

The House of Lords Horticulture Sector Committee Report of Session 2022-2023 Sowing the seeds: A blooming English Horticultural Sector

HTA Briefing Paper & Recommendations Review – November 23

The House of Lords Horticulture Sector Committee report was published in November 2023, following a year-long special inquiry examining various challenges and opportunities for UK horticulture. The report sets out several recommendations covering a range of areas including:

- Cross-government working
- Long-term skills and education gaps and career perception – including green jobs
- Efficient and biosecure international trade and borders
- Lifting or addressing regulatory barriers
- Delivery of UK net-zero and biodiversity ambitions
- Health benefits of horticulture and gardening
- Supported transition to peat-free

The Horticultural Trades Association (HTA www.hta.org.uk) reviews the report as the trade association for 1500 businesses covering growers, retailers, suppliers and landscapers in UK environmental horticulture – the garden and green spaces industry. The HTA gave written and oral evidence to the committee and welcomed the opportunity for its members to do the same.

James Barnes, HTA Chairman commented:

“We are a sector contributing billions to the economy, supporting nearly 700,000 jobs and enriching the UK’s public spaces – both urban and rural as well as our home gardens. The Lords’ report recognises this significant value and challenges the government to create an environment which supports the growth of our original green industry, allowing it to bloom and boom.”

“The report prioritises one of the HTA’s key asks – for the machinery of government to work more effectively for horticulture. The report proposes the establishment of a cross-government working group, recognising that environmental horticulture spans many policy portfolios...we have called for a Government Office for Green Spaces to serve as that bridge.”

“While the report delves into the distinctive aspects of environmental and edible horticulture, it identifies common challenges such as trade, peat, energy and skills. The report places significant emphasis on borders and trade and ensuring biosecurity remains a top priority whilst delivering smoother and speedier border movements.”

“The value of horticulture, whether in the pursuit of net-zero goals, urban cooling, biodiversity enhancement or promoting health and wellbeing, is celebrated throughout this report. It is now imperative for government officials and policymakers to fully embrace, champion, and initiate the necessary actions for the sector not only to survive but to thrive. We urge the government to seize this

opportunity, utilise the insights from the report, and ensure that horticulture becomes a vital policy solution that transcends multiple departments.”

Key report findings:

- “Despite its economic contribution, horticulture is widely misunderstood and poorly promoted.”
- “throughout this inquiry, we have seen the extraordinary potential of the horticultural sector to deliver on the net zero agenda. The ornamental sector underpins a significant proportion of the Government’s 25 Year Environment Plan; it provides the conditions for an array of biodiversity to thrive, opportunities for natural carbon capture and support for urban landscapes through ambitious greening programmes.”
- “The horticultural sector has a significant role to play in delivering on a number of government policies, strategies and plans, but it faces longstanding challenges that have placed barriers in the way of what can and should be a thriving national sector. Key challenges include:
 - A lack of cross-departmental working, poor ministerial oversight and the lack of a dedicated horticultural strategy.
 - A long-term skills and education gap, leading to reliance on a poorly planned and managed seasonal migrant worker scheme.
 - Poor roll-out and communication on the forthcoming peat ban, with a lack of funding into research on alternatives.
 - Lack of long-term funding for research and development, particularly for automation and robotics, including strategic core funding for key institutions.
 - Poor understanding of the mental and physical health benefits of community gardening and social prescribing.”

Full report: <https://committees.parliament.uk/committee/648/horticultural-sector-committee/publications/>

HTA press release: <https://hta.org.uk/news-events-current-issues/news/recognition-for-vital-horticulture-sector-house-of-lords-report-highlights-industry-s-value>

HTA written & oral evidence: <https://committees.parliament.uk/writtenevidence/120061/pdf/>
<https://committees.parliament.uk/oralevidence/13560/pdf/>
<https://committees.parliament.uk/oralevidence/12936/pdf/>

HTA review of the Government Response to the House of Lords Horticultural Sector Committee – February 2024

James Barnes, HTA chairman, commented:

The Horticultural Trades Association (HTA) actively supported the Lords' Inquiry and welcomed its wide-ranging report. The report recognised the importance of UK environmental horticulture, from its contribution to the economy to the pursuit of a net-zero future.

The Government's response fails to grasp the opportunity to truly recognise the cross-government reach of the sector to deliver on key policies or the need for swift action and urgent announcements - including on imminent trade costs and April border changes - which present a real and present threat to sector viability and growth.

The HTA remains committed to growing the profile and impact of environmental horticulture with government and policy-makers, and in anticipation of a general election, has set out its top-ten asks for a future government. These asks include creating a cross-government Office for Green Spaces to deliver a Horticulture Strategy, which is important to underwriting UK climate change ambitions. We implore any future government to re-open the response to this report, understand the significance of what is being asked, work in partnership with ourselves and the industry, and have the mandate and motivation to truly recognise the needs and potential of the original green industry.

Government responses to key areas:

Cross-government working

“The Farm to Fork Summit demonstrated the active approach that Defra have taken when working across all Government Departments. Horticulture remains a key focus for Government, and we are committed to supporting the sector in any way we can.”

No new Minister or responsibility announced.

Border Target Operating Model

Recommendation 15: The risk model proposed in the Border Target Operating Model should be kept under review and more clarity provided to accompany risk status updates. (Paragraph 117)

“Defra will continue to engage border stakeholders about any changes, ensuring sufficient time for any process changes to be implemented. The risk categorisation that underpins the approach is undertaken by a cross Government expert panel who will review and respond to changes in risk. The Government will provide traders and trading partners with at least three months’ notice of any change to risk categorisation so they can adapt their processes as needed. If urgent protective action is required, DEFRA retain the authority to implement temporary safeguarding measures in response to acute threats.”

Recommendation 18: The Government should set out clear timelines for the integration of new and upgraded technologies. It should urgently set out its plans including costs and timeframes for the pilot and implementation of the AOS scheme to enable a seamless transition for businesses in the

sector. The Government should keep the relationship between the Windsor Framework and the BTOM under review to ensure effectiveness. (Paragraph 144)

“Government has been running pilots to test new technologies at the border. The Authorised Operator Status (AOS) is designed for UK businesses of all sizes importing all plants and plant products. AOS will enable traders to manage their own SPS risks. We expect AOS to go live in late 2024. Testing will ensure all elements of the authorisation proposal uphold the high biosecurity standards of the UK. The AOS will be piloted in two stages. Those involved in the Accredited Trusted Trader Scheme Certification Pilot have now been onboarded with the pilot expected to start in January 2024. Wider pilots will start from the point border controls are initiated in April 2024. The Border Target Operating Model is consistent with the commitments set out in the Windsor Framework, including continuing to guarantee Qualifying NI Goods unfettered access to the GB market. Separate guidance has been published on gov.uk on the specific arrangements for goods moving into and out of NI.”

Recommendation 19: The Government must communicate clearly and collaboratively with industry during implementation of the BTOM. It should make good on its promise to work with importers utilising groupage to clarify procedures and ensure complexity and cost is minimised. This should include reviewing the possibility of easements for SMEs and clearly setting out the costs associated with operating and using BCPs and CPs. (Paragraph 146)

“Government is committed to supporting the border policy changes with development of new and existing systems. These will be communicated to stakeholders and systems procedures will be tested and the results analysed before ‘go live’. To minimise the burdens, the Government will continue to work with businesses who use a consolidation model of groupage to explore how certifications could be aggregated, while protecting biosecurity and human health. The Government will implement streamlined EHCs, simplifying guidance and revising official seal requirements. We will launch a Certification Logistics Pilot in January 2024 and will continue to engage with stakeholders to explore what more can be done in this area. We will also work with importers and logistics firms who use the multiple pick-up model of groupage to explore how complexity and cost is minimised under the new model”

Recommendation 20: The Government must define ‘consignment’ for the purposes of charges under the new model. The response to the consultation on the Common User Charge should be published as soon as possible. If it should go ahead, the charge should be reviewed regularly to ensure costs are not squeezing out small businesses. (Paragraph 148)

“Defra consulted on the proposed Common User Charge, inviting views on the principles, methodology and indicative rates for the Common User Charge to determine fair and reasonable charges. The consultation launched 12 June 2023 and ran for four weeks, closing on 9 July 2023. Defra is currently reviewing the feedback from the consultation. The response, and details of the policy as consulted on, the related rates and guidance to the sector will be published in early 2024.”

Convention on International Trade in Endangered Species (CITES)

“We are carrying out a review of the inherited CITES Regulations to ensure that they remain fit for purpose. This comprises 3 strands:

- Digitisation: to modernise the licensing system used for CITES with an ambition to move to full e-permitting if possible.
- Process review: to review the operational processes underpinning the UK CITES regime to ensure they are robust and efficient. This review is expected to examine disposal practices to ensure that where specimens have been seizures that the best practical outcome is achieved.
- Legislation reform: to use the opportunities post-Exit to review and improve the retained EU law that governs the CITES rules in GB. This includes considering alternative approaches to import permits for Annex B/Appendix II species which includes many of the CITES-listed plants cultivated in horticulture.

We are preparing legislation proposals for consultation later in 2024 and would appreciate feedback from the horticulture sector if these proposals will address some of the issues they are facing.”

The Institute for Agriculture and Horticulture (TIAH)

“TIAH is an independent industry led professional body. Whilst ornamental horticulture is not within TIAH’s initial scope, collaboration is at the heart of what TIAH want to deliver and the ambition is to ensure close co-operation with the ornamental sector in areas where there are common issues (such as labour market information research). TIAH are already working with the Environmental (formerly Ornamental) Horticulture Roundtable Group (EHG) to ensure this.”

Nothing new on apprenticeships

No real action on skills/careers.

Grant support for horticulture

“Grants offering a percentage of the cost of equipment are a way to reduce the risk to the farmer when investing in innovative equipment whilst improving value for money by ensuring the farmer also has a stake in the investment. Increasing grants to 100% would require a significant increase in the budget, leading to a significant reduction in the value for money offered by the grant. FETF is intended to be a quick and simple scheme to apply for. For the next round due in early 2024 there are 25 new items, many of which were suggested by the horticulture sector that will provide a broader range of eligible equipment. Horticulturalists are also eligible for grants up to £500K for be-spoke innovative equipment including robotic harvesters and transplanters under the Farming Transformation Fund. We will work closely with horticulture stakeholders to ensure growers understand the full range of equipment grants that are available to them. Currently the scheme only supports the outright purchase of capital items, but we continue to keep this under review ahead of future offers.”

Peat use in growing media by the horticulture sector

“The Government has confirmed in Parliament that the peat ban will apply to imports in the same way as domestic products. Defra is holding discussions with the Office of Internal Markets and the Devolved Administrations on implications for the UK internal market. Targets for ending or significantly reducing peat use in horticulture up to 2030 have been set in both the hobby and professional sectors in Germany, Switzerland, the Netherlands and Belgium (Flanders).” “The Government is working with the horticulture sector to develop the detail around technical

exemptions and the conservation exemption. No consensus has been reached regarding the introduction of quality standard; Defra would not oppose the introduction of a quality standard.”

Water

“Over two rounds, Defra has allocated £20 million in grants to assist growers with the costs of constructing irrigation reservoirs and adopting best practice irrigation equipment through the Water Management Grant under the Farming Transformation Fund. This will support our goal of increasing the amount of water stored by the agriculture and horticulture sectors by 66% by 2050 to support food production and protect the water environment. We are currently exploring the possibility of a third round of funding in 2024. Defra is also presently analysing the evidence submitted as part of a call for evidence on planning barriers to small reservoirs and contemplating the next steps.” “We have also launched a new National Policy Statement for water resources to streamline the process of obtaining planning permission for nationally significant water infrastructure projects such as new reservoirs or water recycling facilities.”

The Government should lower the investment minimum for Water Management Grants to enable small businesses to benefit and continue to work with the sector to streamline the scheme to make it more accessible to a wider range of growers. (Paragraph 456)

“The second round of the Water Management Grant received significant interest from farmers and horticulturalists during the initial online application stage. We are currently considering a third round of funding. For other Farming Investment Fund schemes, we have already reduced the minimum grant amount in order to benefit smaller projects and to respond to feedback from industry. This is something we will consider for a third round of this grant.”

The sale of artificial grass

“The government has no plans to ban the sale or use of artificial grass but we are clear its use should wherever possible follow published advice and guidance, including advice in the Green Infrastructure Framework launched by Natural England in February.”

Recycling

“We want to make recycling easier and ensure there is a comprehensive, consistent service across England. We are introducing our Simpler Recycling reform which will mean that the same recyclable waste streams (paper/card; glass; metal; plastic; food waste; and household garden waste) are collected for recycling from households and businesses, ensuring that across England, people will be able to recycle the same materials, no longer needing to check what their council will accept for recycling: Government response - GOV.UK (www.gov.uk)”

The use of green social-prescribing

“We will publish the evaluation report from the green social prescribing programme and share plans for the next steps in supporting the roll-out of green social prescribing, as soon as possible.”

Full government response: <https://www.gov.uk/government/publications/government-response-to-house-of-lords-horticultural-sector-committee-report-of-session-2022-to-2023>

Page/ paragraph number	Recommendation	Relevance or value to Environmental Horticulture	HTA position
Page 145/ para 2	The Government should consider establishing a cross-departmental horticultural sector working group, to include participants from Defra, DfE, DHSC, DBT, DESNZ, and the Home Office. (Paragraph 8)		HTA fully supports and call for an Office for Green Spaces.
Page 145/ para 4	The Government must look to reassure and guide the horticultural sector through longer-term planning cycles. To this end, it must publish a Horticulture Strategy for England as promised in the Government Food Strategy as a matter of highest urgency. (Paragraph 14)		HTA fully supports and seeks a cross-government horticulture strategy that fully recognises the importance of environmental (or non-edible) horticulture.
Page 145/ para 6	The Government must publish a response to the Automation in Horticulture Review, the Independent Review of Labour Shortages, the Consultation on the Common User Charge, and the Consultation on the Review of the R&D Tax Reliefs Review as soon as possible. (Paragraph 17)		HTA fully supports.
Page 145/ para 8	The Government must appoint a Minister with specific horticultural responsibilities to provide direction and accountability for the sector. (Paragraph 22)		HTA fully supports and notes it is critical they have the mandate to reach across Whitehall given the policy scope outside of Defra for environmental horticulture, hence the HTA ask for an office for Green Spaces.
Page 146/ para 1	The Government must continue to provide tailored communications to the horticultural sector, particularly to growers of ornamental plants, on ELMS schemes for which they are eligible. If applications to the scheme from these growers remain low, the Government should consult on broadening the criteria to make ELMS more accessible to		HTA fully supports.

	land managers in the ornamental horticulture sector, including to those who manage land in urban spaces such as community gardens. (Paragraph 30)		
Page 146/ para 2	The Government must “test and trial” an ELMS initiative for growers in intensive horticulture and protected edibles that is delinked from farm size. (Paragraph 31)		HTA fully supports.
Page 146/ para 3	Payments from the ELMS scheme should be kept under review to ensure they fully recognise the loss of income from reduction of productive land. (Paragraph 32)	TBC	TBC
Page 146/ para 4	The Government must set out how it will implement the lessons learned from the 2022 ELMS test and trial undertaken with the Landworkers Alliance. (Paragraph 33)	TBC	TBC
Page 146/ para 6	The Government must recognise horticulture as an energy intensive industry and add it to the list of sectors eligible for the ETII scheme. (Paragraph 44)		HTA supports and has previously submitted evidence and asks to government.
Page 146/ para 8	The Committee agrees with the EFRA Committee that the Government should set out how it will ensure continued fertiliser production in the UK. The Fertiliser Industry Taskforce must make good on its promise to increase transparency in the fertiliser market to help mitigate the effects of price volatility by working closely with industry on a regular basis. In the long term, the Taskforce must take note of our recommendations on R&D with a view to reducing dependence on nitrogen and phosphorous-based fertilisers. (Paragraph 51)	TBC	TBC
Page 146/ para 10	The Government must conduct and publish its review of fairness in the horticultural supply chain as soon as possible and include ornamentals within its scope. (Paragraph 63)	TBC	TBC

Page 147/ para 1	The GSCOP code must be refreshed to embed the 7 Golden Rules identified by the GCA. The CMA must review the scope and remit of the GCA to examine whether the powers the GCA has are appropriate for a wider scope and if they should be increased to address broader supply chain relationships, including processors and wholesale purchasers. Ornamentals should be included as part of the horticultural sector supplying to retailers. (Paragraph 73)	TBC	TBC
Page 147/ para 3	We recommend in common with the EFRA Committee's recent recommendation that the Government should develop a suite of key food security indicators—from farm inputs and retailer outputs—to monitor and ensure food security and report annually as committed to by the Prime Minister. In addition, the Government must, as a priority, define targets for food self-sufficiency and set itself statutory reporting duties against those targets together with key food security indicators. Defra should, as a matter of urgency, reconsider its interpretation of international rules and consider barriers to promoting British food. (Paragraph 90)	N/A	N/A
Page 147/ para 5	The Government should work with industry to launch a campaign to define what is unique and special about British produce and encourage consumers to buy more seasonal British produce. (Paragraph 100)	N/A	N/A
Page 147/ para 7	The risk model proposed in the Border Target Operating Model should be kept under review and more clarity provided to accompany risk status updates. (Paragraph 117)		This is critical given trees, seeds, plants for planting at present fall into high risk.

Page 147/ para 9	The Plant Healthy Certification Scheme should be compulsory, and support must be provided to ensure SMEs are supported to achieve accreditation. (Paragraph 119)		The HTA supports Plant Healthy and the Alliance's work – other schemes such as OHAS should be supported too and ensure all are access
Page 147/ para 11	The Government should work with industry to promote a British kitemark for UK plant products in tandem with the recommended campaign to help consumers recognise what is unique and special about British produce. (Paragraph 121)	TBC	TBC
Page 148/ para 1	The Government should set out clear timelines for the integration of new and upgraded technologies. It should urgently set out its plans including costs and timeframes for the pilot and implementation of the AOS scheme to enable a seamless transition for businesses in the sector. The Government should keep the relationship between the Windsor Framework and the BTOM under review to ensure effectiveness. (Paragraph 144)		HTA fully supports.
Page 148/ para 3	The Government must communicate clearly and collaboratively with industry during implementation of the BTOM. It should make good on its promise to work with importers utilising groupage to clarify procedures and ensure complexity and cost is minimised. This should include reviewing the possibility of easements for SMEs and clearly setting out the costs associated with operating and using BCPs and CPs. (Paragraph 146)		HTA fully supports.
Page 148/ para 5	The Government must define 'consignment' for the purposes of charges under the new model. The response to the consultation on the Common User Charge should be published as soon as possible. If it should go ahead, the		HTA fully supports.

	charge should be reviewed regularly to ensure costs are not squeezing out small businesses. (Paragraph 148)		
Page 148/ para 7	CITES processes should be digitalised and import permits should be scrapped to reduce duplication of paperwork. The administrative cost of obtaining a CITES permit should be reviewed to allow SMEs to trade effectively. A more flexible mechanism must be put in place to protect legitimately traded plants being destroyed due to incorrect paperwork. In the case of no-fault destruction of consignments, the Government should consider a mechanism to reimburse growers. (Paragraph 155)		HTA fully supports and seeks a no-fault scheme that extends beyond just in cases of CITES no-fault destruction.
Page 148/ para 9	Horticulture should be put on the curriculum as a stand-alone topic within the science curriculum at all Key Stages. (Paragraph 164)		HTA fully supports greater focus on gardening and horticulture at all levels of education.
Page 148/ para 10	At Key Stages 3 and 4, career guidance teachers and counsellors should be given far more information about horticultural careers including those at university and research levels and to support them in pointing students to the varied opportunities available. Qualifications should be encouraged but they should not be a barrier to entry. (Paragraph 165)		HTA fully supports.
Page 149/ para 2	The Government must support The Institute for Agriculture and Horticulture to ensure that its careers programmes and schemes reach young people and new entrants from under-represented backgrounds. (Paragraph 171)		At present the inclusion of ornamentals/environmental horticulture in TIAHs is limited and unclear. Greater diversity should be encouraged across all routes into horticulture including by the sector itself.
Page 149/ para 4	The Government must expand TIAH's remit to include the ornamental sector as soon as is feasibly possible. Any such expansion must be adequately staffed, funded, and supported. (Paragraph 175)		As above.

Page 149/ para 6	The Government should explain what changes they have made to the Agriculture, Land Management, and Production T Level on a “lessons learned” basis following the Ofsted thematic review of extant T Level courses. (Paragraph 183)		HTA fully supports.
Page 149/ para 7	The Agriculture, Land Management and Production T Level should be reviewed after its first year with a view to allowing land-based colleges to deliver the work experience element of T Level courses on site. (Paragraph 184)		HTA fully supports.
Page 149/ para 8	The Government should support providers of the Agriculture, Land Management and Production T Level to raise awareness of the qualification amongst potential students and in the industry. (Paragraph 185)		HTA fully supports.
Page 149/ para 11	The Government must reform the apprenticeship levy to meet the needs of horticultural businesses. Flexibility should be introduced to support delivery of training in rural settings, for example a removal or lowering of minimum thresholds for attendees for training courses. There should be greater flexibility around the use of the apprenticeship levy to support the “bite-size learning” of specific skill sets to up-skill existing workforces. The Government must open up the apprenticeship levy to seasonal workers or provide an alternate training scheme for them to support SMEs who rely on this workforce. (Paragraph 192)		HTA supports greater flexibility of the apprenticeship levy but notes that the example given, to lower minimum thresholds of attendees, will not address the issue fully. Minimum numbers for courses to run are in place to ensure running the course is cost-effective.
Page 150/ para 1	We encourage universities offering courses in Plant Science, Horticulture or Botany to revise their module list considering the skills needed in the sector, to ensure that		HTA fully supports.

	their graduates are trained to meet the challenges of the industry. The Department for Education should offer advice and support on this where possible and appropriate. (Paragraph 198)		
Page 150/ para 2	We support the recommendation of the Independent Review that further and higher education funding bodies should review food supply chain-related subjects to ensure courses are well resourced and that recurrent and capital funding is enhanced and protected in the long-term. (Paragraph 199)	N/A	N/A
Page 150/ para 4	The Government must produce a strategy to ensure that there are sufficient skilled workers available in key areas as recommended by the Independent Review into Labour Shortages in the Food Supply Chain. (Paragraph 204)	N/A	N/A
Page 150/ para 6	The Government must publish its review of the seasonal worker route, as promised in response to the Independent Chief Inspector of Borders and Immigration's December 2022 report. It must also respond to the Migration Advisory Committee's latest Review of the Shortage Occupation list. (Paragraph 213)		HTA fully supports.
Page 150/ para 7	The Government should convene a meeting of retailers and the NFU, with representation from seasonal workers, to discuss the welfare issues raised in this report. (Paragraph 214)	N/A	The HTA supports the NFU's work and position on seasonal workers.
Page 150/ para 9	The Government must review options to make local housing and transport more affordable to ensure that local people are not discouraged from taking up seasonal work. They must also ensure that flexibility in the tax and benefits system is being properly advertised to claimants		HTA fully supports.

	who may wish to move into work temporarily, and to ensure that government departments are communicating with one another about these opportunities. (Paragraph 223)		
Page 151/ para 1	The Government must commit to data collection to understand how many seasonal workers will be needed in the UK in the short, medium, and long-term. Once these figures are collected, a seasonal workers workforce plan should be published detailing how many visas are needed and how many the Government expects to make available for the next 5, 10 and 20 years. (Paragraph 233)		HTA fully supports.
Page 151/ para 2	Even if there is flexibility on the exact number of visas available, the Government must guarantee the existence of the seasonal workers scheme, in principle, for five years at a time, as per the recommendation made in the Independent Review of Labour Shortages in the Food Supply Chain. The Government must communicate any changes to the scheme in good time to allow scheme operators and growers to plan ahead and to communicate with incoming seasonal workers. (Paragraph 234)		HTA fully supports ornamentals access to the seasonal scheme.
Page 151/ para 3	To lower recruitment and training costs to growers, increase efficiency, and to retain and attract talent on UK farms, the seasonal worker scheme visa should be extended to nine months, and employers should bear the consequent cost of the NHS surcharge incurred after six months. (Paragraph 235)		As above
Page 151/ para 5	The GLAA must, as a priority, re-establish confidence with industry that it competently applies due diligence in the licensing of overseas labour recruiters in accordance with	TBC	TBC

	its own guidelines. It must define legal requirements country by country and inspect against these, ensuring that there is a sustainable operational and commercial model in place that does not involve charging recruitment fees to workers, inappropriate sub-contracting, or the use of unlicensed gangmasters. (Paragraph 244)		
Page 151/ para 6	The GLAA must issue new guidance on scam adverts for UK seasonal worker schemes. (Paragraph 245)	TBC	TBC
Page 151/ para 8	To encourage workers to return to the UK, and therefore cut training costs for UK growers, the Government should process the visas of returning seasonal workers at cost. (Paragraph 249)	TBC	TBC
Page 151/ para 9	Reforms should be made to how seasonal workers are taxed to allow them to retain more of their earnings. A dedicated seasonal workers' tax code should be introduced under which no income tax is levied until the worker has reached the annual tax threshold. The pension auto-enrolment and National Insurance enrolment obligations should be removed. Employer National Insurance should be allocated to refund the costs of visa and travel for seasonal workers. (Paragraph 250)	TBC	TBC
Page 152/ para 2	To protect the lawful operation of scheme operators' businesses, workers who claim asylum should not be included in the Home Office requirement that 97 per cent of sponsored workers leave the UK at the end of their stay. (Paragraph 255)	N/A	N/A
Page 152/ para 4	The Government must separate labour inspectorates from immigration enforcement and make clearer the roles and responsibilities of current enforcement bodies including	N/A	N/A

	the Home Office. The Government must provide an official source of redress to seasonal workers that is not linked to immigration. (Paragraph 269)		
Page 152/ para 5	Seasonal workers should be informed of their right to join a trade union during the recruitment process and upon their arrival to the UK and should be signposted to other sources of support. (Paragraph 270)	N/A	N/A
Page 152/ para 6	A compulsory welfare spot-check should be introduced between month three and six at farms that host seasonal workers, during which a selection of workers should be interviewed by the GLAA/Home Office to ensure that welfare standards are being upheld on the farm. This interview should be available in the first language of the workers, and it should be made clear that it has no link to their immigration status and is totally anonymous and confidential. Worker accommodation should also be inspected. Inspectors should have the power to fast-track cases of non-compliance with existing labour laws to the relevant bodies. (Paragraph 271)	TBC	TBC
Page 152/ para 8	The GLAA must implement a system of audits, spot-checks and systematic inspections on farms that are part of the seasonal worker scheme. There should be a clear, tiered, enforceable system of penalties for those who fail to enforce labour laws. The Home Office must increase the budget of the GLAA so that it is able to fulfil its function. Some of this budget increase should be ringfenced so the GLAA is able to hire more labour inspectors in line with the number recommended by the ILO. (Paragraph 279)	TBC	TBC

Page 153/ para 1	The GLAA must proactively enforce the full payment of the National Living Wage to all seasonal workers for 32 hours a week. If the GLAA does not have the resources to do so, responsibility for this task should pass to HMRC. The Government should update the guidance to specify that this means 32 hours a week for the full six-month season. (Paragraph 281)	TBC	TBC
Page 153/ para 3	The Home Office should issue new guidance clarifying that all caravans provided for use by seasonal workers must reach BS3632. Local authorities should be given a duty to inspect and enforce both this standard, and health and safety regulations in caravans housing seasonal workers. The new advice should clarify that only caravans with shared living space and single-occupancy bedrooms which reach BS3632 should be eligible for the maximum occupancy charge, which should not exceed the accommodation offset rate. (Paragraph 291)	TBC	TBC
Page 153/ para 4	The DLUHC should report on the results of the consultation on extending the Decent Homes Standard to the private rented sector, including on how this standard would apply to the seasonal workers scheme. (Paragraph 292)	TBC	TBC
Page 153/ para 5	Rental contracts for accommodation should be provided in seasonal workers' own languages and signed and agreed ahead of their arrival in the UK. (Paragraph 293)	TBC	TBC
Page 153/ para 7	The GLAA should consider how widespread this practice is, and what can be done to ensure that workers are not being charged additional fees. (Paragraph 295)	TBC	TBC
Page 153/ para 9	We endorse the recommendation made by the Low Pay Commission that the Government work together to	TBC	TBC

	address the interaction between seasonal workers' rate of pay and the accommodation offset rate. (Paragraph 297)		
Page 153/ para 11	The Government should consider what flexibility can be introduced into the planning system to enable more farms to provide a higher standard of accommodation to workers. (Paragraph 299)	TBC	TBC
Page 154/ para 2	We thank Professor Pearson for his Automation in Horticulture Review, endorse its recommendations, and urge the Government to adopt them in full. The Government must publish their response to the Review, in which they outline a plan against each of Professor Pearson's recommendations, as a matter of urgency. (Paragraph 316)		HTA fully supports.
Page 154/ para 4	The Farming Equipment and Technology Fund should be redesigned to make 100 per cent grants available, introduce flexibility in the technology that can be purchased, ensure that all technology applicable to both edible and ornamental horticulture is clearly listed as such, and enable provision to lease or co-own equipment to support smaller growers. (Paragraph 318)		HTA fully supports.
Page 154/ para 6	The Government must urgently bring forward legislation and detailed guidance to provide clarity and certainty for the sector on how the peat ban will work in practice, including enforcement measures. It should not implement a total ban until it undertakes a full, revised impact assessment. It should consider appointing an existing sector body or group of representative bodies to spearhead the transition. (Paragraph 362)		HTA fully supports.

Page 154/ para 8	The Government must urgently and clearly outline whether the peat ban will apply to all imported products and set out a plan to establish how the domestic market will be safeguarded against peat-grown imports in collaboration with the Office for the Internal Market. It must work better with its international trading partners, particularly the Netherlands and the devolved administrations, to design a collaborative approach to peat-free. (Paragraph 364)		HTA fully supports.
Page 155/ para 2	The Government must set out in its forthcoming updated impact assessment how the proposed ban could unintentionally cause environmental damage stemming from use of alternative growing media and how it intends to prevent or mitigate such damage. (Paragraph 366)		HTA fully supports.
Page 155/ para 4	The Government must work closely with the sector to establish a realistic list of exemptions to allow more time for R&D innovation into alternative growing media. It must work with the industry to set a minimum standard for quality. (Paragraph 368)		HTA fully supports.
Page 155/ para 6	The Government must continue to provide funding to support research into viable alternatives to peat in collaboration with the industry and academics. It should establish a communications campaign tailored to the professional sector to increase awareness of the viability of alternatives to peat and communicate the findings from its research projects in collaboration with the RHS. (Paragraph 370)		HTA fully supports.
Page 155/ para 8	The Government should set a target for the reduction in use of those agri-chemicals that are demonstrably harmful, including certain pesticides and fertilisers in the		HTA fully supports.

	horticulture sector. It should consult with the sector on a realistic timeframe for implementation and consider mandatory bans if voluntary action is not forthcoming. (Paragraph 404)		
Page 155/ para 10	The proposed Horticulture Strategy must detail how it will support the sector to achieve the ambitions announced in the Plan for Water. (Paragraph 448)		HTA fully supports.
Page 155/ para 12	The Government must continue to support innovative gene editing programmes in close collaboration with academia and industry and must communicate the findings of such studies to industry to translate research into practice. A biannual report on the Farming Innovation Programme should be an effective vehicle for this. (Paragraph 450)	TBC	TBC
Page 156/ para 3	The Government must continue to explore how horticultural growers can access technical support to obtain an abstraction licence and take steps to reduce the length of time taken to determine applications. (Paragraph 452)		HTA fully supports.
Page 156/ para 5	The Government must urgently publish its call for evidence on the planning barriers to small reservoirs with a view to helping land managers with water supply. It must make good on its National Policy Statement for Water Resources Infrastructure and must streamline the planning permission process for nationally significant water infrastructure projects, enable new water supply infrastructure and provide planning guidance for applicants. (Paragraph 454)		HTA fully supports.
Page 156/ para 7	The Government should lower the investment minimum for Water Management Grants to enable small businesses		HTA fully supports.

	to benefit and continue to work with the sector to streamline the scheme to make it more accessible to a wider range of growers. (Paragraph 456)		
Page 156/ para 9	The Government must press ahead with these proposals and update the industry on its consideration in relation to horticulture in a timely fashion. (Paragraph 458)		HTA fully supports.
Page 156/ para 11	The Government should work with the industry to support campaigns for industry to help businesses and consumers to reduce water use in professional and amateur horticultural settings. (Paragraph 460)		HTA fully supports.
Page 156/ para 13	The Government must publish its long-awaited Land Use Framework as promised in 2023. Policy relating to horticulture must be clearly marked within this strategy. (Paragraph 486)		HTA fully supports.
Page 157/ para 2	The Government should remove the 5ha limit on eligibility for ELMS to support urban farms. It should consult on business rates for vertical farming and amend the NPPF to reflect their status as agricultural businesses. (Paragraph 488)		HTA fully supports.
Page 157/ para 4	The Government should include allotments within the framework for Biodiversity Net Gain and introduce an exemption for such horticulture developments. The Government must set out how developers and local authorities will ensure the maintenance of BNG spaces. (Paragraph 490)	TBC	TBC
Page 157/ para 6	The Government should review available incentives for energy-intensive horticultural businesses to transition to renewable energy in order to build resilience to future		HTA fully supports.

	energy shocks and make progress towards net zero. (Paragraph 504)		
Page 157/ para 8	The Government must do more to establish better Life Cycle Assessment data for the horticultural sector to support Carbon Footprinting exercises as part of an accelerated move towards a single standard for environmental measurement and reporting. It should consider how ELMS could encourage take-up of such approaches. (Paragraph 515)		The HTA is working with EU partners on some LCA work and would encourage consultation with industry before pursuing this work.
Page 157/ para 10	The Government should work with industry influencers such as the RHS to develop a simple messaging campaign to raise awareness amongst consumers about environmentally-friendly and climate-resilient growing in domestic settings. It should provide clear guidance on pollinator-friendly species. (Paragraph 530)		HTA fully supports and recognised the garden media and retailers as excellent routes.
Page 158/ para 1	At the end of its term in 2024, the Government should review the effectiveness of its strategies to engage the public within the National Pollinator Strategy 2021–2024, including the reach of the ‘Bees Needs’ campaign and its work with growers to maximise the use of pollinator-friendly plant labelling. It must commit to publishing a revised strategy from 2024 onwards based on the learnings from such a review. (Paragraph 532)		HTA fully supports.
Page 158/ para 3	The Government must ensure that local authorities have a consistent approach to permitting the kerbside collection of plastic garden waste for recycling. It should consult on banning the retail sale of artificial grass and plants for outdoor use. (Paragraph 534)		HTA welcomes this and notes the need to consider landscapers and designers in such consultations on artificial products.

Page 158/ para 5	The Government must undertake a comprehensive review of the future direction of research and development in horticulture and its funding landscape. Public-private partnerships should be supported by Government in both policy and funding models to bind the fragmented landscape, emulating the Dutch 'triple helix' model. (Paragraph 541)		HTA fully supports.
Page 158/ para 7	We urge the Government to re-think its preoccupation with competitive short-term funding as the only solution and give urgent attention to the need for some R&D institutions to receive longer-term core funding for advances in edible and ornamental horticulture. (Paragraph 547)		HTA fully supports.
Page 158/ para 9	UKRI should undertake a review of BBSRC funding criteria to ensure that ornamental horticulture projects are given equal access to opportunities to apply for funding. (Paragraph 557)		HTA fully supports.
Page 158/ para 10	Future R&D strategies should consider the value of on-farm and low-tech innovations and be willing to give smaller grants to small scale projects. (Paragraph 558)		HTA fully supports.
Page 159/ para 2	The Government should keep the impact of the closure of AHDB Horticulture under review and work with the sector to address resultant challenges. (Paragraph 564)		HTA is actively supporting the new approach to EAMUs.
Page 159/ para 4	The Government must ensure the EU Fruit and Vegetable Aid Scheme's replacement is tailored to the UK horticultural landscape. It should make the process simpler for growers to be recognised, allow a more accessible funding programme for collaborative grower groups and individuals, and better provide for the variation in fresh produce crops. (Paragraph 567)		This must continue to include environmental horticulture (ie ornamentals).

Page 159/ para 6	The Government must work with UKRI to develop longer-term funding models for horticultural projects and introduce better models of follow-on funding to enable research to be translated into practice in line with horticultural growing cycles. (Paragraph 574)		HTA fully supports.
Page 159/ para 7	The Government must publish its response to the consultation on the review of R&D Tax Reliefs and outline clearly how this will impact businesses including those in the horticulture sector. The Government should ensure that tax incentives and match funding opportunities are maintained. (Paragraph 575)		HTA fully supports.
Page 159/ para 8	The Government must support a tailored campaign to promote the Farming Innovation Programme to ornamental growers via existing communications channels. (Paragraph 576)		HTA fully supports.
Page 159/ para 10	The Government should mandate that all local authorities are required to devise an allotment strategy as part of local plans, and to identify suitable land and training/ mentoring partners as part of this strategy. (Paragraph 598)		HTA fully supports.
Page 159/ para 12	The National Planning Policy Framework should be updated to fully recognise and reflect the role of community growing in local food security and biodiversity, as well as for its socio-economic benefits. (Paragraph 600)	N/A	N/A
Page 160/ para 2	The Government should recognise the role the domestic horticultural sector can play in supporting health, wellbeing and climate change agendas. It should recognise nutritional security as a public good and properly incentivise horticultural growers to deliver against its public health ambitions. (Paragraph 611)		

Page 160/ para 4	The Government must urgently publish its response to the consultation on public sector food and catering policy for England. It should re-specify the School Fruit and Vegetable Scheme to allow schools the freedom to procure healthy produce from local suppliers. (Paragraph 613)	N/A	N/A
Page 160/ para 6	The Government must publish its plans for delivering the Community Eatwell pilot and commit to publishing the findings of the scheme. (Paragraph 615)	N/A	N/A
Page 160/ para 8	The Government must publish the findings from its 'Preventing and Tackling Mental Ill Health Through Green Social Prescribing' programme at the earliest opportunity. It must develop an action plan to mobilise social prescribing and nature-based solutions to ill-health and implement proper regulatory oversight of such systems. (Paragraph 639)		HTA fully supports.
Page 160/ para 10	The Government should consider how the health of those professionally engaged in the horticultural and wider agricultural sector can be supported to access mental and physical health services appropriate to the occupational risks they face. (Paragraph 641)		HTA fully supports.