

Summary of English Nature's response to Defra's consultation on the arrangements for incorporation of additional income support arising from reform of the EU sugar regime into the Single Payment Scheme.

English Nature is disappointed that the opportunity has not been taken to address the environmental opportunities and challenges presented by reform of the regime. As pointed out in previous responses and recognised in the 2005 RIA, there are both positive and negative environmental impacts of sugar beet cultivation in England including:

- Provision of nesting and foraging habitat for breeding and over-wintering birds (positive)
- Soil erosion during cultivation and harvesting, and consequent siltation of water courses (negative)
- Relatively low pesticide and herbicide use (compared to cereals or other arable/ vegetable crops) ('positive')
- Relatively low fertiliser inputs, particularly nitrogen ('positive')

In English Nature's response to the previous consultation it was observed that "provided these issues are addressed, there is no reason, based on the impacts on the English biodiversity to oppose liberalisation of the regime". English Nature is very disappointed to note that there is no attempt in this consultation to address environmental issues, and that the environment is not even mentioned in the RIA accompanying this consultation.

The environmental benefits of sugar beet cultivation could be secured in a number of ways including targeted agri-environment incentives and/ or national envelopes. These could include payments to grow sugar beet itself, or other land management options providing similar benefits. Without a commitment to manage the environmental implications of agricultural liberalisation, there is no guarantee that the effects will be positive.

It does not appear that any of the options presented in the consultation for paying the additional income support arising from reform of the EU sugar regime are better or worse for the environment in terms of the direct impacts. However, the recent problems over the delivery of the Single Payment Scheme emphasise the importance of ensuring the maximum simplicity in scheme design consistent with the delivery of clear policy objectives. It would be unfortunate if any unnecessary complexity incorporated into this scheme prevented the development or use of policy options such as modulation or national envelopes that could deliver much for the environment.

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