

Supporting the Next Generation of Farmers

Proposals for support schemes to assist the establishment and success of New Entrants to Agroecological Farming

Developing a New Entrants' Support Scheme

The Landworkers' Alliance are proposing a support package aimed at increasing the number of new entrants to agroecological farming by targeting government support at the three core issues facing new entrants: access to land, the start up costs of establishing a business and the lack of appropriate on-farm training.

This document outlines what we believe are workable proposals that DEFRA could implement with relative ease to alleviate the issues and increase the number of new entrants whilst also increasing the positive environmental and social impacts of their farm businesses and reducing environmental and social externalities.

There are further steps to support new entrants that could be taken by working with other departments to address core issues of land concentration, planning permission for farm infrastructure and the lack of accredited training but we have left those schemes out of these proposals at this stage in order to present a clear and deliverable package that would have a significant impact on new entrants with minimal need for cross-departmental work.



Why Support New Entrants to Agroecological Farming?



What is Agroecology?

The UN Food and Agriculture Organisation (FAO) describes agroecology as "The basis for evolving food systems that are equally strong in environmental, economic, social and agronomic dimensions...Agroecology is based on applying ecological concepts and principles to optimize interactions between plants, animals, humans and the environment while taking into consideration the social aspects that that need to be addressed for a sustainable and fair food system. By building synergies, agroecology can support food production and food security and nutrition while restoring the ecosystem services and biodiversity that are essential for sustainable agriculture."

believe that supporting agroecological should new entrants to farming area for UK agricultural policy. A relatively be public a priority small investment would have multiple benefits in environmental, social and public health and represent a positive social return on investment for public money. terms,

We recognise that there is little justification for using public money to support farming systems that externalise the costs of their environmental and social impacts. Instead, we believe that public money should be used to incentivise the kinds of farming systems that deliver environmental and social goods whilst also producing food.

Under the CAP Basic Payment System, and in an unregulated policy environment, farms are forced to internalise the costs of all environmental and social contributions that the market does not reward. This limits the uptake of farming systems that are both productive and environmentally beneficial, and incentivises farming practices that externalise their costs onto society.

Under a public goods system that only rewarded environmental outcomes without any incentives to integrate food production, we would encounter a second issue of outsourcing food production and its externalities to parts of the world with lower costs of production, and weaker environmental and social regulations. This would undermine environmental gains achieved, and often leads to higher emissions and environmental costs.

We argue that by linking support for agriculture to agroecological farming practices, which integrate food production with social and environmental outcomes, we can create an important mechanism for targeting funds to where they will have the biggest impact. In this context we are advocating for support systems to help new entrants overcome the initial costs of accessing land, setting up farming businesses, and accessing the training and mentoring they need. These are not proposals for ongoing support payments, but mechanisms to overcome the barriers to entry into the sector.



The Economic Case



Agroecological Farming

externalities. The of Cost Natural Capital Committee's third report (2015) estimates that UK farming is responsible for net external environmental costs to society valued at £700 million per annum.¹ The Sustainable Food Trust (2017) estimates the hidden externalities of UK farming to include £30.93 billion in natural capital degradation, £12.75 billion in biodiversity loss, £44.91 billion in food consumption-related health costs and £16.08 billion in food production-related health costs. On top of this they add farm support payments, regulation and the value of imported food to calculate a total hidden food system externalities value at £120.25 billion.²

Financial support for new entrants agroecological farming can be to in relation to their role justified reducing externalised costs to in the economy, our natural capital health. base and public resource

O Employment and community Agroecological farms resilience. have higher employment levels than farms. Research conventional on agroecological farms under 20ha found

they employed an average of 0.68 full time workers per hectare.3 This is 26 times more employment per hectare than the UK average of 0.026.4 Employment is a core constituent of community resilience and, combined with the local economy benefits, plays a central role in maintaining and enhancing many rural communities.

9 Local economy benefits and **Omultiplier effect.** Money spent on food produced by small, local farms circulates longer in the local economy. The Campaign to Protect Rural England (2012) conducted a five-year study of the 'local food webs' that many agroecological farmers and producers are part of. They found that money spent in local food networks circulated for longer in the local economy than if spent in supermarkets such that an estimated national spend of £2.7 billion per year in local food webs in effect contributed £6.75 billion of value to local economies.⁵ They also found that "pound for pound, spending in smaller independent local food outlets supports three times the number of jobs than at national grocery chains".



- 1. Natural Capital Committee (2015) The State of Natural Capital: protecting and improving natural capital for prosperity and wellbeing. 2. The Sustainable Food Trust (2017). The Hidden Cost of UK Food
- 3. Laughton, R. (2017) 'A Matter of Scale: A study of the productivity, financial viability and multifunctional benefits of small farms (20 ha and less). Landworkers' Alliance and Centre for Agroecology, Coventry University.
 - 4. Eurostat (2011) 'Large Farm Statistics' 5. CPRE (2012) 'From field to fork: The value of England's local food webs

The Social Case

for supporting Agroecological Farming

1 Public access to nature. Through direct sales schemes such as farm shops, pick your own and community supported agriculture schemes, as well as volunteering schemes, agroecological farming increases public access to and engagement in farms and the natural environment.

Increased access to healthy, nutritious foods. Agroecological farming is well placed to supply the diet that the UK population needs. On average, fruit and vegetable consumption needs to increase by 64% to be in line with the Government's guidelines, and meat and dairy consumption needs to be reduced. Agroecological farming and direct sales contribute to increasing access to healthy, nutritious foods on a number of levels. Firstly, through agroecological production, food tends to be fresher, and more nutritious. Secondly, through direct sales the public's relationship with farming is deepened, leading to behavioural changes in eating and food purchasing; and thirdly, through direct sales a significant portion of the retail margin that is absorbed by supermarkets and processors is avoided. This creates room for both better prices for producers and lower costs for consumers, leading to further incentives to consume more fruit and vegetables.

3 Demand for opportunities. Despite these obstacles there is a high demand for opportunities in agroecological farming. Although data on demand is difficult to find, within our network, established farms offering unpaid traineeships for 1 year will regularly have 10-15 applicants for each space available. That so many people are willing to commit to year long training, in return for just housing and food costs, indicates a considerable appetite for opportunities from new entrants. **Aging farm population.** A third of all farm holders in the UK are over the typical retirement age of 65 years and the proportion of young people aged less than 35 years is around 3%.⁸ This aging farm population is increasing at a significant rate. Since 2005 the proportion in the 35-44 years old band has decreased by 5% whilst the proportion in the oldest band, 65 years and over, has increased by 5%.⁶

This data highlights the renewal issues within agriculture that we aim to address. It points to a decreasing resilience in the sector, as farm managers over the typical retirement age are less able or willing to adapt to changes in policy or economic shocks, and an imminent loss of knowledge and experience when retiring farmers have no clear successor.





The Environmental Case for supporting Agroecological Farming

Agroecological farming has important contributions to make to the goals outlined in the 25 Year Environment Plan.

Clean air. Agroecological farming reduces emissions from production and distribution by reducing the energy inputs required. It focuses on minimising and targeting machinery use in production, shortening the distances food travels through short supply chains, and reducing the amount of packaging and refrigeration in food transport. In addition, the diversified landscapes of agroecological farms increase the number of trees on holdings through woodland and hedgerow management, shelter belts, agroforestry and orchards, leading to further gains in air quality.

2Clean and plentiful water. Agroecological farming uses less water than conventional production systems and reduces the pollution of water sources. Land management practices such as crop rotation, composting, avoiding compaction and careful cultivar choices increase the soil's capacity for water retention and reduce the amount of water required in production.

By composting animal manures rather than spreading slurry, agroecological practices reduce the risk of slurry entering water courses. Spreading the compost created from manures further reduces the need for artificial fertilisers, reducing the risk of fertiliser leaching into water courses. In addition, the diversified nature of agroecological landscapes, with reduced field compaction, smaller fields and increased shelter belts, reduces run-off from agricultural land.⁷

3 Enhancing biosecurity. Farms using agroecological methods increase biosecurity by focussing on increasing genetic biodiversity. Ecological studies suggest that greater ecosystem diversity is associated with greater stability, resilience and net productivity.⁸

4 Thriving plants and wildlife. Agroecological farming protects biodiversity and increases the number of species by improving habitat and cultivating more diverse crops and breeds. Research indicates that by using organic principles, farms can have approximately 30% higher species richness and 50% higher abundance of organisms than conventional farms.⁹ These benefits would be comparable or higher in an agroecological system.

Enhanced beauty, heritage and Jengagement with the natural environment. Agroecological farming is responsible for maintaining many of the landscape features valued by the public. Dry stone walling, hedge laying, small fields, orchards, livestock at pasture and hay meadows are all examples of traditional landscape features, valued by the public and integral to agroecological production. In addition, through direct sales schemes such as farm shops, pick your own and community supported agriculture schemes, as well as volunteering schemes, agroecological farming increases public access to and engagement in farms and the natural environment.

6Using resources from nature more sustainably and efficiently. Agroecological farming tends to be significantly more energy efficient than conventional farming and makes better use of natural resources through improved management of soils and water. With appropriate research and investment, agroecological farming is likely to be the farming system that offers the best balance of carbon sequestration and lowemissions food production, providing an achievable route to net-zero emissions whilst maintaining food production and environmental benefits.¹⁰

7. Gomez, J.A., Sobrinho, T.A., Giråldez, J.V., Fereres, E., 2009. Soil management effects on runoff, erosion and soil properties in an olive grove of Southern Spain. Soil and Tillage Research

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^{102, 5-13.} 8. Yachi, S. and Loreau, M. (1999). 'Biodiversity and ecosystem productivity in a fluctuating environment' Proceedings of the National Academy of Sciences of the United States of America, 96. 9. Bengtsson, J.et al (2005) 'The effects of organic agriculture on biodiversity and abundance: a meta-analysis'. Journal of Applied Ecology. 42, 261-269.

Mitigating and adapting to climate change. Agroecological farming is able to produce food whilst dramatically reducing farming and food system emissions and increasing resilience to a changing climate. UK agriculture is responsible for 10% of GHG emissions.¹¹ However, when land use change abroad driven by UK food and feed imports are factored in, as well as the emissions of the food system (transport, refrigeration, waste, packaging etc.), our food chain contributes about 30% of the UK's GHG emissions.¹² Based on analysis of agroecological farm carbon cycles, the LWA believes that a local food economy, with sustainable agroecological production is able to achieve a net-zero emissions food system.

reduced risk from OA of harm Penvironmental hazards such as flooding and drought. Agroecological farming tends to create more resilient production systems, because risk is spread over more enterprises and the enterprises themselves tend towards more resilient crops and breeds. More diversified land uses that include smaller fields, shelterbelts, more trees and more soil cover reduces run-off. This in turn reduces risks of flooding whilst increasing the soils capacity to retain water, and further reducing risks of drought damage.¹⁰

Managing exposure chemicals. to Agroecological farms aim to avoid chemicals in fertiliser, herbicides, pesticides and insecticides, as well as in food processing. An agroecological system manages exposure to chemicals by avoiding their use.

Minimising waste. Agroecological Ufarming minimises waste throughout the food system. Agroecological farms use diversified production systems and often have direct relationships with customers. This reduces harvest waste by reducing grade outs from cosmetically varied crops, and ensures that crops that can not be sold can be returned to the system by being fed to livestock or composed. In addition, by using short supply chains and direct sales to customers, agroeocological farms are able to use less packaging, adding a further saving on waste.

In addition to the environmental targets listed in the 25 year Environment Plan, agroecological farming is well placed to build and maintain soil fertility and soil carbon levels. Through shallow and targeted tillage, cover cropping overwinter and 'green manure' leys of leguminous and high-biomass plants, research has shown that organically-farmed soils have on average 21% higher levels of soil organic matter than non-organic soils.¹³



10. IPES-Food (2016) 'From uniformity to diversity: a paradigm shift from industrial agriculture to diversified agroecological systems', International Panel of Experts on Sustainable Food systems. 11. Committee on Climate Change (2018): 2018 progress report to parliament.

12. Garnett, T. (2008). Cooking up a Storm: Food, greenhouse gas emissions and our changi 13. Soil Association (2018) To plough or not to plough: tillage and soil carbon sequestration missions and our changing climate. The Food and Climate Research Network, Centre for Environmental Strategy, University of Surrey

Key Issue 1: Access to Land

Access to land is a huge problem for new entrants and is expressed on two key levels. The first is a lack of 'starter farm' or 'farm incubation' opportunities for new entrants to test their farm models in a protected environment, and the second is the high cost and low availability of land to purchase when new entrants want to establish their own farm businesses.

We believe there is a strong case for larger scale and more proactive approaches to addressing the access to land issue, such as reforming the tax system to limit land concentration, and reforming planning policy to reduce incentives for land speculation and encourage the development of agroecological farm infrastructure. In Scotland there are currently proposals to create a commission to review the public benefits and risks of large scale land acquisitions and intervene if the sale is not in the public benefit. Such proactive approaches are likely to yield significantly more benefits. However, with this access to land scheme we are proposing 3 low cost and uncontroversial measures that could be easily adopted into government policy without the need for much cross departmental work.



1.1 Local Authority Smallholdings and Land. Local authority smallholdings are an important resource and should be maintained. However, they are oversubscribed and insufficient to meet the demand by new entrants. Every effort should be made by DEFRA to encourage local authorities to expand their estates and to prevent further sell-offs. Requiring local authorities to register significant land holdings (including farms) as 'assets of community value' would ensure that communities are consulted on any changes of use and would reduce the loss of holdings. Protection could be readily achieved by amending section 8 of the 1925 Allotments Act so that County Farms are made subject to the same protections as statutory allotments. Alongside smallholdings, many local authorities have other land that can be of great use to new entrants. This has been effectively modelled by organisations including Organiclea and Growing Communities in London that have worked with sympathetic local authorities to access former tree nurseries and other land on long term leases. DEFRA's support in encouraging local authorities to make land available to new entrants, and organisations supporting them would be well placed and low cost. Simple measures, such as recording and disseminating the mutual benefits of collaborations between new entrants organisations and local authorities, would help incentivise these relationships.

1 . 2 Agroecological land trust 'starter farms'. In addition to local authority smallholdings we advocate for additional government support in the form of low interest loans for a parallel model of agroecological land trusts to provide starter farm opportunities.

In this model, government would provide long term and low interest loans to agroecological land trusts that met certain criteria. These loans would be used by the land trusts to buy land, which would then be subdivided into 'starter farms' and leased to new entrants.

The land trusts would select new entrants to run the farms based on business plans and relevant experience, and provide the necessary infrastructure, training and support to ensure that new entrants are able to thrive in their enterprises. They would also provide the monitoring necessary to ensure that the farms are being managed agroecologically and are meeting social and environmental targets.

After a 5 or 10 year rental period new entrants would be able to buy the land, or a lifetime lease, from the land trust, freeing up capital for the land trusts to purchase new sites, or to move on to other land, in which case the land would become available to other new entrants. In parallel, shorter leases for specific 'farm start' or 'farm incubation' sites that don't offer longer term leases could be provided where necessary.

As not-for-profit organisations, these land trusts would represent a high value for money approach to supporting new entrants with surplus reinvested into further land purchases or improvements to infrastructure on existing holdings. They would also ensure that the land stays in agriculture and is not sold off in the future. This approach could easily be targeted to priority sectors such as horticulture if necessary.

The French organisation 'Terre de Liens' has pioneered a comparable model with great success. Between their creation in 2003 and 2018 they have acquired 177 farms and 4253 hectares of land is under the agroecological management of new entrants and farmers through their leases.

1.3 Low interest land-purchase loans for new entrants. A further approach to the land access problem that would compliment the agroecological land trusts model would be low interest loans to support new entrants to buy land, essentially a modified 'help to buy' scheme for new entrants looking to start agroecological businesses.

To qualify for the scheme, new entrants would have to provide a business plan and land management plan. The loan rate could be contingent on active farming to a certain minimum level to prevent it being used to buy land on speculation. It would also only apply to those who do not already own land and only be applicable to a maximum size of holding to ensure it benefits those who need it most.

The scheme needs to be sensitive to the low incomes of land-based work and to avoid abuse by land speculators. As such, the loan terms should be sufficiently long (15-25 years), with no repayments necessary during the first 5 years whilst the business is established, and a degree of monitoring will be necessary.

Cost and impacts of the scheme:

In order to estimate the costs and impacts of the agroecological land trusts model we can use the Ecological Land Cooperative as an example of an already functioning agroecological land trust. In their model, sites of approximately 20 acres are bought, planning permission is acquired for 2–3 residential smallholdings, and basic infrastructure is put in place. 150 year leases are then sold to new entrants, along with conditions on the management of the land. The average cost of the lease of a smallholding is £110,000 although this could be reduced with statutory support through low interest loans and start up grants. Based on these costs, a trial loan of £20 million, at a low interest rate of 2% and on a 15 year repayment, would catalyse the creation of 160 new agroecological holdings for new entrants.

The costs to government of the local authority smallholdings and land scheme are minimal and the impacts will vary depending on the success of the scheme. Similarly, with a low interest landpurchase loan the possibilities can be scaled up depending on the degree of investment available.



Key Issue 2: Start Up Costs

The costs of starting up agricultural businesses are significantly higher than in other sectors. Estimates for average small business start up costs range from £12,000¹⁴ to £27,520¹⁵, but within agroecological farming, start up costs can range from £25,000 to well over £500,000¹⁶. Significantly, profit margins are lower than most businesses, whilst annual risk is higher.

The low and unpredictable returns of farming make borrowing money an unrealistic option for many new entrants. For example, with £200,000 start up costs and a £25,000 deposit, taking out a business loan at 4.5% will incur an annual repayment of £11,664 over 25 years. This is impossible in the first years of a farming business, and unrealistic for many businesses in the long term¹⁶. It also makes it difficult for businesses to undertake substantial repairs or take advantage of growth opportunities.

As a consequence many potential new entrants are put off, and the majority of those who start farms do so with substandard equipment and systems in place that limit the long term viability and efficiencies of their farms.



2.1 New Entrant Agroecological Farm Business Start-up Grant and Loan. Government would provide start up grants of £10,000 to £100,000 to new entrants to establish agroecological farm businesses. This grant would be available for either capital costs and/or revenue to support the start up of the enterprise. The grant would be available for two to five years depending on the needs of the applicant.

The grant could be matched by a low interest loan, and a degree of match funding by the applicant, although we advocate for a means testing mechanism to ensure that the grants do not end up disproportionately benefiting new entrants who already have access to capital.

Grant payments should be tied to mentoring on business planning and land management, with mentorship meetings held at least annually. In addition to the grant, a training budget should be made available to support the new entrants to pursue relevant skills.

Applicants would need to provide a robust business plan outlining how their business will deliver environmental outcomes and sustainable land management as well as financial viability.

 $^{14.\} https://www.lloydsbankinggroup.com/Media/Press-Releases/2016-press-releases/lloyds-bank/average-cost-of-starting-a-new-business-is-over-12000/15.\ https://www.moneywise.co.uk/news/2016-08-16/27520-the-cost-starting-business-2016$

https://www.moneywise.co.uk/news/2016-08-16/27520-the-cost-starting-business-2016
See LWA document on start up costs for New Entrants to Agroecological farming (2019)



Cost and impacts of the scheme:

£5 million would provide start up grants for 100 new entrants at an average grant of £50,000. If this program were to run for 10 years we would see 1000 new farms supported for a total cost of £50 million.

Assuming each business had an annual turnover of £50,000 after 5 years and provided 2.5 FTE jobs the £5 million annual investment would create 250 jobs and local food sales of around £5 million every year after the businesses were established. Using the multiplier effect of 2.5 suggested for local food businesses, the average annual benefit of the £5 million grant would be £12.5 million to local economies.

Over 10 years we could see 1000 new agroecological farm businesses and 2500 jobs created, with a total annual sales value of around £50 million and an annual benefit to local economies of £125 million. If these new farm businesses were controlled by people under 35, this would represent a 15.3% increase in UK farm holders under the age of 35, while the percentage corresponding to England would be significantly higher.



Key Issue 3: Lack of Training

There is a lack of appropriate training and mentoring for new entrants, particularly for those going into the agroecological sector. Formal agricultural education is generally viewed as inappropriate and expensive by agroecological new entrants, who tend to opt for low-cost on-farm training instead. However, the on-farm training that exists is largely uncoordinated and so people experience different content and quality of training.

There is a clear need for work to be done to improve accredited training options for agroecological farming. However, with this scheme we are proposing three areas of on-farm training and exchange that DEFRA could support which would have a high impact for new entrants at relatively low cost.



3. 1 Traineeship scheme. The apprenticeship scheme has had limited uptake in agroecological farming because of both a lack of appropriate formal training to run alongside the on-farm work, and wage criteria which limit the ability of many smaller enterprises to take on apprentices as well as existing staff. In recognition of these obstacles we encourage government to provide funding for new entrants to undertake immersive, on-farm training, with a theoretical component.

A small investment in creating and coordinating a trainee host network would bring together farms around the country who are offering traineeship schemes to collaborate on improving the consistency and quality of the training involved. This network would also provide a peer-review function to ensure a basic quality assurance.

Funding to help cover the costs of the training would then be available to farms within the network. The trainees would live and work on-farm alongside experienced farmers for 1 or 2 years, depending on the level of training they require and the farm is able to offer. Alongside the practical experience, the farms would also provide theoretical training, pooling the training provision with other farms in the area that are part of the network.



3. 2 Mentorship scheme. There is high demand for mentoring for new entrants by experienced farmers during the first few years of managing a farm. Investment to create and coordinate a network of mentors, who can be linked to new entrants applying for mentoring based on their area and sector, and provide site visits and remote support, would have a significant impact on the success rate of new entrants. There are obvious overlaps with the traineeship scheme and by running both schemes in parallel we would be able to make savings on the costs of coordinating the schemes.

In the mentoring scheme, mentees would be grouped with 2 others and linked to a mentor with experience of the types of farm they are establishing. Each mentee would host a visit from the mentor and other mentees in the group, and the group would also visit the mentors farm. By grouping mentees, a co-learning and peer support group is automatically created and the breadth of learning is increased. After these visits the mentor would provide telephone and online support when necessary over the course of a year's mentoring term.

3.3 Farmer-to-farmer intergenerational exchange groups. Within our network, farmer-to-farmer groups have proved to be low cost and popular forms of peer-to-peer learning with a high impact on farming practice. We propose developing the concept to create intergenerational exchange groups that run along the same lines as already established farmer-to-farmer groups but operate with a particular focus on creating the conditions for intergenerational exchanges.

A small investment is necessary to fund coordinators for each group that will be established. These coordinators will convene the network and ensure the logistics and administration to run the groups and encourage intergenerational participation. The groups will collaborate to co-design the topics for monthly meetings and decide on venues, depending on the needs of the group.



Cont. overleaf

Costs and impacts of the schemes:

In our experience of trialling similar schemes, we estimate the cost of traineeship and mentoring schemes to be around £3000 per trainee or mentee per year. These costs include the coordination of the schemes and the networking work necessary to ensure peer reviewing of the training and mentoring provided. In the case of traineeships, this covers 6 days of theoretical training, as well as food and accommodation for trainees and trainers. In the case of mentoring this covers travel and accommodation for 3 days of mentoring as well as telephone and online support.

Based on these figures a £390,000 annual investment would finance 65 traineeships and 65 mentorships per year, which would be a good way to trial the scheme. It could then be scaled up depending on impact and demand. Based on these figures a £1 million per year investment would create 33 training opportunities each year, or £5 million could train 1665 people.

Farmer-to-farmer intergenerational exchange groups

In our experience of farmer-to-farmer groups, we estimate that for £30,000 a coordinator could convene 5 groups with an average of 40 participants who would meet on a monthly basis. This includes a part time salary for the coordinator, as well as travel expenses and a small contribution to a larger annual event.

The coordinator would be responsible for getting the groups established and facilitate a preliminary session each year to set the meeting schedule, venues and topics. The groups would then self-manage with remote support from the coordinator.

Whilst not all participants would attend every meeting the benefit is high for the low costs of the scheme. For £30,000 approximately 200 farmers would be involved in the scheme for 6 - 10 meetings. This makes a cost per participant for the year at £150, and per event at £15 - £25 depending on how many they attend. These low costs rely on the voluntary participation of farmers and the possibility of using farms as venues, which incur a cost to the host that tends to be absorbed by the group. As such it doesn't represent the full cost, but the amount that government funding could provide to incentivise the schemes to take off.

Expanding these figures to 15 farmer-to-farmer intergenerational exchange groups would see $\pounds 90,000$ benefiting around 600 farmers and funding 90 – 150 meetings. This would be a good way to trial the scheme, which could then be scaled up depending on impact and demand.



The Landworkers' Alliance (LWA) is a union of farmers, growers, foresters and land-based workers. We campaign for the rights of producers and lobby the UK government for policies that support the infrastructure and economic climate central to our livelihoods.



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