

AIC Policy Report

October 2023



Working in support of
a modern, sustainable
commercial, agriculture

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Summary

- As we head into the autumn, it will provide a last real opportunity for the Government to set out its policy priorities for the final year of its parliamentary term. Recent announcements to revise net zero policies will likely be a contested policy area as different parties try and balance this with the ongoing cost of living challenge. AIC is now preparing for this final year and will be setting out our election priorities to all parties in the UK. This started with the [AIC's 20th Anniversary reception in the House of Commons in September](#).
- After the announcement of [gene editing legislation in the EU](#), the UK Government has signalled its intent to drive its own Precision Breeding (PB) Act forward in 2023 and 2024. AIC is part of a working group that comprises representatives from the whole supply chain and will aim to overcome the practical market challenges to update of PB goods. A recent paper by the FSA on how it may regulate PBs was very welcome; suggesting a future approval system that is proportionate and pragmatic.
- Despite being into the fifth year of this Government's term, AIC continues to grapple with misalignment on policy between GB and EU/NI. This includes seed treatments, deforestation legislation, gene editing, import operating models and carbon border adjustment mechanisms.

1. Animal Feed

1.1 Launch of formal consultation on AIC verified deforestation and conversion free soya standard

AIC Services has launched a consultation on its draft Sustainability Standard, with Members, Participants and industry stakeholders encouraged to respond by the 4 October deadline.

The [Sustainability](#) Programme Standard, Pillar 1 – Deforestation and Land Conversion has been developed to offer certification which demonstrates that commodities, such as soya, have been produced without degradation of natural ecosystems. The proposed new Standard will form a key part of the UK-verified deforestation and conversion-free (vDCF) [soya transition plan](#).

AIC has updated its soya Q & A document [Livestock and Soya: Frequently Asked Questions](#) to include 2023 Q1 soya import data which shows that 65.1% of the soya coming into the UK for use in animal feed could be considered verified deforestation and conversion free. The majority of the remaining 34.9% is considered to carry a very low risk of any association with deforestation.

1.2 US soy conference

James McCulloch attended the US Soya Export Council Soyconnext conference in New York in August and gathered insights into the global oilseed market trends. The message from the US is that anticipated demand for biofuel and green aviation fuel will drive a sharp increase in soya bean production. Given that the oil content of soya beans is roughly 19%, 80% of the increased volumes will be presented as soya bean meal for use in animal feed. It is expected that Brazilian soya production will follow a similar trajectory. Data presented suggests that demand for alternative meats has plateaued but the market for plant-based foods continues to expand.

The USDA continues to address non-tariff barriers such as the anti-GM approach taken by Mexico, EU crop protection rules and the EU Deforestation Regulation.

1.3 Submission of counter proposal to DESNZ on Climate Change Agreements

AIC submitted a counter proposal response to the 5.5% Climate Change Agreement (CCA) target received from Department for Energy Security & Net Zero (DESNZ) for the TP6 period which runs from 1 January 2024 – 31 December 2024.

Working with Members of the Feed Manufacturing Committee a considerable amount of plant performance data was submitted despite the very tight timescales provided. SLR Consulting, which administers the scheme on AIC's behalf collated the data for the counter proposal with AIC developing the evidence to support this. With a high level of engagement from over 60% of the industry our counter proposal provided a robust view of what is achievable within the sector. AIC had an additional request for detail at the end of September and will continue to work with DESNZ for a favourable outcome for the industry.

1.4 Future Forum and development of school leavers career resource

AIC organised a tour of the Houses of Parliament for 11 Members of the Feed Sector Future Forum, followed by presentations from senior Civil Servants and Ed Barker on how policy is developed. It proved to be an invaluable experience of the machinations of Government and the means by which organisations such as AIC can influence policy decisions.

The Future Forum are close to completing a careers booklet aimed at 14-17 year old school leavers who might be considering a career in the animal feed industry. The intention is to attend careers fairs in 2024 to promote the sector, using the booklet and the same information presented digitally and to plan a communication campaign on social media.

2. Arable Marketing

2.1 Digital Passport for Combinable Crops (DP)

The timeline for the Business Case consultation has been pushed back six weeks to make way for the AHDB Cereals and Oilseeds levy fee consultation. This means it is now due to commence in mid-November. The draft business case is being reviewed by the Leadership Group in preparation for sign off for this period. [Details ahead of the consultation is available here.](#)

2.2 Ukraine and EU trade

In September, the European Commission announced that a temporary ban on Ukrainian grain imports (maize, wheat, rapeseed and sunflower seed) will expire. The ban had been introduced in May 2023 under pressure from five EU countries bordering Ukraine. Following threats of unilateral measures following the end of the ban, a proposal with the five countries involving the introduction of Ukrainian export licenses for maize, rapeseed, sunflower seed and wheat is under consideration.

In September, it was also announced that the UK government will [implement a tariff suspension on sunflower seed oil](#) on 1 January 2023 in response to supply chain disruption. This measure will take effect until 31 December 2024.

2.3 AHDB levy fee increase

Discussions began in June around AHDB increasing levy rates from April 2024, as AHDB has stated that the Board's spending power has been significantly reduced by inflation and rising costs. AIC has since been made aware that the consultation for this proposal will commence early October but as of yet are awaiting further detail. AIC will continue to monitor this and share with Members when information becomes available.

2.4 Red Tractor entry level farm standard to supply animal feed sector

This standard is proposed to provide a framework for farmers to choose which standards they require for their customers. This standard would allow farmers growing suitable crops the choice to only be assured to the entry level crops feed standard for feeding directly to own assured livestock, for sale to other assured livestock farmers, or for sale to UFAS feed compounders. The aim of this standard is to address perceived concerns over a unlevel playing field compared with imports. It is not the aim to create an import equivalence. This is the standard required by legislation to feed livestock. It will be up to the supply chain as to who accepts this standard. This standard will not meet the requirements of REDII. The outcomes of discussion will be presented at Red Tractor Board at the beginning of November. Subject to a decision, this would be rolled out from April 2024.

2.5 Renewable Energy Directive (RED) II

AIC, along with Red Tractor and Scottish Quality Crops, continues to regularly meet to find a resolution with both the European Commission and UK Government to ensure that market access for biofuels is retained. This is following the Commission's intention [to withdraw accreditation for UK-based RED II assurance Schemes](#) at the end of 2023, instead only recognising schemes accredited in EU member states, and not third countries such as the UK.

2.6 Footnote 1 regulation

AIC is supporting the arguments put to the Commission by EU industry partners and signed by [the FEFAC, COCERAL, PFP](#) (Primary Food Processors) opposing a proposed deletion of [Footnote 1 of Annex 1 of Regulation 396/2005, based upon concerns that it has been misused in the past](#). This remains an extremely important issue for AIC and Members exporting to the EU. This issue is to be discussed at the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF).

3. Seeds

3.1 Seed Treatments

AIC is calling on the Government to provide greater clarity for agri-supply businesses on the timeline [for the proposed secondary legislation to extend transitional arrangements to the import of treated seed](#) rule changes expected at the end of this quarter. During the summer period, AIC has worked closely with Defra representatives to explain how the ordering, purchasing, and packing works through the supply chain of treated maize seed with Members but confidence is needed in the timeline to ensure Members can place orders.

3.2 Bean derogation

AIC is currently working with Members to collate [evidence on the potential need for a bean derogation](#) on this year's harvested seed crop. AIC will work with Members to do this, and if required will submit a request to Defra to reduce the current seed requirement germinations from 80% to 70%.

3.3 NI Windsor framework

Defra has published guidance on further elements of the Windsor Framework, and the trade of goods from Great Britain to Northern Ireland. [The guidance provides more specific information for growers and/or traders using a Northern Ireland plant health label](#) from 1 October 2023 for plants and seeds for planting. AIC

continues to join weekly calls with the Defra team and other stakeholders to ensure clarity on the expectations.

4. Crop Protection and Agronomy

4.1 Publication of the National Action Plan (for the Sustainable Use of Pesticides)

Stakeholders are awaiting the publication of the National Action Plan (NAP). AIC responded to the consultation on the draft document in 2021 and has engaged with policymakers in a range of fora since. The NAP will set out Government's aims for better PPP regulation, safe and responsible PPP use, increased Integrated Pest Management uptake and reducing the risks associated with PPPs. Members will be advised when the NAP is published, AIC will continue to liaise with Government to understand how the various measures will be delivered.

4.2 Promotion of the work of sector members to policy makers

Policymakers commented that visits to the Lamport Ag X trial site, hosted by Agrovista UK Ltd, were very informative and it was extremely useful to see the evolution of the plots over the year and to hear the rationale behind the different approaches being trialled. The fourth visit to the site in 12 months took place in July 2023. This allowed an understanding of the decisions farmers and agronomists are faced with through the cropping year in the control of herbicide resistant blackgrass based on weather, ground conditions, etc. It also demonstrated the alternative measures used to control herbicide resistant blackgrass and other weeds which are based on non-chemical approaches.

4.3 Trials tours for new intake CRD staff

AIC Members hosted six trials event visits for new intake staff at the Chemicals Regulation Division (CRD). The aim of the visits was to explain how farm location and soil type influence crops grown. The groups also discussed variety selection and how and when plant protection products are recommended for use. Feedback from attendees was very positive including comments that talking to agronomists about innovation in crop protection was useful and it gave them a better understanding of what trial plots look like and how the data is generated.

5. Fertilisers

5.1 Urea

The sector and industry continue to work towards the voluntary agreement only to use urea fertilisers in England between 1 April and 15 January each year if they are abated against ammonia emissions. AIC, together with English farming partners, remain on target to begin on 1 April 2024.

5.2 Production

Gas prices, despite having reduced significantly from their unprecedented Post Ukraine invasion peak, still remain unstable. A 50p fluctuation in the price of gas on the wholesale market is equivalent to £80m annualised cost in gas for fertiliser production for the average manufacturer. This has resulted in many European and domestic manufacturers moving away from primary ammonia production using local gas, and importing preproduced ammonia as the primary production precursor, in order to try and create a more stable production cost base. The permanent loss of Primary Nitrogen fixation by importation of ammonia gas

however meant that CO₂ supplies from fertiliser sources are no longer available neither here, nor increasingly in Europe.

5.3 Regulation

The much-awaited consultation on a revised fertiliser regulation encompassing not just mineral fertilisers, but also digestates and composts and other circular economy products looks set to be launched some time in Q4 2023, following an announcement by the Minister. Changes have also been made to the Explosive Precursors legislation and ammonium nitrate at or above 16% Nitrogen has been made a 'Regulated Substance'. These new requirements ban sales of ammonium nitrate fertilisers with a nitrogen content above 16% to the public, and require all professional users to prove their identity with photographic ID. A record of this ID must be retained on file by the vendor for inspection by the Police. The requirements apply to all points in the supply chain and came into force on 1 October 2023.

5.4 Trade

The Government has now closed its consultation on both common external tariffs and Carbon Border Adjustment Mechanisms (CBAM). As previously reported, in both cases, AIC provided information to Members as to where they could make their representations to the relevant Government Departments as both are distributional issues within AIC Membership. Approximately 70% of UK fertilisers are now imported as is all domestic ammonia used in domestic production.

6. AIC Scotland

6.1 Agricultural Policy

The Scottish Government's [programme for government including a list of bills](#) to be laid before the Scottish Parliament was published in early September. This included a commitment to bring forward the Scottish Agriculture Bill which will provide the legislative framework for future agricultural support in Scotland. It is likely that this will be a framework bill, providing government with broad powers to provide a flexible approach to agricultural support going forward, with detailed information of support schemes and delivery mechanisms likely to be discussed in secondary legislation.

BPS payments have been delivered early to support cashflow. Government is continuing support to increase the uptake of carbon audits, soil testing and animal health and welfare measures, full [details can be found here](#).

Consideration is also being given to new approaches to advice provision. AIC is working to ensure government recognise the role of AIC Member advice provision within new frameworks and the need to ensure farmers can buy in advice from a range of sources through an approved provider type scheme.

6.2 Net Zero

An updated version of the climate change plan will be published in Q4 of 2023, likely to have implications for the agricultural sector. It should be noted that whilst Scotland does have a legally binding net zero target there are no sector or industry specific targets. Key targets include a 75% reduction in national emissions by 2030, and for agriculture the target is 30% by 2032.

6.3 Pesticides/VI

The Pesticide Stakeholder group meets quarterly. The most recent meeting in July discussed a range of topical issues, including a refresher for stakeholders on pesticides regulation which is fully devolved, with HSE acting

on behalf of governments across the UK. Importantly, Scottish ministers do have the right to call in decisions as demonstrated by the divergence on the emergency authorisation for Asulox. AIC continues to make the case that GB-wide approaches should be the default position.

6.4 Precision breeding

Pressure is continuing to grow from a range of stakeholders and opposition parties for the Scottish Government to reconsider its opposition to gene editing plant breeding technology. England is now moving ahead to develop the detailed regulatory regime for precision bred crops, with similar moves within the EU albeit at different approach and slower pace. Scottish Government officials recognise that given the direction of travel and their policy of dynamic EU alignment, the Government may change position and reconsider its opposition to gene editing in the coming years. AIC continues to stress the challenges faced by misalignment in the internal market.

6.5 Political Engagement

With the Scottish Agriculture Bill scheduled to be laid before Parliament before the end of the year, our key political focus is on briefing key MSPs, ministers, officials and advisers on the issues affecting Members and ensuring the future support framework underpins jobs within the wider agri-supply chain. Meetings have been held recently with the rural affairs spokespersons from the Scottish Labour and Liberal Democrat parties. Alongside this we have met with the First Minister's special adviser for Rural Affairs to discuss Members' key concerns including regulatory divergence, gene editing, cost of doing business and the need for agricultural support stability. AIC Scotland will also be attending the SNP Conference in October, along with other key stakeholders such as NFUS.

7. AIC Cymru

7.1 Development of AIC Cymru

A reception was hosted at the Welsh Royal Show on 24 July to mark 20 years of AIC and one year of AIC Cymru. It was pleasing that Members and stakeholders attended, along with representatives of the Welsh Government. The Rural Affairs Minister Lesley Griffiths MS gave a speech affirming the work of AIC Cymru over the past year and working together in the future.

7.2 Wales Future Policy

The Agriculture (Wales) Act received Royal Assent on Friday 17 August 2023. This is the first ever Welsh Agriculture Act and provides Welsh Ministers with the powers to provide future farm support; it replaces the limited powers in the Agriculture Act 2020 which are due to expire in 2024. Whilst the main focus of the Act will be to allow delivery of the new Sustainable Farming Scheme (SFS), the Act also allows for tenant farmers with a route to dispute resolution to ensure they are not unfairly restricted from accessing financial assistance i.e. SFS.

The Welsh Government published in July its findings, comments, and direction of the Sustainable Farming Scheme framework consultation that was launched last year. This will lead to a final round of consultation and co-design in 2024. AIC Cymru will continue to feed into the consultation process and will keep Members up to date on progress. The Sustainable Farming Scheme (SFS) is due to start in 2025. It is clear that this will be a phased approach with first payments for Universal Actions. Optional Actions, and Collaborative Action payments and process will be rolled out there after.

7.3 AIC Consultation submissions

AIC Cymru has submitted a position paper to the Welsh Government on industry resources and capability to support outcomes of the Sustainable Farming Scheme as more details become known. The principal aim is to show the significant resource that industry has with on farm conversations and support against that of Farming Connect, the hitherto preferred Welsh Government, part funded route. 50% funding of Farming Connect will no longer be available as this had come from European Rural Development Funding money. Industry involvement is therefore not only practical but taxpayer efficient.

8. Northern Ireland

8.1 EU Exit

The principle of qualifying food and feed businesses has been included in the Border Target Operating Model, which NIGTA lobbied for. This is to ensure unfettered access could continue for registered feed businesses with others subject to the same SPS regime on arrival into GB as would be the case for goods shipped directly from any European origin.

8.2 Carbon Steering Group

Data from the 100-farm pilot is being uploaded to AgRE Calc via API. The business case for DAERA's whole farm programme is currently with the Department of Finance for approval. NIGTA is working to ensure the specification used for procurement reflects the needs of the agri-supply sector and are also working on developing a new carbon focused FAR module for NI members.

8.3 Call for Evidence on Operational Protocol

DAERA has issued a call for evidence on the Future Operational Protocol to assess the impact of air pollutants on the natural environment, which has implications for both planning and IPPC decisions from an ammonia emissions perspective. A co-ordinated industry effort is underway, which NIGTA is supporting, to prepare a response with input from experts in the planning sector, air modelling, ecologists and legal counsel. In addition, KPMG have been commissioned to prepare an economic impact assessment.

8.4 Soil Nutrient Health Scheme (SNHS)

Registrations for Zone 2 of the SNHS (covering Fermanagh, the west of County Armagh and South Tyrone) closed at the end of August with 92% of farm businesses registered. Registered farmers will be contacted by sampling contractors to schedule a suitable sampling date (November – February). CAFRE are now offering farmers in Zone 1 training who have received their analysis report.

8.5 DAERA Carbon Budget Consultation

DAERA is consulting on the interim GHG reduction targets that should be set for 2030 and 2040 as well as the limits that should be imposed for the next three carbon budget periods. The Committee on Climate Change has recommended cuts to livestock for agriculture to reach its targets. NIGTA will be feeding into the consultation and the forthcoming Climate Action Plan consultation which will detail the actions needed to achieve the emission reductions.

9. Cross Sector Policy

9.1 AIC Political Activity

Despite the summer recess, AIC has held a number of meetings and events with MPs, Peers and Ministers:

- Meeting the Earl of Minto, Minister in the Department for Business and Trade to discuss regulatory burdens and red tape reviews across all parts of Whitehall. AIC has provided case studies that materially impact AIC Member business activity and looks forward to this ongoing Government work.
- Hosting the AIC Parliamentary reception in the House of Commons, which saw representatives from all major parties, Peers and Civil Servants in attendance. Defra Minister Mark Spencer MP gave a short speech to guests, which included embassy representatives from around the world and farming and trade bodies.
- AIC will attend the Labour, Conservative and Liberal Democrat Party Conferences in autumn and will provide key platforms into their policy approaches to food and agriculture over the next year and into the next General Election, which will be no later than the end of 2024.
- AIC continues to engage with MPs on 1-2-1 meetings on matters ranging from soya sustainability, fertiliser issues, precision breeding, methane mitigation in feed and trade issues with Ukraine.

Elsewhere, Steve Reed MP has been appointed Shadow Defra Secretary in September's reshuffle of Labour's Ministerial team. He replaces Jim McMahon MP. Mr Reed is the MP for Croydon North. Daniel Zeichner MP remains Shadow Minister for Farming and Food.

9.2 Trade

In September, the [UK Government announced a list of commodities that would be subject to a partial or full removal of a tariff](#), where they do not already qualify for a preferential rate of duty under an existing trade agreement. This follows an application window open during summer 2023 in which any business could apply for a tariff suspension, subject to meeting minimum criteria. AIC has made Members aware of which products are proposed for a tariff suspension, including crop protection, fertiliser and seed products.

Elsewhere on trade, the UK has concluded trade agreements with New Zealand, Australia and has joined the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) – an Asia-Pacific trade bloc of 11 countries. Trade negotiations are now being pursued with India and the Gulf Co-Operation Council (GCC), whilst further discussions are taking place on enhancing the existing agreement the UK has with Canada, Mexico, Israel and Switzerland. Government always remains open to receiving input from AIC Member businesses as to where trade barriers can be reduced between these countries.

9.3 Food Security

In August, the [Environment, Food and Rural Affairs \(EFRA\) Select Committee released its report into Food Security](#), following oral evidence provided by AIC in November 2022. The report cited much of AIC's evidence, highlighting fertiliser's critical importance to food security. Other recommendations include the Prime Minister chairing an annual food security summit and the Government developing a suite of food security indicators covering inputs and outputs with targets set, which aims to influence policy.

9.4 Defra Land Use Strategy

AIC is anticipating a possible Government Land Use Strategy this year. A Strategy was envisaged as part of Defra's Food White Paper published last year, however it has been subject to delays. Although it is unclear as to how far reaching the Strategy will be, it is expected to consider the balances of interests for land in food production, natural capital, housing and energy.

9.5 Precision Breeding Act (Gene Editing)

The Precision Breeding Act is now moving forwards in England, with considerable activity taking place this summer. The FSA recently [outlined its proposals on how](#) precision bred organisms could be regulated, including supply chain traceability and notification requirements. Interestingly, FSA is recommending a move away from the lengthy regulated products process currently applied to GMOs, novel foods and irradiated foods, opting instead for a more streamlined process for Precision Bred Organisms (PBOs), more proportionate to the scientific evidence of risk. These proposals are set to be consulted upon later this year, with final secondary legislation anticipated to be completed by Autumn 2024, meaning PB goods could be placed on the market from 2025.

In order to facilitate the whole supply chain working together on precision breeding, Defra has convened a high-level group of representatives from trade associations, researchers and food and retail businesses to address practical barriers to the uptake of PB goods in the supply chain, and for consumer facing businesses to articulate what they would like from PB as a technology. AIC is represented in the group.

9.6 Target Operating Model (TOM)

In August, the Government published its [new Border Target Operating Model \(BTOM\)](#), setting out new controls to put in place its border system. As expected, the Government delayed the introduction of remaining sanitary and phytosanitary controls by three months, as well as full customs controls for non-qualifying Northern Ireland goods, which will now be introduced from January 2024. Specific Member briefings and guidance has been provided to members in the seed and animal feed sectors, where the new changes are anticipated to have the biggest impact. AIC is clear that for any new IT systems coming in, it is imperative that there is a clear and rapid process for addressing any errors or delays as and when enhanced checks are introduced.

9.7 SFI 2023 and Wider ELMS Involvement including Test and Trial

Having invited expressions of interest from farmers interested in entering SFI 2023, Defra have now opened the application window and started to invite them to make applications as part of the controlled roll-out of the scheme. The pre-registration process currently remains in place to ensure that applicants receive support from the Rural Payments Agency (RPA) to ensure that all necessary information is in place to make an eligible application, including online maps and land use details.

AIC's Test and Trials report produced for Defra as part of their co-design of the ELM scheme is now available in a new online format. Originally having been produced back in 2021/22 and alongside AIC involvement in working groups and engagement with stakeholders, it demonstrates AIC ability to influence policy decisions. In particular, the inclusion of farmers receiving payment for taking actions in SFI 2023 that require them to BASIS and FACTS advice for nutrient management and IPM respectively.

We continue to work with Defra on the development of new and revised actions that will be included in the 2024 offering of the SFI scheme. These include a suite of grassland options, no till, precision farming and agroforestry actions.

9.8 Extended Producer Responsibility for Packaging

At the end of July 2023, Defra announced that it would defer EPR payments for packaging by 12 months, meaning that producers obliged to pay packaging waste fees will not need to make payments until October 2025. Regulatory Position Statements (RPSs) for business registered in England and Scotland were also issued in respect of the reporting obligations that businesses have in respect of reporting packaging data – the deadline for reporting now being extended to 31 May 2024 whereby large producers will need to report two sets of data for the periods January to June, and July to December. In Northern Ireland, the RPS does not apply and relevant producers are still being asked to use all reasonable endeavours to report packaging data. In Wales, the reporting of packaging data for producers does not come into force for businesses until April 2024.

9.9 Sustainability Self-Assessment Framework and Introduction to Sustainability for the Agri-Supply Industry training

In July AIC launched its new ["Introduction to Sustainability for the Agri-Supply Industry" online training](#) and [Sustainability Self-Assessment Framework](#) to help Member businesses better understand the sustainability credentials of their operations. The training and framework complement the commitments made in AIC's [Roadmap for a Sustainable Food Chain](#) and have been developed by AIC through its contacts, experiences and involvement in a diverse range of stakeholder forums.

In time, AIC hopes that uptake of the Framework will be sufficient to allow it to collate and share anonymised data with Member businesses to allow for insightful cross-sector and cross-industry benchmarking. The training is a pre-requisite to completing the framework and will ensure a degree of consistency in understanding of sustainability within the agri-supply industry.

9.10 Food Data Transparency Partnership (FDTP)

The FDTP is a long-term partnership between government, industry and experts seeking to drive positive change in the food system through better and more transparent food data. The initial focus is on streamlining the measurement and communication of scope 3 greenhouse gas emissions to meet the Government's net zero targets.

AIC met with Defra officials leading this work to understand more about it and to ensure Members in the agri-supply chain are represented. As a result of this meeting, the AIC now has Member representation on its Eco Working Group. This group has been established to introduce consistent scope 3 measurement and reporting for the food and drink sector and a mandatory methodology for voluntary eco-labelling. Finally, AIC has Member representation on the newly formed Task and Finish Group set up to consider the approach to data sources for the measurement and communication of greenhouse gas emissions of food and drink.

ENDS.

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