7th June 2004

Mrs K Tremellen-Frost Scrutiny Officer States Greffe Morier House Jersey JE1 1DD

Dear Kay

Thank you for inviting The National Trust for Jersey to make a submission to the Scrutiny Panel in relation to their investigations into the appropriateness of the proposed agri-environment scheme.

As you maybe aware The National Trust for Jersey has actively supported and sought to promote the concept of an agri-environment scheme since the Countryside Forum in November 2000. The case for an agri-environment scheme continues to be paramount importance and in support of this contention the Trust would like to highlight the following:

Current State of Play:

The agricultural industry remains inherent to the culture and heritage of Jersey. It has played a key role in shaping the island's landscape and vernacular buildings and today over 50% of the island's land remains in agricultural usage. However, despite its predominance in terms of the island's countryside, the industry contributes less than 1.8% to the island's tax revenue, and in turn absorbs nearly twice this amount in subsidy and support payments.

With increasing international competition and a tighter regulatory framework, profit margins will continue to erode and the long term viability of the current industry, and in particular the small holder, is questionable. In response to this new economic climate, large scale corporate farming is beginning to emerge in the hope that dominance of the market place and efficiency of scale will secure a future for certain elements of the industry. Marginal areas and in particular wet meadowlands and heathland continue to suffer from a lack of grazing and active management.

It is also widely acknowledged that current farming practices resulting from agricultural policy and technological development have created an industry which has become alienated from its traditional role of supporting the natural environment with its diversity of flora and fauna. With mono-cropping and high stocking density the relationship between agriculture and the environment has been severely weakened and this has been highlighted by a number of recent reports which detail the detrimental impact upon water quality, biodiversity and the general degradation of Jersey's traditional agricultural landscape.

Guaranteed subsidies, self-imposed restrictions and general complacency by such organisations as the Milk Marketing Board have resulted in the industry failing to respond to customers requirements especially in relation to the home market. Farmers have not been encouraged to be innovative and as a result the industry is severely lacking in diversification. The subsidies paid by the general public,

including the premium in respect of milk prices, have largely been taken for granted with little effort being made by the industry to justify its requirement for such high levels of public support.

Despite the downturn in the agricultural industry the countryside remains a key asset for Jersey and it is of prime importance to both residents and people visiting the island. No longer seen solely as a source of food production, people value the countryside for a range of attributes and qualities, including scenic beauty, historic features, cultural values, wildlife, and recreational opportunities. Flowing from this is an evident desire amongst the general public for the countryside to be appropriately managed and the natural environment safeguarded.

The issue now facing the island is how to bring these two diametric views together so that the agricultural industry continues to remain economically viable whilst at the same time re-engaging with its traditional stewardship role of caring for the countryside.

Why do we need an agri-environment scheme?

Prior to the onslaught of modern intensive farming techniques the agricultural industry was environmentally benign resulting in a countryside rich in flora and fauna together with an aesthetically pleasing landscape of small fields, high roadside banks, and hedgerows. In other words a healthy and attractive countryside was a relatively cost-free, unintentional, by product.

It is clear to anyone who drives through Jersey's countryside that this is no longer the case. Although there is a distinct lack of base line data upon which to quantify the degradation of Jersey's countryside, it is clearly evident that there are a number of issues which need to be urgently addressed including high levels of nitrates and phosphates in the water supply, the damage to biodiversity such as the disappearance of sky larks and cirl buntings, and the gradual loss of landscape features including dry stone walls, roadside banks and hedgerows.

It would be both unreasonable and unrealistic in the current economic climate to believe that the industry is capable of reversing these trends without public support. Although supermarket protocols have significantly contributed to improvements in animal welfare and food production, they do not necessarily address wider environment issues or the need to safeguard the island's bio-diversity. In addition the agricultural industry, like any other business, is profit driven and it would be economically unviable to invest in areas, outside the core business, which do not improve yields or profitability. Also with 70% of agricultural land being rented on short term leases there is no longer the incentive or the desire to invest in and improve the land in the longer term.

Therefore if the people of Jersey want a healthy and well managed countryside with a rich natural environment it would seem reasonable that farmers should be paid in order to provide these wider environmental public goods. Obviously any such payments must provide good value for money, both in terms of results and administrative efficiency. Such "value" will be essential if the public are to be encouraged to provide further financial support in the future.

Is the current scheme appropriate?

The Trust very much welcomes the overall concept of the scheme and the clear objective of addressing the major issues of pollution, biodiversity, access and visual attractiveness of the landscape. However, the Trust would like to highlight the following:

- (i) The need to develop and encourage a sustainable industry should be added to the five key issues.
- (ii) The flexibility of the scheme results in a distinct lack of prioritisation and targeting in respect of specific areas of the island. It is therefore essential that the Farm

Environmental Plans are comprehensive and clearly identify the major environmental issues and opportunities on each farm. Only when this has been completed can the tests of appropriateness and adequacy be properly adhered to.

- (iii) The benefits of any agri-environment scheme accrue over a period of time and as a result countryside stewardship schemes in the UK have been based on 10 year agreements. It remains unclear as to whether the AES scheme will be an annual agreement or operate for a number of years. This is particularly important in respect of meadow management, arable crops for wildlife, orchard and hedgerows.
- (iv) There seems little point in encouraging public access in the countryside through new footpaths and cycleways if these can subsequently be closed without notice for 165 days of the year. The Trust considers that for any such scheme to be effective it should be part of an island wide strategy to improve access in a logical and targeted way. Such a scheme could be based upon the recommendations of the Countryside Character Appraisal.
- (v) Jersey's countryside already suffers from a plethora of signs and benches. Careful consideration should be given to funding such items when they could have the adverse effect of undermining the natural quality of the countryside.
- (vi) The planting of orchards must be part of a long term agreement and further clarity is required as to the main objectives of the scheme and the potential to develop markets.
- (vii) Financial assistance for the repair or replacement of new fencing should be considered. This could be linked to encouraging more extensive grazing regimes in marginal areas such as heathland and coastland.
- (viii) A component for the repair of roadside banks, dry stone walls and traditional boundaries should be included in the scheme. This is one of the key characteristic landscape features of Jersey's countryside and therefore its omission is all the more surprising.
- (ix) The Trust very much welcomes the Special Project component. This could enable appropriate management to be applied to specific sites of high conservation value and help assist with species action plans as highlighted in the biodiversity strategy.

In summary the current scheme successfully begins to address many of the major environmental issues currently facing the island's countryside and agricultural industry. However, it still suffers from an inherent weakness in that the scheme does not as yet form an integral part of an island wide countryside policy. As a result certain components including those relating to access, visual enhancement and bio-diversity appear to lack strategic direction and cohesion. The Trust has always argued that any environmental initiatives should not viewed in isolation but should be addressed alongside such issues as diversification, rural enterprise, land use and change of use for buildings. The Trust still believes this should be the case and hopes that the rural economy strategic plan may address this shortfall.

What happens if no scheme is adopted?

It is clearly evident that if no agri-environment scheme is put in place then the island's countryside will continue to suffer from environmental degradation. With no financial incentives available it will not be economically viable or practical for farmers to address issues which are not central to their core business. Undoubtedly legislation and protocols will force the industry to address certain aspects such as slurry storage, chemical control and nitrate run off. However, this will only serve to increase the financial burden, which in turn will exacerbate the continuing demise of the small holder. In addition if the visual attractiveness of the countryside continues to erode then Tourism may in turn suffer and the general public begin to question why they are subsidising an industry

which appears to do little for the natural environment.

It is difficult to predict future scenarios but the Trust believes that the following could occur if the States and the general public fail to recognise the need to invest in the future of Jersey's countryside:

- (i) Rapid consolidation of the farming industry with the emergence of large scale corporate farming.
- (ii) Abandonment of marginal land and the deterioration of meadow land, heathland and cotils.
- (iii) Continuing loss of roadside banks, walls, hedgerows and traditional boundaries.
- (iv) Loss of small field patterns resulting from pressure for increased efficiency and production.
- (v) Increasing loss of bio-diversity.
- (vi) Increased pressure to take land out of agricultural usage for development and recreational activity.
- (vii) Lack of diversification and interest in the countryside.
- (viii) Loss of scenic value and individual characteristics of wider landscape.
- (ix) Increased financial pressure on NGO's and State's Departments to intervene and help manage and protect the island's countryside.
- (x) Poor environmental record could damage potential marketing of produce

The agri-environment scheme allows the island to invest in one of its key heritage assets. Considerable funds are annually expended on the island's museums and art institutions and yet so little is invested in maintaining an asset which every visitor and resident of the island sees and appreciates. The Trust strongly believes that the agricultural industry should now be given the opportunity to embrace the responsible stewardship of he island's countryside by moving towards a more sustainable and environmentally sensitive agricultural industry. The States have already acknowledged the need for such a scheme and it is hoped that they will honour their decision by sourcing the necessary funding to make the scheme a reality. As a parting thought I would refer the Committee to a most apt comment in the Countryside Character Appraisal which states:

Agriculture in Jersey has a scenic importance out of proportion to its economic contribution to the island and conservation of the scenic value of the agricultural landscape will be vial in ensuring the Island's future prosperity.

Yours sincerely

Charles Alluto

Chief Executive of The National Trust for Jersey