



18 March 2024

By email

Dear Sir Robert

Call for urgent EFRA Committee inquiry into Defra-funded scientific review of ELMS

On behalf of the Science for Sustainable Agriculture advisory group, I am writing to you as chair of the House of Commons EFRA Committee to urge you and members of your Committee to conduct an urgent inquiry into the impact of the Government's environmental land management schemes (ELMS) on domestic food security.

This follows the recent publication of a Defra-funded scientific review which identified multiple risks to both food production and the environment from its land-sharing policies.

Science for Sustainable Agriculture (SSA) is concerned that Defra Ministers are failing to follow even their own science in the development of ELMS, let alone take account of the accumulating body of scientific evidence which supports a predominantly land-sparing approach as the most effective policy option to produce enough food sustainably while leaving room for nature, biodiversity and climate action.

The research commissioned by Defra to ensure that its environmental land management schemes (ELMS) reflect 'the very latest and best possible evidence' does not in fact support the land-sharing approach on which the policy is based, but instead provides clear evidence of the need to move towards a predominantly land-sparing approach, according to our analysis, which was supported by former NFU and CLA chief economist Dr Derrick Wilkinson.

A Defra farming [blog](#) described the recently published [Qualitative Environmental Impact Assessment \(QEIA\)](#), a £0.5m multi-partner project led by the Centre for Ecology and Hydrology (CEH), as an important source of evidence to ensure the Government's ELMS policies provide value for money and support the delivery of environmental targets and climate commitments, while maintaining food production and supporting resilient rural communities.

But the QEIA report highlights a host of unknown risks and uncertainties with a land-sharing approach, and clearly identifies multiple red flags in terms of potential risks to food production and the environment posed by the 741 potential land management actions included in ELMS. For example, the report states that "*literature shows that connectivity is complex, and can also have disbenefits. For example, new corridors may allow pathogens to spread*", which would affect food production beyond land under the ELMS scheme.

More widely, the report identifies a high risk of displacement of food production as a result of yield-reducing ELMS options, with unknown effects on either domestic food security or the environment.

For action after action, the Defra-funded report indicates that achieving environmental benefits in land managed under ELMS actions can be expected to be offset by potentially more significant disbenefits elsewhere – both in terms of environmental and food production impacts. In simple terms, it recognises that land under the ELMS will be less productive, which will require the missing food to be produced on other land, including in other countries, which could result in an overall environmental and food security disbenefit.

This aligns with the findings of leading conservation scientists such as Professor Andrew Balmford of the University of Cambridge, whose extensive [research](#) has shown that the localised environmental benefits associated with land-sharing measures, such as reduced input use and creating small-scale habitats and woodland, risk exacerbating problems of biodiversity loss, climate change and environmental degradation on an even a greater scale elsewhere.

The CEH report also highlights the enormous complexities and uncertainties associated with a land-sharing approach. For example, the report comments on “the need for more widespread advice and guidance to be made available to land managers as many actions have contextual dependencies and/or need to be done according to best practice.”

But is it credible to anticipate widespread advice and guidance to be made available to land managers on contextual dependencies when the report covers almost 40,000 interactions as part of the impact assessment, when most are expressed as uncertainties rather than clear guidance, and when the report acknowledges that most expert external reviewers were unable to review the assessments due to its complexity?

And why are these uncertainties and concerns not being reflected in the development of the environmental land management schemes?

To make the best choices for the environment, while providing food security, SSA believes farmers need simple incentives to produce food as efficiently as possible where it is most viable to do so, and to receive support for purely environmental measures where other farmers or other parts of the farm can better produce the food we need.

This is the essence of a land-sparing approach, which also requires a policy environment that supports access to innovation, technologies and advice which will enable agriculture to become ever more productive and sustainable on land that is farmed, so freeing up more space for nature and carbon sequestration.

We hope you will agree that Government Ministers must account for the multiple red flags and significant uncertainties raised in this report, particularly in relation to the displacement of food production. It certainly does not provide the evidence base to confirm or even suggest that ELMS policies will deliver on the Government’s environmental, climate and food security objectives.

Yours sincerely

Daniel Pearsall
For and on behalf the [SSA advisory group](#)