENVIRONMENT AND RURAL AFFAIRS COMMITTEE INQUIRY:

Impact of the Covid-19 outbreak on the agriculture and fisheries sectors, food supply, animal welfare, climate change and the environment

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FOREWORD

The Countryside Alliance is a membership organisation that works for everyone who loves the countryside and the rural way of life. We reflect the views and interests of over 100,000 members and supporters who come from all walks of life and every part of the United Kingdom including our 4000 members in Wales.

The COVID-19 crisis has shown up starkly many of the challenges facing rural Wales, but it also presents us with an opportunity to rebuild our economy on a more resilient and sustainable basis – a green recovery. That recovery must build upon the Environment (Wales) Act 2016, The Well-being of Future Generations (Wales) Act 2015 and the Wales Agriculture Bill, which includes a new approach to agricultural support, developed around the Sustainable Land Management Framework. The Alliance is, in principle, supportive of what the Welsh Agriculture Bill intends to deliver, as indeed are members across the political spectrum and from differing environmental campaign groups. However, none of these objectives will be deliverable, or at least deliver their full potential, without working with those who live in, and manage, the countryside.

The countryside is a national asset, important for public health and wellbeing, and we must ensure we recover the full richness of biodiversity, not simply halt the loss of biodiversity.

Too often when we approach issues in the countryside, the thinking is top down and not bottom up. If we are to deliver a successful green recovery that has to change, by working with local communities not against them, and recognising the work that farmers, shooters, gamekeepers and land managers do, and can do, in enhancing biodiversity, often at little or no cost to the taxpayer, but benefiting everyone.

This submission concentrates on how the rural community can help deliver a green recovery, is a reminder of what the countryside and its businesses already do, and what support is required for them to do more. There has been a recent tendency in policy making to focus more on the headlines than on the details. You do not always need to reinvent the wheel or look to Silicon Valley to deliver solutions, sometimes they are much more local. This submission will explore what the rural economy needs to recover, which in turn will help, and promote, a green recovery. The two are not mutually exclusive but rather intertwined, and it is this approach that we believe will yield the best result for a green recovery. Improving broadband, wildlife management, food production, public transport and skills are all areas that can, if invested in, play a key role in a green recovery and a green future.¹

1.0 RURAL BUSINESSES

Unquestionably for a green recovery the Welsh Government needs to invest in the rural economy and that means investing in agriculture as well as modern industries. In 2018, 78 per cent of the land in Wales was used for agriculture. In 2017, the agricultural, forestry and fishing sector was estimated to have produced £510 million, 0.8 per cent of the total Gross Value Added (GVA) of Wales. This compares to 0.6 per cent of total GVA in England. Any support for the green recovery must recognise this and be tailored appropriately.

1.1 Broadband

- COVID-19 has highlighted the disparity in broadband connectivity across the country as the networks have struggled to keep up with unprecedented demand. This has seen

¹ This submission is approached by topics, rather than by individual questions, each topic however will refer to and answer the questions posed.

millions of Britons suffering because of poor connectivity and outages. According to ThousandEyes monitoring firm there was a 62 per cent rise in outages in April and a third of people surveyed by 4G Internet had experienced internet issues during lockdown. This is holding the rural economy back. The business opportunity in rural areas includes 28 per cent of all UK firms and over one million small businesses.

- Rural digital connectivity will not only allow rural businesses to realise their potential but could play a vital part in addressing climate change by reducing damaging emissions. It would allow people to work from home, thus being less dependent on private transport. In essence, it could reverse a common finding in rural areas: poor broadband, high car ownership, and greater distances travelled. This would also help improve the quality of life by reducing instances of, if not eradicating, long commutes.²

1.2 Tourism

- Tourism makes a significant contribution to the Welsh rural economy, supporting village shops and services, jobs, and businesses, and it is crucial to ensuring the long-term sustainability of our countryside. £2.258 billion of expenditure was generated by overnight visitors staying in Wales in 2018, an increase of £324 million since 2012 (Welcome to Wales: Priorities for the visitor economy 2020 – 2025). The seasonality of much of this work in rural areas has a huge impact on retaining those skilled workers over the quieter months. The industry must work with the Government to help deliver tourism that operates 365 days of the year.
- Staycations will undoubtedly become more popular as international travel is curtailed. A survey by Barclays Corporate Banking in 2019 found that 50 per cent of those surveyed said that they had seen an increase in domestic tourism since 2017. Hospitality businesses had witnessed an increasing demand for domestic holidays in Wales. 50 per cent had seen employment opportunities improve, 27 per cent had seen an increase in the number of hospitality businesses in the area and there had been a rise in the number of independent shops. It is clear that there is a real opportunity for rural tourism and local businesses post COVID-19.
- We also have a great opportunity to invest in public transport and make it easier for everyone to see everything the countryside has to offer. Lack of public transport is one of the biggest issues in the countryside, according to polling last year (ORB 2019) and it remains the case. Better local transport links would not only encourage those who live and work in the area to use public transport, but it would also encourage holidaymakers to leave their cars at home. This would in turn reduce congestion and emissions, whilst making the staycation itself more affordable.

1.3 Skills

- If the rural economy is to grow green, both figuratively and literally, the Government must look to up-skill those in rural communities. The Government should invest in diversifying skills and up grading skills, when doing so, ensuring those skills will benefit and contribute to a green future. From farming and tourism to the digital economy, these sectors will all play their part in supporting green rural communities but we must ensure these industries have the right skills from improving farming practices and animal welfare, delivering a year round tourism offer to ensuring that all industries can make the most of the internet and the benefits that will bring. This will not only help those who live in the countryside, but also

² Swiss economists Alois Stutzer and Bruno S. Frey found that long commutes risk adversely effecting people's enjoyment of their work and life overall ([link](#))

introduce new sectors into the rural economy, making it less dependent on traditional industries such as seasonal tourism.

- Digital skills are now necessary life skills and we must aspire for the whole population to achieve the level of digital literacy needed to participate fully in social and economic life. However, a parliamentary inquiry into digital skills reported that: “there is a digital divide where up to 12.6 million of the adult UK population lack basic digital skills. An estimated 5.8 million people have never used the internet at all. This digital skills gap is costing the UK economy an estimated £63 billion a year in lost additional GDP”.
- A study by Cardiff University’s Welsh Economy Research Unit found that 21 per cent of rural businesses are “digitally disengaged” compare to 15 per cent of urban businesses. The Digital Maturity Survey for Wales 2017 showed that higher digital maturity is associated with better business performance in terms of turnover, profitability, employment, and innovation activity, such as the introduction of new products, services, and processes.
- Countryside Alliance research, undertaken for the House of Lords Rural Economy Committee, has found that there is a lack of digital skills and confidence in using technology, which impacts both businesses and personal life. Businesses are unable to take advantage of the potential of social media, online bookings, or travel sites, and individuals, particularly older people, are unable to take advantage of online services, such as food deliveries and banking. Inability to use online services again increases dependency on car use, which of course in turn contributes to emissions and congestion in rural towns where the larger shops, such as supermarkets, are found.

1.4 Business Rates

- COVID-19 will continue to have a devastating impact on our high streets and businesses if we do not review how we tax physical businesses and recognise the role they can play in delivering a green economy. For businesses to be part of that, they must invest in green solutions, and be incentivised and enabled to do so.
- Business rates are currently a huge detriment to many businesses. A recent study led by retail expert Bill Grimesy ‘Vanishing High Streets’ concluded that the business rates system is accelerating shop closures in many towns. As such it will be difficult for many to invest in new green measures when struggling to stay-afloat at the same time. A tax based on output rather than input which would be more equitable.
- Around one-third of the cost of a pint in a pub is made up of one tax or another. Many pubs are facing increases in the amount they pay in business rates and ultimately, it will be the consumers who pay the price as publicans are forced to put up prices or shut up shop.
- Technology giants should pay more tax. Current tax is disproportionate. For example, the retail sector accounted for 5 per cent of the UK economy’s gross value added, but paid 10 per cent of all business taxes and pubs are responsible for 0.5 per cent of turnover of the UK economy but pay 2.8 per cent of business rates. Amazon pays only around 2 per cent in direct taxes of its total revenue. A proportionate, fairer, tax system could lead to further investment in green solutions and enable the survival of local businesses, which would reduce distances travelled to access key services.

2.0 WILDLIFE MANAGEMENT

COVID-19 has thrown into sharp relief the importance of rural communities and the value of the countryside as a national asset, which should be enjoyed by all. However, that enjoyment must be accompanied by a realistic understanding of what is needed to ensure properly managed wildlife and landscapes. We all must recognise and accept that the management of the environment is an essential part of the work of farmers and land managers across all parts of the UK.

Nature conservation and wildlife management is the wise use and active management of valued landscapes, native species and their habitats. This is a dynamic concept, embodying change and development as well as care and protection. The supporting pillar of sustainability is the planned use of resources ensuring their continued supply. The key to sustainable use is defining tolerable limits to environmental change and resource use. Key is the need for recognition that humans are a part of the environment and have an indispensable role in managing it, including wildlife. As Sir David Attenborough wrote in 1979: "...No species has ever had such wholesale control over everything on earth, living or dead, as we now have. That lays upon us, whether we like it or not, an awesome responsibility. In our hands now lies not only our own future, but that of all living creatures with whom we share the earth."

Key principles in delivering environmental improvement and wildlife management include:

- Community-based conservation which is consistent with livelihood needs, cultures, and interests.
- Recognition that individuals in communities are motivated directly and indirectly by 'rewards' or 'returns' from the sustainable use of local natural resources.
- The use of local ecological knowledge as a key to co-operation with other conservation stakeholders.
- Close co-operation with government agencies and scientists which depends on transparency, accountability, shared responsibility, and shared knowledge.
- Livelihoods can and should drive conservation. Wildlife assets contribute to livelihoods, benefiting local communities and thereby benefiting biodiversity.

2.1 Shooting

- Shooting, in all its forms, is a key part of wildlife management, a driver of conservation, and a key part of the rural economy, as previously highlighted.
- Game shooting is one of the primary drivers of conservation throughout the UK. The contribution of shooting to the Welsh economy is valued at £75 million (GVA) according to a 2014 report carried out by the Public and Corporate Economic Consultants (PACEC). The study found that:
 - Shooting supports the equivalent of 2,400 full time jobs in Wales.
 - Shooting is involved in the management of 380,000 hectares of the rural land area in Wales.
 - Shooters undertake 119,000 days conservation work annually across the Welsh Countryside.
 - £7.4 million is spent each year on conservation and habitat maintenance by shooting estates in Wales.
 - At least 600,000 people in the UK shoot (live quarry, clay pigeons, targets) and at least 1.6 million people shoot live quarry with airguns.
 - People who shoot spend £2.5 billion each year on goods and services, bringing income into rural areas across the UK, particularly in the low-season for tourism.

The research shows that an established shoot generates local economic benefits for businesses in a radius of up to fifteen miles.

- This level of effort is by far the greatest contribution to our wildlife of any private group and comes at no cost to the taxpayer. Crucially, these contributions take place because they have an economic output in the form of shooting. A Wales without game shooting is a Wales without acres of cover crops, which provide vital food and shelter for a myriad of species.
- Predator control is an essential part of game management. The legal trapping and shooting of predator species is carried out by shoots, enabling wild game successfully to rear young. Predator control is vital to maintaining populations of rare ground nesting birds and waders, such as curlew, lapwing and grey partridges, and these species tend to flourish on kept ground. The RSPB has adopted these predator control methods on their nature reserves as well. Peer reviewed research undertaken by the Game and Wildlife Conservation Trust (GWCT) has shown that predator control has a major impact on maintaining populations of ground nesting birds, without having an excessive impact on the population of predator species.³
- In the UK as a whole, shooting providers have management responsibilities over some 14 million hectares. That is about two-thirds of the total rural land mass. Within this area active shoot management – managing heather moorlands, and planting trees and hedgerows, for instance – is undertaken on nearly two million hectares, which represents 12 per cent of the UK's rural land. This is more than ten times the total area of all national and local nature reserves.
- Research by the GWCT shows that woodland managed for shooting rather than for commercial timber production provides richer and more varied habitat. In the wide rides required for shooting, there can be four times as many butterflies as on woodland edge, and in 2012/13 shoots managed 500,000 hectares of woodland. In addition, they managed 100,000 ha of copses specifically planted to shelter game.
- The industry has also addressed concerns over releasing too high a density of pheasants may have a negative impact on woodlands. There is now an accepted density, as laid out in the Code of Good Shooting Practice from the British Game Alliance (BGA). It also forms a key tenet of the BGA's assurance scheme, which shoots must abide by if they are to be accredited.
- Game shooting makes a vital contribution to some of the most marginal rural areas of the UK, at a time of year that is traditionally the most difficult. After Summer, when traditional tourists have left many of our more remote rural regions such as the Lleyn Peninsula and heartlands of Mid Wales, shooting fills the void tourists have left by filling the hotels, pubs and related businesses ensuring these tourist businesses can operate 365 days of the year. The reality is clear: many of these remoter communities would struggle to exist if it were not for the employment provided by game shooting and the substantial expenditure of shooters that visit these areas during the season.
- As with lowland game shooting the management of much of the UK's uplands is in connection with grouse shooting, which has played a key role in creating and maintaining upland landscapes, preserving and improving heather habitat and peatland, sustaining some of the UK's rarest plants and wildlife, and promoting biodiversity. Without grouse

³ Tapper, S.C., Potts, G.R., & Brockless, M.H. (1996). *The effect of an experimental reduction in predation pressure on the breeding success and population density of grey partridges *Perdix**. *Journal of Applied Ecology*, 33: 965-978

shooting, the landscape of many UK upland areas, and the communities they support, would be threatened.

- The 1992 Rio Convention on Biodiversity ratified the global importance of UK heather moorland, and it is our duty to protect it. The UK is responsible for 75 per cent of the world's heather moorland and the evidence suggests that the reason the UK has largely retained its heather moorland is due to the presence of management for grouse shooting.
- Interestingly, the only scientific study of wildlife populations after a driven grouse moor has ceased to operate, but walked-up shooting continued, is in Wales. Welsh moors were once the most successful grouse moors in the UK supporting an abundance of other wild birds. Since management for grouse shooting ceased, they have gone into serious decline. Studies on a former grouse moor in the Berwyn's show what can happen in just 20 years with golden plover declining by 90 per cent, curlew declining by 79 per cent, ring ouzel by 80 per cent, and black grouse by 78 per cent.⁴ Both curlew and lapwing are red-listed by the British Trust for Ornithology, and the curlew has recently been described by the RSPB as the UK's highest conservation priority.
- At present conservation management is a largely centralised, command and control system which protects only 'key' habitats, landscapes, and species. This system is ineffective in managing complex conservation issues affecting whole landscapes and ecosystems. Local community perspectives and participation in environmental management cannot be adequately accommodated. This centralised, protectionist approach has failed to win the hearts and minds of those living and working in the countryside and does not always ensure the protection of our most vulnerable species, or strike the balance between species that is essential to genuine biodiversity gain.
- The recent issues arising over wildlife licensing in relation to predator bird species is illustrative of the need for a workable licensing system, based on a presumption in favour of management not a presumption against. Our departure from the EU gives Wales the opportunity to develop such a system.
- The role shooting, and the shooting community, plays in the management of the countryside and the contribution to biodiversity should not be ignored or willed away. A green recovery must recognize and acknowledge what already works and decisions should be based on sound science and research.

2.2 Farming

- Many areas of our countryside look 'wild' but the vast majority of landscapes around the British Isles are the result of existing management by farmers and other land managers, which has developed over many centuries. Through the maintenance of fields, walls and hedges, woodlands and other landscape features, farmers and other land managers play an important role in creating and maintaining some of our most iconic rural landscapes, including National Parks and Areas of Outstanding Natural Beauty.
- Using the skills and experience of farmers is often the best way to improve biodiversity and secure the future of our vital natural resources. If farming in upland, and other marginal areas, were to be abandoned because of changes to support payments, there would be detrimental effects on the habitat in these areas and the species they support.

⁴ Ibid.

2.3 Upland farmers

- Farmers in the uplands, and other marginal areas, are generally limited to low intensity grazing which has small profit margins and is often more exposed to market volatility than other sectors of the industry. Without direct income support, many hill farmers would struggle to make a profit, even with income from diversification. Their work, however, often provides the most amount of public good in creating and maintaining some of our most iconic rural landscapes which support many of our rarest habitats and wildlife and are central to rural tourism.
- The transition from CAP to a new agricultural policy must not be used to reduce the amount of funding to upland communities. Defra has recognised the role of upland farmers and reference to the uplands is now on the face of the Agriculture Bill in England. We would urge Welsh Government to ensure that the same value of upland farming to Wales is similarly recognised. However, there is much upland management which provides public good but is not strictly agricultural but should be recognised such as the management of moorland and restoration of peatland.
- There are already different payments for farmers in “Less Favoured Areas” under the CAP so the principle that upland farmers require greater financial support has already been established, and we strongly believe this principle should be continued in any new agricultural policy outside the EU.

3.0 FOOD LABELLING AND SUPPLY

As part of a green recovery it is important that we look at the role that food production and consumer attitudes can play in supporting our countryside, its communities, and its businesses. COVID-19 has demonstrated the fragility of our supply chains and consumers have embraced supporting their local businesses. Going forward implementing country of origin food labelling and supporting small abattoirs are two such ways in which we can support our food producers, improve animal welfare, and green our economy.

3.1 Small Abattoirs

- The Alliance has long campaigned for small abattoirs to get the recognition they deserve for the crucial role they play in the food supply chain. They are a vital and crucial resource for farmers across the country and that role will only become more important if a ban on live animal exports is introduced. A simple blanket ban on live exports leaves much to be desired. As proposed, the policy does not limit the distance the livestock travels rather it prevents travel from the UK to another country. As such the situation could arise in which livestock would be unable to travel from Dover to Calais or across the border from Northern Ireland to the Republic of Ireland but could travel from Dover to Ceredigion. The policy should be focussed on minimising the distances over which animals are transported, which is best achieved by developing a network of small local abattoirs. Our departure from the EU is an opportunity to regulate abattoirs in a way which makes small abattoirs viable and thus improving animal welfare.
- There is clearly a demand for local produce, and the COVID-19 pandemic has strengthened that demand. However, without a network of small abattoirs Welsh livestock will still have to travel longer distances.

- There should be recognition that small abattoirs are a public good, in terms of delivering is should be reflected in their eligibility for capital payments in any future agricultural support framework.
- The Welsh Government should ensure that public bodies and economic partnerships or forums see small abattoirs as essential infrastructure supporting the rural economy.
- Government should consider low capacity abattoirs processing under 1,000 LSUs and running alongside other farming and processing activities as being deemed agricultural buildings with respect to business rates and building control, subject of course to planning conditions necessary for local community protection.

3.2 Food labelling

- The Alliance believes that all fresh meat sold in the UK must be labelled with where the animal has been born, reared and slaughtered, ensuring that consumers can make a choice about what they are buying. Currently, sausages made in Britain from Danish pork can be legitimately labelled as British because the meat has been processed in the UK. Not only does this mislead customers but does nothing to support our hardworking farming community who rear animals to a higher welfare standards. Moreover, it would ensure that Welsh lamb and other premium Welsh products were clearly distinguished from inferior products or imports.
- Consumers often struggle to identify where their meat comes from due to poor labelling and a lack of transparency which is why the Alliance calls for proper, mandatory country of origin labelling, including where meat is an ingredient and part of an overall product. This would also ensure a level playing field for our farmers after the transition period ends on 31 December and promote greener sustainable food sources with reduced food miles.
- UK consumers are becoming more conscious of the food they are purchasing and eating, and the COVID-19 pandemic has reinforced many people's desire to buy local. People are taking much more notice of where the meat they eat originates from. It is clear that people want to buy meat, as several recent surveys have shown, but from producers that abide by high animal welfare standards and that are environmentally sustainable (i.e. travelled a short distance). Key to ensuring that those desires are met is through processing as close to where the livestock was reared as possible, and clear labelling.

4.0 CONCERNS

4.1 Rewilding

- We are concerned by suggestions that existing management should be withdrawn, or scaled back, as part of any policy of 'rewilding'. Supporters of 'rewilding' often see farming as an obstacle to conservation, but this ignores its benefit in many areas. For example, low intensity grazing plays a valuable role in preserving the upland environment, which is home to extensive areas of rare habitat, internationally important rivers and lakes, and a key source of drinking water. If remote areas in the UK were to be abandoned as part of a policy of 'rewilding' they would soon revert to scrub or woodland which would threaten some of our rarest moorland and grassland habitats.
- In many cases, 'rewilding' land management practices result in the loss of agricultural land or a reduction in its productivity. Land that is flooded as part of managed river and coastal flooding will be difficult to restore if there is a change in policy, and the reintroduction of

apex predators such as lynx and wolves can also make the land less productive by increasing predation. Any economic advantages claimed by proponents of 'rewilding' do not outweigh the potential loss of income to existing businesses, the social impact resulting from a loss of traditional employment, or the possible damage to existing landscapes and wildlife.

- There is no single definition of 'rewilding'. A report from the House of Commons Environmental Audit Select Committee in January 2017 stated their preferred definition was "...reducing human intervention in some areas, preferably in a planned way, so that natural environmental processes will have more scope to shape the composition and structure of such landscapes...". The Committee acknowledged that 'rewilding' was a contested term and concluded that there was not enough evidence to recommend a general policy on this after we leave the EU, which we welcomed. However, we are concerned by the Report's suggestion that rewilding "may arise out of necessity" if changes to support payments or unfavourable trade deals "lead to less land being viable for profitable farming" after we leave the EU.
- Simply abandoning large areas of land to rewilding is not an option. That is not to say that managed species reintroduction, if appropriate and with an exit strategy, or the appropriate planting of trees, do not have a part to play, but all such plans must be done in the context of an understanding that the UK is a managed environment and a place where people live and work.