

Thursday 24 March 2016

Re: Consultation on a set of specific proposed changes to official statistics produced by the Defra group

To whom it may concern:

I am writing in response to the Government's consultation proposing changes to official statistics across the Defra group.

As you will be aware, the Committee on Climate Change has statutory duties to advise the Government on the level of carbon budgets, to report to Parliament annually on progress towards meeting carbon budgets and the 2050 target and to report on progress to prepare the UK for the risks from climate change. Agriculture is a key sector in all these areas but in this response we focus on its contribution in reducing greenhouse gas emissions. Significant emissions reduction will be required from agriculture in the medium and longer term if the statutory 2050 target is to be met.

The uncertainties attached to emissions statistics for agriculture in the current National Atmospheric Emissions Inventory (the NAEI) are high compared with other sectors. This means it is even more important to have other sources of good quality and timely data to provide a robust assessment of progress. We use a range of Defra statistics to monitor progress and to understand abatement options in agriculture. These statistics are also needed by Defra, and others, to put in place cost-effective policies. The proposed changes to some of the datasets - particularly in regard to the scope, frequency and scale of the data collected - could have a negative impact on our ability to fulfil our statutory duties and Government's ability to fulfil their statutory emission reduction target by 2050. The proposals may also have an impact on the agricultural industry's ability to track the progress of the Greenhouse Gas Action Plan, which is the industry-led approach to reduce emissions in England by 3 MtCO₂e by 2020.

We are also concerned that some of the proposals could undo some of the progress Defra has made in developing its Smart Inventory.

We are particularly concerned with proposed changes to the following datasets:

- **British Survey of Fertiliser Practice (BSFP):** The application of organic and inorganic fertiliser, which is captured by this survey, makes up a significant source of nitrous oxide emissions in agriculture (around 44% in 2013). Proposals to scale back the survey to "essential" items and review the sample size will reduce the ability to monitor progress in reducing nitrous oxide emissions through improvements in fertiliser use efficiency. In addition, the BSFP is critical for calculating agricultural emissions for the inventory. We are concerned that the proposals could put at risk the inventory

improvements (e.g. reducing the large uncertainty range in estimating nitrous oxide emissions) of Defra's Smart Inventory work.

- **Farm Practices Survey (FPS):** This is the key survey which focuses on practices relating to GHG mitigation. The proposal to conduct the survey every four years rather than annually will severely restrict Defra's ability to develop cost-effective, well-targeted policies and our ability to review progress. There is a risk, if progress is off-track but only discovered later because of the longer time between surveys, that this could result in a need for more severe and potentially more costly and disruptive policy intervention to get back on track.

Data from the FPS is also used to monitor against Defra's ten GHG indicators, which was a very welcome innovation.

It is proposed that industry might take on responsibility for collecting this information. The necessary expertise to deliver such a statistical survey would need to be developed. There would in any case be possible adverse implications for robustness and independence of the data.

We welcome rationalisation of data collection, for example to include some of the GHG related questions from the FPS into the BSFP. However, we are concerned that questions relating to methane emissions from livestock may be excluded. It will be necessary to widen the range of questions to cover farming practices that impact both nitrous oxide and methane emissions.

- **Agriculture in the United Kingdom:** Proposed changes to the format and scope could hinder an understanding of the drivers of emissions in agriculture. For example, we use the data related to agricultural output and area of land use combined with emissions data to understand how emissions intensity of output changes over time. This should also be crucial for Defra's consideration of a farming strategy and how policy should adjust over time. For many stakeholders, including us and Defra, this serves as a useful proxy for assessing progress given the uncertainties attached to calculating changes in absolute emissions.
- **Agricultural Statistics and Climate Change:** This publication is important for understanding the link between agricultural practices and GHG emissions. Proposed changes to the content and frequency of the report could weaken the ability of Defra and the CCC to monitor progress against the ten GHG indicators that Defra established in 2012, which were developed after much discussion and effort over several years. Furthermore, the indicator framework reflects the farm practices which are aligned to the Industry's Greenhouse Gas Action Plan, and therefore is essential to assess the industry's progress in meeting the ambition to reduce emissions in England by 3 MtCO₂e by 2020 and thereafter to 2030.

Agricultural emissions currently account for around 10% of total UK emissions. This share can be expected to increase as other sectors decarbonise more quickly. Deeper reductions in agricultural emissions than those seen to date will be required in order to contribute to statutory emission reduction targets. The requirement to have robust data will become even more important in order to ensure cost-effective policies that support UK agriculture can be put in place and to adequately monitor farming practices and impact on emissions.

Sincerely,



Matthew Bell

Chief Executive, Committee on Climate Change