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Developing an Environmental Policy System Review Tool

Final Report

08 May 2024

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Developing an Environmental Policy System Review Tool

Final Report

A report submitted by [ICF Consulting Services Limited](#)
in association with

[CECAN Ltd](#) and [Matthew Baumann Associates](#)

Date: 08 May 2024

Job Number 30303180

Jessica Lyon
jessica.lyon@icf.com
[ICF Consulting Services Limited](#)
Riverscape
10 Queen Street Place
London
EC4R 1BE
T +44 (0)20 3096 4800
www.icf.com



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Document Title	Developing an Environmental Policy System Review Tool
Job No.	30303180
Prepared by	Jessica Lyon, Ben Platt, Ben Shaw (CECAN Ltd), Matthew Baumann (Matthew Baumann Associates)
Checked by	Andrew Jarvis
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Contents

1	Introduction	1
1.1	This report	1
2	Part 1: The Environmental Policy System Review Tool	4
2.1	The Environmental Policy System Review Framework	4
3	Part 2: Using the Environmental Policy System Review Tool	6
3.1	Overview of the Environmental Policy System Review Tool.....	6
3.2	The Environmental Policy System Review Process	6
3.3	Uses of the Environmental Policy System Review Tool	8
4	Part 3: Applying the Environmental Policy System Review Tool to the Environmental Land Management schemes - a case study	11
4.1	Introduction	11
4.2	Step 1: Define review aim and purpose.....	11
4.3	Step 2: Conduct data searches	11
4.4	Step 3: Extract data and summarise	12
4.5	Step 4: Test and refine evidence.....	13
5	Conclusions	16
	ANNEXES	18
	Annex 1 Development of the Environmental Policy System Review Tool.....	19
	Annex 2 Environmental Policy System Review: Evaluative Questions	20
	Annex 3 Workshop briefing material	23
	Annex 4 Summary of workshop discussion.....	26

1 Introduction

1.1 This report

This is a deliverable of a contract awarded to ICF (supported by CECAN Ltd and Matthew Baumann Associates) by the Office of Environmental Protection (OEP) to support the OEP in its scrutiny of the UK Government’s implementation of the Environmental Improvement Plan 2023¹ (EIP). This introductory chapter:

- Describes the context for this work;
- Explains the objectives and how they have been addressed;
- Introduces the remaining sections of the report.

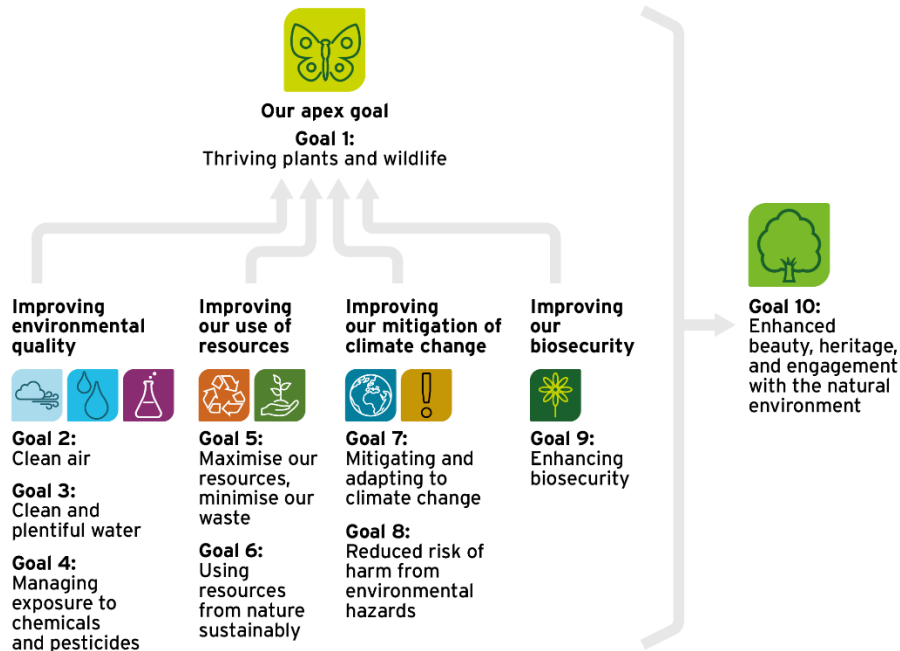
1.1.1 Context

The work reported in this document builds on a previous report² delivered by the ICF-led team for OEP which provided a catalogue, and four supporting graphics, that summarise and structure the key actions linked to goal 1 in the EIP through which the UK Government intends to deliver ‘Thriving Plants and Wildlife’ targets.

The 25 Year Environment Plan³ and the EIP 2023¹ organise the delivery of government action within ten environmental goal areas (Figure 1.1).

Figure 1.1 Defra’s EIP 2023 Goals

Connections between our environmental goals



Source: *The Environmental Improvement Plan 2023*¹

¹ [Environmental Improvement Plan 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-improvement-plan-2023)

² [Thriving Plants and Wildlife - policy mapping.pdf \(theoep.org.uk\)](https://theoep.org.uk/policy-mapping)

³ [25 Year Environment Plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/25-year-environment-plan)

A set of actions have been defined that are intended to collectively deliver each goal and the associated environment target(s). An 'action' was defined by the OEP as a catch-all term to encompass everything that the UK Government suggests it will do to achieve any one of the ten goals. In the previous project a typology of actions was developed by which the different 'types' of actions found in Goal 1: Thriving Plants and Wildlife could be classified. The catalogue and the graphics structured and clarified what the EIP contains, enabling a greater understanding of this complex policy space, and supporting future monitoring and evaluation. Key messages within the narrative of the diagrams examined and highlighted action maturity, delivery stakeholders, actions of interest for OEP, and evidence gaps for further research. The results were presented in the OEP's Annual Progress report 2024⁴ and the final report of the project was published on the OEP website²

1.1.2 Aims of this project

The OEP is adopting a new approach to its annual reports to Parliament. It intends to establish a consistent, multi-annual methodology for tracking and assessing policy progress in each of the ten goal areas of the EIP. This will be complemented by focussed analysis of key actions in each goal area.

To facilitate this, the OEP needs to be able to identify, sort and describe the key components of the policy system and how they are expected (by government) to lead to the achievement of long-term targets. This goal-level view will facilitate the review, assessment and communication of the Government's progress in the round.

The aim of this project was to develop an approach that the OEP can use in future analysis of, and reporting on, government progress for each of the EIP's environmental goals. It has developed an Environmental Policy System Review (EPSR) tool which can be used to guide and focus the OEP's analysis and monitoring by identifying aspects of environmental policy where there is sufficient activity and those where there are significant gaps, ambiguity or concerns about policy logic or deliverability.

1.1.3 Structure of this report

This report describes the EPSR tool and how it can be used. It is structured as follows:

Part 1: The Environmental Policy System Review Tool

- Describes the EPSR Framework, that underpins the tool, including details of the components of government action, and the enablers that are likely to be required to achieve the environmental goals. It defines the **evaluation questions** that should be asked in relation to each component.

Part 2: Using the Environmental Policy System Review Tool

- Provides advice to OEP on how to use the tool to support analysis, monitoring, and reporting of government's progress towards EIP goals and the related policies, portfolios and programmes.

⁴ [Government remains largely off track to meet its environmental ambitions, finds OEP in annual progress report | Office for Environmental Protection \(theoep.org.uk\)](#)

Part 3: Applying the Environmental Policy System Review Tool to ELM (a case study)

- Describes how the EPSR process was applied to the Environmental Land Management schemes (ELMs) during this project to test the practical application of the tool and gauge its suitability. The case study also generated specific insights about ELMs that can support OEP's future analysis.

Reflections and Conclusions

- Provides reflections on the work undertaken for the project and the practicality of the EPSR for supporting future OEP work.

Annexes provide the method used to develop the tool, a set of evaluative questions and a summary of the workshop undertaken as part of this project.

2 Part 1: The Environmental Policy System Review Tool

2.1 The Environmental Policy System Review Framework

The need for the EPSR tool arose from recognition of the challenge of understanding and capturing, in a concise form, the development and delivery status of high-level and broad ranging environmental policies. Informed by a review of existing frameworks (Annex 1 explains the methodology used to develop the tool), and with consideration given to the factors required to ensure successful design and delivery of government portfolios, programmes, and policies, six key components were identified:

- **Vision:** a description of the aim of the portfolio, policy, programme along with the associated targets which indicate the desired outcomes and metrics for success.
- **Evidence:** the evidence used to underpin the vision and targets, and the associated strategy, plan and implementation arrangements.
- **Strategy:** an articulation of the approach and associated ‘change mechanisms’ along with specific ‘actions’ that will be used to address the pressures, solve the problem(s), deliver the targets, and realise the vision. This could include a mental model or theory of change for how the portfolio, programme, or policy is expected to achieve its outcomes.
- **Plan:** a plan that defines the level of funding required and available for delivery, and some of the preparatory steps required to establish the portfolio, programme or policy (e.g. stakeholder buy in, arrangements for any major legislation required to put the actions in place).
- **Delivery:** how the portfolio, policy or programme is managed, the capacity and capability of people to deliver the strategy, and governance systems to support it.
- **Evaluation:** how the portfolio, policy, or programme will be assessed over time and how the evidence will be used.

Each of these six components is important to any portfolio, policy or programme and the scrutiny of it. We have defined criteria to be used to structure the scrutiny of each component, identifying them as ‘evaluative standards’ that the component can be judged against. If the evaluative standards for each component are well evidenced then there can be increased confidence that the portfolio, policy or programme has the potential to meet its objectives. For example, a strategy requires a logic or theory of change which:

- is traceable to the overall vision and understanding of drivers and pressures;
- is coherent with the different policy areas, identifying the relevant synergies and trade-offs;
- articulates why the types of measures have been selected and why they should be successful.

Figure 2.1 brings the components together in one framework. Each has a definition and several evaluative standards to judge it against. A full list of evaluation questions, derived from the framework and the standards, is provided in Annex 2. These questions can be used for more detailed analysis of each component.

Figure 2.1 Environmental Policy System Review Framework



3 Part 2: Using the Environmental Policy System Review Tool

3.1 Overview of the Environmental Policy System Review Tool

Section 3.2 explains the process used to gather, structure and analyse information related to a specific environmental policy and summarise it in a concise format. This process, when applied together with the Framework described in the previous chapter, is the Environmental Policy System Review tool.

Section 3.3 provides examples of how the tool can be used by OEP for different purposes, including as an aid for internal analysis, and externally in its engagement with stakeholders and/or to communicate government progress publicly.

The tool can be used to:

- gather and structure information on environmental policy objectives and actions, and understand evidence gaps and analysis needs within this;
- structure conversations with and gain input from government and wider stakeholders;
- prioritise scrutiny of government activity, within or between environmental policy goals; and
- summarise, report and communicate information on the adequacy of government environmental policy action.

3.2 The Environmental Policy System Review Process

The EPSR 8-step process is represented in Figure 3.1. The steps are:

1. **Define review aim and purpose** - Identify and define the environmental policy objective of interest and the purpose of reviewing it, e.g. internally scoping research and analysis, preparation for stakeholder engagement, or external communication and publication.
2. **Conduct data searches** - Collate data sources relevant to the objective, e.g. government policy documents, implementation plans and reports from arms-length bodies, or academic research reports.

Figure 3.1 The Environmental Policy System Review Tool 8-step process



3. **Extract data and summarise** – Identify and group the information to be used to describe the objective:
 - a. Read and review original data sources to identify material relevant to each framework component;
 - b. Group information under each component (e.g. by cutting and pasting the information under the component headings using an interactive online white board, spreadsheet or table and using links/cross referenced to original sources to facilitate subsequent review). Summarise this information in the framework graphic to provide a descriptive overview of what is known on the policy. Figure 4.1 shows how publicly available information on ELMs was summarised in the framework.
4. **Test and refine evidence** – Use expert workshop(s) or individual interviews to identify additional data sources that will further build the knowledge base and refine extracted evidence relevant to each component. Insights from expert workshops/interviews may *also* include judgements on the progress of government action for each of the components of the framework. This can help to support analysis and assessment of these areas against the evaluative standards. Section 4.5 describes how this process was applied to ELMs. The aim of this step is to refine the description of the components and also gather evidence that informs the assessment in step 5.
5. **Assess and summarise** - Evaluate the evidence collated for each component, including any insights gained from workshops/interviews relating to the evaluative standard for that component. Use the evaluative statement and evaluative questions as a guide to ‘what success looks like’ and see if the evidence currently available matches up to that. Generate summary text

capturing judgement for each component using the prompts from the EPSR Framework.

6. **Whole system review** - Review the populated framework as whole and consider:
 - a. What and where are the strengths, weaknesses and gaps in policy development and delivery?
 - b. Does the evidence and statements across the populated framework suggest that policy development and delivery for the environmental objective of interest is on track or are there concerns?
 - c. What and where are the priorities for further evidence and analysis? Annex 2 provides additional evaluation that could guide further analysis.
7. **Test review assessments** – review and develop individual component assessments and whole system review. Depending on the purpose of the review, this could be done internally or with external stakeholders.
8. **Reporting and actions** – what are the conclusions from the EPSR review? What recommendations and actions need to be taken forward internally or externally? How and where are findings to be reported?

3.3 Uses of the Environmental Policy System Review Tool

Each of the eight steps of the EPSR process would normally be completed. The level and detail of the work done at each stage would to be calibrated to the purpose of, and resources available for, the review. An internal scoping review could be done in a matter of days, while a review for an OEP annual report could take place over a number of months, with more formally structured data collection (possibly including commissioned research or calls for evidence) and formal stakeholder engagement being used to collect inputs and validate review findings. In the following paragraphs we provide some suggestions on how the process could be adapted and used in these different contexts.

3.3.1 Gathering and structuring information on government action to deliver environmental objectives

The overall aim of the EPSR is to gather, structure and summarise information related to a specific environmental objective and make a judgement on whether publicly available evidence indicates that government action is adequate to achieve it. The tool can be used to provide scoping reviews in new areas of interest to OEP. Alternatively, for areas of ongoing interest, it could be used as a monitoring tool to capture and record evidence as it becomes available and use this to update internal or external assessments made. A consistent process and protocol for collecting and recording data is likely to be required, particularly if the tool is used as an ongoing monitoring and review tool.

3.3.2 To identify areas of prioritisation for further research and scrutiny of government progress

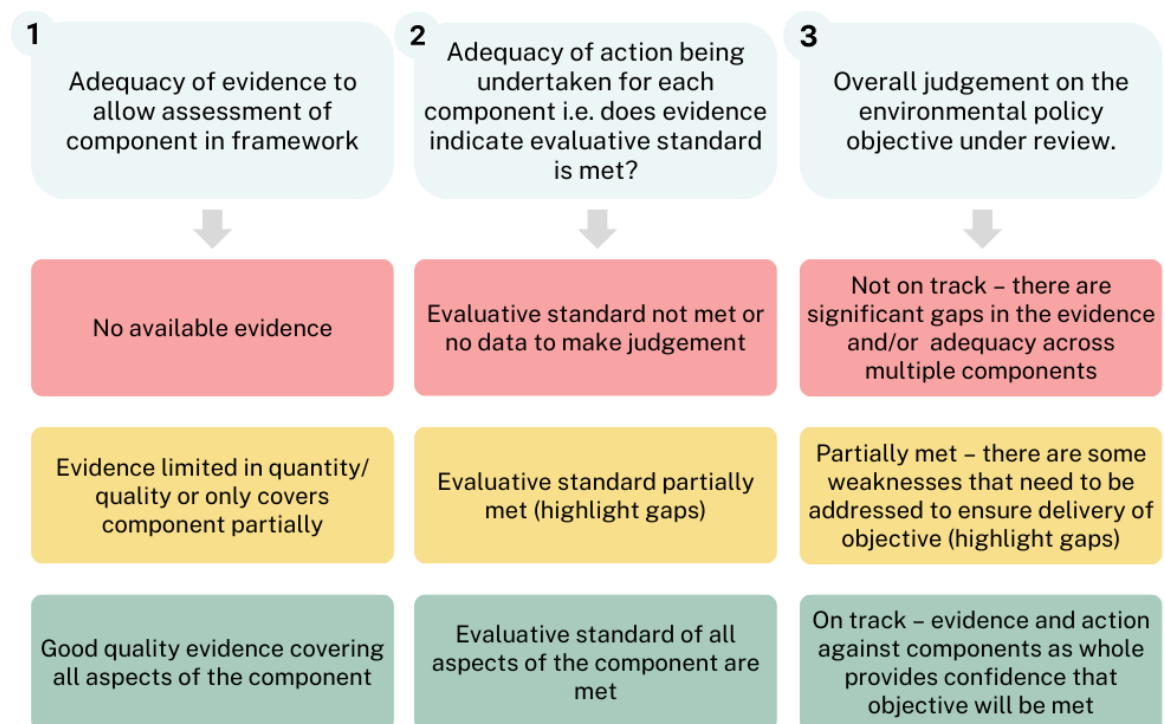
The review will generate insights into the strengths, weakness, and gaps for the individual framework components and the overall environmental objective. These insights can then be used direct further research, evidence generation or scrutiny

activity to areas where it is most needed. A traffic light assessment could be used to summarise and communicate:

1. The availability and quality of evidence for each component,
2. The adequacy of action for each component based on the evidence available,
3. A judgement on whether the activity contributing to the environmental objective as whole appears to be on track given the available evidence and assessments of each component.

Illustrative criteria for traffic light assessments are given in Figure 3.2. An individual review will reveal areas of weakness or gaps in evidence or action that need to be addressed. When multiple reviews of different environmental objectives are available, they can be used to direct resources to areas of most concern.

Figure 3.2 Illustrative ‘traffic light’ assessments that could be used with the EPSR tool



3.3.3 Using the tool to structure conversations with stakeholders

The populated tool can be used to support structured conversations with stakeholders in a workshop setting about large complex portfolios or programmes of activity. This can be an effective means of testing and refining the evidence and assessments, allowing a large amount of material to be worked through systematically (see Part 3: Applying the Environmental Policy System Review Tool to the Environmental Land Management schemes - a case study)

3.3.4 Using the tool for communication & reporting

The outputs from use of the EPSR provide summary level information which allows the evidence and adequacy of government action to be assessed and presented in a concise format suitable for external communication and report. We have found it

possible to summarise large portfolios of activity in this way, for example, ELM, described in the following section.

As noted above, the reporting could utilise traffic light assessments (both within and between reviews of different environment policy objectives) to show where there is lack of progress or information, or where there are signs of success. The framework could also be used in OEP annual reports to signal which components of the system/goal OEP has focussed its analysis on.

While the EPSR can be used to summarise a particular portfolio, programme or policy, we have found it challenging to identify information at the EIP goal level. Work, governance and planning within government is not organised by reference to EIP goals and there is generally a dearth of 'goal level' information, either 'descriptive' or 'evaluative'. It would be possible to use the framework to summarise and communicate descriptive and evaluative information about **each action** in the framework, but it would be challenging to apply the evaluative standards for each component at the goal level if the links between the actions (in terms of strategy, interactions, planning, delivery) have not been articulated. Reducing the assessment to a single page may also be difficult given the scale of activity at goal level. We return to this issue in the report's conclusions below.

4 Part 3: Applying the Environmental Policy System Review Tool to the Environmental Land Management schemes - a case study

4.1 Introduction

The practicality and suitability of the EPSR tool was tested by applying it to the ELM schemes (ELMs). The process, which followed the template given in section 3.2, is described below. Steps 1 to 4 were completed and have generated useful insights and evidence for the OEP to consider in further analysis. Steps 5-8 involves judgements on the adequacy of government action against environmental policy objectives and go beyond the scope of the current assignment.

4.2 Step 1: Define review aim and purpose

There are three ELM schemes: the Sustainable Farming Incentive (SFI); Countryside Stewardship (CS); and Landscape Recovery (LR). The schemes have been identified by the Government as key to the achievement of environment targets and are therefore of great interest to the OEP.

To ensure that the OEP can focus its efforts on critically assessing and monitoring progress of ELMs, the OEP is asking for experts in the field of environmental, agricultural, and social science/policy to share their opinions on ELMs' progress and highlight any risks to the achievement of the environment targets that can be attributed to ELMs.

4.3 Step 2: Conduct data searches

To populate the framework, the ICF team reviewed and extracted information about ELMs from the EIP¹, the Agricultural Transition Plan update⁵, the Government's consultation on ELMs⁶ and its published monitoring and evaluation plans⁷. Some information was already available from the catalogue described in ICF's previous report to OEP². Information was extracted for each of the relevant components of the EPSR framework. This information was then used to produce a summary description of ELM in the editable framework template.

⁵ [Agricultural Transition Plan update January 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115422/agricultural-transition-plan-update-january-2024.pdf)

⁶ [ELM Policy Discussion Document 230620.pdf \(defra.gov.uk\)](https://www.defra.gov.uk/consult/consultations/elm-policy-discussion-document-230620/)

⁷ [Monitoring, evaluating and learning in the Future Farming and Countryside Programme – Farming \(blog.gov.uk\)](https://www.blog.gov.uk/2023/06/27/monitoring-evaluating-and-learning-in-the-future-farming-and-countryside-programme/)

4.4 Step 3: Extract data and summarise

The collated information was extracted and summarised in the EPSR framework by reference to the relevant components (Figure 4.1)

Figure 4.1 Summary of information on Environmental Land Management Schemes



4.5 Step 4: Test and refine evidence

To test and refine the available evidence, the project team reviewed published reports and stakeholder commentary on ELMs to ensure it knew enough about existing criticisms and scrutiny of the schemes to be able to effectively facilitate the workshop (described below). Sources that were reviewed included:

- A report by OEP on progress with improving the natural environment (2022/23);⁴
- Two House of Lords briefings;⁸
- A report by the House of Commons Environmental Audit Committee;⁹
- The Rock Review;¹⁰
- A report¹¹ and a briefing¹² from Wildlife and Countryside Link;
- Commentary from the Country Land and Business Association¹³, the Game and Wildlife Conservation Trust¹⁴, Farmers Weekly¹⁵, the National Farmers Union¹⁶ and the British Ecological Society¹⁷.

Experts from across the environmental and agricultural social sciences were invited to a workshop that was used to test and refine the evidence and provide an initial assessment of the adequacy of ELMs to deliver the environmental targets. The workshop was facilitated by members of the project team and OEP staff.

A briefing document that provided an overview of ELMs and the OEP (Annex 3) was circulated in advance of the workshop. It advised participants that the findings of the workshop would help the OEP to prioritise its long-term work on nature friendly farming and inform part of the next EIP progress report to Parliament.

The aims and objectives of the workshop were to:

- Discuss the adequacy of policy components that are in place for achieving ELM-specific and wider, longer term EIP targets;
- Identify key areas of concern and discuss risks for successful delivery; and
- Discuss priority areas and lines of enquiry for OEP monitoring.

A Mural digital whiteboard containing an interactive version of the EPSR tool was shared with participants prior to the workshop.

⁸ [Environmental land management: Recent changes to the sustainable farming incentive and countryside stewardship schemes - House of Lords Library \(parliament.uk\)](#)

⁹ [Environmental change and food security \(parliament.uk\)](#)

¹⁰ [The Rock Review - Working together for a thriving agricultural tenanted sector.pdf \(publishing.service.gov.uk\)](#)

¹¹ [The Rock Review - Working together for a thriving agricultural tenanted sector.pdf \(publishing.service.gov.uk\)](#)

¹² [Link briefing - Cross Compliance - October 23.pdf \(wcl.org.uk\)](#)

¹³ [CLA responds to latest ELM scheme announcement: 'Time is running out' • CLA](#)

¹⁴ [Environmental Land Management Scheme – Mind The Gaps! - Game and Wildlife Conservation Trust \(gwct.org.uk\)](#)

¹⁵ [Industry welcomes SFI expansion, but food production fears remain - Farmers Weekly \(fwi.co.uk\)](#)

¹⁶ [SFI 2024 expansion revealed at OFC 2024 – NFUonline](#)

¹⁷ [Part 2: Will ELMS achieve their environmental objectives? - British Ecological Society](#)

For Exercise 1, participants were invited to interact with the Mural canvas by leaving comments on the strengths, weaknesses, and risks to achieving outcomes of ELMs by reference to the:

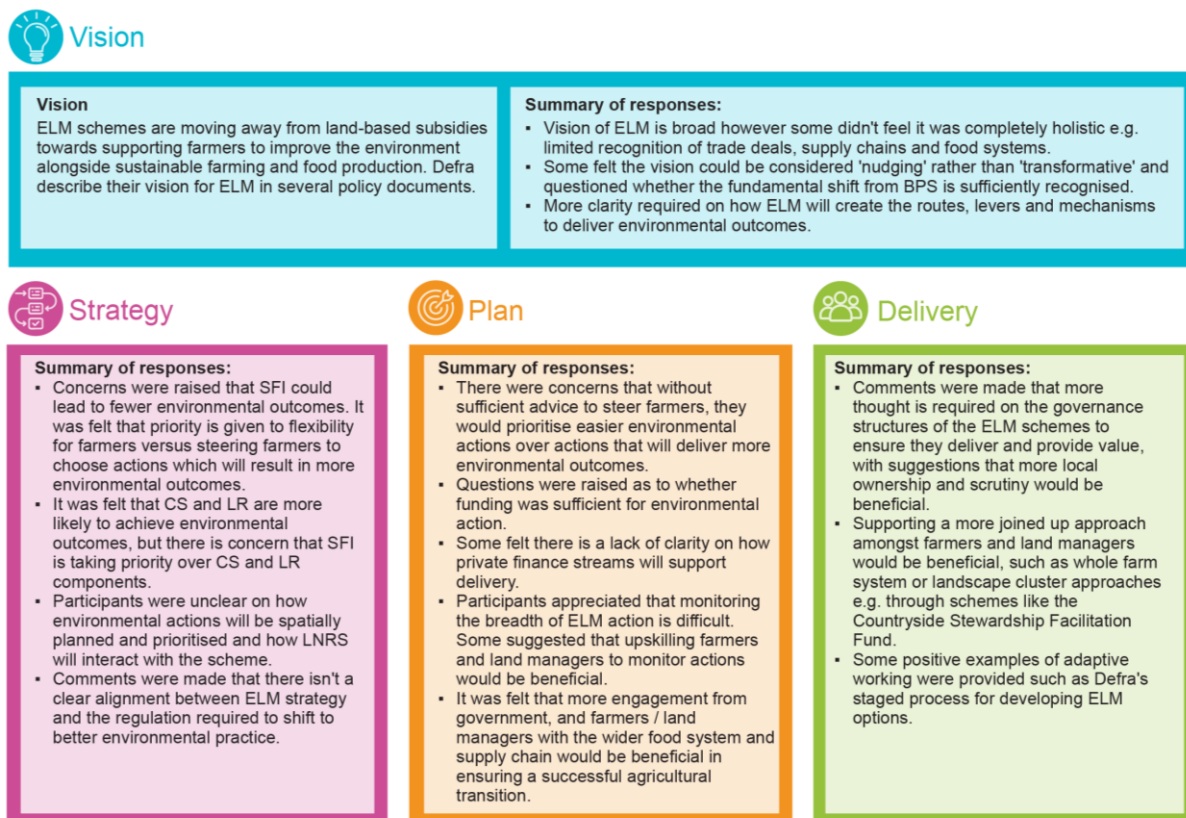
- **Vision:** The vision and targets related to ELM;
- **Strategy:** The strategy and logic behind ELM and its three schemes - SFI, CS & LR;
- **Plan:** The components required to implement ELM and information on progress; and
- **Delivery:** The stakeholders involved in the delivery and management of ELMs.

In Exercise 2 participants used Mural’s interactive voting tool to identify priority areas for the OEP in its future monitoring of ELMs.

The workshop generated insights into the strengths and weaknesses of ELMs, with a focus on the potential delivery risks and implications for environmental targets.

Figure 4.2 includes a summary of reflections made by workshop participants as we worked through the exercises. These reflections by workshop participants can be considered by the OEP alongside their own analysis to help review the progress and adequacy of ELM. For a more detailed account of the workshop see Annex 4.

Figure 4.2 Insights from the workshop on Environmental Land Management Schemes



4.5.2 Steps 5 - 8

The application of the EPSR tool to ELMs provided insights for OEP to consider in its further analysis of nature friendly farming. Steps 5-8 were not completed here but can be conducted by the OEP in a process that may involve further engagement

with stakeholders from the farming industry, eNGOs, Defra, etc. The text below provides a commentary on potential ways of approaching that task.

Step 5: Assess and summarise

The OEP can combine the information collated during this project (listed below), with its in-house expertise and knowledge to assess and evaluate each component of ELMs against the evaluative standards.

Information collected as part of this project

- i) publicly available information on ELMs which is summarised according to the framework.
- ii) insights from various public articles that provide commentary on ELMs.
- iii) insights and reflections from experts in agricultural, environmental, and social science.

Step 6: Whole system review

OEP could then, with respect to ELMs as a whole, consider:

1. What and where are the strengths, weaknesses and gaps in policy development and delivery?
2. Does the evidence suggest that policy development and delivery is on track, such that ELM will meet its expected contributions to various goals and targets or are there concerns?
3. What and where are the priorities for further evidence and analysis? Table A2.1 provides suggestions that could guide further analysis.

Step 7: Test review assessments

After completing the review, OEP could test its findings, internally or externally, to increase the robustness of the findings and the validity of evidence. Depending how much engagement and quality assurance of findings has been done throughout the process this step may not be required.

Step 8: Reporting

The OEP could then report the conclusions from the EPSR review on ELMs, using the framework as a tool for communicating the key messages as described in section 3.3.4.

5 Conclusions

The project has developed a practical, easy to use tool.

The aim of this project was to develop an approach that OEP can use in future analysis and reporting on progress for each of the goals in the EIP. The Environmental Policy System Review (EPSR) tool contributes to this aim by providing a framework and methodology for, firstly, identifying, sorting, and describing the key components of the policy system and secondly, a set of evaluative standards and a process for reviewing and assessing government's progress on portfolios, policies and programmes. The diagrams used in the tool also provide an intuitive structure and format for communicating progress following a review.

When applied to the ELM scheme, the tool was an effective means of gathering and organising information and facilitating critical conversations. Using the framework to guide the workshop discussion helped to keep participants focused on the topic and enabled coverage of conversation over a wide range of issues.

The OEP monitors and reports on progress with improving the environment by reference to the ten goals described in the EIP. The EPSR tool will be useful in providing structure and evaluative lines of enquiry for this level of analysis, though there may be some challenges in conducting analysis at this level.

The EPSR tool can be used to guide OEP'S analytical and scrutiny activity but should be used in conjunction with other tools and evidence processes.

The tool is intended to be straightforward to use, however, some inevitable trade-offs to be made in developing such a tool:

- The quantity of actions and evidence on environmental policy areas means there are necessary decisions to be made about what can and cannot be included – not everything can be captured in a single page summary.
- Trade-offs between competing policy areas and external factors are not actively considered in the tool. An example in the case of environmental policy is the competing priorities for use of land (e.g. housing, renewable energy infrastructure, food production and nature recovery). Those using the tool should bear in mind that policy trade-offs and external factors can be key reasons why well thought through and planned policies do not work.
- The framework is based on a logic of what is understood to be necessary for a policy objective to be delivered successfully. The components have been identified through a review of other similar frameworks and the policy literature. As such, the framework can be seen as an inductive generalisation rather than a specific causal pathway for policy delivery. For the intended purpose of the tool we think this is a valid assumption to make but the EPSR tool should be used in conjunction with a wider set of analytical and evaluative work and techniques.

Defra organisational structures limit the ability to use of the tool at the EIP Goal level: this poses challenges for OEP scrutiny of government

The project's review of publicly available documents suggests that Defra does not organise its governance and delivery of environmental targets at the 'goal' level as described in the EIP. The response to the 'Thriving Plants and Wildlife Goal' is provided by a variety of different portfolios, policies, programmes and actions and it is not clear that there is any strategic oversight that brings these streams of work

together. A lack of strategic oversight and coordination of government action from an EIP goal perspective may be a line of enquiry for OEP to pursue.

The EPSR tool makes a contribution to the ongoing development of OEP's analytical and scrutiny toolkit

The catalogue and associated graphics developed as part of the previous project collate and structure a large amount of information about the Thriving Plants and Wildlife Goal. Those outputs and the EPSR tool and options outlined for its use in this project, improve the ability of the OEP to identify gaps and issues with the plan for delivery of the TPW goal and to focus analysis on components identified as a priority. We anticipate that whilst there are challenges to be overcome in applying the tool at goal level, the tool has contributed to OEP's analytical toolkit and capacity of effective scrutiny.

ANNEXES

Annex 1 Development of the Environmental Policy System Review Tool

In the first step we reviewed a range of existing frameworks and tools that were used to organise, structure, and scrutinise government action.

- [Framework to review portfolios - National Audit Office \(NAO\) insight](#)
- [Good practice guide: Delivery Environment Complexity Analytic \(DECA\), understanding challenges in delivering project objectives \(nao.org.uk\)](#)
- [Government Functional Standard \(publishing.service.gov.uk\)](#)
- [Making Policy Better.pdf \(instituteforgovernment.org.uk\)](#)
- [CCC Mitigation Monitoring Framework - Climate Change Committee \(theccc.org.uk\)](#)
- [Part B: Policies, Goals, Objectives and Environmental Governance: An Assessment of their Effectiveness | UNEP - UN Environment Programme](#)
- [CPI-Public-Impact-Fundamentals-Report-English.pdf \(centreforpublicimpact.org\)](#)
- [Conceptual framework for increasing legitimacy and trust of sustainability governance | Energy, Sustainability and Society | Full Text \(biomedcentral.com\)](#)
- [Integrating a systems approach into Defra - GOV.UK \(www.gov.uk\)](#)
- [The Public Impact Fundamentals: Helping governments progress from idea to impact. Centre for Public Impact \(www.centreforpublicimpact.org\)](#)

In reviewing these frameworks and in generating initial ideas for the tool we considered:

- What are the different hierarchies and layers of government action and how are they described in existing frameworks? And do existing frameworks focus on portfolios of policies or discrete programmes?
- What are the different components of government action that these frameworks suggest need to be in place for delivery of any successful outcome? Which of these are most relevant to environmental policy and specifically to achieving goals that require multiple actions?
- How might the framework be used by the OEP and others? What level of detail is required in the framework to be fit for purpose?

Through the review and several internal workshops, the team developed:

- A framework (way of structuring design, planning, delivery of actions)
- Associated evaluative standards (criteria) for what “good” looks like for each component
- A longer list of Evaluation Questions for use in more detailed analysis (Annex 2)
- A process and materials that can be used to scrutinise government policy in practice.

These were presented to the OEP and discussed in a workshop to allow OEP teams to critically challenge the work in progress. Following further refinements, the final framework and associated tools developed are termed the Environmental Policy System Review (EPSR) Tool which is described in the following section.

Annex 2 Environmental Policy System Review: Evaluative Questions

Table A2.1 Environmental Policy System Review: Evaluative Questions

Component	Evaluation Question
Vision	
Vision	<p>Is there a clear description of the aims of the portfolio/policy/programme? Are the benefits of achieving the aims clearly described? Are the aims consistent across programmes of work and do they have government wide commitment and buy-in? Is there general agreement and buy-in from stakeholders on the vision?</p>
Targets	<p>Have government set targets which are specific, measurable, relevant and time based? Are these targets consistent with one other and do they have a clear pathway to achievement? Are the targets linked to the key dimensions of the vision? Are underpinned by sets of interim targets and indicators to enable monitoring of progress overtime to ensure delivery is on track to meet targets?</p>
Evidence	
Drivers & Pressures	<p>Is there a comprehensive understanding of the environmental system including the drivers, pressures, enablers, dependencies & influences? Has there been appropriate prioritisation of the key drivers and pressures which need to be addressed?</p>
Scientific Evidence	<p>Is there sufficient natural, social and economic evidence available that identifies the change required to deliver targets? Does the evidence identify the priorities for change at a spatial level? Has the baseline state of nature been clarified at sufficient spatial granularity? Have the appropriate ex-ante assessments been conducted that identify the effectiveness, costs, feasibility and acceptance of proposed interventions? Are the gaps in the data and evidence known, and is there a plan for addressing these gaps?</p>
Strategy	
Logic	<p>Is there a clear description, for example in a theory of change that describes the theory of how the strategy will deliver on the targets? Does the strategy adequately and appropriately recognise and address the drivers and pressures? Are the mechanisms likely to achieve the expected contribution? Is it likely that the strategy will contribute sufficiently to key targets? How are portfolio/policy/programme interdependencies captured and understood? How have/are stakeholders engaged in portfolio/policy/programme development? Has their buy-in been secured? How has/is spatial planning and prioritisation been/being incorporated into policy development and delivery?</p>

Component	Evaluation Question
<i>Actions and interventions that may be considered in the logic include:</i>	
Regulation, control, enforcement	Are the plans for meeting and improving the regulatory baseline sufficient?
Protecting or restoring nature through mobilising funds or payment schemes	Is there a strategy for mobilising the appropriate funds for supporting nature? Are incentive schemes outlined appropriate for the delivery of the required environmental outcomes?
Designation or management of an area	Are areas for management or designations spatially targeted considering factors such as biodiversity and ecosystem services? Are the targeted areas in line with local and national priorities? Are plans for how the programme works in protected areas adequate?
Actions to conserve and / or manage a range of species	Have the relevant species which require specific plans for their conservation or management been considered? How will other actions in the strategy contribute to species management?
Plan	
Action plan	Is there a clear and coherent action plan for the portfolio/policy/programme? Is there enough money in the portfolio/policy/programme to deliver the scale of environmental change that is articulated in the targets? Has the legislative process been sufficiently considered within the timescales of delivery? Is there evidence that adequate resources have been allocated to delivery - both scale and continuity of resourcing? Are the risks and assumptions to delivery been identified?
<i>Some of the elements the implementation plan should cover include:</i>	
Legislative Process of regulation/control measures	Have the appropriate regulation measures been enacted on time? Are these regulatory measures in themselves effective?
Enforcement & Compliance Plans:	Is there a plan and appropriate resourcing for the enforcement of regulatory and control measures? Are the regulatory measures being enforced effectively and fairly?
Paying for public goods	Have the appropriate funding streams to support action for nature been mobilised? Is the funding sufficient to deliver the appropriate actions whilst also providing value for money?
Engagement & buy-in of the vision and strategy	Are stakeholders appropriately informed of the relevant suite of government actions that fall under the portfolio/policy/programme? Are stakeholders aware of and understand their role in delivery of policies? Do they comply with the policies? Are they involved in the continual development and design of policy improvement where relevant?

Component	Evaluation Question
Delivery	
Strategic oversight and governance	<p>How is oversight role given legitimacy/powers to address roles, responsibilities, structures, systems, decision making/leadership?</p> <p>Is there a team that manages the streams of work at the portfolio/policy/programme level to ensure co-ordination and delivery of work?</p> <p>Is there a team providing strategic support and advice to ensure effective delivery of actions?</p> <p>Is there a team monitoring and managing risks?</p> <p>Are there the appropriate governance systems to enable adaptive management of programmes and projects so that necessary changes can be implemented in response to MEL findings?</p>
<i>Some of the delivery issues to be considered include:</i>	
Capacity, capability and resourcing of Defra teams	<p>Are the appropriate Defra teams assigned roles and responsibilities that are well understood?</p> <p>Do the teams have the capacity and capability to deliver on their tasks?</p> <p>Are Defra staff aware of and collaborate with other relevant teams and partners to ensure effective delivery?</p> <p>Are the teams aware of the different streams of work and are able contribute across multiple issues to support the delivery of the overall strategy?</p>
Capacity, capability and resourcing of delivery partners	<p>Are the appropriate delivery partners assigned roles and responsibilities that are well understood?</p> <p>Do the delivery partners have the capacity and capability to deliver on their tasks?</p> <p>Are delivery partners aware of and collaborate with other relevant teams and partners to ensure effective delivery?</p> <p>Are delivery partners sufficiently empowered to adapt and evolve their strategies and actions in order to tailor them to contexts and achieve impacts?</p>
Engaging, collaborating, and working with the relevant stakeholders	<p>Is there sufficient and appropriate communication with stakeholders to keep them aware of developments in the policy area?</p> <p>Is advice and guidance provided sufficient to support stakeholders in complying with regulation?</p> <p>Is the advice and guidance provided sufficient to support stakeholders in taking advantage of different schemes available?</p> <p>Are government and engaging and listening to stakeholder's feedback on how the strategy is being delivered?</p>
Evaluation	
Monitoring and Evaluation	<p>Have the needs, purposes and audiences for MEL been articulated? By and with whom?</p> <p>How are accountability and learning purposes being addressed by MEL?</p> <p>Is the MEL activity appropriate to the portfolio/programme/policy attributes?</p> <p>Are the MEL activities feasible given available resources and expertise?</p> <p>Is MEL activity reported on and shared publicly so relevant stakeholders are able to access information on progress of the portfolio against targets and milestones?</p>
Learning	<p>Are the MEL findings shared amongst the appropriate teams?</p> <p>Do the portfolio management teams provide strategic advice and guidance to support teams to adapt work based on evaluation findings?</p>

Annex 3 Workshop briefing material

Online Workshop 21st March 2024 15:00–17:00

Interactive Tools

Mural is an online interactive whiteboard, which will be used for people to add and record their ideas.

Please follow the following link to view the workshop mural board

'[Environmental Land Management](#)' and check you have access to Mural.

This 3-minute video gives you a quick guide

[Welcome to MURAL. Know what, why, and how to use MURAL before your meeting. - YouTube](#).

Environmental Land Management schemes: where are we now?

The Office for Environmental Protection's (OEP) mission is to protect and improve the environment by holding government and other public authorities to account. Part of this role involves monitoring, critically assessing and reporting on the government's progress in improving the natural environment in line with their Environmental Improvement Plans (EIP), goals and targets (see [recent report](#))

The Environmental Land Management schemes (ELM), which includes three components Sustainable Farming Incentive (SFI), Countryside Stewardship (CS) and Landscape Recovery (LR), are the policy areas that are indicated by government as key to the delivery of environment targets, and therefore of great interest to the OEP. To ensure that the OEP can focus their efforts on critically assessing and monitoring progress of ELM, the OEP are asking for experts in the field of environmental, agricultural, and social science/policy to share their opinions on ELM progress and to highlight any risks to the achievement of the environment targets due to ELM.

OEP has commissioned an independent consultancy, ICF working in partnership with CECAN Ltd and Matthew Baumann Associates, to develop frameworks and tools which can be used by OEP to support future analysis and reporting on government progress across the goals of the Environmental Improvement Plan. The frameworks developed by the ICF-led team and co-designed with OEP, will be used in the workshop as a tool to support discussion and analysis of ELM and its progress.

Workshop objectives

- Discuss the adequacy of policy components that are in place for achieving ELM-specific and wider, longer term EIP targets.
- Identify key areas of concern and discuss risks for successful delivery.
- Discuss priority areas and lines of enquiry for OEP monitoring.

The findings of the workshop will help the OEP prioritise its long-term work on nature friendly farming and inform part of the next EIP progress report to Parliament.

Workshop Agenda

Time	Agenda Item	Description
5 mins	Welcome & Introductions	Introduction to the project and the work
15 mins	ICF Presentation: ELM framework	The ICF team will do an introduction to the workshop session and the agenda. They will then provide an overview of ELM using the developed framework.
70 mins	Exercise 1: Where is ELM at now?	As a group we will go through the following components of the framework – vision, strategy, plan & delivery – to discuss the strengths and weaknesses of ELM and identify potential risks to achieving intended outcomes. In addition to discussing ELM, participants will be invited to leave comments in the Mural Board itself to suggest improvements, additions, or alterations to the framework.
20 mins	Exercise 2: What are the priority areas for OEP to scrutinise and / or monitor?	As a group we will work to identify and agree areas of ELM where participants feel the OEP should particularly focus its monitoring and reporting work. Using Mural participants will be invited to vote for their top three areas for scrutiny
10 mins	Final Discussion	We will summarise the key takeaways from the session and the next steps for the work.

Background information on the framework

The workshop will use a [framework](#) developed by the ICF led team and the OEP to assess the strengths, weaknesses, implications, and prospects of ELM. The framework spans the vision, strategy, action plan, and delivery of ELM.

Participants may wish to familiarise themselves with a summary of current published information on ELM which is represented in the diagram in the Mural board underneath the title [‘Environmental Land Management’](#).

Whilst we offer a series of prompts to aid this evaluation (below), we also welcome broader reflections on ELM as well as on the usefulness of the framework itself, as it will inform other areas of OEP work.

Vision

- Is there a clear and consistent vision for ELM?
- Does ELM clearly identify a problem and propose a way to address it?

- Are targets appropriate (linked to vision), coherent, and underpinned by plausible pathways to achievement?

Strategy

- Is the logic of ELM clear and linked to the vision?
- Does ELM recognise drivers and pressures?
- Are the interventions to address the problem clearly defined, underpinned by evidence, and appropriate?

Plan

- Is there a sufficient plan of action to deliver ELM?
- Are the tiers of ELM and the environmental actions included appropriate and sufficient to meet environmental targets?
- Is the ELM programme sufficiently funded?
- Is there an appropriate plan to ensure or enforce universal compliance of regulatory baseline?
- Are there sufficient plans to verify compliance?
- Have Defra secured sufficient engagement and buy-in to ensure uptake of ELM?

Delivery

- Are the appropriate governance structures in place to provide oversight across ELM?
- Are teams sufficiently resourced (capacity and capability) to deliver the scheme and ensure join up and adaptive management?
- Are delivery partners sufficiently resourced (capacity and capability) to deliver the scheme?
- Are Defra providing sufficient support to stakeholders (farmers and land managers) to deliver ELM actions?

In addition to the areas above, our framework includes scientific evidence, monitoring and evaluation. We anticipate that consideration of the quality and use of scientific evidence and M&E will be relevant to the workshop discussion and to OEP's analysis of policy design, delivery, and associated risks, but we do not anticipate discussing these areas substantively.

Workshop information and privacy notice

The workshop will be recorded for the purposes of notetaking. This recording will not be shared with any parties beyond ICF or the OEP and will be destroyed as soon as the report is completed. The workshop participation and outputs will be handled in accordance with the OEP's [Privacy Notice](#), which is committed to protecting the privacy and security of participants information in accordance with the UK General Data Protection Regulation (UK GDPR). The OEP's [Personal Information Charter](#) sets out the standards which are upheld when processing personal information, with further guidance on how to view, change, or remove this data. Your contributions will remain anonymous, but we may use some anonymous quotes in reporting for illustrative purposes.

Annex 4 Summary of workshop discussion

This annex provides a summary of the contributions made by workshop participants during the exercises as the following components were considered:

- **Vision:** The vision and targets related to ELM.
- **Strategy:** The strategy and logic behind ELM and its three schemes - SFI, CS & LR.
- **Plan:** The components that are required to implement ELM and known information on progress.
- **Delivery:** The stakeholders involved in the delivery and management of ELM.

These reflections can be considered by the OEP alongside its own analysis in review of the progress and adequacy of ELMs.

A4.1 Vision

Tension between vision and complexity of food/environment systems

Participants described the vision of ELMs as broad - encompassing a vast selection of areas from food protection to climate and nature. Some participants felt that despite the vision encompassing a wide range of issues it stopped short of being holistic because there was little recognition of how land use is connected to complex political economic systems (such as trade deals, supply chains, and food systems).

A few participants specifically referred to ELMs as having a 'nudging' vision, suggesting that the policy is concerned with nudging actors in the system rather than transforming its conditions. One participant suggested that to rectify this ELMs could be reframed so that it contributes to system transformation, possibly by signalling transformations needed in land use to achieve desired outcomes.

Clarity of vision

Lack of clarity was raised at multiple points throughout the workshop, with several participants feeling it is generally unclear what ELMs is trying to achieve. Participants felt that this lack of clarity could in part be attributed to the difficulty in transitioning from the previous Basic Payment Scheme (BPS) to ELMs. Participants recognised that while to a certain extent ELMs represents a replacement for the BPS by providing funding to support farmers, it also represents a fundamental shift from what went before. BPS subsidised the production of food and other goods through area-based payments whereas ELMs' core proposition is the provision of public money for public goods. Funding is distributed as payments for specific actions that contribute to the production of environmental goods and services. Multiple workshop participants felt that this transformation is not clearly communicated to stakeholders. One participant suggesting that Defra itself might experience difficulties in transitioning to this vision.

Alignment of ELMs vision and Targets

Multiple participants raised concerns over how the vision of ELMs aligns with the targets in the 25 Year Plan and the EIP. Again, participants noted the broad range of environmental actions under the ELMs vision, including carbon, air, water, and nature. Yet, as one participant suggested, these elements are often not complementary. This reflected a broader concern amongst participants over the extent to which the ELMs' vision will be translated into outcomes which meet environmental targets. Many suggested that Defra need to provide further clarity

over how ELM will create routes, levers, and mechanisms to deliver environmental outcomes. This situation is further compounded by multiple participants concerns that ELM might function as a policy ‘wrapper’ i.e. its contents are likely to change depending on political pressures and budgets, making any prediction over target contribution difficult.

A4.2 Strategy

The logic behind ELMs and the three schemes

‘ELMs Logic’ ranked the highest priority for further scrutiny in the voting exercise during the workshop. When discussing the three schemes (Sustainable Farming Incentive (SFI), Countryside Stewardship (CS), and Landscape Recovery (LR)) there was concern that more emphasis is being placed on SFI, which participants felt would not be as successful at delivering environmental outcomes. Participants were concerned that SFI does not seem to supply any strategic guidance or steer to encourage farmers to undertake actions which result in greater environmental outcomes. Some participants felt that this could result in landowners and farmers choosing easier or already occurring actions, resulting in a lack of additionality and difficulty demonstrating return for further funding. Some participants suggested that SFI schemes could create a two-tier land management system where farmers or landowners might choose to designate one zone of land for intensive farming whilst another zone is used to stack the subsidy for public good. Participants felt that this would create a splintered land management plan which lacked spatial join up and would therefore be limited in the extent to which it could meet environmental targets.

In comparison to SFI, workshop participants felt that CS more likely to deliver environmental outcomes. While one participant commented that new payment rates included in CS for existing features are a good sign several participants were concerned that funding is being distributed more heavily towards SFI at the expense of the CS and LR components which are more long-term and bespoke environmental actions. There was a concern from one participant that LR was being taken up mostly by large scale eNGOs rather than farmers and land managers which would perpetuate current activity rather than finding new forms of environmental additionality and improvement.

Spatial planning and prioritisation

While a more flexible approach to the schemes could result in higher uptake as it is more appealing to farmers, there is a concern that such a hands-off approach might make it difficult to ensure enough environmental action is occurring in the right place. Participants felt that some form of advice is necessary to ensure that the SFI, (SFI), CS, and LR schemes align with the holistic vision of ELMs. Some participants felt it was unclear how Local Nature Recovery Strategies (LNRS) will inform the delivery of ELMs. It was also noted that that administrative boundaries could complicate delivery of LNRS and result in variation of quality of the plans.

Regulatory baseline

Participants highlighted the importance of a regulatory baseline for ELMs to achieve environmental outcomes and measure progress. In the voting exercise, participants identified this as one of the primary areas for OEP attention. It was felt that a lack of baseline would make it difficult to monitor and measure the impact of environmental actions against targets. Participants made comments that there needs to be more alignment between the ELMs strategy and regulation and that regulation needs to be used effectively to shift the dial on better environmental practice. One participant

suggested that the College of Agriculture, Food, and Rural Enterprise's (CAFRE) Soil Nutrient Health Scheme was an example of best practice in developing a regulatory baseline.

A4.3 Plan

Environmental Action

Workshop participants highlighted 'environmental action' as the second highest priority area for OEP monitoring. As mentioned above, it was felt that unequal weighting towards SFI schemes would reduce the availability of funding for CS and LR actions, both of which were considered by participants to generate more beneficial to biodiversity, nature, and environmental outcomes. During the workshop there was limited discussion on the specific environmental actions that fall under SFI or CS, but this could be an area for further investigation with other stakeholders in future engagement exercise.

Funding

There was concern amongst participants over whether the funding of ELM was sufficient to ensure that actions are adequate and appropriate to meet environmental targets. Multiple participants suggested that this lack of funding is compounded by the removal of BPS, and the subsequent need to make the case to the Treasury for continued funding by demonstrating additionality. One participant also highlighted the uncertainty about how ELMs relates to other funding schemes and private finance such as Biodiversity Net Gain (BNG) and Peatland Nutrient Offsets.

Compliance

Participants questioned whether there was an appropriate plan to measure ELM actions and enforce compliance. There was an appreciation that monitoring the breadth of ELM actions is difficult. There is more evidence in certain areas, such as biodiversity, than there are in others, such as carbon storage and sequestration. Participants were keen to highlight the need to equip land managers and farmers with technical abilities to ensure that they have the capability to monitor their own actions. Yet, there was also an appreciation amongst participants of the political pressures and economic challenges that underpin regulation and compliance. Participants acknowledged that upskilling land managers and farmers to be able to monitor their own actions is costly. There was also an appreciation that ELMs exists in a post-Brexit political context and has been sold on the notion of lighter touch regulation and a move away from cross compliance.

Engagement & buy-in to the strategy: Private sector/supply chain

Participants felt that the lack of engagement of the private sector in the food supply chain as a gap that required further consideration. Participants felt that engagement between land management and food systems would make it easier for farmers and landowners to respond to the market and that government would not be able to deliver agricultural transition without engagement from the wider food system. Participants noted that climate and economic resilience are linked and felt that there was a need to better reflect this in value across the supply chain. They felt that the public good element of ELMs is not valued by retailers and their supply chains who are regulated by other values such as greenhouse gases. Recognising the value of nature across the supply chain would mitigate any possible conflict between food production and the environment.

A4.4 Delivery

Governance

Participants felt that local ownership and scrutiny was needed to ensure good governance. Some participants suggested that ELM might include elements of best practice from the FIPL scheme, which they felt managed to balance spatial prioritisation with local ownership. Participants also highlighted how little attention has been paid to the specific governance requirements of LR schemes. LR's bespoke, long-term structure means that a large proportion of funding goes to eNGOs. Overall, participants suggested that there has been little attention to the specificity of governance structures required by different schemes under ELM, making their delivery and management unclear.

Capability for joined-up delivery

Capability to develop joined-up spatial interventions was identified as a critical factor for ensuring the successful delivery and management of ELMs. This was voted as the third priority for OEP monitoring in the voting exercise. Some participants suggested that advice and guidance to farmers should support a whole farm system or landscape cluster approach, to enable better spatial prioritisation and improve outcomes. Northern Ireland's Environmental Farming Scheme (EFS) as well as Countryside Stewardship Facilitation Funds were raised as examples of where farm clusters have facilitators to ensure actions are joined up at the at the landscape scale. It was felt that developing spatial delivery would allow ELMs to find synergies with the LNRS and improve spatial targeting of measures.

Adaptive management

One participant praised Defra for the staged process of developing ELM options and this was felt this was a useful process that could continue and evolve to support other Defra-led initiatives. It was also noted that monitoring and evaluation of individual agreements was important for both the farmers and Defra so that agreements can adapt and evolve over time based on learnings through the contract period.

A4.5 Further scrutiny of ELM

Participants shared questions that they had or would like to be explored to further scrutinise ELM:

- What is the strategy for delivering the environmental targets/outcomes? What are the alternative strategies that one could adopt? What is the potential of current scheme to deliver?
- How will better regulation align with the ELM strategy to shift the dial on better environmental practice?
- How do you help shift behaviour to get action for long term shift towards more sustainable farming system?
- How is Defra monitoring and evaluating SFI? In a system which is low on controls, how are links made between what is happening on the ground and the outcomes which are being produced?
- How are the different funding streams from both public and private sector coming together to support farmers and environmental outcomes? It is currently unclear and confusing.