

4. Results from Questionnaire B and Other Consultations

As noted above (Section 1.2) Questionnaire B was designed to determine the constraints which had prevented, or were delaying, the implementation of desirable, sustainable conservation grazing schemes. The Crewe meeting (see Section 1.1) provided further evidence based on the experience of 45 participants, to which were added 15 postal responses from those unable to attend. The problems identified by respondents to questions 28 and 29 of Questionnaire A (Section 3.10) are also relevant in determining the constraints on the implementation of grazing schemes.

These various sources of evidence have been collated by JCB and, whilst each has added novel problems, there is considerable repetition of the more common constraints. Rather than unpick the collation and analysis already undertaken to report each source of information separately with consequent repetition, this section summarises the evidence from all sources; however, some details of the response to Questionnaire B is given and Section 3.10 contains the answers to Questions 28 and 29 of Questionnaire A.

4.1 Results from Questionnaire B

A pro-forma for Questionnaire B is shown in Appendix 3. Completed questionnaires were submitted for 42 sites by 33 respondents. The sites were distributed in 20 counties around the U.K. with 16 counties in England, 3 in Scotland and 1 in Northern Ireland.

4.1.1 Description of Sites

Three habitats were represented in >10% of sites - grasslands (19 sites, 45%), heaths (11 sites, 26%) and sand dunes (4 sites, 10%). The remaining sites included moor, mire, fen, estuarine, wood pasture and orchard habitats.

The area to be grazed varied from <10ha to >1000ha but the majority (22 sites, 52%) were <10ha. Twenty sites (42%) were 10-100ha, seven sites were 100-1000ha and two sites (5%) were >1000ha.

4.1.2 Grazing Animals Required

Cattle were the preferred stock on 24 sites (43%). Four breeds were specified: Highland (5 sites), Galloway (4 sites), British White and Longhorn. Thus breeds with proven records in conservation grazing were identified. Sheep were preferred on 19 sites (34%) and again the breeds specified were generally those with established conservation grazing records: Hebridean, Herdwick, Manx Loghtan and Soay, although Cheviot was also identified. Ponies were specified for 10 sites (18%) with Exmoor and New Forest breeds named; three sites expected to use goats.

For sites where a particular breed was not identified the choice was often stated to be from amongst 'hardy-type' breeds.

4.1.3 Number and Nature of Identified Constraints

A total of 140 constraints were identified for the 42 sites with up to seven constraints for any one site (Table 62).

Table 62. Number of constraints per site in Questionnaire B

Number of Constraints	1	2	3	4	5	6	7
Number of Sites	5	6	13	7	3	6	2
Percentage of Total	12	14	31	17	7	14	5

The constraints occurring most frequently were classified as follows:

- Resources for, and viability of, the scheme - 54 sites (38%)
- Public access and education issues - 22 sites (16%)
- Availability of the right type of stock - 18 sites (13%)
- Control of vegetation at the start of the scheme - 15 sites (11%)
- Legal issues - 14 sites (10%)
- Practical management of livestock - 8 sites (6%)

Although the slightly different categories from those used in the summary to Box 25 may conceal some similarities, clear differences emerge when these frequencies are compared with those identified in establishing conservation grazing schemes in Questionnaire A (see Section 3.10). These differences may reflect how the proposals have developed; for example, practical stock management issues such as dog-worrying, water availability and keeping stock enclosed contributed over 20% of the problems summarised in Box 25, compared to just 6% amongst sites in Questionnaire B. Legal issues, whilst subsumed into fencing and public access categories in Box 25, did not warrant a separate category there whereas they constitute 10% of the constraints in Questionnaire B. It would appear that problems change as schemes progress; in the earliest stages the constraints identified in Questionnaire B need to be addressed but, as they are overcome, the increasingly practical problems identified in Questionnaire A present new challenges. Eventually, if the scheme is implemented, the problems of established sites as summarised in Box 26, become paramount.

Despite this progression some difficulties appear to continue. The availability of the right stock was identified by 13% of respondents to Questionnaire B; this rises to 17% (admittedly including a timing element) in establishing schemes (Box 25) and to 20% in established schemes (Box 26). Although too much reliance must not be placed on the precise percentages, it is clear that the problem of obtaining the best stock in the optimum numbers, continues to be an important, perhaps even the most important, issue facing managers of conservation grazing schemes.

Another such issue is public access and the need for education to overcome public resistance to fencing, to the perceived dangers of livestock and to the impact of grazing. In Questionnaire B this was raised as an issue for 16% of sites which is comparable to the 19% total for public access, public reaction/resistance categories in Box 25. Although this appears

to drop to 12% in established schemes (Box 26) to this should be added 4% for fence cutting and other vandalism. When adverse public reaction spills over into direct action the costs in staff time to check on the location of stock and to effect repairs can undermine the viability of grazing schemes.

One constraint identified in 11% of sites detailed in Questionnaire B but rarely in answers to Question 28 of Questionnaire A was the control of unwanted vegetation at the start of the scheme. Interestingly, this issue resurfaces as weed and scrub control problems in established schemes (Box 26). It may be that in the early stages of restoration management projects the need for removal of unwanted vegetation is recognised as a requirement to allow stock to graze but that the hope that stock will continue to exert control is not always fulfilled.

4.2 Categorisation and Ranking of Constraints

In collating the information on constraints from the various sources listed in Section 4.0 cross-checks established that there was little duplication of evidence (i.e. information on the same site was rarely submitted to more than one of the sources). An initial analysis sub-divided the 140 constraints into 47 subject headings. These were then further classified into 14 categories (Box 28).

Box 28: Categories for the constraints on the implementation of conservation grazing schemes

- | | |
|-------------------------------|------------------------------------|
| 1. Legal | 8. Short and long term viability |
| 2. Agricultural policy | 9. Livestock management |
| 3. Agri-environment schemes | 10. Equipment |
| 4. Planning policy | 11. Control of unwanted vegetation |
| 5. Conservation policy | 12. Monitoring of grazing |
| 6. Resources planning | 13. Education |
| 7. Staff expertise / training | 14. Alternatives to grazing |

Table 63 shows the fourteen constraint categories and the 47 subject headings identified. However since the initial collation of the constraints some developments have occurred, or have been initiated by GAP, which at least begin to address the issues raised. The intention of the GAP Steering Group has been to work constructively with any person or organisation to ameliorate or remove the constraints on conservation grazing projects. The consultations that led to the collation of the list of constraints had also identified existing information, or sources of advice and guidance and suggestions for further action had been made. Details of the action taken or proposed by GAP up to July 1999 is also shown in Table 63, together with other possible sources of assistance.

Table 63. Summary table of the constraints affecting the sustainable grazing of land for wildlife

Constraint Category	Itemised constraints Number in brackets = cross reference to original 47 identified constraint subject headings (see text)	Action by GAP and Recent Developments C: action 'completed' U: action 'underway' P: action 'proposed' R: Recent Developments GN = GAP Newsletter No .. ENRR = English Nature Research Report	Sources of further help suggested to assist with removal or reduction of the constraint.
A. Legal Issues	<p>A1. <u>All</u> issues regarding grazing on common land including:</p> <ul style="list-style-type: none"> - failure to exercise grazing rights on common land leading to under grazing, or conversely, over registration of rights in the past now leading to over grazing. [1] - difficulty in obtaining legal permission to erect stock fencing on common land under Law of Property Act 1925, Section 194. [2] <p>A2. Failure of legal occupiers to co-operate in grazing statutory sites (e.g. SSSIs). [3].</p> <p>A3. Need to persuade 'agricultural tenants' to carry out the required grazing prescriptions. [4].</p> <p>A4. Issues concerning the issue of grazing licences:</p> <ul style="list-style-type: none"> - annual licences and annual competitive tendering give no encouragement for grazier to set up livestock enterprises. [5]. - upward reviews of grazing rents (e.g. in 1998) seriously risk the loss of financial viability for grazier. [26] - need for increased flexibility in setting livestock numbers according to herbage growth in a season. [27]. 	<p>C: Publicise the <i>Good Practice Guide on Managing the Use of Common Land</i>, DETR, June 1998. (GN 4)</p> <ul style="list-style-type: none"> - especially Sections 3 and 4 - especially Sections 3 and 4 and pages 58-60 <p>U: Pursue systems of controlling livestock that do not require fencing</p> <p>C: Publicise consensus building approach as in <i>Good Practice Guide on Managing the Use of Common Land</i>, especially pages 55 to 57 (GN 4)</p> <p>C: Publicise Agricultural Tenancies Act 1995 (which replaced Agricultural Holding Act 1986) allowing farm business tenancies on own terms including grazing (GN 4)</p> <p>C: Produce and publicise 'best practice' licence; publicise that grazing licences can now be issued for any term without creating exclusive possession - 3 year MAFF licences no longer needed (GN 4)</p> <p>P: Publicise and lobby for more understanding by staff in conservation organisations; more use of 'peppercorn' rents</p> <p>C: Publicise alternative of requiring the achievement of a given 'vegetation structure' (provide photographs) rather than stating the precise number of animals required (GN 4)</p>	<p>See the <i>Good Practice Guide on Managing the Use of Common Land</i>, DETR, June 1998.</p> <p>Review of legislation by DETR.</p>

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	<p>- problem of need to run a bull with cows where there is public access. [6].</p> <p>A5. Frequent need for professional advice on legal issues. [7].</p>	<p>C: Publicise Wildlife & Countryside Act 1981, Sect 59, that allows bulls of <u>non-dairy</u> breeds to graze if accompanied by cows. A bull of a <u>dairy</u> breed is allowed free range only up to 10 months of age (GN 4)</p> <p>C: Publicise that NFU members have use of legal 'help line' (GN 4)</p> <p>P: Consider need for other legal 'help line' / advice notes</p>	<p>NFU</p> <p>? / ARICS or other.</p>
B. Agricultural Policy Issues	<p>B1. Short term: more flexibility required in respect of quotas and headage payments to reduce overstocking [15]; need for rapid move to more subsidy support for environmental benefits [8]; need for more support for 'disadvantaged' grazing land [16].</p> <p>B2. Detrimental effect of BSE policy on the supply of animals (especially older animals) for grazing of wildlife sites. [17].</p>	<p>P: Support representations to MAFF on Agenda 2000 proposals for movement of support to 'area' payments (in short term) with rapid move to environmental objectives</p> <p>R: Continued negotiations following publication in summer 1998 of Agenda 2000 'Working papers from the countryside agencies in Great Britain' (EN, CC, JNCC, SNH, CCW) in response to EC draft regulations</p> <p>C: Publicity for NFU's "Landscape in Peril" publication 1998 (GN 4)</p>	<p>MAFF/FRCA</p> <p>MAFF</p>
C. Agri-environment Scheme Issues	<p>C1. Various issues surrounding the running of agri-environment schemes including:</p> <p>- low level of funding results in low viability and poor take-up. [9].</p> <p>- discrepancy of funding support e.g. Countryside Stewardship Scheme (CSS) - grasslands £50 ha⁻¹; arable £450 ha⁻¹. [9].</p> <p>- uncertainty created by what happens if / when schemes come to an end [10].</p>	<p>P: Publicise this ENRR to statutory agencies for scheme reviews and 'policy' staff in conservation organisations</p> <p>P: Need for flexibility to front-end load agreements and for higher capital works payments</p> <p>P: Need for re-assessment</p> <p>P: Need for longer term assurances; support for Agenda 2000 proposals and on going development work</p> <p>R: Government commitment to continue agri-environment schemes Autumn 1998; funding for new CSS agreements £7.5m for 1999-2000.</p>	<p>MAFF / FRCA policy staff.</p> <p>MAFF / FRCA policy staff.</p> <p>MAFF / FRCA policy staff.</p> <p>MAFF / FRCA policy staff.</p> <p>MAFF / FRCA policy staff.</p>

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	<ul style="list-style-type: none"> - lack of financial support for the use of native, traditional and rare breeds in conservation grazing, for stock person support and for organic grazing conversion. [11]. - ESA stipulations too rigid and inflexible and no support for pony grazing as classed as 'non-agricultural'. [12]. - CSS needs more emphasis on conserving existing sites and their central cores rather than boundaries; less of a tick list of criteria; separate money for arable headlands in arable conservation scheme to prevent shortage for grassland conservation. [13]. - insufficient mechanisms for financial support of grazing schemes on non-farming type land. [21]. 	<p>P: Need for increase in level of financial support and incentives within schemes</p> <p>P: Need for greater flexibility and to include ponies</p> <p>R: ESAs now have prescriptions drawn from management plan for each site; should enable greater flexibility in grazing.</p> <p>P: Need for action as issues stated; also to move away from profits foregone basis to payment for positive works</p> <p>P: Review use of WES or RES if SSSI (?)</p> <p>R: New organic conversion payments from April 1999: unimproved grasslands in Tier 3 with rates of £25 ha⁻¹ in year 1, £10 ha⁻¹ year 2 and £5 ha⁻¹ years 3-5.</p>	<p>MAFF / FRCA policy staff.</p> <p>MAFF / FRCA policy staff.</p> <p>Policy staff.</p>
D. Planning Policy Issues	D1. Loss of livestock holding facilities and loss of viability of grazing units caused by break up and re-development of farms especially in arable areas. [18].	P: Need for representations to planning authorities for policy changes to guard against loss of grazing unit viability; re-introduce stock tax allowances; provide grants or other investment funding to increase unit viability	MAFF / FRCA / DETR / HMT
E. Conservation Policy Issues	E1. Perceived constraint of viewing the implementation of grazing as a 'means to an end' for conservation management, rather than as an 'integral part of rural countryside management' (the 'holistic' view) . [14].	<p>P: Communicate to policy staff the results of the 'Crewe debate' that over 80% of participants voted for the 'holistic' approach; and give publicity to identified examples.</p> <p>C & P: Need for acceptance of concept, and setting up, of 'regional grazing schemes'. See GAP Project Objective 4 (Appendix 1)</p> <p>R: Hampshire County Council pilot Regional Grazing Scheme initiated</p> <p>U: Proposals for other Regional Grazing Schemes under development</p>	Policy staff.

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	<p>E2. Need for more help and advice on determining suitable grazing regimes for the vegetation on specific sites (grazing period, animal type, breed, age, sex), that will deliver objectives (including for single species management), whilst balancing the animals' needs with conservation objectives. [28], [35].</p> <p>E3. Need for local staff to be allowed more freedom to implement conservation grazing objectives in the most practical manner. [19].</p> <p>E4. Need for local staff to be allowed to take decisions on whether grazing objectives should be implemented by 'in-house' stock, licensee grazing, or other method. [20].</p> <p>E5. Risk that many animals are not sufficiently hardy for conservation grazing conditions as increasingly bred for 'show' purposes rather than primitive attributes. [36].</p> <p>E6. Lack of acceptance and understanding of the need for 'lay-back' land to assist viability of grazing schemes. [23].</p>	<p>C & P: Key role for GAP Grazing Forum: meetings (themed); publicising of information where already available (including 'references' list); fact and data gathering (breed profile accounts); preparation and publication of advice; identifying research needs; facilitating training days. See GAP Project Objectives 1 and 2 (Appendix 1) (GN 1, 2, 3 & 4)</p> <p>U: Compilation of breed profiles started (GN 5)</p> <p>C: Discussion document: <i>The potential for using organic systems to aid the delivery of biodiversity targets in the grazing management of SSSIs, NNRs and other wildlife sites</i>. Available from EN Enquiry Service.</p> <p>U: GAP involvement in FACT Conference, Cambridge September 1999</p> <p>P: Communicate to policy staff by distribution of this ENRR.</p> <p>C: Publicise the 'local consensus approach' to the most practical implementation of grazing; e.g. adapt <i>Good Practice Guide on Managing the Use of Common Land</i>, DETR, June 1998, pages 55-57. (GN 4)</p> <p>C & P: Provide more guidance on conservation and financial performance by case studies. (GN 2)</p> <p>P: Obtain advice on how to find, select and maintain hardiness & encourage suppliers of hardy animals for conservation grazing; refer issue to R.B.S.T.</p> <p>U: Compilation of breed profiles started (GN 5)</p> <p>P: Communicate to policy and acquisition staff by distribution of this ENRR.</p>	<p><i>Lowland Grassland Management Handbook</i> 2nd Edition, EN 1999;</p> <p><i>Upland management Handbook</i>. EN 1998.</p> <p>Policy staff</p> <p>Policy staff</p> <p>Policy staff.</p> <p>e.g. EN Research Report No 271, 1998.</p> <p>R.B.S.T.</p>
F. Resource Planning	<p>F1. Need for better forward planning of resource allocation to see through the setting up, implementation and continuation of the grazing to meet stated conservation objectives. (To include provision for: scrub removal, fencing, water supply, handling pens, equipment, staff / stock person, sheep dogs, grazing animals, etc.). [22].</p>	<p>P: Publicise by copy of this ENRR to relevant staff.</p>	

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G. Staff Training/ Expertise	<p>G1. Need for training of staff who are involved in setting conservation objectives and prescriptions, (including how best to obtain grazing from (extensive) farming systems and how this may fit into farming systems more generally. [24].</p> <p>G2. Need for specialist training of staff who will oversee and implement the conservation grazing or provision of suitably skilled contractors to carry out the work. [30].</p>	<p>P: GAP to work with others to encourage and facilitate the design of 'specialist' training by training courses; practical experience and competency testing.</p> <p>P: To provide advice on 'share farming partnerships'</p> <p>U: GAP involvement in FACT Conference, Cambridge September 1999</p> <p>U: GAP involvement in specialist training courses e.g. Snowdonia N.P. and Peak District N.P. Study Centres.</p> <p>P: GAP to work with others to encourage and facilitate the design of specialist training by training courses, practical experience and competency testing. Encourage 'career-ship' training, day / block release, work experience.</p> <p>U: GAP involvement in specialist training courses e.g. Snowdonia N.P. and Peak District N.P. Study Centres.</p>	<p>Agricultural and environmental training establishments.</p> <p>The National Trust.</p> <p>Agricultural and environmental training establishments.</p>
H. Short and Long Term Viability	<p>H1. Grazing required to implement many grazing schemes provided by temporary or short term measures, many of which may not be sustainable in the longer term. Ensure that the implementation of grazing schemes is effective and sustainable into the future.</p> <p>This issue includes:</p> <ul style="list-style-type: none"> - continued viability of 'in-house' grazing schemes and finding lay-back land when the stock are not needed to graze the 'home' site [25] - finding co-operative graziers who will regularly graze as required without overgrazing [28] 	<p>P: GAP to encourage networking with all interested parties in the agricultural and conservation industries to build on current successful grazing initiatives and work towards the setting up of a network (dependent on successful piloting) of formal or informal 'regional grazing schemes' whereby animals are moved around between sites as and when needed. They would be concerned with the viability of the grazing from 'grass blade to meat joint'. See GAP Project Objective 4 (Appendix 1)</p> <p>C: Discussion document: <i>The potential for using organic systems to aid the delivery of biodiversity targets in the grazing management of SSSIs, NNRs and other wildlife sites</i>. Available from EN Enquiry Service.</p> <p>U: GAP involvement in FACT Conference, Cambridge September 1999</p> <p>R: Hampshire County Council pilot Regional Grazing Scheme initiated</p>	<p>Numerous organisations</p>

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	-lack of 'value added' / sustainable market outlets for non-intensively produced and organic stock and other products [43].	<p>U: Proposals for other Regional Grazing Schemes under development</p> <p>Assist with networking through:</p> <p>C: GAP Grazing Forum; "Grazelots" (GN 2 onwards), with possible development to broader "Eco-Lots".</p> <p>P: Encourage improved co-operation with licensed grazers through production and publicising of 'best practice' grazing licence.</p> <p>C & P: Publicise existing schemes (Organic Livestock Marketing Co-op; RBST Meat Marketing Scheme, HCC register of sites; native breed premiums) and encourage development.</p>	OLMC, RBST, HCC, Breed Societies, etc.
I. Livestock Management Issues	<p>I1. Need for a standard 'best practice' code for animal management and welfare issues applicable to conservation sites, and to enable agreed standards to be followed. [29].</p> <p>I2. Lack of knowledge of how to manage 'clean' grazing systems with minimal need for disease and parasite control, especially without use of 'ivermectins' and to assist those wishing to pursue organic farming options. [31].</p> <p>I3. Too much emphasis on obtaining production from grazing animals leads to compromising of conservation objectives; also how to finish animals for sale with supplementary feeding? [37].</p> <p>I4. Lack of knowledge on alternatives to, and best ways of, supplementary feeding; need for help with determining mineral deficiencies of any modern breeds used. [38].</p>	<p>C: Publicise Appendix 6, '<i>Animal Welfare Code of Good Practice</i>', in the <i>Lowland Grassland Management Handbook</i> 2nd edn., 1999, written by Bill Grayson; obtain feedback and review. (GN 4).</p> <p>C: Discussion document: <i>The potential for using organic systems to aid the delivery of biodiversity targets in the grazing management of SSSIs, NNRs and other wildlife sites</i>. Available from EN Enquiry Service.</p> <p>C: Publicise '<i>Report on Ivermectin Use in Livestock</i>', FWAG, 1997. (GN 2).</p> <p>P: Seek provision of advice from organic farming industry and possible writing of an advice paper.</p> <p>P: Prepare information on and publicise 'store animal' approach to grazing (i.e. only maintenance diet required).</p> <p>P: Encourage 'regional grazing scheme' approach using different pastures for different stages of production. (GAP Project Objective 4).</p> <p>P: Prepare and publicise advice paper on options.</p>	<p>MAFF Codes.</p> <p>Soil Association</p> <p>Soil Association</p>

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J. Equipment Issues	<p>J1. Information needed on methods of supplying water to remote sites and of automatically controlling the flow (e.g. bowser, gravity systems, ponds, 'push drinker' systems etc.). [40].</p> <p>J2. Need for information on easier ways to round up, pen, and handle stock on remote sites, including flexible transport systems, but not forgetting issues surrounding the use of sheep dogs [42].</p> <p>J3. Need for a quicker method of finding animals on remote or wooded sites for periodic inspections. [39].</p> <p>J4. Problems of stock containment on sites where fencing is not an option. [41].</p>	<p>P: Prepare and publicise a review of watering systems.</p> <p>P: Prepare and publicise a review of equipment and techniques available.</p> <p>U: Continue to investigate remote tracking systems, trial and if successful publicise; two systems currently under review.</p> <p>U: Continue to investigate and trial potential systems; publicise if any meet required standards of control.</p>	English Nature's 'ENPACT' Project, & 'FACT' (Forum for the Application of Conservation Techniques Liaison Group).
K. Control of Unwanted Vegetation	<p>K1. More techniques required for the control of weeds whilst minimising disruption to grazing and without damage to wildlife interests. [33].</p> <p>K2. More techniques required for controlling scrub whilst minimising disruption to grazing and damage to wildlife. [32].</p>	<p>C & P: Publicise techniques as they become available: e.g. 'bracken bruisers' (<i>Enact</i> Vol. 5 No 3); weed pulling machine (GN 2; <i>Enact</i> Vol. 6 No 2); weed wipe machines ("Eco-Wipe" rough terrain machine <i>Enact</i> Vol. 2 No 1 & Vol. 3 No 2).</p> <p>C & P: Publicise techniques as they become available: e.g. root cutting chain saw (GN 4; <i>Enact</i> Vol. 6 No 4).</p>	English Nature's 'ENPACT' Project, & 'FACT' (Forum for the Application of Conservation Techniques Liaison Group).
L. Monitoring of Grazing	<p>L1. Advice required on the best ways of monitoring grazing and its effects to ensure achievement of objectives. [44].</p>	<p>P: Produce and publicise a review of best techniques including advice on the best technique(s) to give 'best assessment with least cost'.</p>	
M. Education Issues	<p>M1. Public objections, obstruction and interference to grazing schemes currently prevents some schemes starting and others attaining their full objectives. Problems revolve around objections to fencing and gates, vandalism of equipment, livestock worrying by dogs, motorbikes etc., and dismay when stock are seen to eat 'the flowers' [45].</p>	<p>C: Encourage and publicise adoption of consensus building approach, by adapting information provided in the "<i>Good Practice Guide on Managing the Use of Common Land</i>", DETR, June 1998. (GN 4).</p> <p>P: Review and publicise information sources about the best practice in the management of public access on sites, with examples of case studies.</p> <p>P: Review and publicise best choice of grazing animals (type, breed, age) which will deter, or not react to, interference.</p>	

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	M2. Dependence of successful grazing schemes on the support of local landowners, farmers and other neighbours. Many do not fully appreciate the need to graze land in order to maintain its wildlife, landscape and accessibility. [46].	P: Encourage and assist where possible with the holding of relevant training days and demonstration events.	
N. Grazing Alternatives	N1. On some sites it is just not currently possible to graze animals despite all efforts (e.g. some urban sites, difficult terrain, sites where fencing is not allowed). There is therefore a need for vegetation management that reproduces as nearly as possible the same ecological effects as grazing. [47].	P: Provide advice on alternatives to grazing. U: Liaison with anyone who can help, including with FACT who have identified the need from a different questionnaire to land managers and who have started work on it as a separate Project.	FACT (Forum for the Application of Conservation Techniques), Project 2.

The action that can be taken by GAP clearly varies depending on the nature of the constraints. Thus on legal and policy issues GAP's role is limited to advising or persuading policy makers. In this context GAP and its objectives can only be viewed against the backdrop of wider developments such as CAP reform arising from Agenda 2000. In contrast GAP can adopt a more practical approach to constraints involving liaison, information exchange, publicity, training and identification of research priorities. The funding for, and appointment of, GAP project co-ordinators (see Section 1.1) will facilitate GAP's ability to contribute to the resolution or removal of all constraints on sustainable conservation grazing schemes.

Since publication of the draft constraints report in the GAP Newsletter (No. 4) FRCA have responded and this response is reproduced in Box 29.

Box 29: Farming and Rural Conservation Agency's response to draft constraints report

Grazing Animals Project - Background to Response

MAFF supports the management of wildlife sites through its agri-environment programme. The agri-environment schemes are an important priority for the government. The Comprehensive Spending Review has set the budgets for MAFF's work over a three year period. Significant additional funding was allocated to be spent on new agri-environment scheme agreements over the next three years (including ESAs, Countryside Stewardship and the Organic Farming Scheme). £7.6m in 1999/2000, £14.3m in 2000/2001, £19.5m in 2001/2002 (*as agreements last between five and ten years the second year funding has to cover the on going costs of the first year agreements as well as providing for new applicants and so in the third year*).

Following the 1992 CAP reform member states were required to implement agri-environment schemes as part of the accompanying measures of the reform package. To maximise our funds for agri-environment work all our schemes are submitted for co-finance under the EC Agri-environment Regulations, support is available at 50% for specified measures. To secure approval and co-finance our schemes have to be fully compliant with the rules governing agri-environment measures, these are set out in EC Regulations 2078/92 and 746/96. The schemes are checked and audited for compliance with these rules.

A new regulation, the Rural Development Regulation, agreed as part of the Agenda 2000 package will set the framework and rules for agri-environment schemes after January 2000. The elements relating to agri-environment are strongly based on those in the previous regulations, including the requirement to submit detailed descriptions of the work involved and calculations of the typical income forgone.

Within this framework MAFF operates three schemes under the agri-environment regulations. The new Organic Farming scheme was launched earlier this year, ESAs have been designated in 22 areas of the country and Countryside Stewardship scheme operates outside the ESAs.

The objectives of the schemes vary and are set out in the MAFF literature, for instance the CS scheme has a range of objectives including enhancement of landscape and historic features and providing opportunities for public access in addition to wildlife objectives.

The ESAs are subject to review on a five year cycle, when extensive consultation takes place and appropriate adjustments are made to ensure the scheme is meeting its objectives. The CS scheme has a five year cycle but in fact develops from year to year with elements being adjusted and new items being added e.g. the enhancement of the upland items and incorporation of the Moorland Scheme objectives and the current consultation on the incorporation of successful items of the Habitat Scheme.

Consideration is being given to how to deal with the CS agreements that are ending, initial views were sought from the National Agri-environment Forum last year and further consultation on MAFF's proposals can be expected shortly.

Many of the questions are outwith the scope of agri-environment policy e.g. issues associated with quotas, headage payments and LFA policy. The Agenda 2000 package has set out the future funding of the main agricultural sectors such as arable, beef and sheep regimes. There are a number of optional elements in the Agenda 2000 package and the Minister will be seeking views on their implementation as part of the consultation on the future strategy for agriculture. Within the Rural Development Regulation there is scope for schemes such as training, early retirement, diversification, HLCA etc. Match funding would be required and there are currently no additional funds to those agreed in the CSR to expand upon what we are presently doing (i.e. without additional funds, money for new schemes would have to come from those already operating).

GAP identified constraint (from GAP report "Constraints affecting the implementation of sustainable grazing regimes on wildlife sites")	Suggested MAFF/FRCA response
More flexibility is required in respect of quotas and headage payments to reduce overstocking with rapid move to more subsidy support for environmental benefits; more support for 'disadvantaged' grazing land.	The level/mechanism of support payment is outside the scope of AES and primarily governed by CAP. MAFF will be consulting on those areas of the Agenda 2000 package within which there is some national flexibility.
Low level of funding results in low viability and poor take-up. Need for flexibility to front-end load agreements and for higher capital works payments.	AES are carefully costed in accordance with precise EC rules. Take up is high with demand for CS regularly in excess of the available budget. The level of demand and quality of agreements do not point to a need to generally increase payment rates. Changes are carefully considered in the course of regular scheme payment reviews.
Discrepancy of funding support; need for re-assessment e.g. CSS - grasslands £50 ha ⁻¹ , arable £450 ha ⁻¹ .	Payments are regularly reviewed in accordance with EC rules. Payments are based on income forgone and reflect current agricultural market prices. The figures do not seem accurate CS lowland grassland is £85 ha ⁻¹ plus £30 ha ⁻¹ small area supplement, arable reversion is £280 ha ⁻¹ .
Uncertainty created by what happens if/when schemes come to an end. Need for long term assurances	CS policy for agreements coming up for renewal (first agreements end Sept 2001) currently being developed. Consultation on proposals due shortly - should remove uncertainty.
Lack of financial support for the use of native, traditional and rare breeds to carry out conservation grazing, for stock person support and organic grazing conversion.	New Organic Farming Scheme introduced earlier in 1999. AE area payments can be used to cover costs of additional stock management is built into some income forgone calculations where appropriate. Support for traditional and rare breeds is eligible for EC co-finance under the new Rural Development Regulation but see text above regarding national funding constraints under the CSR.
ESA stipulations too rigid and inflexible and no support for ponies.	ESA reviews address environmental issues and prescriptions are amended accordingly. Exmoor ponies are accepted within the ESA.
CSS needs more emphasis on conserving existing sites and their central cores rather than boundaries; less of a tick list of criteria; separate money for arable headlands in AES to prevent shortage for grassland conservation; move away from profits foregone basis to payment for positive works.	CS is a multi-objective scheme which seeks to select applications that achieve best value for money and maximum environmental enhancement. The CSS scoring system has been devised in consultation with the statutory agencies to identify the best applications and has been amended recently to reflect UK BAP priorities within the 'wildlife' elements of the scoring system. Income forgone calculations include the cost of positive actions prescribed as well as income lost.
Loss of viability of grazing units caused by break-up and re-development of farms especially in arable areas. Policy changes to guard against loss of grazing unit viability; re-introduce stock tax allowances; provide grants or other investment funding to increase unit viability.	Relates to wider issues that go well beyond scope of agri-environment schemes. MAFF has initiated consultation on the Agenda 2000 package and further consultation is due in the coming months.