

Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement

Stakeholder Responses

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Brexit Division
DAERA
Dundonald House
BELFAST
BT4 3SB

8 October 2018

Dear Norman

Re: NI Future Agricultural Policy Framework

Thank you for the opportunity to respond to the above document on behalf of Outdoor Recreation NI.

Outdoor Recreation NI, established in 1999, is a not-for-profit organisation whose vision is 'placing outdoor recreation at the heart of society'. Our mission is to create a vibrant outdoor recreation culture through collaborative initiatives, that inspire action.

Since 1999 we have worked in partnership with a wide range of organisations across Northern Ireland including central and local government, national governing bodies of sport, private sector activity providers and numerous landowners and land managers including eNGOs e.g National Trust, Ulster Wildlife Trust and private landowners to develop a wide range of outdoor recreation products on the ground. This includes, walking, off-road family cycling, all-ability, horse riding, mountain biking and canoe trails which have been developed not only for the local population to enjoy but also visitors to Northern Ireland.

More recently ORNI has been instrumental in developing the concept of Community Trails across Northern Ireland, driving at a political level the need for a NI Walking Strategy and working with the Public Health Agency and SportNI to put in place a new integrated Northern Ireland-wide walk leadership training scheme, 'Walking For All'.

PLACING OUTDOOR RECREATION AT THE HEART OF SOCIETY

Outdoor Recreation Northern Ireland is a not-for-profit organisation whose role is to develop, manage and promote outdoor recreation across Northern Ireland.

Charity registration number NIC 102808 | Company Reg: NI 38105
Outdoor Recreation (N. Ireland) is an Equal Opportunities Employer



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It is against this background therefore that ORNI welcomes the Department's inclusion within the framework policy of development to support actions such as the provision of access for recreation for public health. We believe that the recreational community in Northern Ireland would support future agricultural policies that produce a public good, that is, the provision of enhanced recreational opportunities.

ORNI recognises however that this is not a new approach and that back in the early 1990s the Department of Agriculture for NI (DANI) introduced, under EC Regulation 2078/92, the Agri-Environment Regulation which accompanied CAP reform measures - this regulation made provision, among other things for measures relating to public access in the form of the 'Countryside Access Scheme'.

As you are aware the objective of the Countryside Access Scheme was to provide new opportunities for access in the countryside for walking, horse riding and other forms of quiet recreation so that the public's appreciation and enjoyment of the countryside might be increased. The voluntary scheme saw DANI providing modest annual payments to farmers for the provision, management and maintenance of trails. For farmers to be eligible for the payment, the trail crossing their land had to be included in a District Council Access Strategy document, which had been approved by the DOE's Environment and Heritage Service and they had to sign up to a permissive path agreement with the local council.

Although the Scheme was not overly successful, as only one or two Councils in the early 90s had an Access Strategy in place, ORNI was supportive of the scheme and is again is supportive of any scheme that would be voluntary and provide payments in support of new or enhanced recreational facilities that provide access to land or water.

We are concerned however of the brevity of the reference given within the new consultation document and are disappointed that it appears that the support would be to other funding streams rather than meriting a stand-alone scheme.

We are also concerned that in any new scheme landowners would be penalised for providing new or enhanced recreational facilities that provide access to land or water. Under the current Agri Environment Scheme, if a landowner gives up a corridor of land for recreation, they forego their Single Farm Payment for this strip. This should not be the case. Any payments to landowners for providing enhanced opportunities for recreation should be additional.

To overcome the major downfall of the previous DANI Countryside Access Scheme, we recognise the need for payments to be tied into recognised and approved Strategic Plans. This could include Plans

such as the Greenways Strategy, Council Outdoor Recreation and Access Strategies and Community Trails Plans.

ORNI has been leading the concept of Community Trail Planning in Northern Ireland during the past number of years and has recently completed a Community Trail Plan for Newry, Mourne and Down District Council. This is the first Council in Northern Ireland to have such a Plan.

The Community Trail Plan sets out all the potential outdoor recreational opportunities within the Council area down to individual landowner level and therefore could be used as the appropriate framework on which decisions for any such Agri Scheme could be based.

Given the timeframe of any new Agri Environment Scheme becoming operational, ORNI believes that there is scope to complete for all other Councils in Northern Ireland a Community Trail Plan. We would welcome the opportunity to discuss this further with the Department.

I trust that these comments are helpful and look forward to seeing the Department's detailed proposals in the future.

Please do not hesitate to contact me directly if you require clarification on any of the above.

Yours faithfully

Caro-lynn Ferris

Executive Director - ORNI



giving
nature
a home

Northern Ireland Future Agriculture Policy Framework: Stakeholder Engagement

RSPB Northern Ireland, October 2018

RSPB Northern Ireland (NI) welcomes the opportunity to comment on the Future Agriculture Policy Framework for NI. As a member of the NIEL Brexit Coalition, Nature Matters NI, **we support the detailed points and analysis contained within thier response to the future agriculture policy framework and endorse it fully.** In particular we support the call to use public money for the delivery of public goods as we transition away from the Common Agriculture Policy (CAP).

The RSPB's vision for agriculture and land management is a profitable farming sector that provides a sustainable supply of safe healthy food, in turn providing society with a range of public goods such as thriving biodiversity, clean water supplies, adaptation to climate change and resilience to local land use pressures such as flooding. Our long-term view is that Pillar I subsidies should be phased out and replaced with a system that sees farmers rewarded for delivering 'public money for public goods' through a sustainable land use model that protects and enhances priority wildlife habitats, conserves populations of priority biodiversity species as well as ensuring designated wildlife sites are in good condition. We believe it is vital that **funds currently associated with agriculture are maintained** and we support the analysis within the 'Scale of Need'¹ report commissioned by RSPB and partners, which assesses the costs of environmental land management in the UK.

The RSPB has a long history of working on agricultural forestry and rural development issues. Many of our nature reserves are farmed and we receive Single Farm Payment (SFP) and Environmental Farming Scheme (EFS) payments on some of our nature reserves. We give advice to farmers over a land area covering in excess of 15 000 ha, including farmers in EFS. Our interest in the agricultural sector has stemmed from the fact that since the early 1970s, wild farmland bird populations, which are used as an indicator for the health of the farmed environment, have declined by up to 52%² (some over 80%). Indeed, corn buntings became extinct in the 1980's and there have been no records of breeding corncrake in the past 10 years. Such declines have been rapid, massive and widespread, with parallel declines in other components of farmland biodiversity, including wild plants and insects, and ecosystem services upon which the future of farming depends. Unless concerted action is taken now, it is highly likely that some of our most iconic species and habitats in NI, such as peat bogs, Marsh Fritillary butterflies and curlew, could disappear within a generation.

It is vitally important that we use the transition away from the CAP as an opportunity to fundamentally reform agriculture and land management policy to set the agri-food industry on a sustainable footing for generations to come. Although agriculture has contributed much in the way of environmental harm, the RSPB believes it can provide solutions to many of the challenges currently experience by species and habitats and deliver significantly more for the public.

¹https://ww2.rspb.org.uk/Images/Assessing%20the%20costs%20of%20Environmental%20Land%20Management%20in%20the%20UK%20Policy%20Briefing_tcm9-449500.pdf

² <http://www.obcc.info/index.php?ID=470>

RSPB is working in partnership with the UK Environment Links and Greener UK. We are aligned with England, Scotland and Wales, in pursuit of a policy that delivers public goods and the principles set out by the Greener UK³ paper 'Agriculture at a crossroads: the need for sustainable farming and land use policies'. In the lead up to the publication of 'Health and Harmony', the DEFRA consultation prior to the Agriculture Bill, we collaborated with UK colleagues on the development of the Wildlife and Countryside Link evidence paper, although developed for England, much of this is relevant for NI. We are also supportive of the direction of travel of the recently proposed Agriculture Bill in Westminster which has put the environment at the heart of agriculture policy post-Brexit, and would like to see similar primary legislation in NI.

Key Asks

- DAERA must continue to engage with stakeholders to ensure farmers and land managers have a clear picture of changes to agriculture policy resulting from Brexit
- For a future agriculture policy to be sustainable in the long term, efforts to drive innovation and productivity must be coherent with those aimed at protecting, restoring and enhancing the natural environment.
- There needs to be a stronger recognition that effective environmental land management can lead to increases in productivity. Science innovation and research based upon maximising productivity must seek to identify opportunities for these win-win scenarios
- The framework must recognise that a focus on profitability is of equal importance, and that in some cases focusing on this will not necessarily maximise productivity in some farming systems
- Payments for positive environmental management can provide a stable reliable income source independent of market volatility whilst providing societal benefits. This represents a better use of public expenditure to manage risk and build resilience, as well as delivering beneficial outcomes.
- We call on DAERA to adopt a broader view of vulnerability and risk management to develop a wider concept of resilience
- Rather than being viewed as areas of disadvantage, economically marginal systems should be recognised for their high potential to offer significant public benefits
- Any future payments related to farming and land management must be based on the recipient meeting ambitious minimum regulatory standards.
- To ensure that farming is productive, profitable and resilient in the long term a future framework must have environmental enhancement at its core
- We need to shift emphasis from 'what farming can do for the environment, to what the environment can do for farming'
- It is important that existing levels of funding associated with the CAP are maintained and repurposed in order to meet environmental outcomes
- Funding to support farmers and land managers to provide environmental public goods needs to be allocated on the scale needed to meet specific environmental outcomes
- There needs to be some recognition that the rural landscape is an important and distinctive element of Northern Ireland, and there should be reference to the importance of protecting the rural historic environment and distinctive landscape features.

³ <http://greeneruk.org/>

RURAL SUPPORT

Northern Ireland Future Agricultural Policy Framework: Stakeholder

Engagement - Questions

- 1. What are your views on the retention of entitlements as the basis of direct support until a new agricultural policy framework is agreed?**

Essential – this is key to ensuring we have a viable industry moving forward without shock changes and until something is agreed which farmers can plan for and work toward – it is difficult to make business decisions without this

- 2. What are your views on the possible abolition of the greening requirements of crop diversification, ecological focus area and retention of permanent grassland and the incorporation of the greening payment into the BPS entitlement values?**

Agreed – this makes absolute sense – reduces admin costs

- 3. What are your views on the retention of the current ploughing ban on environmentally sensitive permanent grassland (i.e. within Special Protection Areas and Special Areas of Conservation) and how this could be achieved?**

Retained – a condition of BPS

- 4. What are your views on those accepted into the YFP up to and including 2019 continuing to receive payment for as long as they are eligible to do so?**

Only fair to encourage our farmers of tomorrow

- 5. What are your views on whether to allow further applications to the YFP and the Regional Reserve after 2019?**

Only fair to encourage our farmers of tomorrow

- 6. What are your views on the most effective means of encouraging and facilitating generational renewal on farm businesses?**

Encouraging Young Farmers through incentives and taking stock of their opinions.

Retirement scheme for older farmers could be considered

7. What are your views on whether the elements of the current direct payments discussed in Section 2.7 could remain in 2020 and 2021?

Agreed

8. Have you any specific suggestions for simplifying other aspects of the current direct payment in 2020 and 2021 which are not mentioned here? If so, please explain your rationale for suggesting these.

None

9. What are your views on a “Productivity Grand Challenge” approach to delivering a step change in the rate of advance in science and innovation?

In theory this is the way forward, but it must be sensitively managed – especially from the environmental perspective.

10. What are your views on the principle of placing greater policy emphasis and investment in agricultural education and knowledge transfer as means of driving better industry outcomes?

This is fine so long as it is an effective learning process and not simply a means to attain a qualification. Students must leave any training with improved business management skills to include a sound understanding of managing business costs and financial planning as well as technical knowledge.

11. What are your views on linking qualification attainment with a broader range of policy interventions as a means of incentivising farmer engagement with formal training initiatives?

There would need to be evident business management learning within the qualification.

12. What are your views on continuous professional development (CPD) as a policy intervention and the possible investment of public funds to incentivise CPD?

Again, the core outcome needs to be effective learning which can be easily applied to the farm business – if there is seen to be a value in the learning this will have an impact

13. What are your views on the provision of investment that is specifically targeted on innovation and new technology uptake and that is aligned to other strategic objectives, notably environmental performance?

In theory this makes sense

14. What are your views on the provision of investment incentives other than capital grant (such as loans, loan guarantees, interest rate subsidies etc.)?

Good idea so long as the red tape is not a prevention tool for uptake

15. What other initiatives by government and/or industry should be pursued to facilitate restructuring and investment and drive productivity?

Encourage long term leases through incentives – make any grant process more transparent – unlike Tier 2 and with realistic timeframes so farmers may plan effectively.

16. What are your views on the provision of a basic farm resilience support measure?

Good idea in principle

17. What are your views on an appropriate mechanism to establish the level of payment under a farm resilience support measure?

Should be linked to productivity – ie land which is well maintained should be eligible for higher payment than that which has been neglected – those who are good workers and managers should always be paid more than those who have a low work ethos – as in any business

18. What are your views on the targeting of a basic farm resilience support payment to take account of issues such as natural disadvantage?

Should be considered but also bearing in mind the above comments

19. What are your views on linking a farm resilience support measure with cross compliance obligations?

Provided the framework is simple and straightforward

20. What are your views on the content of cross compliance/good farming practice associated with this provision?

Fine provided the 'eligibility conditions' are realistic and achievable

21. What issues would an appropriate cross compliance regime seek to encompass?

Nitrates – management of slurry/manure

22. What are your views on the tiering or capping of a basic farm resilience support payment, or the establishment of an eligibility threshold?

Tiering may be more appropriate with minimum threshold established

23. What are your views on the introduction of anti-cyclical/insurance type measures to help address volatility?

Only if linked to variance in input/output costs – farm accounts vary drastically. Would wish to avoid over compensating very profitable farmers who aren't investing in their business as they head to retirement as opposed to younger farmers who have invested in the farm business to secure its viability moving forward

24. Should anti-cyclical/insurance type measures be sector-specific or aimed more generally at income protection?

Sector-specific

25. What are your views on the enhancement of fiscal measures as a means of addressing the issue of income volatility?

I cannot see the Australian model working here – most farmers would prefer to reduce their bank interest costs

26. What are your views on a possible pre-defined and agreed crisis response framework to respond to crisis events, either locally or nationally?

This is essential and while it needs to be flexible enough to be in a position to respond there needs to be significant emphasis on building a framework with the capacity to act quickly and effectively when a crisis arrives – the definition of crisis demands immediate intervention.

27. What are your views on the suggested environmental principles to be incorporated within the agricultural policy framework?

Agreed – in particular the collaborative approach which gives farmers some ownership
– based on experience

28. What are your views on the need for investment in research and education targeted on environmental and conservation management in the agricultural sector?

Needs to be realistic and easily understood

29. What are your views on a shift towards outcome based environmental measures for agriculture, including co-design with farmers and land managers?

Excellent idea

30. What are your views on the need for future schemes to move beyond the costs incurred income forgone approach to incentivise changes in farming practice to enhance environmental sustainability?

So long as farmers can see the benefit this is a good idea – especially targeting issues such as flood risk mitigation – not so sure about access for recreation – in theory this is a good idea but in practice farmers potentially won't utilise this

31. What are your views on the role of other actors in the supply chain seeking to drive better environmental outcomes?

they should be involved

32. What are your views on the delivery models that would deliver the best uptake and outcomes?

Targeting delivery models in line with local variation makes perfect sense

33. What are your views on the role of government in ensuring market transparency?

It is one of their key functions – or should be – it doesn't seem to be working

34. What are your views on CPD extending to encompass supply chain awareness training for farmers, including increased emphasis in farmer training on business planning, benchmarking and risk management?

Business planning etc are essential learning outcomes for farmers – our agri colleges should be heavily focused on these areas - we have not placed enough emphasis on this

35. What are your views on the need for, and nature of, government action to achieve greater collaboration within and better functioning of the agri-food supply chain?

In theory this would be an excellent outcome however sadly in practice we don't feel the trust is there to build greater collaboration – past history has seen many broken contracts with the farmer usually being the one to suffer the consequences.

36. Are there any equality comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

Farmers no longer have easy access to DAERA officials for advice - they are now seen as inspectors rather than advisors

37. Are there any rural needs comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

38. Are there any regulatory impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

39. Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

40. Are there any other comments you wish to make or any other evidence of need that you think the Department would find helpful? Please submit any evidence with your response.

The importance of all rural agencies to act as a team moving forward with a joined-up approach - more transparent to the farmer

In moving forward focus must be in preparing our young farmers to be business managers - every young person intending to farm should be able to gain a place at our agricultural college and encouraged to learn and develop over several years. The Business Development Groups should have actively encouraged all farm family members to attend group meetings to share and develop the learning.

Funding opportunities/ incentives for farmers' groups not facilitated by DAERA as many of these works very well - programme to include essential topics eg

environmental issues, grassland management etc - benefitting from educational and social experiences.

Jude McCann – Chief Executive of Rural Support is in the process of completing his Nuffield farming scholarship report, entitled 'Securing farmers' resilience in a changing world'. Below are some recommendations from his report which should be considered by DAERA.

- A resilient farm sector is fundamental to the financial well-being of agricultural suppliers, processors, supermarkets, financial institutions, and insurance companies. It is also part of the social responsibility of the business sector. Corporate social responsibility can be expressed in a variety of ways including the initiation of specific support programmes and initiatives and through support and work with NGOs and farm support organisations.
- There is a fundamental need to normalise mental health and issues of well-being. Policies for agricultural policies should take a holistic approach that encompasses economic, environmental and social resilience.
- Financial support for resilience is an investment not a cost and there is a fundamental need to work with existing support agencies and provide appropriate support.
- Adverse weather events, disease outbreaks, and other crises demand attention and increased funding but the resulting stresses on farmers are persistent, often undramatic, and require on-going support.
- Medium and small-scale farm enterprises need attention and support to promote adaptation and change.
- There is an important role for NGOs and farm support organisations who should collaborate with one-another as well as with all stakeholders to support and facilitate farmers' resilience.
- There is a need to recognise farmers' stress and related conditions not as "special circumstances" but part of normality and to explore options to provide and promote integrated services for resilience whether for individual farmers, farm households or the wider rural community.

Northern Ireland Executive Consultation on The Future Agricultural Policy Framework A response from The School & Nursery Milk Alliance

The School & Nursery Milk Alliance is a coalition of organisations from the dairy, health and education sectors, seeking to highlight the benefits of milk to children and encourage its increased consumption as part of a healthy diet. As a membership organisation, the Alliance represents over 90% of the suppliers of milk to educational settings, as well as 10,500 nurseries, schools and other educational settings in receipt of milk. The Alliance is calling for a domestic replacement to the EU School Milk Scheme post-Brexit.

In this submission, we answer:

- What are your views on the provision of a basic farm resilience support measure?

We assert that school milk subsidies are a necessary basic farm resilience support measure, as noted in your consultation. Additionally, it greatly benefits Northern Irish children in their physical, cognitive and social development.

Current provisions

School milk is subsidised as part of the 'Common Organisation of the Markets' (COM) market support measure element of Pillar 1 of the Common Agricultural Policy (CAP). COM accounts for approximately 4% of the overall EU CAP budget. In addition to school milk, COM provides support for storage and export refunds, as well as the recent programme of paying dairy farmers to decrease their milk outputs. We welcome Defra's pledge to continue to pay farmers the subsidies they receive under CAP until 2022, which includes the COM; however, the UK has committed to remaining in the School Milk Scheme only until March 2019 and matching provisions until 2022. We were disappointed that the UK Government's Agriculture Bill outlining the future of British agriculture policy does not include a replacement school milk subsidy scheme.

The EU School Fruit, Vegetables and Milk Scheme is currently enjoyed by 63% of Northern Irish primary schools and administered by the Department for Agriculture, Environment, and Rural Affairs, children over the age of five receive a subsidised portion of milk. The programme was known as the EU School Milk Scheme until August 2017, when it was merged with the School Fruit and Vegetables Scheme.

Challenges arise from the complex nature of both leaving the current supporting arrangements and the possible impact of devolution on post-Brexit agriculture policy. However, Brexit provides the opportunity to tailor a domestic school milk policy to the needs of Northern Ireland. We would seek to see the upcoming Devolved Agriculture Bill address this or, at the very least, to provide certainty to nursery and school children, parents, teachers and the dairy industry that school milk will remain a staple nutritional product for Northern Irish schoolchildren.

School milk helps Northern Irish farmers be resilient to market fluctuations

The Northern Irish countryside and Northern Irish farmers benefit from the provision of milk to children. As outlined in this consultation, school milk is a British institution, which supports the livelihood of many dairy farmers by providing a much-needed market and thereby encouraging productivity whilst empowering them to better manage risk and volatility. Farmers currently have to struggle with ongoing global trends affecting milk prices, and have to adjust to post-Brexit agriculture policy, which is likely to remarkably change their business model. Provision of school milk provides farmers with a stable market along with the ability to supply excellent Northern Irish produce to our children, which contributes to the economy and rural society.

School milk ensures public money goes to funding public health

Childhood obesity is a major public health issue in Northern Ireland. Research has found that that almost 40% of young people in Northern Ireland are overweight or obese, which is the highest of all the devolved nations¹. A research review conducted by Northumbria University shows that children who drink milk are more likely to have a lower body mass than those who do not. The fat content of milk is low, with semi-skimmed milk containing just 1.7% fat and whole milk containing 3.9% fat.

The British Dental Association has also found that tooth decay is the most common reason for children being admitted to hospital in Northern Ireland, as over 40% of Northern Irish 5-year-olds have tooth decay². As well as being unpleasant for children, treating tooth decay also has significant costs for the NHS. Cow's milk contains micronutrients, such as calcium, vitamin B3 (niacin), and vitamin B12 and B2 (riboflavin), which reduce the risk of tooth decay, bleeding gums and mouth sores.

The Northern Irish Government has acknowledged the benefits of children drinking milk in its school food guidance for both breakfast and lunch, where it refers to milk as a healthy option and good source of essential

¹ <https://www.ucl.ac.uk/ioe/news-events/news-pub/dec-2017/one-in-five-young-people-obese-age-14>

² <https://www.belfastlive.co.uk/news/health/tooth-decay-number-one-reason-14435699>

nutrients³. The Northumbria University review suggests that drinking milk helps to improve children's cognitive function as well as their physical health, which directly contributes to improving education outcomes. Encouraging children to drink milk regularly helps them to form a healthy habit when they are young and leads to them making healthier choices throughout their lives.

The public support a replacement school milk scheme

We commissioned ComRes to conduct independent polling to determine public's opinion across the UK on a domestic replacement to the EU School Milk Scheme and the results were:

- (a) 86% of respondents believe that drinking milk is good for children's health and development;
- (b) 69% of respondents believe that schools should play a role in their pupils' diets; and
- (c) 57% of respondents believe that schools should be legally required to provide primary school pupils with milk.

This shows categorically that the public widely regard school milk as a public good that should continue to be subsidised for the continued future good health of the nation and the children of Northern Ireland.

³ <https://www.education-ni.gov.uk/publications/school-food-essential-guide>

SINN FÉIN

DAERA Future Agricultural Policy Framework

Sinn Féin Submission

Introduction

This consultation is premised on leaving the EU and the Common Agricultural Policy (CAP) no longer applying to the north. As such it is premature. The north's relationship with Europe is subject to negotiations which will only begin after a withdrawal agreement is agreed.

In those negotiations Sinn Féin will argue for the north to be granted Special Designated Status. This would respect the north's vote to remain and allow it to continue to enjoy the considerable benefits of EU membership. This response sets out why the north's future agricultural framework should be within the EU. It also records Sinn Féin's position on other policy issues raised in the consultation document.

EU workers

EU workers are vital to our economy. They bring skills we don't have and fill labour shortages in all skill sectors. The Agri food industry in particular strongly relies on workers from other EU countries.¹ To put this in context a report released by the Department of Agriculture, Environment and Rural Affairs on 'Migrant Labour and Trade Enquiry' in 2017 states that approximately 40% of employees in the food and drinks processing sector are citizens of EU countries other than Britain and the 26 countries.

Even before Brexit has been implemented the Brexit vote has itself had a negative impact. Migrants gravitate towards modern, diverse and inclusive societies where they and their families are welcome. But the Brexit vote has already signalled that foreign workers are not welcome. That 'chill factor' together with the fall in the pound triggered by the Brexit vote has already led to a 26% reduction in EEA workers.

¹ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/DAERA%20-%20Migrant%20labour%20and%20trade%20enquiry%20-%20web.PDF>

The British Government is committed to a hostile immigration policy which would make it even more difficult for the agri-food sector to attract the workers they need. It is essential for the future of the agri-food sector in the north that it can continue to freely recruit EU workers. This can best be achieved by Special Designated Status within the EU.

CAP Funding

The north is a major beneficiary of Common Agricultural Policy (CAP) funding. CAP funding is worth in excess of £2.3 billion (2014-2020) to the north and accounts for 87% of annual farm incomes. As the then Agriculture Minister Michelle O'Neill MLA brought in CAP reforms in 2014 which helps small family farms and provides farmers with an equal amount of money per hectare. This system should not be replaced by a system that links payments to levels of production. Farming should be incentivised through farm modernisation schemes, young farmer's schemes and ongoing professional development to encourage more young people into the industry and make farm businesses more efficient and sustainable.

The current EU CAP architecture must be retained. In 2017, the European Union Issued a communication on Agriculture: *'The Future of Farming and Food'* outlining the main objectives of the future CAP: *to foster a smart and resilient agricultural sector; to bolster environmental care and climate action and to contribute to the environmental and climate objectives of the EU; to strengthening the socio-economic fabric of rural areas.* What is central to achieving these objectives is that direct payments will remain an essential part of CAP, unlike the English draft policy which is phasing out direct payments.

As a result of the Brexit vote there is no clarity on how the Agriculture Policy will be funded beyond 2020. Under CAP reforms Sinn Féin would like to see the current levels of Single Farm payment retained and enhanced beyond 2020. There should be a move towards a flat rate payment by 2021. We would support a larger payment for the first number of Hectares EG (At a minimum 10 hectares at €400 and the remainder at €150). This would provide better supports for smaller farmers. That support from the EU through CAP stands in stark contrast to what has been proposed in England where the direction of travel is to phase out direct payments. Special Designated Status would allow for CAP payments to continue.

Trade

EU membership provides for unfettered trade across Ireland, with Britain, and with the rest of the EU. The EU is the largest trading bloc in the world and it has trade agreements with over 60 other countries. Brexit will undermine free trade through tariffs and non-tariff barriers such as additional bureaucracy, checks of goods, and different regulations and standards.

The Agri-food sector in Ireland, worth £1.3 billion each year, would be one of the worst affected by Brexit because it is so integrated across the island. For example, according to Dairy UK, “the dairy industry on the island of Ireland has evolved such that there is free movement of milk, free movement of dairy products and free movement of people” (Northern Ireland Affairs Committee 2017, p.19). To disrupt the seamless cross border operation of the industry and its supply chains would be a complete disaster and undermine the tremendous progress that been achieved in making Ireland a world leader for high quality, traceable food. This was acknowledged by the previous First and deputy First Ministers in their letter of August 2016 to the British Prime Minister which identified agriculture as one of the key areas of north-south co-operation under the Good Friday Agreement that would be vulnerable to trade barriers.

Sinn Féin has grave concerns on the direction of travel towards ‘public goods for public money’. While we welcome measures that protect the Environment there is also a public demand for the provision of food that is affordable, high-quality, nutritious and traceable. Sinn Féin are opposed to any regression on traceability in standards. High standards of food safety and animal welfare should be protected in line with what consumers expect.

Special designated status would allow the north to continue to enjoy unfettered tariff-free trade and preserve the high standards and reputation of Irish agri-food.

Areas of Natural Constraint

Sinn Féin is calling for the reintroduction of Areas of Natural Constraints Payment at a rate that helps hill farmers mitigate against adverse Impacts. A Sinn Féin Minister introduced the ANC Scheme to address disadvantage. Hill farmers are ‘restricted’ in their business choices due to the limitations of climate and environment. Hill farmers got ‘extra’ support because they face ‘additional’ challenges. However DUP Minister McIlveen subsequently withdrew

this payment. A report by NFU² states that the value of hill farming must be recognised if it is to shape the social and economic needs of people living in rural areas. The additional challenges faced by such farmers would need to be considered under the Rural Needs Act as part of addressing the social and economic needs of people living in rural areas.

Other Issues

1. Sinn Fein have worked hard to ensure that the needs of people living in rural areas feature prominently within government policy. The current Rural Development Programme in the north has an overall budget of £623m (2014-2020). The NIRDP is a key mechanism for addressing the needs of rural communities and should be continued.
2. The consultation document does not deal with cross border trading of livestock and veterinary standards. The Department should give consideration to these issues in order to protect Ireland from disease.
3. Sinn Féin supports the retention of the Young Farmers Scheme. There needs to be incentives for young farmers in order to sustain the farming sector. They need to continue receiving the payment that was promised to them when they signed up to the scheme. Further applications to the YFP should continue as the farming sector needs to see more young farmers coming through.
4. With regards to facilitating generational renewal Sinn Féin supports the development of schemes that are an incentive to both the young farmer and the senior farmer. For example, early retirement schemes and farm partnerships. Supports must be made available to young farmers and new entrants in order to get them established in the business which should include financial, educational and health and safety measures.
5. We are opposed to any introduction of farm Insurance measures. Farmers should be entitled to receive government support regardless of whether or not they take out farm insurance measures.
6. Agricultural educational needs are important for all young farmers and new entrants and continued education through Knowledge Transfer is essential for improving productivity and profitability of the farm. Farm safety needs to play an important part of this

² <https://www.nfuonline.com/assets/11251>

education process. We believe that incentives are needed to obtain farmer engagement on training and education.

7. Continuous education is needed in all forms of business and Agriculture should be no different. Farmers need to develop their skills as technology and science advances. To ensure uptake on such a scheme, incentives will be needed and it would be a good investment of public funds. However, we have concerns with regards to the requirement of a level three qualification. It could be prohibitive to demand a level three qualification. Support needs to be provided to those individuals with learning difficulties and other basic skills deficits to access levels 2 and 3 qualifications. It must also be factored in the lack of broadband connectivity in rural areas. The Confidence and Supply Agreement provides £150m over two years for ultra-fast (i.e. over 100 mbps) Broadband. Priority should be given to mostly rural areas with the weakest broadband service.
8. New technology and innovation are improving farming practices all the time and continued investment incentives are needed to help farmers modernise their holdings which can increase productivity and standards. It is important to recognise that Cash flow is always a problem for farmers due to volatility in markets and also extreme weather events. Farmers can have difficulty getting credit as a result. Sinn Féin supports any measure that would provide some kind of supports for farmers who find themselves in financial difficulty.
9. Inspections, land eligibility, cross compliance and penalties are all connected. These procedures should be simplified where possible and the focus should be on helping the farmer to improve their farming techniques, they should not be penalised without first giving them the opportunity to correct any issues identified.
10. With regards to farm resilience measures there should be a move towards a flat rate payment. We would advocate a move to a larger payment for the first number of Hectares EG (At a minimum 10 hectares at €400 and the remainder at €150). This would provide better support for smaller farmers who are usually worst hit due to price volatility and market gate prices. Consideration should also be given to a separate fund for extreme events such as weather or disease which do not affect every farmer or area at the same time. This fund could be accessed by those farmers affected. A farm resilience support measure payment should be on a per hectare rate with two or three

different rates based on how disadvantaged the land is with the worst affected getting the highest rate. Farmers with holdings that have natural disadvantage and some are severely disadvantaged are less profitable than those on better land. However, these types of farmers are very productive only they seem to get poorer prices. Sinn Féin believes that Support for these farmers is needed. Good farming practice and cross compliance is needed in all schemes and it should be no different for farm resilience support measures. Any cross compliance regime should encompass issues like land being farmed and managed responsibly and that farming practices have regard for the environment. High standards of animal welfare are adhered to. Resilience support payments should be capped at an appropriate level and tiered payment rates for the severity of the disadvantage of the land.

11. An agreed crisis response framework is a good concept as events can happen unexpected and catch you off guard. Any type of framework should be updated frequently and should be flexible and able to adapt to changing circumstances.
12. The suggested environmental principles are positive and focus on working with the farmer which is central if DAERA want to get the right outcome. Farmers do not want to be the cause of pollution or environmental incidents and they also know their holding better than anyone. Sinn Féin support investment in research and education on environmental and conservation management. We all need to protect the environment and research and education is an important part of this. Clearly targeted investment is needed in this area.
13. Outcome based measures is generally a good idea but consideration needs to be given to the fact that all outcomes will not be the same. One measure may work well on one farmers land but not on another even though both farmers may have followed the same steps. Penalising farmers for not getting the proper outcome when it may not be their fault could turn farmers off such a scheme.
14. If the Department expects farmers to invest in environmental measures with no return there may be very poor uptake and even resistance. Farming in an environmentally friendly way needs to play an important part of Agricultural education. To achieve targets on outcomes DAERA should undertake more engagement with farmers on this issue and to incentivise them to take up environment schemes. Inspections need to

allow farmers the opportunity to rectify any issues that are identified without the threat of penalties failure to do so can then result in penalties. We would also suggest for consideration a Climate Change Act with sector specific targets to underpin the sustainability of the farming and Agri-food sectors within the context of any environmental schemes to be proposed.

15. Government need to ensure better market transparency especially with processors and retailers. This will provide more confidence in the market. Government should provide better regulation when it comes to food processors and retailers especially around pricing. CPD extending supply chain awareness should be part of Agricultural training as it may be difficult to get older farmers to take it on. Agriculture is a major sector of the economy and government should be doing everything it can to achieve greater collaboration and better functioning of the food supply chain.
16. Farmers we have spoken to have commented on a lack of awareness about this consultation and the technical nature of the some of the questions which make it difficult to engage with.

Conclusion

Any situation that places the north outside of the EU and CAP would have a disastrous impact upon our farming and rural communities as well as our economy. Farming and Agri-food industry would be devastated by the loss of CAP funding, tariffs and restrictions on trade and movement. For those reasons Sinn Féin continue to make the case for the north to have Designated Special Status.

We also call for:

- Continuation of the Rural Development Programme.
- More consideration of cross border trading of livestock and veterinary standards.
- The retention of the Young Farmers Scheme.
- Supports to young farmers and new entrants to get them established in the business.
- Farm Insurance measures not being introduced.
- Incentives to obtain farmer engagement on training and education.
- Continuous education in all forms of business and Agriculture without the requirement of a level three qualification.

- Investment in broadband to prioritise mostly rural areas with the weakest broadband.
- Measures to help farmers deal with cash flow problems due to volatility in markets and also weather events.
- Simplification of inspections, land eligibility, cross compliance and penalties. Farmers should not be penalised without first being given the opportunity to correct any issues identified.
- A move towards a flat rate payment. We advocate a larger payment for the first number of Hectares EG (At a minimum 10 hectares at €400 and the remainder at €150).
- The development of a crisis response framework.
- Investment in research and education on environmental and conservation management.
- Recognition that all outcomes will not be the same.
- More engagement with farmers on environmental measures
- A Climate Change Act with sector specific targets to underpin the sustainability of the farming and Agri-food sectors.
- Better market transparency especially with processors and retailers. This will provide more confidence in the market.

SUSTAINABLE FOOD TRUST

Northern Ireland's Future Agricultural Policy Framework: Sustainable Food Trust's ambition for the future of food, farming and the environment

October 2018

The Sustainable Food Trust welcomes the opportunity to submit written evidence to this consultation and would be pleased to provide further information, oral evidence, or to elaborate on any points.

The Sustainable Food Trust (SFT) is a small UK based organisation, established in 2011, that works in the UK and internationally to accelerate the transition to more sustainable food systems. We focus our work in three main areas:

- Leadership and Collaboration: Influencing leaders, policy makers and individuals
- Research and Policy: Enabling policy change based on sound science
- Communications: Acting as a source of information, sharing ideas and empowering citizens

Response

The Sustainable Food Trust (SFT) welcome Northern Ireland's Department of Agriculture, Environment and Rural Affairs (DAERA) consultation on the Future Agriculture Policy Framework and the adoption of a whole-farm approach, which integrates efficient and sustainable food production with practices that maintain and enhance natural and human capital. We support their objective to design a new agriculture support system that corrects the economic distortions that currently exist within food and farming and reintegrate food systems in harmony with the natural environment. Such an approach could have multiple benefits, including climate change mitigation, improvements in biodiversity and encouraging better diets and public health outcomes.

To achieve the systemic shift towards more sustainable farming methods, we need to unlock the barriers to change since the current business model means that most farmers have no option but to employ agricultural practices that do not serve the public interest in terms of its impacts on environment and public health. Through the new consultation, DAERA has the opportunity to create the economic environment where farmers are financially supported for adopting sustainable practices, which can then emerge as the most profitable and economically-viable way of producing food.

One of the key provisions include phasing out Pillar I area-based payments. We recognise the logic associated with this proposal on the basis that current eligibility for such support requires little more than adherence to minimum environmental standards. However, one of our core concerns is that by taking this action, the 'baby' of area-based payments will be thrown out with the 'bath water' of the social security element of the existing Common Agriculture Policy scheme. Instead, we believe that many of the desired changes in farming practice would be most effectively delivered through a whole farm support package, much of which should be based on land area. Such a scheme could include a number of options - some applicable on a field scale, some on a whole farm scale, and some of a more tailored stewardship nature, which together would ensure a systemic, rather than piecemeal, adoption of more sustainable farming practices.

To enable the widespread shift towards a food production system that is truly integrated and functions in harmony with nature, the Sustainable Food Trust recommends that the DAERA introduce of a suite of sustainable

Sustainable Food Trust
For more information, contact: *Honor Eldridge, honor@sustainablefoodtrust.org*

farming policies that could transform Northern Ireland's food and farming, acting as a beacon for others to follow. These should include;

- Rewarding farming systems that build and maintain soil carbon through crop rotations that include a soil fertility building phase, usually with clover/grass to reduce inputs and improve long-term soil health.
- Incentivizing the maintenance of holistic systems of grassland management that deliver a greenhouse gas reduction, carbon sequestration, improved water management and increased biodiversity above and below the soil line.
- Applying the polluter pays principle to ensure financial accountability for practices that negatively impact environmental and public health so that those whose practices have negative impact bear the financial costs of that damage with the money raised being used to support good farming practices.
- Supporting small-scale regional horticulture with an emphasis on investment in vertically-integrated supply chains that focuses on provenance and increase public access to nutrient-dense food.
- Developing regional infrastructure for localized food systems to tackle the move towards centralized supply chains and supermarket dominance, including local abattoirs since the closure of local abattoirs undermines the ability of farmers to diversify and sell meat locally.
- Rewarding high standards of animal welfare to ensure a good life for farm animals where they can express their natural behaviour and be raised in an ethical way to create a better-quality product.
- Reducing the use of chemical inputs including artificial nitrogen fertilisers and pesticides, which have damaging effects on water quality, biodiversity and public health. By reducing high input farming systems, the level of agrochemicals in the environment can be dramatically reduced.
- Employing public procurement and purchasing targets for local producers, as opposed to local wholesalers, to provide key food staples to schools, hospitals, government offices, and prisons.
- Incentivizing farming practices that incorporate positive in-crop biodiversity to dramatically reverse UK species loss through a whole-farm landscape-based approach that requires more than simply greening the edges of fields and creating isolated areas of natural habitats.
- Supporting employment-based incentives for jobs both in primary agriculture and value-added production, helping to revitalize the rural economy and bring life back into rural communities.
- Supporting farmer who introduce public access to farms through education programmes to better educate the urban population (specifically children) on the realities of agriculture and rural life.
- Enhancing human capital and encouraging the next generation by increasing skills and a system of apprenticeships on farms to provide added entry points for young people looking to enter the sector.
- Improving mental and public health through increased access to the countryside, farm animals, food opportunities, and improving diets, which would help to tackle increasing concerns of mental health and reduce the non-communicable diseases.

Sustainable Food Trust

For more information, contact: Honor Eldridge, honor@sustainablefoodtrust.org

Monitoring and Managing the Public Goods Outcomes

To monitor the impact of these schemes, DAERA should require all farmers to submit an annual sustainability assessment using a framework of harmonised metrics and units of measure. The data derived from such an assessment could serve multiple functions: for government and government agencies to monitor eligibility and the impact of public purse support, for certification schemes to collect data they require, for consumers by providing more information about their food, and most importantly, for producers as a farm management tool.

To demonstrate eligibility for DAERA support and to enable the delivery of public goods effectively, we recommend that DAERA introduce a sustainability assessment that farmers would have to complete annually. This assessment could provide the necessary data needed to determine the level of support each farmer receives as well as helping DAERA to understand and monitor success and failures.

The benefit of the assessment would be three-fold:

1. The reporting of farm data would allow DAERA to have a better understanding of the national situation for each specific public good (such as biodiversity and net carbon emissions) which would allow for more targeted interventions to help to meet the stated goal. For example, if the goal is reducing antibiotic usage, a common framework to measure on-farm usage would allow comparison of farm data.
2. By using a harmonised framework, farmers could benchmark themselves to show that they are delivering on their commitments and provide evidence of the improvement. Farmers should be encouraged to progressively increase their environmental commitments since all farms can become more sustainable, and the annual sustainability assessment would provide the necessary information to improve.
3. By implementing this annual sustainability assessment, trade organisations and certification bodies (Red Tractor, Leaf, Soil Association, et al.) could draw on the data to help with decision making, as opposed to conducting all their own assessment on each farm. This will save time and paperwork for farmers, allowing them to concentrate on growing food in a sustainable manner, and would streamline the delivery process for certification bodies.

We would recommend that this could (at least in part) be effectively delivered through an online system (similar to the model for the online system for filling in your tax return) that would enable farmers and land managers to easily and efficiently upload the necessary information as a management tool. While backup and spot inspections would still be necessary, particularly in higher risk cases (i.e. involving livestock), shifting the responsibility over to the farmer would help them to better understand and appreciate the impact making small changes can have, both to the land and to their business models. For the assessment to be comprehensive, there needs to be a blend of specific targets, proxies and hard data collection methods. These would include (but not limited to) monitoring:

- Soil organic carbon levels and microbial life
- On-farm educational courses for new entrants and apprenticeships offers
- Acreage of forage legume crops
- Levels of on-farm biodiversity
- Quantity of agrichemical application
- Hedgerow mileage and quality
- On-farm nutrient cycling
- High welfare management of livestock
- Cultivation of heritage and local breeds
- Greenhouse gas emissions
- School-children visits
- Water infiltration rates
- Antibiotic usage

Sustainable Food Trust

For more information, contact: Honor Eldridge, honor@sustainablefoodtrust.org

Northern Ireland Future Agricultural Policy Framework

Comments by

Sustainable Northern Ireland

9 October 2018

Sustainable Northern Ireland (SNI) is a networking and forum body for statutory and non-statutory organisations concerned with the pursuit of sustainable development in Northern Ireland. We work closely with councils to promote and deliver sustainable development policy and practice at a local level. Our work programmes encourage organisations to integrate the principles of sustainable development throughout their operations and business planning functions, and deliver bold and innovative projects to promote economic, social and environmental wellbeing. Sustainable NI, its Board of Directors and wider public sector membership brings together a range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation in the field of sustainable development.

Sustainable Northern Ireland is a Company limited by guarantee N1038784 and registered with The Charity Commission for Northern Ireland NIC10342

Introduction

SNI welcomes the opportunity to respond to the government's proposals on Northern Ireland's Future Agricultural Framework.

To develop a truly sustainable food and farming system, where farmers work with nature to produce high quality nutritious food, we need to move out of our current siloed approach and recognise numerous inter-related problems that need to be addressed. These include volatility in farm gate prices, public health crises, poor diets, food poverty, food waste and environmental degradation. These issues cannot be solved purely through the reform of any one policy, but instead rely on coherence across different areas, including health, environment, public procurement, agriculture, welfare and education.

Key asks

- DAERA must continue to engage with stakeholders to ensure farmers and land managers have a clear picture of changes to agriculture policy resulting from Brexit.
- For a future agriculture policy to be sustainable in the long term, efforts to drive innovation and productivity must be coherent with those aimed at protecting, restoring and enhancing the natural environment.
- There needs to be a stronger recognition that effective environmental land management can lead to increases in productivity. Science innovation and research based upon maximising productivity must seek to identify opportunities for these win-win scenarios
- Payments for positive environmental management can provide a stable reliable income source independent of market volatility whilst providing societal benefits. This represents a better use of public expenditure to manage risk and build resilience, as well as delivering beneficial outcomes.
- We call on DAERA to adopt a broader view of vulnerability and risk management to develop a wider concept of resilience
- Rather than being viewed as areas of disadvantage, economically marginal systems should be recognised for their high potential to offer significant public benefits
- To ensure that farming is productive, profitable and resilient in the long term a future framework must have environmental enhancement at its core
- We need to shift emphasis from 'what farming can do for the environment, to what the environment can do for farming'
- It is important that existing levels of funding associated with the CAP are maintained and repurposed in order to meet environmental outcomes
- Funding to support farmers and land managers to provide environmental public goods needs to be allocated on the scale needed to meet environmental outcomes
- There needs to be some recognition that the rural landscape is an important and distinctive element of Northern Ireland, and there should be reference to the importance of protecting the rural historic environment and distinctive landscape features.

Productivity

Key points

1. For a future agriculture policy to be sustainable in the long term, efforts to drive innovation and productivity must be coherent with those aimed at protecting, restoring and enhancing the natural environment
2. We call on the framework to pursue increases in productivity that is innovative, resilient, sustainable and humane
3. There needs to be a stronger recognition that effective environmental land management can lead to increases in productivity. Science innovation and research based upon maximising productivity must seek to identify opportunities for these win-win scenarios
4. The framework must recognise that a focus on profitability is of equal importance, and that in some cases focusing on this will not necessarily maximise productivity in some farming systems and locations.
5. A new policy must work with a range of stakeholders to develop strategies for improving productivity and profitability in ways that are coherent with enhancing the natural environment.
6. Investment in education and knowledge transfer must effectively identify and communicate tried and tested scenarios in which positive environmental land management has provided significant benefits to farming systems.
7. Investments in CPD must help to provide measurable benefits to the farmer and the public. To ensure this, environmental sustainability must be embedded throughout all training programmes.

Improved Resilience

Key points

1. Payments for positive environmental management can provide a stable reliable income source independent of market volatility whilst providing societal benefits. This represents a better use of public expenditure to manage risk and build resilience, as well as delivering beneficial outcomes.
2. We call on DAERA to adopt a broader view of vulnerability and risk management to develop a wider concept of resilience
3. Positive environmental management builds the long resilience of the sector. For example, moves to increase soil health will better equip our farming systems to safeguard themselves against the negative impacts of climate change and disease, whilst positive environmental land management in upland areas will safeguard against fire and erosion, whilst benefitting lowland systems in reducing flood risk
4. Rather than being viewed as areas of disadvantage, economically marginal systems should be recognised for their high potential to offer significant public benefits
5. Any future payments related to farming and land management must be based on the recipient meeting ambitious minimum regulatory standards. This not only applies to proposed payments for resilience, but for any public payments moving forward
6. The design of cross compliance and its enforcement is ineffective and bureaucratic and in need of reform

7. Future regulation should be based on knowledgeable enforcement with visits and monitoring undertaken by qualified inspectors
8. A proportionate approach to penalties is required, potentially adopting a similar approach to Scotland's general binding rules where farmers are given up to three opportunities to rectify regulatory non-compliance
9. A future regulatory system must be underpinned by the principle of polluter pays provider gets to ensure a fair and level playing field for farmers and value for money for the taxpayer

Environmental Sustainability

Key points

1. To ensure that farming is productive, profitable and resilient in the long term a future framework must have environmental enhancement at its core
2. The Framework must fully recognise the pivotal role that a healthy environment has in supporting a productive, profitable, resilient agriculture sector
3. We need to shift emphasis from 'what farming can do for the environment, to what the environment can do for farming'
4. It is important that existing levels of funding associated with the CAP are maintained and repurposed in order to meet environmental outcomes
5. Funding to support farmers and land managers to provide environmental public goods needs to be allocated on the scale needed to meet environmental outcomes.
6. Outlining the benefits of environmental land management towards the farm business will be central to ensuring the long term sustainability of the sector.
7. Trusted advice will play a fundamental role, securing farmer buy in and delivering value for money
8. A collaborative approach to the development of new policy interventions is necessary, this must encompass a wide range of stakeholders with skills, knowledge and expertise in farming and environmental land management.
9. Sustainable approaches to agriculture must be embedded throughout all stages in education and professional development
10. We support outcomes based approaches to payments in some cases, however action based payments will remain important in many scenarios
11. It is essential to create environmental payments which are attractive to farmers and land managers, whilst also providing clear value for money to the public. A practical approach towards moving beyond costs-incurred income-foregone can help to achieve this.
12. Examples of well-designed agri-environment schemes provide a proof of concept on which future delivery models can build on.
13. Future schemes must be targeted, based on evidence, provide dedicated expert advice, secure farmer buy and make sound business sense to fully realise the benefits.
14. We recommend that more regard is taken of the historic rural landscape. We recommend the Daera consult with the Department for Communities to review how measures can be put in place to ensure the protection and enhancement of the historic environment.

Conclusion

SNI recognises that this is a real opportunity to improve the future of agriculture in Northern Ireland.

Key changes in policy that can be adapted to a range of stakeholders must to be adopted. It should not lie within an agricultural bubble but encourage partnerships with other public and private bodies to ensure sustainability. Local and central government and other public agencies can all contribute and support a successful agricultural sector within their own plans and strategies.

Investment in education and Continual Professional Development with environmental land management central to any future educational and training programmes. This requires investment in our education system, appropriately skilled and trained educators, availability and affordability of courses for farmers to pursue and opportunity to share good practice. Positive environmental management will build long term resilience within the agricultural sector.

Investment must also be made in research and innovation to develop the skills and knowledge of those on the front line. Farmers should be supported technically and financially to develop ideas and business cases in order to move the sector forward.

In achieving a positive behavioural change towards the natural environment farmers and their partners can ensure long-term sustainability.

This short submission serves only to offer some limited comments on the plethora of issues to be considered in depth as part of any review of agricultural policy in Northern Ireland.

DAERA NI Future Agricultural Policy Stakeholder Engagement

October 2018

About Sustrans

Sustrans is the charity making it easier for people to walk and cycle. We are engineers and educators, experts and advocates. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute. Sustrans works in partnership, bringing people together to find the right solutions. We make the case for walking and cycling by using robust evidence and showing what can be done. We are grounded in communities and believe that grassroots support combined with political leadership drives real change, fast.

Join us on our journey. www.sustrans.org.uk

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Sustrans in Northern Ireland has been involved in developing routes for Active Travel for over 20 years. As custodians of The National Cycle Network (NCN)¹, we work with local Government and Councils to ensure routes for all non-motorised users are well maintained but more importantly, developed and improved.

Much of the NCN – 83% - is on-road. A recent audit and review of the entire NCN across the UK (1030 miles in Northern Ireland) has received financial contribution from the Department for Infrastructure (DfI) in Northern Ireland and Transport equivalents in the rest of the UK. One strand of the NCN Review has emphasised the need for a focus on shifting on-road NCN to traffic-free options to ensure safety, accessibility, and attractiveness for users, ultimately *generating transportation modal shift, increasing public health, reducing carbon emissions, improving air quality and reducing congestion.*

Northern Ireland is ahead of the rest of the UK in many respects – DfI published a NI Strategic Plan for Greenways² in November 2016 that fulfils a commitment in the Bicycle Strategy³ to explore the potential for the development of greenways. It sets out a high level plan for the region to enable people to link to places locally, regionally and nationally by active modes of travel.

Greenways are route corridors for active travel. They can follow the line of disused railways, canals, or run alongside roads. Greenway development typically preferentially makes use of existing public lands but they also where necessary may require land take or access agreements from private landowners. Greenways are relatively narrow and generally unobtrusive, and their development can provide opportunities to improve conditions for landowners by providing accommodation works and complimentary facilities.

Of note is the very derivation of the term ‘greenway’. While the term has now been popularised to quite generally define many traffic-free pathways for walking and cycling, greenways by their very nature are opportunities to provide biodiversity corridors that link our diverse landscapes through these developing networks. Their development provides opportunities for the population to immerse themselves in our natural and farming landscapes in a *sustainable, controlled, and biosecure manner.*

Greenways also have a well-documented record of generating significant economic benefit to communities, particularly in rural settings⁴. This is never more important than now where economic uncertainty could be mitigated with a mechanism that facilitates this type of economic opportunity.

Sustrans has been involved in a number of high-level consultations relating to greenway and path development across Northern Ireland and the Republic of Ireland. While we can make no claim to being experts on agricultural policy and subsidy arrangements in either jurisdiction, what we are gleaning from these consultations is that there is currently very limited incentive or reward for farmers to accommodate any plans for this form of countryside access, even if in principle landowners are enthusiastic about the product.

¹ <https://www.sustrans.org.uk/ncn/map>

² <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/exercise-explore-enjoy-a-strategic-plan-for-greenways-november-2016-final.pdf>

³ <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/drd/a-bicycle-strategy-for-northern-ireland.pdf>

⁴ http://www.eurovelo.org/wp-content/uploads/2016/10/Great-Western-Greenway_Economic-Impact-Case-Study.pdf. See also appendix 1 for economic benefits of the National Cycle Network – a conservative economic assessment given the NCN's mostly on-road nature.

This is why it is extremely important that farmers and land managers are supported and rewarded for farming practices that work with nature. We want to see a countryside that is filled with wildlife, producing sustainable and healthy food, all the while allowing the public to experience the natural world in a sustainable way. Safe routes for walking and cycling are key to generating modal shift and with the transport sector in NI generating carbon emissions and NO₂ well in excess of recommended limits, we need every mechanism available to enable more people to travel sustainably for more of their journeys⁵.

To achieve the above, the new policy must:

- ***Ensure that funding enables and encourages farmers to deliver a range of environmental benefits, including the development of greenways for walking and cycling.***
- ***Incentivise practices that reduce carbon emissions.***

We want to see the protection and restoration of the environment to be the central focus of a new agriculture policy post-Brexit in Northern Ireland. Our countryside is reliant on a healthy and vibrant rural economy with farming playing a central role. Improving the deliverability of Greenway projects and more generally improving access to the countryside is strongly recommended for inclusion within post-Brexit policy to ensure this economic and public need is fulfilled.

⁵ <https://www.clientearth.org/new-pollution-plan-reveals-toxic-air-in-england-worse-than-feared/>

Appendix 1: Economic impact of the National Cycle Network

This report identifies some of the benefits of the National Cycle Network (NCN), from the wider economic benefits of the whole network to the impact on the communities through which it runs.

- The economic benefits of the NCN since 1995 are estimated to be £7.3 billion, with health benefits accounting for £6 billion
- The benefit cost ratio (BCR) of the NCN to date is 5.93:1, a huge improvement over road schemes that often fail to achieve a 2:1 BCR
- The development and maintenance of the NCN has sustained or created 4,259 jobs since 1995, with nearly 400 jobs created or sustained in the financial year 2014/15
- People who used the NCN to access shopping areas in 2014 spent at least £1.27 billion, 29% more than they would have if they had travelled by car

This report uses the Department for Transport's appraisal framework (webTAG) as a basis for estimating the overall economic benefit of the NCN as well as using data from two of Sustrans' largest projects, Linking Communities and Connect2 to calculate some of the other economic benefits of the NCN.

Benefit of the NCN to the UK economy

We conservatively estimate that the NCN has benefited the UK economy by over £7 billion since it began in 1995. This means that for every pound that has been spent expanding and developing the NCN, the economy has benefited by nearly six pounds.

Table 1 – Summary of economic benefits of the NCN since 1995

| Benefit | Cyclists | Pedestrians | Total |
|-------------------|--------------------------|--------------------------|-----------------------|
| Health | £1,491,540,075 | £4,791,512,213 | £6,283,052,289 |
| Absenteeism | £101,328,989 | £93,307,485 | £194,636,474 |
| Amenity | £719,431,161 | £10,518,456 | £729,949,618 |
| GHGs | £9,866,226 | £1,900,693 | £11,766,920 |
| Accidents | £18,918,637 | £3,645,771 | £22,564,408 |
| Decongestion | £111,605,782 | £21,500,457 | £133,106,239 |
| Air quality | £907,364 | £174,800 | £1,082,165 |
| Noise | £907,364 | £174,800 | £1,082,165 |
| Infrastructure | £907,364 | £174,800 | £1,082,165 |
| Indirect Taxation | -£45,368,204 | -£8,740,023 | -£54,108,227 |
| Total | £2,410,044,759.29 | £4,914,169,453.81 | £7,324,214,213 |

We have also estimated the number of car trips that are replaced each year by people using the NCN, and the kilograms of CO₂ that are saved as a result¹.

Table 2 – Car trips replaced and kilograms of CO₂ replaced annually by people using the NCN (as of 2013)

| | |
|------------------------------------|------------|
| Car trips replaced | 29,566,994 |
| Kgs CO ₂ saved annually | 30,357,619 |

¹ Note, these values differ to the figure given in the 2013 NCN report, as that figure only used people travelling by bike or foot. The figure used in this calculation is a rolling average of the survey results from 2011-2013.

Economic benefits to communities

Job creation and maintenance

Total investment in the NCN to date is £1.23 billion (including match funding). We estimate that this investment has resulted in 4,259 jobs being created and sustained by the NCN over the last 20 years, with 393 jobs created or sustained in financial year 2014/15, when £114 million was invested².

This is calculated using data from Linking Communities schemes where we estimated that 6.9 FTE jobs were created and maintained for every £1 million invested³. We assume that 50% of this value can be applied to expenditure across NCN.

Retail benefits

We estimate that people who used the NCN to access shopping areas in 2014 spent at least £1.27 billion, 29% more than they would have if they had travelled by car.

Nearly 50% of all those interviewed in shopping areas at Connect2 schemes stated that they had used the new route to get there, while on the wider NCN over 87 million trips were for shopping purposes in 2014. Our research also suggests that overall monthly spend in retail areas by pedestrians and cyclists is at least 29% higher than those travelling by car (£285/£234 compared to £181) and they make double the number of trips to shops⁴.

In 2014 16.1% of pedestrian trips and 5.3% of cyclist trips on the NCN were for shopping purposes. Using trip frequency data, we are able to calculate that these shopping trips were made by over 900,000 people. Assuming that these shoppers spend 50% of the typical monthly spend identified above, we estimate that people who used the NCN to access shopping areas in 2014 spent at least £1.27 billion.

Conclusion

This report has identified some of the benefits of the National Cycle Network (NCN). It shows that the NCN brings positive economic benefits to the communities through which it runs while also benefitting the wider economy. Our research suggests that the money that has been spent on the NCN has provided a far higher benefit cost ratio than that spent on road schemes, which typically receive much more funding.

² S:\RMU\01 Analysis Team\30_Projects\NCN 20th Anniversary\3 Accumulating data\2 Economic benefit\2 Economic benefit to local communities\Source material\Money vs Length.xls

³ Sustrans (2014) Improving access for local journeys

⁴ Sustrans (2014) Connect2 final report (internal document)

JAMES THOMPSON

Dear Sir/Mad

Just a few points as I see it.

We do need to stop calling this money a Subsidy. What it really is, is income support. Without this money that if not all Beef & Sheep farms would disappear overnight. The knock on effect to the rural economy would be a disaster.

We must remember that if not all this money has already been spent, where this farmer and his family live, paying bills.

In the counties, small communities, villages and towns the loss of this spending power would be a catastrophe to the local economy.

The abandonment of the countryside would be real, as people move away to look for work, especially young people without which these communities would die.

No glorified environmental Scheme or the like can replace the cold hard cash the rural economy needs just to survive.

Yours Sincerely
James K Thompson

PTO

Any money that does find its way
to farming, must go directly to the
farmer, and not be diverted through
the cesspit of Starmond or anyone else.

1117.