



23 April 2010

Deputy C. F. Labey
Chairman
Rural Economy Strategy Scrutiny Sub-Panel
States Greffe
Morier House
St. Helier
JERSEY JE1 1DD

Dear Deputy Labey

Thank you for your letter dated 13 April 2010.

The Jersey Farmers' Union has already prepared a response to the Green Paper for the Economic Development and Planning and Environment Departments. We are only too pleased to be able to forward a copy of the response for your Sub-Panel's consideration.

The Rural Economy Strategy is a complex and involved subject so we have restricted our comments to the growing sector. In our response we do not make comment on the dairy sector as it is well represented by the Royal Jersey Agricultural & Horticultural Society, the Jersey Milk Marketing Board and the Jersey Dairy

We are disappointed that there is no financial information contained in the document. We understand that this is not unusual in States of Jersey's strategic documents but feel in this instance, with the present constraints on public spending, that it is vital that the costs of all policy options, particularly any new proposals, are identified. With this information it will then be possible to identify which policies offer the best value for money. It is obvious that with the limited budget available not all of the proposed options can be funded. We need to be sure that the fundamental support given to the Industry is not eroded by financial resources being used for projects that may be desirable but not affordable or not value for money.

We would also like to take up your Sub-Panel's offer to attend a hearing and will make arrangements as you suggest.

Yours sincerely

JOHN E. LE MAISTRE
PRESIDENT



RES/10/01.

19 April 2010

Mr. Daniel Houseago
Assistand Director
Environmental Management and Rural Economy
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Dear Mr. Houseago

Re: Issues and Options for the Rural Economy 2011 – 2015

The Council of the Jersey Farmers' Union has now had the opportunity of reviewing the Rural Economy Strategy 2011 – 2015 – Issues and Options Paper (Green Paper) – “Sustaining and Growing the Rural Economy” and would like to comment as follows.

We are disappointed that there is no financial information contained in the document. When discussing options the financial implications of their respective costs have to be taken into account especially at present when States finances are under extreme pressure. We also feel that further detail is needed in what is actually being proposed in certain circumstances before passing final comment.

The future success of the rural economy will depend on Government support through a successful rural strategy but other Government influences such as increased taxation, increased ‘red tape’ and other Government interference in the market place can have a significant negative impact on it. Such influences that immediately come to mind that have or will add cost to the Industry include Vehicle Emission Duty, Water Extraction Licences, the Minimum Wage and Harbour Dues.

We hope the States of Jersey will continue to support the remaining Agricultural Industry. We believe that it was short-sighted of the States to withdraw its support for the Glasshouse Sector. We believe that that move has added to unemployment and has had a negative effect on the economy as a whole. We hope they do not make the same mistake with the growing and livestock sectors. Any contraction in the Agricultural Industry will have a negative impact on the economy and the environment.

Below are our comments on the respective options as set out in the Green Paper. The subject matter is complex so we would welcome further consultation.

Policy Option IN 1
Strategic Vision

States of Jersey and the rural sector to consider the advantages and disadvantages of extending the scope of the Rural Economy Strategy to encompass a 10, 15 or 20 year strategic vision.

We would welcome longer term strategic options and plans from the States of Jersey but it is inevitable that some revision of these will be required to adapt to unforeseen circumstances.

Policy Option PR 1
Performance Indicators

States of Jersey to develop a comprehensive set of indicators for the economic, social and environmental performance of the rural economy so that its total value to the Island is measured.

It can be difficult to measure performance of costs and benefits to the environment and social activities. How do you put a price on peoples enjoyment of the Jersey countryside ?

How and at what cost will performance be measured ?

Policy Option PR 2
Labour Productivity

States of Jersey, in consultation with the agricultural industry to develop a strategy that promotes both higher productivity per employee through education and training and creates opportunities for new entrants into the rural economy to ensure the long-term sustainability of the sector.

The Industry is continually looking at ways to improve productivity and some training does take place. We would be only too willing to enter into dialogue as to how we could improve education and training so that we could further

improve productivity but with the present restraints on States spending we do not believe that the States should be involved in its provision. As modern techniques develop fewer people will be required by the Industry and there are enough young people joining the Industry to ensure its future.

Policy Option PR 3
Growth of the Rural Economy

States of Jersey to identify barriers to higher productivity and growth in the rural economy and, in consultation with the industry representatives, assess and develop ways to remove them or limit their impact.

One possible way that improvement in productivity in the future may be made is in the use of GM technology. The Island should be involved in development work with regard to GM developments particularly with regard to eel worm and blight resistance in Potatoes.

If other barriers could be identified and reduced then this should happen, if cost effective.

Policy Option PR 4
Reducing the Environmental Costs of Agriculture

All support given by the States of Jersey needs to take into account appropriate environmental standards. States of Jersey to develop and monitor robust criteria for both the environmental impact and effectiveness of Rural Economy Strategy grant schemes.

Most if not all farms are aware of the need to reduce to the minimum the effect their respective businesses have on the environment. Continued support through the Countryside Renewal Scheme will be required so that farms are able to continue to do so.

Policy Option PR 5
Land classification

States of Jersey to develop and introduce a land classification system linked to land quality.

There is no benefit in classifying land. All non built-on land is of value whether for the Industry or purely for its environmental value, (the north coast for example). We believe that no green fields should be used for building and the new Island Plan should reflect this. When sites are suggested for development it is easy to identify its value either for production or for the environmental good.

Policy Option PR 6
Access to the Countryside

States of Jersey to develop a strategic document that identifies opportunities for new and better access to the countryside, ensuring these new routes link with and improve existing access routes.

We do not think this is necessary. We are of the opinion that there is wonderful access to our countryside. The Industry welcomes visits from Schools, (health and safety permitting); there are numerous Farm Open Days; the Hunt; the Hash House Harriers; Bird Watchers; Blackberry Pickers and numerous other organised Walks.

Jersey is also endowed with hundreds of miles of lanes that allow access to the very heart of our countryside. There are also a number of Walks some which have been provided through the Countryside Renewal Scheme. There may be opportunities for more access but it must be remembered that due to some farm practices, crop spraying or livestock grazing for example, it is not always possible to allow access.

Policy Option PR 7
Environment Plan

Any individual or business receiving grants or subsidies within the rural sector will need an "Environment Plan". This will identify where soil and water must be protected and will also highlight opportunities for enhancing key wildlife and landscape features. This will also allow better targeting of support through schemes such as the Countryside Renewal Scheme.

We agree that all farms should have an environmental plan and believe that many do. Support should be given to update or provide such plans.

Policy Option PR 8
Review of Direct Support

States of Jersey to compare the funding available through the Fruit and Vegetable Aid Scheme, the Single Payment Scheme and other support within the EU. This will also include a review of the conditions which need to be met with a view to ensuring similar levels of support and conditionality.

It is vital that the States support the Industry to at least the level of our European competitors. We have called for the implementation of the EU Fruit and Vegetable Aid Scheme in the past. It may have been enough to have saved the Glasshouse Sector. We would welcome a further review of support. The EU Fruit and Vegetable Aid Scheme may be appropriate but would probably need modifying or it may be that such support could be delivered by grants for business developments. We would like input into any new proposals.

PR9 and PR10

The Jersey Farmers' Union will leave any comments regarding the dairy sector to the Royal Jersey Agricultural & Horticultural Society and the Jersey Milk Marketing Board.

Policy Option PR 11
Rural Initiative Scheme

States of Jersey to continue support of the rural sector through the Rural Initiative Scheme to ensure growth, energy efficiency, diversification and entrepreneurial activity.

We support the proposal to continue the Rural Initiative Scheme. We understand that part of the funding for this Scheme has been used to provide school milk. We contend that this is wrong. If money is required for school milk it should be found from another budget. This item cannot be considered as a Rural Initiative and does not fit the three criteria, namely, diversification, enterprise and innovation. We were surprised that monies designated for business developments had been used in this way. We understand that as a result of this action a number of genuine applications have been turned down. This must be addressed.

PR12 - No comment

Policy Option PR 13a

Rural Initiative Scheme – Exploring the potential for local markets and greater food self sufficiency

Rural Initiative Scheme to continue to support the applications for research and development into innovative and more efficient production techniques and the development of new markets.

We agree with the States supporting initiatives that result in greater efficiencies.

Policy Option PR 13b

Rural Initiative Scheme – Exploring the potential for local markets and greater food self sufficiency

States of Jersey and the rural sector to collaborate to increase the efficiency of production, for example through supporting investment in new technology, reduction in usable waste e.g. using vegetables not fit for export and encouraging the production of more food crops for local markets and through improved targeting of the Islands research and development capability.

We believe that this policy will be extremely difficult to achieve.

Policy Option PR 14

Organic Farming

To transfer the support for organic farming from the Countryside Renewal Scheme to the Rural Initiative Scheme in recognition that this is predominantly an economic activity that needs to be market focused and based on long-term business planning.

Organic farming as conventional farming should be supported both for its economic activity as well as its environmental benefit. There must be environmental advantages in no nitrate and pesticide use in organic systems and thus there should be some additional support from the Countryside Renewal

Scheme. The two year organic conversion period should be funded as it has in the past though there has at times been a shortfall of funds to do this. Organic farming does and should have access to the Rural Initiative Scheme and Jersey Enterprise Grants.

Policy Option PR 15a
Countryside Renewal Scheme

States of Jersey to maintain Countryside Renewal Scheme funding to ensure that the objectives and commitments contained in key strategic documents are achieved and that farmers, landowners and other organisations in the rural sector are encouraged to continue with enhancement projects in the countryside.

We welcome the fact that the objectives of the Countryside Renewal Scheme are valued and believe that funds should be made available for it to continue. We have always objected to the name of the Scheme. We do not like the negativity implied by the title of the Scheme regarding our countryside and find the notion that our countryside needs “renewing” to be insulting.

It is generally accepted by locals and visitors that our countryside is spectacular. Of course it is not perfect and we are willing and keen to ensure that it is maintained and where possible improved. We would suggest “Countryside Enhancement Scheme” would be a better name.

We would like more involvement in the process of determining what elements are included. We have been disappointed that fringe organisations such as schools have had projects that have taken preference ahead of main stream farming projects.

Policy Option PR 15b
Countryside Renewal Scheme

States of Jersey to consider a Countryside Renewal Scheme (CRS) component to promote the use of external advice to help in completing an Environment Plan and to identify specific CRS projects that could be put out to tender to encourage the development of a new market in the provision of public goods and an independent, on-Island agri-environment support service.

We would like further information on what is being proposed here. We feel that individual businesses should be supported through the Countryside Renewal Scheme to develop environmental management plans. There should be no need to support outside agencies to provide these as well.

Policy PR 16
Jersey Enterprise Grants

States of Jersey to analyse its business advice provision and grant delivery methods in order to identify how the Rural Economy section and Jersey Enterprise can deliver a fully integrated service to the rural sector, with a view to developing a consolidated Rural Business Support Service.

It would appear that Jersey Enterprise grants are awarded for the same core reasons as funds from the Rural Initiative Scheme but can be applied for by non-agricultural businesses as well. We would be interested to know how many agricultural businesses have benefited from these grants. We regard both Schemes as positive for the Industry. We feel the recent requirement for businesses that have had grants to provide their accounts for publication may deter applications.

We note that the Small Firm Guarantee Scheme is specific to Jersey Enterprise and see this as positive but again we are unaware of the uptake.

Policy Option PR 17
Marketing Support for Jersey Produce

States of Jersey to work with the rural sector in order to review future marketing needs and roles and responsibilities to ensure fully coordinated approach.

There is important work to be continued and developed in this area. We look forward to having input to ensure there is a coordinated approach.

Policy Options PR 18 – PR 21

The Jersey Farmers' Union does not wish to comment on fisheries matters.

Policy PR 23a
Risk Management Tools

Rural enterprises are needing to do more to address key risks to their businesses and with the shelter of the subsidy system gradually disappearing, the States of Jersey should encourage wider use of risk management instruments.

It is disappointing that nowhere in the whole document is there any mention of the cost of the various options. It is also worrying that despite earlier reference to parity with our European neighbours that it is suggested that the subsidy system will be gradually disappearing for the growing sector. There is no real sign of such support reducing in mainland Europe. We feel that there are enough safeguards in place when grants are awarded to satisfy any concerns. Business plans have to be put forward when grants are applied for.

Policy Option PR 24
The future of processing and added value from food waste

States of Jersey to carry out an Island-wide infrastructure survey to determine the current processing capacity and consider the development of a greater range of local value-added processed products.

We believe that if opportunities are out there to develop, then the Industry will do so. The Rural Initiative Scheme and the Jersey Grant Scheme can provide the funds to facilitate any such developments. The reality is that such opportunities are few and far between. The scale of production and the cost of trading within the Island makes profitability difficult. There are though, some examples of such initiatives.

Policy Option PR 25
The need for Research and Development

States of Jersey and the rural sector to set up a “priorities board” to develop a long-term research and development strategy in conjunction with stakeholders, with a view to establishing a research programme based on a Public Private Partnership.

We do not believe that Jersey can afford the infrastructure to provide research and development. Much of the work suggested is continually being done

elsewhere and the Industry is always looking at newly developed techniques. We do not completely rule out a private public partnership for research and development for specific one-off issues but would not like to see a return to the past where numerous, sometimes meaningless, trials were undertaken at great expense. Many such trials were merely poor replicas of work done elsewhere. Any such trials should only be instigated on the request of the private sector.

Policy Option PE1
Allotments

States of Jersey to assist the development of allotments based on the Working Group Report and to allow non bona fide Agriculturalists or Smallholders to occupy the land where this is in the best interests of the community.

The Jersey Farmers' Union recognises the demand for allotments. We believe that their provision can be achieved through the use of smaller fields that are near residential areas. We also believe that fields that are or could be used by the Industry should not be re-zoned for allotments.

It will be necessary to ensure that only permitted pesticides, (non commercial) are used on these sites and care must be taken to ensure that allotment holders follow the correct protocols to avoid chemicals entering water courses etc. We would request that the Industry is consulted prior to any fields being taken out of agriculture for this purpose.

Policy Option PE 2
Community Agriculture (CA) or Community Supported Agriculture (CSA)

States of Jersey to investigate the scope for Community Supported Agriculture with a view to increasing community engagement with the rural economy.

Policy Option PE 3
Community Agriculture (CA) or Community Supported Agriculture (CSA)

Agriculture also needs to attract young people – the farmers of tomorrow. It is also important that our children make a strong connection with where and how their food is produced.

There is already a great deal of interaction between the farming community and the general public. Project Trident and school visits already take place. There will be no problem in attracting young people to the Industry it is simply a case

of making it profitable. Hopefully, with a successful strategy this will be achieved.

Policy Option PE 4
Working together and collaboration

States of Jersey to promote the establishment of a Food and Farming Partnership body to include businesses that retail food (shops and supermarkets) working together with those who market and produce food in Jersey.

The work of the Genuine Jersey Products Association needs to continue and we agree a food and farming partnership should be developed.

Policy Option PE 5a
Climate Change – mitigation and adaptation

States of Jersey to promote reduced reliance on fossil fuels in the rural economy through the development of a series of best practice guidelines to help mitigate and adapt to climate change and measures to reduce fossil fuel use.

We agree the States should promote reduced reliance on fossil fuels.

Policy Option PE 5b
Climate Change – mitigation and adaptation

To protect and increase natural carbon storage by enhancing the amount of carbon stored in agricultural soils through evaluation of soil husbandry techniques and timeliness of operations and by increasing soil organic matter through use of cover crops and green manures. In addition, to investigate opportunities encouraging woodland management, tree planting and hedgerow establishment e.g. through the Countryside Renewal Scheme.

We believe that these measures are already being done by the Industry using the Countryside Renewal Scheme and that they should continue.

Policy Option PE 5c
Climate Change – mitigation and adaptation

States of Jersey to facilitate adaptation and/or mitigation of climate change by providing additional components and criteria within the Countryside Renewal Scheme and Rural Initiative Scheme.

We would like to know more about what components are being suggested and have input into whether they should be included or not.

Policy Option PE 6
Rural skills, training, advice and education

States of Jersey to work with Industry to develop a rural skills action plan, to include the introduction of a training needs assessment for those businesses receiving public support in order to identify skills gaps linked to best practice.

We would look forward to helping to develop a rural skills action plan.

Policy Option PE 7
Rural skills, training, advice and education

States of Jersey will develop a Rural Business Support Service to provide a package of vocational training, so that managers and staff can undertake continuous professional development. The Rural Initiative Scheme will be expanded to provide for vocational training based on business needs.

We do not accept that the States should be providing the training needed. We believe that such training can be delivered through the private sector. We understand that the Dairy sector are already ahead of the game in this area and have hired consultants to satisfy their needs.

Policy Option PE 8
Agri-tourism

States of Jersey to consider the development of an agri-tourism strategy and action plan for Jersey.

We believe there may be scope for increased agri-tourism but would be concerned if it led to the loss of large amounts of land that are required for mainstream farming. We think that the Jersey Grant Scheme would facilitate any such developments and that the States should restrict their involvement to advising stakeholders of the possibilities and availability of grants.

Policy Option PE 9
Access to the countryside

States of Jersey to undertake a review of access to the countryside, identifying opportunities to provide new access and identify where improvements to existing access infrastructure are required.

We believe for the reasons given in Policy Option PR 6 that there is currently good access to the countryside.

Policy Option PE 10
Access to the countryside

States of Jersey to create a forum of user groups to identify and implement an agreed action plan to provide improved access to the countryside.

We are not opposed to the formation of this forum and if it is created we would like some involvement.

Policy Option E 1
Best practice in farming

States of Jersey to develop and implement a comprehensive range of best practice guidance specific to the maintenance and enhancement of biodiversity on farms to comply with both Jersey's local and international agreements and obligations.

This policy is extremely important for the environment but already a great deal of information is available both locally and from the United Kingdom. We believe that such guidance and information required to enhance the biodiversity of farms should be able to be produced with relative ease. The Countryside Renewal Scheme should then be able to facilitate the delivery of such policies.

Policy Option E 2
Identifying key habitats within an Environment Plan

The Environmental Plan to identify and provide recommendations for the maintenance and enhancement of biological diversity both within and between habitats on all land covered by the Plan. This will include areas of woodland, wet meadow and other permanent grassland, ponds, marsh, dunes, heathland, cliff slope and boundary features (banks, hedges and ditches).

We agree that each farm should have an environmental plan and that funds from the Countryside Renewal Scheme should be used to provide them. The Countryside Renewal Scheme should also provide funds for the delivery of the various plans.

Policy Option E 3
Wildlife corridors and increasing connectivity

States of Jersey to develop a component within the Countryside Renewal Scheme for the provision of wildlife corridors and target applications that increase connectivity between semi-natural areas and areas of high biodiversity to enhance ecological processes.

There is already provision within the Countryside Renewal Scheme for habitat strips and wild life corridors. We can appreciate that these provide environmental good and we have no problem in funds being made available to encourage them.

Policy Option E 4
Understanding wildlife in the countryside

Develop and implement a comprehensive monitoring strategy to ensure that changes are identified and the States of Jersey meets both local and international obligations, supported by an annual Rural Habitat Statement (due to be published 2010).

Policy Option E 5
Jersey Biological Records Centre

States of Jersey to support the development of a Jersey Biological Records Centre (JBRC) and develop simple wildlife monitoring methods and protocols that can be used by anyone interested in collecting information to record data on wildlife and local ecology to support the JBRC.

We are concerned at the possible cost of these two initiatives and would like to know the financial implications.

Policy Option E 6a
Water Catchment Management Pilot Scheme

States of Jersey to work with the agricultural industry through the Diffuse Pollution Pilot Project (DPPP) in order to discuss, define and implement agricultural 'best management practices' that are associated with on farm soil and water management measures.

Policy Option E 6b
Water Catchment Management Areas

States of Jersey to designate and implement Water Catchment Management Areas under the Water Pollution (Jersey) Law 2000. Under these provisions, it would be possible to 'specify conditions for the prevention, control, reduction or elimination of pollution or of the risk of pollution in controlled waters'.

Policy Option E 6c
Water Catchment Management Pilot Scheme

States of Jersey to consider introducing additional components that are specifically designed to tackle diffuse water pollution within the Countryside Renewal Scheme.

We are keen to work with Government to address the issue of nitrates and indeed any other pollution.

Policy Option E 7

Codes of Good Agricultural and Environmental Practice

States of Jersey to develop Codes of Good Agricultural and Environmental Practice (CGAEP) to include the above and to require documentary evidence from those receiving public support that the CGAEP are being complied with.

Codes of Good Agricultural Practice are widely available. All dairy farms that market through Jersey Milk, (there is only one that does not), and all farms that export to or supply supermarkets are required to and audited to ensure that they have a copy of these Codes. It is true that some revision of these Codes may be required to reflect local circumstances but like policy E1 this is no major task.

Policy Option E 8

Nutrient budgeting and green waste compost

States of Jersey to support the use of composting and to introduce nutrient budgeting and management planning into the Environment Plans to ensure the nutrient value of wastes and manures are correctly calculated to reduce the risk of diffuse pollution

We agree with composting and the use of green waste and further agree that the nutrient value of any material applied should be taken into account when calculating other fertiliser requirements, thus minimising diffuse pollution.

Policy Option E 9 – Policy Option E 11

The Dairy Sector, Royal Jersey Agricultural & Horticultural Society, Jersey Dairy and the Jersey Milk Marketing Board, to comment.

Policy Option E 12a

Safeguarding the agricultural land bank

States of Jersey to review the current laws and to identify the appropriateness of enabling more land to be made available for bona fide Agriculturalists and Smallholders to ensure a viable agricultural land bank.

We agree that the land bank needs to be protected. We note in the background information the phrase ‘brown cows in green fields’ and would point out that the growing sector also plays its part in providing interesting diversity for locals, tourism and indeed wildlife.

We agree that the States should review the current land laws and make sure that any laws past or future, are enforced.

Policy Option E 12b
Safeguarding the agricultural land bank

Review the eligibility of people who are able to occupy and undertake economic activity on agricultural land including a mechanism to release land formerly occupied by smallholders and bona fide Agriculturalists who no longer meet the eligibility criteria as defined in the Rural Economy Strategy 2005.

We agree that eligibility of people to occupy land should be reviewed. We are concerned that good agricultural land is being lost to marginally or non profit making uses to provide the owner with privacy.

Policy Option E 13
Land Development Levy

States of Jersey to re-evaluate the options for a Land Development Levy.

We do not consider this is a matter to be dealt with in the context of this document.

Policy Option E 14a
Enabling or linked development

Introduce an Enabling or Linked Development policy to support individual agricultural businesses to modernise and develop efficient production systems funded through the mechanism of obtaining development permission for non agricultural development on part of their agricultural holding. This would be conditional on there being no alternative funding source, nor causing significant environmental harm, not reducing the value of the countryside asset in the long-term and that the benefits to society, outweigh the disbenefits.

Policy Option E 14b
Enabling or linked development

Consider options within the Enabling or Linked Development policy to allow funds to be re-invested within the business, not just for capital items, but also to reduce borrowings or generate working capital where it can be proven that this is related solely to the needs of the agricultural business.

We are not wholly supportive of this initiative. Whilst it may be attractive for farm businesses to be able to effectively by-pass the Island Plan and develop sites that would otherwise not be allowed, we do not feel that this would be right. We also contend that farming has to be profitable in its own right rather than be subsidised by other developments.

Policy E 14c
Enabling or linked development

Proposals for Enabling or Linked Development should include environmental gains, e.g. to generate finance to return redundant / derelict areas, such as glasshouse sites back to agriculture or to the natural environment.

In contrast to the above, we believe that enabling development that would see old glasshouse sites cleared and returned to green fields by allowing some development on those sites would be a positive action.

Policy Option E 15
Change of use of buildings

States of Jersey to develop a web site and require a need to advertise any agricultural building for a three month period prior to a change of use application (or when temporary planning permit expires e.g. within three months prior to the expiry date).

We agree with this suggestion.

Policy Option E 16
New agricultural buildings

Identify short / medium / long-term strategies for prime agricultural businesses with regard to

infrastructure needs.

It is vital that agricultural businesses are allowed to develop premises that are adequate for today's needs.

Policy Option E 17
Derelict and redundant glasshouses

Where glasshouse sites are not rezoned, planning permission for other agricultural use should be given priority in order to keep them available to the rural economy.

We agree with this policy.

We trust you will note our comments and if you require any additional information or clarification we would be happy to meet with you for further discussion in this respect.

Yours sincerely



JOHN E. LE MAISTRE
PRESIDENT