

Consultation:

Brexit and our land – securing the future of Welsh farming

Which? is the largest consumer organisation in the UK with more than 1.3 million members and supporters. We operate as an independent, apolitical, social enterprise working for all consumers and funded solely by our commercial ventures. We receive no government money, public donations, or other fundraising income. Which?'s mission is to make individuals as powerful as the organisations they have to deal with in their daily lives, by empowering them to make informed decisions and by campaigning to make people's lives fairer, simpler and safer.

Summary

Which? welcomes the opportunity to respond to the Welsh Government's consultation on the future of Welsh farming. Leaving the EU should be used as an opportunity to develop a food and farming policy that better aligns support for farming with the needs of the final consumer.

There needs to be a much more explicit recognition of the importance of consumer confidence and acceptability, as well as a stronger focus on food safety and public health as part of the economic resilience and public goods schemes and the proposals for a new regulatory framework.

A key principle for reform should also be that the success of Welsh farming has to be underpinned by high quality and safety standards, meet consumers' needs and expectations and assure consumer confidence.

Introduction

Which? welcomes the opportunity to submit comments on the proposals for securing the future of Welsh farming. The Welsh government has an opportunity to make sure that as we exit the EU, farming policy can be much more aligned with the issues that matter most to the consumers whose confidence farmers and the wider food industry are dependent on.

Which?'s consumer research shows that consumers expect future policy to promote high standards. Which? has carried out extensive consumer research to understand consumers'

attitudes to food. Our recent research focused on Brexit and food standards¹, using an online forum and a survey which were representative of the UK population. This found that people expect there to be high standards in place and that they do not expect there to be any lowering of standards after the UK leaves the EU. If anything, they expect standards to be enhanced. Nine in ten (90%) of people say that it is important that food standards are maintained after Brexit². 71% of people told us³ that they would not buy food items produced to lower quality standards if they were cheaper than they currently are – a finding that was consistent across socio-economic groups.

Our research has also highlighted strong support amongst consumers for buying food produced in the UK: 81% of people said it was important to buy UK-produced milk; 78% in the case of dairy products and 72% for red meat and meat products.

Which? research has also found that 7 in 10 (69%) of people think that the government should provide financial support to farmers. A slightly higher percentage of people in Wales think this (71%)⁴. When we asked people what this support should be based on, animal welfare, food safety and animal health were people's top priorities.

We welcome the publication of "Brexit and our land" as a starting point to re-consider how a new approach can be developed that fully reflects Welsh needs. To be successful, sustainable and ensure that food production is aligned with people's expectations, the proposed approach needs to more explicitly address consumers' interests.

Our comments focus on the three main elements of the proposed approach: the principles for reform, the twin approach and the regulatory framework.

Five principles for reform

Five principles have been set out by the Cabinet Secretary:

- To keep farmers, foresters and other land managers on the land
- Food production is vital for our nation and food remains an important product from our land
- Building a prosperous and resilient Welsh land management industry, especially agriculture and forestry
- Future support will encompass the provision of additional public goods from land
- All land managers should be able to access new schemes.

There needs to be a stronger focus in these principles on ensuring that future reform will also align food and farming with consumer needs and expectations. This includes incentivising high safety and quality standards and improving public health outcomes, as part of a wider focus

¹ <https://consumerinsight.which.co.uk/articles/brexitandfood>

² Populus, on behalf of Which?, surveyed 2399 online between 17-21st October 2018. The data were weighted to be demographically representative of the population.

³ Populus, on behalf of Which?, surveyed 2107 UK adults online between 17th and 18th January 2018. The data were weighted to be demographically representative of the UK population. Hereafter, this survey is referred to as the January 2018 wave of the Which? Brexit tracker.

⁴ Populus, on behalf of Which?, surveyed 2100 UK adults online between 19th and 20th September. The data were weighted to be demographically representative of the UK population

on sustainability. The importance of consumer confidence for the success of farming needs to be given more emphasis.

Economic resilience and public goods schemes

It is proposed that future policy is based on a twin approach, designed and implemented in parallel:

- An economic resilience scheme – with support for economic activities, in particular the production of food and timber in the form of targeted investment in physical and human capital.
- A public goods scheme – with support for public goods in the form of payments for specific outcomes arising from active land management.

Five areas of support under the economic resilience scheme are suggested:

- Increasing market potential
- Improving productivity
- Diversification
- Effective risk management
- Knowledge exchange, skills and innovation.

The public good scheme would go beyond the existing agri-environment scheme, focused on rewarding delivery. The following public goods are proposed:

- Decarbonisation and climate change adaptation
- Resilient habitats and ecosystems
- Reducing flood risk
- Air quality
- Water quality
- Soil conservation
- Heritage and recreation.

We agree with the overall emphasis on using farming support to deliver wider societal benefits, but are concerned that the schemes are too narrow in scope. Health, food safety, quality and wider consumer acceptability do not feature directly and need to be explicitly set out as outcomes to be incentivised through future policy and farming support.

Obesity and diet-related diseases, such as cancers, heart disease, diabetes and stroke, are for example one of the most fundamental challenges facing the food system. But along with helping to tackle unhealthy diets, policy must incentivise high standards of food safety and quality, not only animal and plant health and animal welfare. The challenge of antimicrobial resistance also requires action across the food supply chain – and needs to be an issue that is acknowledged within the policy.

Consumer confidence and acceptability will be key to ensuring that there is a strong domestic market – as well as a high level of confidence in exports. It is also essential that innovation is focused on delivering benefits for consumers and that it is developed in line with their

expectations. If new and innovative production methods are to fulfil their potential they have to be acceptable to consumers so that they will ultimately choose to buy them.

Which?'s consumer research⁵ has for example found that eight in ten (79%) of people would be uncomfortable eating beef produced using growth hormones; 79% would be uncomfortable eating dairy products produced using growth hormones, 68% would be uncomfortable eating chicken treated with chlorine carcass treatments and 72% would be uncomfortable eating meat from cloned animals.

Most people would also not want to compromise on standards for lower prices. Two-thirds (66%) said that hormone treated beef should not be allowed to be sold, regardless of whether it would be cheaper. 65% said this for milk from dairy cattle treated with hormones, 62% for meat from cloned animals and 61% for chlorine-treated chicken. This was also consistent across all socio-economic groups.

New regulatory framework

It is essential that there is a robust regulatory framework that underpins future food and farming policy, building on current EU legislation, but ensuring that there is no weakening of protection. Much of the current framework has evolved in response to food scares such as the BSE crisis and serves consumers well. We agree that it is important that support for economic resilience is not at the expense of broader outcomes and that payments for public goods should be made for outcomes above the "regulatory floor" rather than funding compliance with existing regulation.

The appropriateness of the "basic measures" that are proposed depends on the level at which these are set as a minimum. There may be benefits to increasing the coherence of regulation where it is possible to do so without compromising on standards – and the aim should be to raise standards. The principles that underpin the current regulatory approach should also be maintained, including for example a plough to plate approach and the precautionary principle. The framework should also be underpinned by robust, independent enforcement. Care is needed in any shift towards a more principles-based approach, as failure to set out clear expectations of standards may result in additional burdens on farmers and poorer outcomes for consumers.

It is important to take this opportunity to ensure that the future framework incentivises what matters to consumers including helping to reduce foodborne disease, antimicrobial resistance and improve the nutritional quality of food given the significance of these public health challenges. More explicit mention should therefore be made about the importance of food safety and quality standards, along with standards for water, soil, animal health and air quality.

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⁵ Populus, on behalf of Which?, surveyed 2399 online between 17-21st October 2018. The data were weighted to be demographically representative of the population.