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From the Foreign Secretary and Vice-President Professor RB Heap CBE FRS

24 October 2000

Our ref: RSWB

Dear Dr Palmer

CONSULTATION ON MAFF'S RESEARCH STRATEGY FOR THE PERIOD 20001-2005

Thank you for giving us the opportunity to comment on your proposed research strategy. We hope that other government departments follow this example and consult relevant bodies of expertise when preparing their research strategy. As is our usual policy we will be making our response publicly available. Should you wish to discuss the points outlined below in further detail I would be happy to meet you, or arrange for you to meet with the various contributors to this response. This letter was compiled in consultation with members of the Royal Society's working groups on 'GM Animals', 'SSSIs' and 'GM plants' and therefore addresses those areas in particular.

The strategy as presented clearly provides scientific input to underpin current policy, but is neither forward looking nor innovative. In order to facilitate long-term strategy of policy development there must be some capacity for long-term scientific vision and horizon-scanning activities. There is at present provision for such 'forward planning' in the Chief Scientist's Policy Programme, but the allocation within this programme is ill-defined. It is vital that a programme such as this is as open and transparent as all other areas of the research programme.

The document outlining research policy should have a section on independent peer review mechanisms that are used (or not used) by MAFF. There is no evidence in this document that anything is peer reviewed. It is essential in order to ensure the best quality of research that more initiatives are put out for open competition from the academic and private sector in order to achieve the best value for unit investment. In general there is little information about how this research policy will be realised. How much research will be done by MAFF and how much will be contracted out? Can centres throughout Europe (& the USA) apply for such contracts?

It would also be useful to have an introduction to the research strategy explaining how these priorities were reached. How many consultations with Research Councils, other Government



President Sir Aaron Klug OM FRs
Executive Secretary Stephen Cox cvo

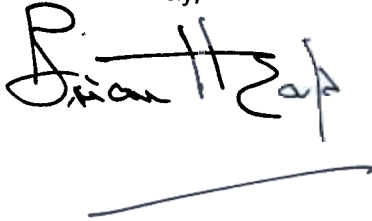
Founded in 1660, the Royal Society
is the independent scientific academy
of the UK, dedicated to promoting
excellence in science

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It would also be useful to have an introduction to the research strategy explaining how these priorities were reached. How many consultations with Research Councils, other Government departments (DETR, DfID, DoH, etc), industry, SMEs & European bodies were carried out and how were priorities ordered?

I have attached a page of specific issues pertaining to the individual objectives in your strategy. Please don't hesitate to contact me if you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Brian H. Zap". The signature is written in a cursive style with a long horizontal line extending to the right from the end of the name.

Objective 2 – to sustain and enhance the rural and marine environments and public enjoyment of the amenities they provide and to promote forestry

ENVIRONMENT PROTECTION

- we support the shift in emphasis from production based support to one more on the role of agriculture as a provider of environmental goods and services.
- On climate change issues, it might be useful to explore how MAFF intend dealing with changes in agricultural practises in terms of types of food grown (especially seeing as water supplies could potentially become less predictable, and warmer temps will allow different types of crops to be grown. The whole section on climate change deals only with emissions and emission abatement at present.
- The target criteria for Environmentally Sensitive Areas (ESAs) (heather moorland, species rich grassland, lowland heath and biologically diverse field boundaries) are currently inadequate. There are several other habitats which are under threat, e.g. ancient woodlands, freshwater ecosystems (lakes and streams), coastal / marine habitats and some morphologically important areas which are not considered.
- The document makes no reference to changing climate and biodiversity - due to money constraints; it is acknowledged that studies may have to be focussed on the rarer of habitats. It is unclear what criteria are used to prioritise such areas, and also whether the sustainability of such protection measures is considered (will these rare habitats remain constant in the face of environmental change such as climate alterations? Why conserve single species rather than entire habitats?)

CONSERVATION

- Our working group on sites of special scientific interest (SSSIs) are concerned that there is a significant detrimental effect of on such sites from current agricultural practices. Whilst this is addressed to some extent by current subsidy schemes, it is not underpinned by research into the causes and possible solutions for such problems.

FARM WOODLANDS

- It is incorrect to state that 'many of the research requirements associated with the programme have been addressed', further work is needed on the quality of stock available to growers.

While it is laudable to concentrate on biodiversity issues associated with woodland it does not achieve the main policy aim of carrying out strategic research to improve the quality of planting stock.

ORGANIC FARMING

- The section on organic farming is unclear – ‘organic’ is not defined. There is no reference to the potential for biotechnology to be used within an organic agricultural system
- No mention is made of research on the costing of environmental impacts of agriculture and alternative options

AGR-INDUSTRIAL MATERIALS

- Insufficient investment in Agri-industrial materials where UK S&T is advanced and should be taking the lead
- Biomass for energy – MAFF appears to be investing nothing into the improvement of crops for this purpose, despite current government policy on sustainable energy production. It is important that there are continued resources for pest management in biomass crops, however more attention needs to be paid to increasing the quality and quantity of biomass crops that can be grown. There is a need for support of basic science to address this issue.

AQUATIC ENVIRONMENT

- It is disappointing to see that this section solely deals with the marine environment. Whilst the UK drastically underfunds any research on our marine and coastal waters, it would appear from this document that we have even less regard for our freshwaters. Freshwater resources are likely to become an important issue in the UK in the next decade or so, both in terms of water quality and water quantity for humans and livestock.

Objective 5 – to promote strong and sustainable rural and coastal communities through broadening economic opportunity and enhancing social development

- The investment in economic and social research in this area is woefully inadequate. There is a dearth of economics research on agricultural issues.
- Much more work is needed in conjunction with the ESRC and relevant centres of excellence in the UK and elsewhere on social implications.

Objective 8 – to ensure that farmed animals and fish are protected by high welfare standards and do not suffer unnecessary pain or distress

- The likely welfare implications of the development of transgenic animals for agricultural use has not been considered at all in the research strategy. There is currently very little published research which addressed the specific welfare issues related to the development of GM animals. The Royal Society and other groups such as the Animals Procedures Committee and the Agriculture and Environment Biotechnology Commission are carrying out horizon-scanning exercises to assess likely future scientific developments, which may be useful to inform MAFF's research strategy in this area.