

## Appendix 2.

### **Under current proposals, the total ELMS budget will be split three ways:**

- 1) The Sustainable Farming Initiative. 33%.  
Support for individual farmers to deliver 'public goods'.
- 2) Local Nature Recovery. 33%.  
Collaborative projects between groups of farmers.
- 3) Landscape Recovery. 33%.  
To all intents and purposes: Rewilding.

This budget allocation needs amending now, with the three strands being cut down to two.

- 1) Sustainable Farming Initiative. 90%.
- 2) Nature Projects. 10%.

For the vast majority of farmers, the LNR and LR strands to ELMS will be irrelevant. Farmers are already facing one administrative burden with the SFI. Asking them to replicate this commitment of time and energy to a second or even third scheme, and mesh them in with the first, is totally unrealistic. It would be an abuse of public money to only allocate 33% to the SFI and to commit 66% to schemes that will only be of interest to those who least need public money.

There is no need for a 'Local Nature Recovery' strand to ELMS. There is nothing that can be achieved by such a scheme, that cannot be achieved via the SFI. If there is seen to be a need for work that crosses boundaries between individual farms, then simply offer that work as options within the SFI and let neighbouring farmers talk to each other about putting in mutually enhancing – but independent – applications. Three farms set up a joint project via LNR. The farmer in the middle then decides to sell up. Is the farm devalued by a legally binding agreement?

All collaborative schemes need coordinating. As soon as you introduce a supporting role into a scheme you are creating an administrative burden that needs paying for. It is absolutely vital that the vast majority of ELMS money finds its way to farmers. Creating 'clusters' and suchlike will just mean money being syphoned off for overheads.

The Landscape Recovery pilot is looking for sites between '500 and 5,000 connected hectares'. What proportion of England's farmers will find that relevant to them? If large landholding bodies - private estates, charities, NGO's – wish to carry out nature-based projects, then great. However, any 'public money for public goods' test would find them to be poor value, and they have access to existing funding streams without needing 66% of the ELMS budget.

The money is already being chipped away at. ELMS was being talked about as having an annual budget of £3 billion a year ago. A figure of £2.4 billion was mentioned by Defra recently. In the absence of any categorical assurances on what the budget will actually be, Defra must at the very least commit that 90% of it will go to those who deliver the most public good: farmers.