

COUNTRYSIDE ALLIANCE

CONSERVATIVE POLICY FOURM: ENVIRONMENT AND ANIMAL WELFARE

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TABLE OF CONTENTS

FOREWORD	1
1. RURAL BUSINESSES	2
2. WILDLIFE MANAGEMENT	4
3. FOOD LABELLING AND SUPPLY	8
4. CONCERNS	9
For more information please contact	10

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.

The COVID-19 crisis presents us with an opportunity to rebuild our economy on a more resilient and sustainable basis. We must build upon the 25 Year Environment Plan, the Environment Bill and the Agriculture Bill, which includes a new approach to agricultural support – public goods for public money. The Alliance is, in principle, supportive of what the Environment Bill and Agriculture Bill intend, 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 – all of which will be key to deliver a greener future.

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, including in the 25 Year Environment Plan, the thinking is top down and not bottom up. If we are to deliver a greener future 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 greener future and will be 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 countryside needs to in order to continue an improve on their work. By supporting rural communities and businesses we ensure a greener future for all. 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 future.¹

1.0 RURAL BUSINESSES

Unquestionably for a greener future the Government needs to invest in the rural economy. The rural economy is worth £400 billion and is made up of all different sectors from food production and tourism to manufacturing. The countryside is also home to 24 per cent of all registered businesses in England and there are proportionately more small businesses per head of population in rural areas.

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, which has seen millions of Britons suffering as a result of poor connectivity and outages. We saw a 62 per cent rise in outages in April and a third of people surveyed 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 also play a vital part in addressing climate change by reducing damaging emissions. It will allow people to work from home, thus being less dependent on private transport. In essence, it will reverse a common finding in rural areas: poor broadband, high car ownership. This itself will help improve the quality of life by reducing instances of, if not eradicating, long commutes.²

1.2 Tourism

- Rural tourism in England contributes over £13 billion per year to the economy, and VisitBritain predicts the £80 billion domestic tourism industry, spanning holidays and day visits, will suffer a £22 billion drop this year. Tourism makes a significant contribution to the rural economy, supporting village shops and services, jobs and businesses, and it is crucial to ensuring the long-term sustainability of our countryside. Seasonality 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. We therefore 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, and it remains so. However, better local transport links will not only encourage those who live and work in the area to use public transport, but it will also encourage holidaymakers to leave their car

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

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](#))

at home. This will in turn reduce congestion and emissions, whilst making the staycation itself more affordable.

1.3 Skills

- If ever the rural economy is to grow green, both figuratively and literally, the Government must look to up-skill those in rural communities. Tourism is a significant part of the economy, however, it faces the issue of seasonality. The Government should invest in diversifying skills and when doing so ensure those skills will benefit and contribute to a green future. This will not only help those who live in the countryside, but also introduce the rural economy to other sectors, and make the rural economy less dependent on seasonal sectors, like 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”.
- Our own research 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 persons, are unable to take advantage of online services, such as food deliveries and online banking. Unable to use online services again places 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 businesses. A recent study 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 themselves. We support a tax based on output rather than input which would be more equitable.
- The landlord of The Boot pub in St Albans claims his rates bill is set to soar by 280 per cent over five years from £14,000 a year to £52,000. They would have to sell an additional 22,000 pints of beer a year just to pay for the increase. 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. 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 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; 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."

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.
- 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.
- Game shooting is one of the primary drivers of conservation throughout the UK. Shoot owners and managers spend £250 million of private investment in conservation schemes. Shoot participants contribute 3.9 million voluntary days each year to conservation projects.³ 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 UK without game shooting is a UK with 62,000 fewer 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 of predator species is carried out by shoots, enabling wild game – which are ground nesting birds – to successfully rear young. Predator control is vital to maintaining populations of rare ground

³ Public and Corporate Economic Consultants (2014), The Value of Shooting, p.3.

nesting birds and waders. These species, such as curlew, lapwing and grey partridges, 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 conducting predator control has a major impact on maintaining populations of ground nesting birds, without having an excessive impact on the population of predator species.⁴

- 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 that may have a negative impact on woodlands. There is now an accepted density, as laid out in the Code of Good Shooting Practice and required by the British Game Alliance (BGA). It 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 South West and North East, 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.
- Research by the Countryside Alliance about the community of Blanchland, Northumberland highlights the growing public awareness of the benefits of grouse shooting and its role in protecting England’s remote upland communities.
 - Nine out of ten people (91%) agreed that grouse shooting provided the communities with economic, social or environmental benefits.
 - Two thirds of respondents (65%) agreed that grouse shooting provided them with direct economic or social benefits.
 - Nine out of ten people (87%) agreed that there would be a negative impact on the communities if grouse shooting stopped.
 - Nine out of ten people (96%) valued the services provided by local businesses, the economic viability of which can be dependent on the revenue generated by shooting parties.
 - Eight out of ten people (83%) agreed that tourists were attracted to the area thanks to the beauty of the landscape and increased wildlife that are a direct result of moorland management associated with grouse shooting.

⁴ 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

- The environmental benefits of grouse shooting are well documented but its role as the economic engine for many remote communities has been less well known. This survey clearly shows that grouse shooting is vital to the local employment, businesses and people of England's uplands.
- Overall, shooting contributes over £2 billion per year to the UK economy and supports an additional 74, 000 jobs. Arguments that this could be replaced by either wildlife tourism or simulated shooting of clay pigeons are misleading. Both have a part to play, but shooters are willing to brave inclement conditions and tolerate surroundings that would not appeal to most other tourists. Ensuring the survival of these communities requires a diverse and pragmatic blend of businesses, and game shooting, with its 480, 000 participants, is a key ingredient. Those calling for alternative land uses to game shooting must first ensure that any changes to the status quo would be at least as beneficial. The International Union for the Conservation of Nature has identified three dimensions to the core of mainstream sustainability - environmental, social, and economic, and all three need to be addressed by anyone proposing changes.
- As with lowland game shooting the management of much of our uplands in connection with grouse shooting has played a key role in creating and maintaining our upland landscapes, preserving and improving heather habitat and peatland, sustaining some of our rarest plants and wildlife, and promoting biodiversity. Without grouse shooting, the landscape of many 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.
- Whilst heather moorland may look wild, in reality it is carefully managed. It is often thanks to its management for grouse shooting that this unique landscape has been maintained or restored, where elsewhere it has been lost. Recent figures produced by Natural England reveal that some 44,500 acres of moorland have been repaired and revegetated across the North of England, all on land managed for grouse shooting.⁵ It is also because of their management that more than 60 per cent of England's upland Sites of Special Scientific Interest are managed grouse moors, and over 40 per cent are also designated as Special Protection Areas for rare birds and Special Areas of Conservation for rare vegetation under the EU Nature Directives.
- Grouse moor managers, and seasonal workers employed during the shooting season, help with vital conservation work such as spraying bracken, and removing saplings and invasive shrubs to prevent their encroachment onto the moorland. This labour-intensive work is carried out because grouse shooting provides a financial incentive to conserve heather moorland despite economic pressures and the attractiveness of government subsidies for other activities such as forestry and farming.
- The only scientific study of wildlife populations after a driven grouse moor has ceased to operate, but walked-up shooting continued, is in Wales and it shows dramatic declines of many threatened species. 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 went into serious decline. Studies on a former grouse moor in

⁵ Quoted in the Moorland Association 'High and Lows for start of grouse season' found at: <https://www.moorlandassociation.org/2016/08/highs-lows-start-grouse-season/>

Berwyn 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.⁶ 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 in the UK is a centralised, largely 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, and ongoing, fiasco over wildlife licensing in relation to predator bird species is illustrative of the point. The UK needs a workable licensing system suited to its particular needs and one based on a presumption in favour of management not a presumption against. The current approach, especially the use, or misuse, of the precautionary principle, has rendered impossible the control of predator bird species of no conservation concern in many areas, leaving the most vulnerable species of high concern exposed to predation.
- The role the work shooting plays in the management of the countryside and to biodiversity should not be ignored or willed away. We must remember and acknowledge what already works and make all decisions on evidence and research. For too long certain communities have been wrongly characterised and at worse deliberately misunderstood.

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 from 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.
- The conservation work of farmers is often supported by other forms of land management, such as the work of grouse moor managers. Management of moorland for grouse shooting has been carried out for over 150 years and provides a valuable habitat for a variety of species. More than 80 per cent of English grouse moors fall within a National Park or Area of Outstanding Natural Beauty and are popular for outdoor pursuits. Grouse moors are sustainably managed, largely through private investment by their owners who spend approximately £52.5 million every year on moorland management and support the equivalent of 1,500 full-time jobs.

⁶ 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 will 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, which is worth £19 billion a year to the UK economy.
- England's uplands currently receive £230 million per annum from the CAP. As a minimum this total needs to be guaranteed long term to secure the future of upland farming. 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 Bill. 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 greener future it is important that we look at the role that food production and the role that 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 resource for farmers across the country and their role will only become more important if a ban on live animal exports is introduced. However, the blanket ban as proposed, leaves much to be desired. As proposed, the policy by itself does not limit the distance the livestock travels but rather it would prevent travel overseas. As such, we have a situation in which cattle could not travel from Dover to Calais but could travel from Dover to Northumberland. These types of distances may be forced on farmers, if more small abattoirs cannot be used for processing. Now we have left the EU we must ensure more small abattoirs open and that distances travelled are reduced significantly, thus improving animal welfare.
- There is clearly a demand for local produce, and the COVID-19 pandemic has strengthened that demand, but without a network of small abattoirs UK livestock will still have to travel longer distances. When the purpose of wanting to end live exports is to reduce distress caused to animals, it seems wrong to ignore the reality we face in this country.

- We also recognise that small abattoirs are contributing to the public goods of animal welfare and environmental benefits should be recognised and eligible for capital payments in any future agricultural support framework.
- The Government should ensure that public bodies and, in particular, economic partnerships or forums see small abattoirs as essential infrastructure supporting the rural economy.
- Funding waste disposal or re-usage technology within small abattoirs should be included in the Government's criteria for capital payments under environmental schemes and integrated with initiatives such as the Waste and Resources Action Programme (WRAP).
- Government should consider low capacity abattoirs processing under 1,000 LSUs and running alongside other farming and processing activities 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 standard.
- 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 also do so much to promote greener sustainable food sources.
- UK consumers are becoming more conscious of the food they are purchasing and eating, and the COVID-19 pandemic has once again reinforced that people are looking to buy local and are taking much more notice about where the meat they eat originates from. It is clear that people want to buy meat, as a number of recent surveys have shown, 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 measures are met is through processing as close to where the livestock was reared as possible.

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 Lake District's environment, which is home to extensive areas of rare habitat, internationally important rivers and lakes, and a key source of drinking water for cities in the North West of England. 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.

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.