

Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement

Stakeholder Responses

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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? **That entitlements be retained until a new policy framework is agreed.**
 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? **Abolish greening requirements and incorporate into BPS entitlement values.**
 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? **Retain current ploughing ban in these areas**
 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? **That they continue to receive payment so long as they are eligible to do so.**
 5. What are your views on whether to allow further applications to the YFP and the Regional Reserve after 2019? **Further applications post 2019 should be allowed.**
 6. What are your views on the most effective means of encouraging and facilitating generational renewal on farm businesses? **Farm business renewal is vital and can be facilitated by a no. of measures to include higher level training, ability to secure long term land leases, financial support through eg a loan investment scheme and/or an interest rate subsidy to encourage targeted investment.**
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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? **That payments remain in 2020 and 2021.**
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. **Leave as is.**
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? **Welcome the challenge if it delivers a step change in the rate of advance in science and innovation.**
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? **Support this proposal and particularly in adopting KT on farm.**
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? **Support this proposal and suggest the min qualification attainment should be NVQ level 3.**
12. What are your views on continuous professional development (CPD) as a policy intervention and the possible investment of public funds to incentivise CPD? **Support this proposal in full**
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? **Support**

this proposal if targeted at specific envtl issues eg ammonia levels, water quality and is linked to improved productivity.

14. What are your views on the provision of investment incentives other than capital grant (such as loans, loan guarantees, interest rate subsidies etc.)? Support this eg if investment was made on basis of a long term cost of production contract.
15. What other initiatives by government and/or industry should be pursued to facilitate restructuring and investment and drive productivity? Land mobility, long term land leases coupled with tax incentives for land owner to lease land.
16. What are your views on the provision of a basic farm resilience support measure? Would welcome a basic farm resilience support measure but at a lower level so as not to mask poor performance/inefficiency
17. What are your views on an appropriate mechanism to establish the level of payment under a farm resilience support measure? Likely this needs to be addressed for each farm enterprise and to be coordinated by DAERA.
18. What are your views on the targeting of a basic farm resilience support payment to take account of issues such as natural disadvantage? Yes, areas of natural disadvantage should be targeted.
19. What are your views on linking a farm resilience support measure with cross compliance obligations? Yes, they should be linked.
20. What are your views on the content of cross compliance/good farming practice associated with this provision? That current content of CC/GFP should be maintained.

21. What issues would an appropriate cross compliance regime seek to encompass? **Ammonia levels, nitrates, phosphates. Should help meet the aim of sustainable farming.**
22. What are your views on the tiering or capping of a basic farm resilience support payment, or the establishment of an eligibility threshold? **Yes, payments should be tiered, capped and subject to eligibility threshold.**
23. What are your views on the introduction of anti-cyclical/insurance type measures to help address volatility? **Would welcome measures that help reduce volatility eg deposit scheme, 5yr income averaging. We are unsure if an insurance type system could operate here and how it would be administered.**
24. Should anti-cyclical/insurance type measures be sector-specific or aimed more generally at income protection? **A general type system given the level of mixed farms in NI.**
25. What are your views on the enhancement of fiscal measures as a means of addressing the issue of income volatility? **Would welcome these as options that farmers could opt in/out of eg farm deposit scheme.**
26. What are your views on a possible pre-defined and agreed crisis response framework to respond to crisis events, either locally or nationally? **Yes, this is needed particularly given our border with EU post Brexit.**
27. What are your views on the suggested environmental principles to be incorporated within the agricultural policy framework? **Agree with principles as listed. Agriculture needs to be environmentally sustainable.**
28. What are your views on the need for investment in research and education targeted on environmental and conservation management in the agricultural sector? **Agree there is a need for both.**

29. What are your views on a shift towards outcome based environmental measures for agriculture, including co-design with farmers and land managers? **Welcome any measures which improve farm productivity without impacting on the environment.**
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? **Yes, there is a need to move beyond current system towards an incentive type scheme.**
31. What are your views on the role of other actors in the supply chain seeking to drive better environmental outcomes? **Better Env'tl outcomes are best driven by farmers and DAERA working together. While industry has a role in eg FQAS, Red Tractor scheme we don't see the need for 'actors in the supply chain' having a role in driving better on farm env'tl outcomes.**
32. What are your views on the delivery models that would deliver the best uptake and outcomes? **DAERA working with farmers should deliver the best uptake and outcomes.**
33. What are your views on the role of government in ensuring market transparency? **We welcome any measures which improve transparency.**
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? **Fully supportive of this measure.**
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? **Fully supportive of this measure**

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. **Nil**

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. **Nil**

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. **Nil**

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. **Nil.**

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. **Nil**

BELFAST CITY COUNCIL

BELFAST CITY COUNCIL

City & Neighbourhood Services Department



Belfast
City Council

Waste Management

Your reference

Our reference TW/KM

Date 10 September 2018

Received at DAEEA 13/9/18
CColl

Brexit Division
Department of Agriculture, Environment and Rural Affairs
Room 414
Dundonald House
Upper Newtownards Road
Belfast BT4 3SB

RE: Northern Ireland Future Agricultural Policy Framework

Dear Sir/Madam,

The Council welcomes the opportunity to comment on the potential structure of a post-Brexit agricultural policy.

We would like to emphasise the importance of continuing to protect and embrace the rural environment. We would anticipate that any future policy will continue to adhere to the principles as set out in the Sustainable Agricultural Land Management Strategy and would draw your attention to the EEA Circular economy and Bioeconomy report (<https://www.eea.europa.eu/publications/circular-economy-and-bioeconomy>) which may be able to contribute to your plans.

In our opinion, any future agricultural policy wishing to deliver environmental sustainability and enhancement should embrace Circular Economy concepts which maximise and maintain the value of bio-economy resources through the use of innovative technologies, such as Anaerobic digestion and 3d printing of bio plastics, as well as to encourage the creation of secondary material markets.

If you would like to explore this further please get in touch.

Yours sincerely,

Tim Walker
Head of Waste Management

BELFAST FOOD NETWORK

Call for a food and farming policy that works with people and nature

We represent a range of NI farmers, food producers and suppliers who are calling for a food and farming system that works better for farmers, nature and society. We believe that to produce high quality food, it is utterly essential to protect, restore and enhance our environment.

There is a growing movement calling for locally sourced sustainable food. This can be seen in the busy restaurants serving local produce up and down the country, to the growing number of entrepreneurs finding success in producing and selling food products founded on environmental sustainability. As a result, Northern Ireland has developed a strong brand based on locality and quality.

Although this movement is gaining momentum, current farming policies have often made it difficult for food and farming to strike harmony with environmental sustainability. This can be witnessed through declines in wildlife, poor water quality and degraded soils. Farming policies also fail to secure a fair deal for farmers produce, with those further up the supply chain profiting most.

To begin addressing these problems we need to move towards a sustainable food and farming system. We need to create a high-quality food brand for NI that is based as much on the quality of our landscapes as the quality of our food. We need to ensure that farmers and producers receive a fair price for their product, and that people can easily access food that benefits their health and vitality. In doing this, we will realise countless benefits whilst safeguarding domestic food production and building resilience for the long term.

By working better with the environment, we can create a more prosperous, resilient farming sector, which better sustains rural communities and produces top-quality food.

As organisations, we have come together because we believe everyone should have access to plentiful, sustainable tasty, nutritious food.

Creating new agriculture policy for NI offers a once in a lifetime opportunity to realise this vision. To move away from the damaging policies of the past and create a new system that works for everyone. We urge you to help turn vision into reality.

There are many ways in which this can be done, we strongly suggest;

Four steps towards a Sustainable Agricultural Policy	
<p>First – Recognising that ‘People Matter’ by developing a food system that values people. Everybody should be able to access food with dignity; people working in the food sector should be valued; and we should all have a say over the rules that govern our food system. Increasingly, we lack connection to our food. Relatively few people are engaged directly in producing or harvesting food and the majority of us are largely ignorant of the practices and processes by which food comes to our plate. Our food system could be very different, with significant benefits for all.</p> <p>We need the Agricultural Policy to: <i>Create structures to ensure the governance of our food system is more democratic, facilitating greater public participation in food policy and reining in the power of corporations.</i></p> <p><i>Invest in regional food economies connecting urban populations with rural producers – including community land ownership and community-connected agriculture</i></p>	<p>Second – Recognising that ‘The Environment Matters’ by prioritising sustainability so that we can produce food, both now and into the future. This means taking greater care of the natural environment on which food production itself depends. It also means reducing, and ultimately ending, the wider negative environmental impacts of our whole food system, including its impacts on our climate.</p> <p>We need the Agricultural Policy to: <i>Establish agroecology as the underlying principle of farming in NI, and set out a programme to embed it in practice.</i></p> <p><i>Champion a reform of the CAP that supports and develops truly sustainable production.</i></p> <p><i>Ensure more effective implementation and enforcement of existing environmental legislation throughout the food supply chain.</i></p> <p><i>Take a whole system approach to reducing the impact of our food on the climate.</i></p>
<p>Third – Recognise that ‘It’s about more than food’ and that what we eat, and how much of it are critical determinants of our health. Improving our food culture and engaging more with the food we eat can have wide-ranging benefits.</p> <p>We need the Agricultural Policy to: <i>Lead by example, with all food purchased with public money and served in the public sector, being nutritionally balanced and sustainably sourced through local supply chains</i></p> <p><i>Support community food initiatives, helping to provide access to resources such as land, as well as training and development opportunities.</i></p>	<p>Fourth - ‘Shorten Supply Chains’, our current models of food production, distribution and supply are increasingly large scale and industrialised. Fewer and fewer individuals benefit economically from this system while many of us bear its social and environmental costs.</p> <p>We need the Agricultural Policy to: <i>Strengthen the powers of the planning system to ensure the vitality and diversity of town centres and safeguard land for growing food.</i></p> <p><i>Make prime spots available in town and city centres to facilitate farmers markets, drop-off points for buying groups and other models for supporting and facilitating short food chains.</i></p>



TASTE OUR LOCAL SEASONS



BELFAST HILLS FARMERS

Northern Ireland Future Agricultural Policy Framework: Stakeholder Response from Belfast Hills Farmers

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

Entitlements must be retained if NI agricultural support is to be effectively distributed.

- 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?**

We are in favour of retaining a separate greening requirement and payment.

- 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?**

A common sense approach would be that the ban is retained for the designated features and site only – other parts of fields should be able to be ploughed.

- 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?**

While some changes may be required, this must be continued in some form.

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

Again this should be continued at a level appropriate to need.

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

Profitability is the key element to ensuring generational renewal and the retention of key management skills within farming families in the hills. Support is essential to ensure this happens. Also, the 40 year old limit is not effective and can work against generational renewal.

- 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?**

We must continue to remove non-active farmers from support. Cross compliance needs to continue but penalties must be proportionate. We would welcome a better use of the yellow card system. DAERA need to work with farmers rather than against. Key dates should be retained. We do not agree with retrospective recoveries and believe that these should be relevant year only.

The inspection regime needs to be reviewed with more workable notification for remote sensing inspections. We also need a more common sense approach to land eligibility. Where farmers can meet a minimum stocking density appropriate to land type, e.g. SDA, all areas should be eligible.

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.

We would emphasise again that penalties must be proportionate. Better use of the yellow card system should make this simpler, reduce stress on farmers and improve relationships between farmers and DAERA.

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?

As Belfast Hills farmers, we would look for more research on ways to maintain good upland productivity and efficiency in harmony with the environment.

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?

We agree that investment in agricultural education and knowledge transfer is essential.

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?

We believe it would be a mistake to make education levels a mandatory requirement as this would penalise long established and older farmers. Whether mandatory or not, recognition of any current qualifications should be sufficient at level 2. There

needs to be recognition of long established generational skills and knowledge of the land.

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

Continuous professional development should be supported but as a policy intervention should be voluntary rather than compulsory. We believe that a compulsory approach runs the risk of being discriminatory.

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?

We would support investment that targets innovation and new technology which improves profitability, productivity and environmental performance.

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

We would support employing a range of incentives as long as it does not reduce money from the existing agricultural budget.

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

We would support a longer term land tenure system with tax incentives for landlords.

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

Going forward, we support this provision as absolutely essential and would go further in suggesting a figure of at least 50% of the regional average value of entitlements i.e. €330 be directed to farmers as a basic resilience payment.

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

It is essential that any mechanism to deliver farm resilience support payment must be directed at productive farmers and be simple and easily obtained.

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

Whole sectors within agriculture such as suckler cows and breeding ewes are at risk if issues of natural disadvantages are not properly taken into account. We therefore strongly support payments that reflect natural disadvantage and make vulnerable sectors resilient. We would suggest that previous well established SDA areas offer a simple mechanism on which to direct this farm resilience support.

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

We do not support a link between resilience support and cross compliance obligations.

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

We do not support a link between resilience support and cross compliance obligations. We are in favour of Good Farming Practice and believe that the penalty regime currently associated with cross compliance works against this in practice.

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

This regime must encompass both productivity and environmental stewardship.

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

We are against tiering or capping, nor do we see the need to change any eligibility threshold.

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

We see no such systems or measures which could work for uplands.

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

Other sectors could lobby for such a system if they identify systems that would suit their sector.

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

Workable systems would need to be identified by government before we would comment.

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

We would welcome this in theory, but more details must be worked out before we could express an opinion.

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

What we are already doing in the uplands in keeping with these environmental principles needs to be recognised and supported. There are current barriers to fully delivering on these such as unrealistic stocking levels for both the environment and productivity.

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

As Belfast Hills farmers, we would look for more research on ways to maintain good upland productivity and efficiency in harmony with the environment.

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

We welcome co-design as we believe that the voice of farmers has previously not listened to in designing prescriptive environmental outcomes, leading to foreseeable mistakes and poor environmental outcomes.

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?

The costs incurred income forgone approach has delivered nothing to encourage farmers into environmental schemes. We therefore welcome a new approach to properly incentivise true environmental sustainability.

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

Other actors in the past have acted against and at the expense of the farmer for their own commercial gain. We must develop a common approach to achieve better environmental outcomes.

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

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

Market transparency must apply globally across all supply chains including imported product. Food fraud must be eliminated.

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?

We support CPD as the way forward as long as long term or older farmers are not penalised for lack of qualifications.

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?

The government must ensure the agri-food supply chain is fully protected and functional. Bodies such as the Supermarket Ombudsman's Office need to have more regulatory powers to ensure this.

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.

We want to repeat our concerns that mandatory levels of education for payments would raise a range of equality issues.

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.

Our industry supports the other non-agricultural rural sectors in terms of rural income and employment. This policy will have impacts beyond our sector.

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.

Inspections have a major impact on stress and loss of earnings, especially when notifications are short notice or do not happen. Farmers who have committed no

breaches can still suffer financial loss due to payments being withheld. It is no wonder that good farmers have a real fear of inspections.

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.

There needs to be a balanced approach to environment and productivity. Mistakes made at this stage can have wide ranging and unforeseen impacts on our environment.

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.

We would take the opportunity to propose that consideration is given to deferring penalties to the following year. This raises the likelihood of successful restructuring of farm businesses to survive and therefore reduces the danger of farm business failure due to penalties.

We also want to further emphasise the dangers of whole sector failure if major changes to support are made. If changes have to be made, they must be gradual leaving room for businesses to adapt.

BELFAST HILLS PARTNERSHIP

NI Future Agricultural Policy Framework – Stakeholder Response from Belfast Hills Partnership 8/10/18

Introduction

The Board of the Belfast Hills Partnership welcomes the opportunity to respond to the Consultation exercise regarding the Future Agricultural Policy Framework for Northern Ireland. There is one key area that the Board would wish to emphasise as listed below.

Response

Q27. What are your views on the suggested environmental principles to be incorporated within the agricultural policy framework?

The Belfast Hills Partnership would like to express their concerns regarding the potential decline in upland farming and in particular grazing levels. The substantial loss of support for upland grazing being discussed within potential scenarios could well lead to upland abandonment. It is widely recognised that under-grazing can have major detrimental effects every bit as much as over-grazing. Under-grazing or abandonment would have negative impacts on many of the environmental principles outlined in the document, namely that

“• Natural capital and its associated ecosystem services are protected and enhanced;”

“• Consistent increases in the proportion of priority habitats and species (of UK and European importance) achieving favourable or recovering status, as well as broader gains in biodiversity;”

Many upland habitats require appropriate levels of grazing to maximise ecosystem services and achieve favourable or recovering status. Loss of grazing soon leads to deterioration of habitat quality.

In addition to this, we would be keen to emphasise the role of appropriate levels of grazing in minimising risks of wildfires and managing fuel loads. It is widely acknowledged that lower grazing levels leads to higher loads of vegetation i.e. potential fuel and more frequent and more intense wildfires. Recent history demonstrates both the high costs and the threats to life and property that wildfires can cause. Such cost impacts beyond the agricultural industry must be taken into account. We would also highlight the potential negative impacts of increased wildfires in relation to two other environmental principles cited, namely that

“• The carbon intensity of food production continues to fall;”

“• Soil quality and functions are improved and soil erosion is prevented;”

It would be an error to think of over-grazing as being the only potential driver for carbon intensity and soil erosion and loss of soil quality. Under-grazing which results in increased and more intense wildfires will also increase carbon loss substantially and can also have substantially detrimental and long term effects on sensitive upland soils.

MR BENIANS

Brexit Division
DAERA

7th October 2018.

Response to Q9, stakeholder engagement

Primary productivity can be increased through research into soil fertility. A 'Productivity Grand Challenge' would advertise advances to farmers, though they would need to see such advances as transferable to their farms. As an example, a farmer with whom I am working sees new ideas as more suitable to the better soils of South Fermanagh. This means experimentation has to be carried out on different soils and in different climatic areas to be most useful.

Research may also need to be pursued further. Yield responses to sodium, for example, in ryegrass and other species, have been widely established and found in Fermanagh, but not by Ashnahan, Bailey and Gordon, who worked near the upper limit of nitrogen application - was this the reason for the lack of response? Similarly, Charles Lowe looked for a response to trace elements in ryegrass at Hillsborough, and found none: there is a response in Fermanagh. Hillsborough is not representative of NI. Ireland. The combination of sodium, sulphur, boron and copper appears to be promising locally.

The widespread occurrence of manganese deficiency, which can reduce yields or kill crops altogether, has not been publicised. Tackling this problem would be an easy issue.

Our present situation has arisen because soil studies have been given lower priority than animal nutrition and health. Elsewhere in the world good relations exist between animal scientists and soil scientists, but not here. If progress is sought we need soil analysis suitable for local conditions under local supervision, in Belfast, Ballykelly or perhaps Derrygonnelly. Instead we have procedures unsuitable for an important area of the country carried out in Lincolnshire. If this is the consequence of having a succession of animal nutritionists and veterinary surgeons at the helm of DAERA thought should be given to appointing a plant scientist or microbiologist as Chief Scientist.

Finally, the RHI scandal has repeatedly demonstrated how civil servants can be led astray by vested interests. SPAD's should not own or have family who own woodchip burners. Nor should senior DAERA employees own farms, even inherited ones. A farm owner should be transferred to another Department once promoted above, say, SPSO or equivalent.

✓
Yours sincerely
Guy Benians

G. J. BENIANS

Citizen Scientist

LINDSAY BEST

From:
Sent:
To:
Cc:
Subject:

Responses to q1 to q8

Q1. Entitlement values are disproportionately valued against differing levels of farming activity. For example a protected strawberry producing enterprise occupying 0.5 ha generates approximately £150 of subsidy, but the output is greater than that of a small dairy farm who would receive a much larger payment. Similarly poultry producers have high investment and running costs but receive minimum or no support payment. One possible solution could be to incorporate a "labour unit" assessment value as a proportion of the entitlement value. The current system favours certain enterprises over others.

Q2. Arable farmers are renowned for using high amounts chemicals on land which is proven to have detrimental effects on the environment. Therefore arable farmers need to demonstrate a positive approach to managing the environment. Retain greening element status quo.

Q3. Retain status quo.

Q4. System open to abuse. Young farmer is there in name only when nothing has really changed in reality. Should not enter at 329 euro while other farmers struggle to achieve maximum value during scheme. It should start low and increase with experience.

Q5. Should not discriminate by age. No need for this discrimination.

Q6. Introduce a retirement scheme that cannot be abused.

Q7. Active farmer requirements are too lenient. E.g. Stocking rates too low. Content with other measures.

Q8. See point 1-labour units

Responses to q9 to q15

Q9. Agree in theory as long as resource is spread proportionally across all sectors, including horticulture and poultry, and not mainly focused on dairy as is current situation.

Q10. Content with proposals

Q11. Content with proposals

Q12. Content with proposals as long as courses are wide ranging and practical

Q13. Long term leases could make it more difficult to obtain land. Prices may continue to be forced up. Leases should not be permitted for land used in anaerobic digestion. Also, no subsidy should be paid on land used for anaerobic digestion.

Q14. Concerns here may be in the form of how such a scheme would be policed. Previous experience has highlighted a lack of suitably skilled advisers. Also, confidentiality concerns have been experienced. Lending should only be controlled through professional bodies. If Daera were involved, it would become over regulated. Lending should always be based on financial planning.

Q15. Current schemes seem to be very short term and oversubscribed. They should be always present to avoid peaks and troughs. We have concerns about how many poultry units obtaining funding for expansion. Has Daera considered an industry wide approach to such support in order to achieve long term sustainability.

Responses to q16-26

Q16. Would distort market prices and could be taken advantage of by suppliers and processors/abattoirs/supermarkets etc. Any support provided must include intensive sectors including horticulture and poultry where input costs are proportionally very high.

Q17. Support should be targeted at commercial farmers who gain a certain % of their annual income from farming. Cannot just target at all category 1 businesses. Many cat 1 businesses are only hobby farms.

Q18. Support should be provided to farmers in disadvantaged areas, but must not be a replacement for requiring a farmer to seek off farm employment where the farm is not viable as a business.

Q19. Some sort of checking required to determine levels of farming activity. Animal identification may be required. Other forms of regulation should be reduced and kept to a minimum.

Q20. Checks should be simplified and possibly tied in with Farm Quality Assurance audits for beef sheep, or other sector specific audits e.g. Lion egg, freedom foods etc

Q21. Environmental. Issues not already covered by other bodies.

Q22. Agree with suggestions.

Q23. Good idea. Should be on an individual farm business. May require increase Daera staff resource. Confidentiality issues must be considered. Are Northern Ireland producers up for this????-take take take!

Q24. Sector specific.

Q25. Would not benefit the majority of farmers.

Q26. This would be required in order to facilitate timely response to crisis. An over arching framework would need to encompass sector specific trigger points and organisational capability. It should be done locally.

Q.27

Agree but should be more emphasis on arable farmers to enhance environment and reduce hedge removal and abolish roundup use on all food or feed producing crops.

Q28

Important but not to overwhelm current farming practices

Q29

Good to have incentives but most farmers would think, more money in for no monetary value back

Q30

Environmental sustainability important as long as food production isn't compromised, otherwise most of our food will be imported in the future.

Q31

They need to understand whole picture and not be in it for environmental improvement alone.

Q32

Ones that are low cost, easy to implement and see results quickly. You could be encouraged by incentives if you avail of a model

Q33

Too many different labels-confusing

Need a standardised label for all food stating

country of origin, where grown, where packaged in simplified format.

Q34

Very important. Benchmarking should be made anonymous so farmers are happy to input. Have experienced confidentiality issues in the past with daers.

Q35

Low food miles should be a big incentive!(should not have to compete with Belgium strawberries!

Fair price for produce through out

Standardised labelling

Q36

All farmers should have equal incentives, not more for young farmers

Q37

Q38

Regulation needed but not overkill as overspec regulation in tier2 by Daera caused us to spend an extra £7000 which after a daera rule change wasn't needed, but money was spent.

Would be good to amalgamate all audits in one day so that less days were wasted by farmers giving duplicate information

Thank you

Lindsay Best

BLAKISTON HOUSTON ESTATES

Blakiston Houston Estates

Received in DAERA
26/9/18 C. Magill

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BLAKISTON HOUSTON ESTATE COMPANY - REGISTERED OFFICE AS ABOVE - REGISTERED No N.I. 369 - VAT Reg No 251 7986 23

Dear DAERA,

We are pleased to respond to the Northern Ireland Future Agricultural Policy Framework.

Our response below provides general comments, and specific responses to DAERA's questions found in Annex 2.

We have a long history of farming in Northern Ireland and advise on several successful agricultural businesses in Northern Ireland and in Great Britain.

Our response is a collation of carefully considered thoughts from our senior team which includes farm managers, analysts, surveyors and valuers.

Sincerely,

Blakiston Houston Estate Company

Estate and
Property
Management

Farm and
Forestry
Consultancy

Property
Sales and
Purchases

Planning and
Development

Compulsory
Purchase and
Wayleaves

Valuations

Building and
Architectural
Services

Sporting and
Rural Leisure



General Comments

We believe that farming must be part of a rural economy, and as such would welcome the inclusion of diversified business models in the approach to agricultural policy in Northern Ireland. This stakeholder engagement paper does not include diversified business models, which provide crucial additional income to farm businesses in Northern Ireland and will need to be supported in the future. This includes tourism, education, renewable energy and a host of other farmer led enterprises that provide employment and support the rural economy and rural community.

With regards to Active Farming, more flexibility is essential in the sale of crops off farm such as grass and arable crops in bulk.

The below paragraphs respond to specific questions in DAERA's paper.

2. Greening

We believe that the benefits of greening outweigh the administrative burden of managing the scheme. This will be important in the future for Northern Ireland's agricultural sector. If greening is to be removed a more robust plan would be required from DAERA.

3. Soil Quality / Ploughing

We feel strongly that maintaining and improving soil quality is an important part of Northern Ireland's Natural Capital. This does not feature in the paper as prominently as it should. Most permanent pasture is effectively temporary grass that has not been ploughed – genuinely traditional meadows should not be ploughed, but 'green desert' soil improvement should be permitted, and this includes the ability to plough and introduce more crop rotations and the reseeded of grassland. This approach would diversify agriculture and in the future would support the management of DAERA's objectives around Nitrogen, and support increasing productivity (e.g. arable area could be expanded).

11, 12, 34. Innovative Farmers / CPD

We believe that a prescriptive approach to farmer education should not be included (e.g. the suggestion to tie payments to CPD). This will not support productivity and may have the opposite effect than desired. Mandatory 'CPD' tied to payments does not incentivise good quality 'CPD'. To call knowledge exchange 'CPD' gives the wrong impression, and this should really be to encourage exposure to high quality agricultural advisors and farmers, including those outside of DAERA.

11, 12, 34. Minimum Education Level

We are cautious about mandating a minimum education level, which does not necessarily translate to minimum competency level. Perhaps a solution is to ensure that farmers who do not meet minimum education levels can be assessed from a competency perspective.

13, 29. Outcome Led Planning

We would like DAERA to explore farmer led planning that focuses on outcomes. This manner can improve productivity and encourage innovation. Regimented output based grants do not necessarily encourage development and education, and as such DAERA should consider some capacity to allow agricultural businesses to seek funding for forward thinking ideas. This could be aligned to the manner in which Invest NI act, or in line with the UK Industrial Strategy. We would support development of the department in this area and would be happy to work with DAERA to develop in this area.

22. Capping

We align with Ulster Farmers Union in suggesting that the cap on BPS is removed.

28. Investment in Research and Development

AFBI and CAFRE are important institutions for Northern Irish agriculture and should be encouraged. Private sector research and innovation should be encourage greatly as this is not an area that contributes as much as it could in Northern Ireland.

37. Rural Community

The value of the 'rural community' to agriculture (and the environment) in Northern Ireland should not be underestimated and it is concerning that this does not feature in the stakeholder engagement paper as effectively as it should. Farming is a very important part of the rural community as the rural community is a lifeline for many farm businesses, for social and economic reasons. Whilst the major issues the rural community face are not all issues under DAERA's remit DAERA should be championing to resolve these issues. We see these issues as:

- Very limited access to the internet
- The effect of increasing traffic while infrastructure struggles to keep pace
- Limited or no telephone signal
- The effects of rural crime
- Access to essential services (schools/doctors/public transport).

40. Conacre

The government should examine the Republic of Ireland's approach to agricultural tenancies, in order to extend the average amount of time that agricultural land is effectively 'let' for. The qualification for Agricultural Property Relief for Inheritance Tax purposes should be clarified. Encouraging longer term tenancies could improve investment, productivity and environmental management of farmland in Northern Ireland where the owner does not have the desire or skills to farm productively or profitably. Rolling occupancy, which is a result of the current conacre culture, may provide a huge challenge to agriculture in Northern Ireland as land owner generational change takes place in the future.

BORDER COMMUNITIES AGAINST BREXIT

Our group Border Communities Against Brexit is representative of all border counties and the vast majority of the land farmed is in the SDA as is 44% of the total Northern Ireland land base. We feel Q16 in the Consultation, regarding the resilience payment, is the most crucial one in the document as a meaningful payment of at least 75% of the current rate would help ensure our livelihoods are maintained as it is well proven that hill cattle and sheep farming enterprises are not profitable stand alone enterprises. This is all the more important as we have no alternative land use for our disadvantaged land.

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?**

Yes, they should be retained.

- 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?**

Greening, the criteria and the payments around it should be retained.

- 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?**

The ban should only relate specifically to the actual 'protected' area. There should be a higher tier rate of payment for these restrictions as one of the environmental funding streams.

- 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?**

It should be retained.

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

It should be retained as we must encourage younger farmers into the industry.

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

Farming needs to generate profits to give the basic encouragement. Top up grant rates of 10% for young farmers and 10% for those farming in the SDA, as has happened in other regions of the UK, would provide encouragement.

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?

A minimum stocking density should be required. When a farm is being inspected a simplistic warning system should be introduced much the same way as when you would take your vehicle for an MOT, you are told what is required to pass the test and then you get it rectified. Any areas of land deemed ineligible should be specifically detailed on an actual map for the farmer.

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.

There should be a simplistic warning system introduced and penalties for non eligible land should only be percentage based.

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?

Any such work must be funded from the core departmental agricultural budget as all financial support should go direct to farmers to avoid wastage in administration etc.

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?

Education is always to be encouraged but should not be essential. Level II should be sufficient for anyone entering the industry. There are many with immense practical ability but yet may be academically deficient.

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?

The Level II agricultural qualification should be a sufficient standard.

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

The principle of CPD appears a worthy one but it should not be funded using direct payment funds, again to avoid wastage in administration etc.

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?

Investment towards innovation and new technologies are to be welcomed but there needs to be a better understanding of the environmental issues and the works that have been carried out over the years on farms.

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

Agree in principle, but loans and guarantees should be left to Banks, the recent encouragement of Ministers on loans within RHI is not in the public interest.

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

Long term land leases should be encouraged in our taxation system, and government should seek to create an equalisation of farm payments across the Island of Ireland. Failure to do this will mean a very serious economic imbalance in farm supports on each side of the border.

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

A basic farm resilience payment is very welcome. This needs to be set at a level of at least 75% of what farmers currently receive. Other environmental public goods can be rewarded via greening and targeted common sense simplistic environmental schemes. There is an opportunity to have various levels/tiers of environmental goods being provided with enhanced financial rewards. This is very important as, to date, farmers receive 80% of the income from the current direct payment system.

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

We should have a long term gradual movement.

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

The 44% of NI which is classified as SDA needs to be targeted for extra funding as this is where the public good can best be attained. This is the area where the average farm size is smaller, requires the most maintenance and is least profitable.

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

We need a simplistic warning system moving forward for inspections.

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

We need to always monitor the worth of the same.

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

The current regime seems to be sufficient.

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

We would not favour either tiering or capping or any change to the threshold.

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

Not in favour.

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

Not in favour.

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

The taxation system should be looked at regarding long term land leases and a more beneficial capital allowance provision.

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

There always needs to be a financial reserve in the event of a natural disaster.

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

A realistic level of compensation needs to be available to farmers who protect the environment as so many of the current interpretations have a severe negative effect on the farm's profitability.

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

Research needs to be targeted at the uplands in a Northern Ireland context as current questionable advice/regulations appear to originate from elsewhere.

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

Co-design could work as long as practical working farmers can have a real meaningful say on the outcomes. This MUST have a fully bottom up approach and not left to the usual suspects! The Leader model must be used in this instance to get proper engagement.

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?

A new, realistic examination needs to be taken at future environmental schemes and their associated payments. The environmental work on farms to date appears to be taken for granted.

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

There is no reason why other actors cannot be included but the practical working farmers who have maintained the landscape for years, and know it better than anyone else must have a genuine real input into how to achieve any such environmental outcomes. This MUST have a fully bottom up approach and not left to the usual suspects! The Leader model must be used in this instance to get proper engagement.

Unfortunately recent past experiences have not been good when advice from impractical book led sources appear to have been utilised.

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

The current schemes are excellent examples of how not to deliver any such desired environmental outcomes. These schemes appeared to be thrust upon farmers with no practical consultation. The public good value of the landscape, its maintenance and habitats appear not to be recognised financially. All delivery models need to be practical, have common sense and be financially rewarding to the farmer.

This MUST have a fully bottom up approach and not left to the usual suspects! The Leader model must be used in this instance to get proper engagement.

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

Government's oversight role is to be welcomed, especially in the secondary and third processing stages.

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?

Any such training should not be funded from the direct payment funding sources as, in so often can be the case, it can lead to 'jobs for the boys' and cause financial wastage.

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?

Government has certainly a very meaningful role to fulfil.

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.

The hill areas and the farmers within them need to be recognised as being equal partners in NI agriculture. This is even more important nowadays as these are the areas where most of the environmental 'public goods' can be obtained. Farmers in border communities are NOT represented, some organisation claim to do so, they do not, so far more work need to engage with these communities.

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.

The destination of environmental sites, many of which are located in the SDA, should be adequately compensated on an ongoing basis as, in effect, the affected land is virtually vested with no meaningful compensation for the restrictions placed upon it.

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.

The farmers in these areas now find their normal farming practices constrained so, in effect, we have the public goods being delivered without adequate compensation. If common sense prevails, productive, profitable farming can sit side by side in these areas as it has done over many generations.

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.

A new simplistic warning system for all aspects of cross compliance inspections would be welcomed. We need everyone working in partnership for the benefit of NI Agriculture plc and get back to a mindset of inspectors asking 'What can I do for you?' instead of 'How can I do you?'.

BRITISH VETERINARY ASSOCIATION

BVA RESPONSE TO NORTHERN IRELAND FUTURE AGRICULTURAL POLICY FRAMEWORK

Who we are

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 17,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters and the wellbeing of the profession.

2) The BVA's Northern Ireland Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.

3) We welcome the opportunity to respond to 'Northern Ireland Future Agricultural Policy Framework.'

Introduction

4) The veterinary profession is an integral part of the agricultural and food sectors. Veterinary surgeons, working collaboratively with others, protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability.

5) Veterinary surgeons negotiate, draft and uphold necessary legislation and international standards as well as the care of animals and their clients. By carrying out surveillance and enforcement from farm to-fork, Authorised Veterinary Inspectors (AVIs) certify the trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production. The future of the Northern Ireland agri-food sector is therefore of great interest and importance to the veterinary profession.

6) Brexit provides the opportunity to develop a strong, competitive and innovative food industry which enjoys the confidence of customers at home and abroad. A new agricultural policy should be both ambitious and focussed on delivering outcomes.

- 7) BVA recognises the specific context of farming in Northern Ireland. Of the four constituent parts of the UK, Northern Ireland is most reliant on agriculture in terms of the share of Gross Value Added (GVA) and percentage share of total employment. Conversely, however, Northern Ireland also has the smallest average farm size within the UK. Northern Ireland farmers are more dependent on direct payments than their counterparts elsewhere in the UK. It has been estimated that EU subsidies make up between 50 and 60 per cent of farm income in the UK.¹ However, it is estimated, within the consultation document, that this provides 83 per cent of total farming income in Northern Ireland.
- 8) It is therefore understandable that the future agriculture policy framework would place a strong emphasis on increasing the productivity and resilience of the sector. We welcome provision to improve agricultural productivity and resilience. However, the role the veterinary profession plays in increasing productivity and resilience, while ensuring the animals' physical and mental needs are met, is overlooked within the framework.
- 9) It is disappointing to see animal health and animal welfare largely overlooked by the future framework document, with no mention of the role of veterinary surgeons. This is in contrast with the ambitious system of public money for public goods that has been taken forward in England, where animal health and animal welfare are explicitly listed to receive financial support.
- 10) Below we propose changes within the Northern Ireland Future Agricultural Policy Framework where opportunities exist to incorporate animal health and welfare outcomes more explicitly.

Transitional Agricultural Support Regime, 2019-2021

- 11) DAERA will seek to maintain the status quo until 2021, enabling it to continue to implement the Direct Payment schemes as if they were still operating under EU rules. This is understandable within the current context of considerable uncertainty about future trading relationships with the EU and other countries.
- 12) Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries. Any requirement for veterinary checks on animals and products of animal origin at ports or at the land border could reduce the efficiency of produce moving to European markets and place additional administrative costs upon farmers. This uncertainty means it will be difficult to assess the full impact of the withdrawal of direct payments to farm incomes at this time.

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- 13) More challenging will be determining the impact on the wider rural economy that deliver goods and services to farms. Farm animal veterinary practices represent an important service sector to livestock farmers, and act as means to detect disease and enforce animal health and welfare legislation.
- 14) Therefore, we welcome the plan to provide a period which aims to provide farmers with stability and confidence to invest in their businesses and thereby deliver public benefit. While a period of stability is welcome, where there is scope for improvement this should be exploited. This time should also be used to develop and trial an ambitious new agricultural policy that is focussed on delivering outcomes.

Cross-compliance

- 15) Cross compliance is made up of 'Statutory Management Requirements' (SMRs) and standards for 'Good Agricultural and Environmental Conditions' (GAECs). The majority of SMRs focus on issues of animal health, animal welfare, public health and food safety – all of which are of the utmost importance to the veterinary profession. It will be essential that there is no downgrading in what is expected in relation to animal health, animal welfare, public health and food safety:
- SMR 1. Protection of Water against Nitrates Pollution
 - SMR 2. Conservation of Wild Birds
 - SMR 3. Conservation of Natural Habitats and of Wild Flora and Fauna
 - SMR 4. Food and Feed Law
 - SMR 5. Restrictions on the Use of Substances Having Hormonal or Thyrostatic Action and Betaagonists in Farm Animals
 - SMR 6. Pig Identification and Registration
 - SMR 7. Cattle Identification and Registration
 - SMR 8. Sheep and Goat Identification and Registration
 - SMR 9. Prevention, Control and Eradication of Transmissible Spongiform Encephalopathies (TSE)
 - SMR 10. Restrictions on the Use of Plant Protection Products
 - SMR 11. Minimum Standards for the Protection of Calves
 - SMR 12. Minimum Standards for the Protection of Pigs
 - SMR 13. Protection of Animals Kept for Farming Purposes

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- 16) Moving forward, there is the opportunity to improve upon the compliance regime. It should be predominantly based on outcome safeguards and done in a meaningful way. An outcomes approach should be utilised as a tool to drive continuous improvement of animal management and husbandry practices, thereby promoting high animal health and welfare.
- 17) A welfare outcome safeguards approach contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal's health and welfare needs. Indicators of positive welfare should be incorporated into welfare outcome assessments when possible, as promoted by the Farm Animal Welfare Committee (FAWC)'s "good life" framework.
- 18) Behavioural opportunity for animals can be a key differentiator between some assurance schemes,² which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct assessment.

Agricultural Policy Framework Beyond 2021

Productivity

- 19) The productivity of farm businesses is linked to the health and welfare of livestock. Support for productivity should be linked to health and welfare outcomes and designed to support improvements in standards. Improved animal health outcomes benefits productivity through efficiency. Improved health status, biosecurity and husbandry will also reduce disease risk leading a more financially resilient sector.
- 20) Disease outbreaks and the measures to control them can carry wide and costly consequences for public health, the economy and the environment. These impacts are substantial; across the UK, the Foot and Mouth outbreak in 2001 is estimated to have cost £5 billion to the private sector and £3 billion to the public sector, damaged the lives of farmers and rural communities and caused a general election to be postponed³. Compensation and testing costs in the current Northern Ireland bTB programme will reach almost £40 million in 2017/18.⁴

² British Veterinary Association, BVA Position on Farm assurance schemes, 2017

³ National Audit Office (2002), The 2001 Outbreak of Foot and Mouth Disease

⁴ DAERA, (2017) Consultation on the Department's Response to the TB Strategic Partnership Group's Recommendations to Eradicate Bovine Tuberculosis (bTB) in Northern Ireland,

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- 21) The continuous monitoring of new and emerging disease through data collection, analysis and sharing across species provides high-quality intelligence on animal health and welfare that enables policy makers, veterinary professionals and animal keepers to take decisions to improve animal health and welfare and therefore productivity. A robust surveillance system is integral to the realisation of the high value outputs of Northern Ireland's £1 billion plus export-reliant livestock industry.
- 22) BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post Brexit⁵. This forms Annex A of this submission. The development of a new agriculture policy presents an opportunity to modernise and optimise our animal health and disease monitoring networks. This can be achieved through:
- Maintaining the current level of Government resource spent on the scanning surveillance network
 - Adopting new approaches to data collection and feedback
 - Optimising appropriate skills and expertise
 - Rethinking traditional approaches to funding and coordination
 - Articulating the value of surveillance reporting to the veterinary profession and other stakeholders through education to increase awareness and participation
 - Working collaboratively with stakeholders to explore innovative communication strategies
 - The establishment of a body to oversee and co-ordinate surveillance policy across the four administrations of the UK.
- 23) Good animal health and welfare is paramount from farm-to-fork. We therefore support the focus being on the entire supply chain rather than restricted to land management businesses only, to help improve animal health and welfare at all stages of their lives.
- 24) Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs, has stated that "high animal welfare standards and high environmental standards reinforce the marketability of our produce." Therefore, agricultural policy should support animal health and welfare which underpins the reputation of Northern Ireland's agricultural exports. This reputation allows Northern Ireland farmers to add value to produce through the by marketing to discerning, value-added markets.

Science and Innovation

⁵ British Veterinary Association (2018), Position on veterinary scanning surveillance (animal health and disease monitoring)

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- 25) Public money should be used ambitiously. Priority should be given to incentivising innovation, technology and new processes which can support animal health and welfare whilst optimising productivity and competitiveness.
- 26) We recognise the role of new technologies and innovative methods in monitoring animal health and welfare outcomes, addressing animal health and welfare conditions and optimising the contribution of each animal to agriculture systems such as Precision Livestock Farming⁶. We would welcome the use of grants or pilot schemes to trial the use of innovative technologies to improve animal health and welfare outcomes within a new agricultural policy.
- 27) This is an opportunity to exploit the existing ecosystem of organisations with an interest in encouraging the adoption of innovation, new farm management practices and technology transfer from the lab to the field. This includes organisations such as Further Education (FE) Colleges, CAFRE, Queens University and Ulster University, AFBI and Catalyst Inc. Encouraging early adoption and a culture of evaluation will allow Northern Ireland to be a test-bed for new technologies. The role of the private vet will be essential to advise any farmer involved in early adoption, to collect data and ensure animal health and welfare are maintained.

Agricultural Education and Knowledge Exchange

- 28) We welcome efforts to incentive education, CPD and knowledge exchange with the aim of professionalising the agricultural sector. In this arena Northern Ireland has been ahead of other parts of the UK, starting early with the availability of a GCSE in Agriculture and Land Use. There is also a framework providing high quality higher and further education across FE Colleges, CAFRE, Queens University and Ulster University. This is an opportunity to capitalised upon this existing structure.
- 29) Investment in measures which make achieving desirable outcomes and compliance with basic standards easier would be beneficial. For example, investment in a well-conceived programme of CPD for farmers has the potential to positively impact many areas of concern, including animal health and welfare, AMR, productivity and carbon usage.
- 30) Private veterinary surgeons are trusted advisors to farmers and uniquely positioned to offer advice and work closely with farmers and animal keepers to counsel and signpost

⁶ Precision Livestock Farming is the creation of ‘a management system based on continuous automatic real-time monitoring and control of production/reproduction, animal health and welfare, and the environmental impact of livestock production’. Berkman, D., 2014 Precision livestock farming technologies for welfare management in intensive livestock systems. Rev. sci. tech. Off. int. Epiz., 2014, 33 (1), 189-196. Available at: <https://www.oie.int/doc/ged/D13666.PDF>

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to the appropriate course of action. Veterinary involvement ensures biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. Both private veterinary surgeons and Government employed veterinary surgeons, are uniquely positioned to make every on-farm contact count by advising on overall herd health and welfare, wider determinants and, in turn, disease surveillance and prevention.

- 31) Thus, the involvement of the veterinary profession within any new Agricultural Education and Knowledge Exchange framework will be integral to converting knowledge into action and thus achieving animal health, animal welfare, environmental and productivity gains.

Environmental Sustainability

- 32) Animal health and welfare can mutually benefit environmental sustainability. The veterinary profession has long led the way in recognising and encouraging the concept of 'One Health', recognising the synergies between animal health, public health and environmental health. For example, the current 5-year Antimicrobial Resistance (AMR) strategy and the 'One Health' approach it utilises has been successful in reducing sales of antibiotics to treat and prevent disease in UK farm livestock to a record low. The new agricultural policy could be used to build on this and further the objectives of the new 5-year AMR strategy by incentivising measures which help to achieve these targets.
- 33) The use of innovative whole farm management systems that integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and welfare food products are paramount to ensure environmentally sustainable agriculture. Veterinary input is essential to the design and implementation of these systems.
- 34) Antimicrobial use in livestock can lead to antimicrobials being excreted unchanged and thus reach the environment. This creates the potential for Antimicrobial Resistance (AMR) transmission from livestock into ecosystems.
- 35) Animal agriculture can be a significant contributor to climate change. To mitigate climate change, changes in animal production and farming practices are necessary to increase efficiency while maintaining animal welfare. Schemes designed to advance national animal health with a focus on disease prevention and eradication can help to maximise performance and reduce wastage including greenhouse gas emissions.
- 36) Several practices have already been identified to have a positive impact in improving production efficiency and reducing greenhouse gas emissions, such as improving grazing management, adding certain nutrients to the diets of animals, providing

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appropriate water sources and protecting water quality and improving genetics and reproductive efficiency⁷.

37) It is important to recognise the role livestock can play in optimising soil quality and productivity with whole farm management models that minimise environmental degradation and use resources and energy more efficiently. Mob grazing or managed intensive rotational grazing (MIRG) for example is a form of rotational grazing whereby a high stock density is grazed in a paddock with short grazing periods and long rest periods⁸. This approach ensures that:

- Forage is harvested
- Optimal trampling and treading of the soil occurs to prevent compaction and allow water penetration
- Soil erosion is minimised through rest periods to prevent livestock from continuously treading and compacting the same area
- Manure is dispersed through hoof action, reducing fertilizer maintenance costs and mitigating against the environmental impact of some fertilizers

38) Veterinary input in the design of managed intensive rotational grazing systems is vital to ensure that provisions are in place across rotations to adequately meet ruminant and non-ruminant nutrient, water, shade and shelter requirements and maintain animal health.

Veterinary Capacity

39) The involvement of the veterinary profession within any new agricultural policy will be integral to achieving animal health, animal welfare, environmental and productivity gains. This ambitious agriculture policy will not achieve its aims if the veterinary profession does not have the capacity to play the role it is uniquely able to.

40) There have been concerns about the capacity of the veterinary workforce, which have existed for some time, but have been brought into sharp focus by the exit of the UK from the EU. The Major Employers Group (MEG) which represents large veterinary practices carried out a review in July 2017 which found a workforce shortage of around 11%. The demand for veterinary surgeons is likely to increase following exit from the EU. Nigel Gibbens, the then Chief Veterinary Officer UK, suggested that the volume of

⁷ Royal College of Veterinary Surgeons, Veterinary research in the UK: a snapshot A Report by the RCVS Research Subcommittee 2013

⁸ Undersander, D., Pastures for Profit: A guide to rotational grazing. 2015 [pdf] Available at: https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1097378.pdf

**BVA CONSULTATION RESPONSE
OCTOBER 2018**

products requiring veterinary export health certification could increase by as much as 325% in the case of no deal being reached between the EU and UK.⁹

41)The UK veterinary workforce is highly reliant on EU graduates. Statistics from the RCVS reveal the dependence of the UK on non-UK EU vets. The RCVS currently registers around 1,000 overseas vets per year, of which EU nationals make up the clear majority. In 2016, the proportion of all new registrants in that year from non-UK EU vet schools was 47%¹⁰

42)It will be vital that an appropriate number of veterinary surgeons can be recruited from overseas, whether from EU or from outside the EU, to ensure that essential veterinary work continues, and the opportunities of a new agricultural policy can be seized. To alleviate labour constraints BVA has made the following calls upon Government:

- Overseas nationals graduating from UK vet schools should be allowed to live and work in the UK.
- Vets should immediately be restored to the Shortage Occupation List.
- The veterinary profession should be prioritised within future immigration policy. The Government should consider the economic and social impact the profession has, beyond its relatively small size.

October 2018

⁹ Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vetsessential-after-brexitsays-cvo/>

¹⁰ Royal College of Veterinary Surgeons, RCVS Facts 2016, 2017

ROBIN BROWN

Dear Sir/Madam,

My thanks to DAERA for their drafting of this new document which sheds some light on the potential way ahead for the agricultural sector in NI.

Before providing a response to the contents of the document, I would like to suggest as a headline item that farmers should receive the correct market price for the produce leaving their farm rather than being potentially underpaid by the large processors and big market players who can utilise the financial support payments made to farmers as a means of maximising profits by having access to produce at a price which is below true market value. Indeed, in my view, DAERA should actively support the creation of many more small scale co-op style processors for both dairy and meat which are co-owned by farmers rather than big businesses draining these profits out of the agricultural sector at the expense of the farmer and the tax payer. These smaller processors would also be much more environmentally sustainable with significantly reduced food miles.

In response, I wish to provide answers to some of the questions contained within the document as follows:

Q1. I support DAERA's position and believe this to be a logical stance in the context of the ridiculous scenario we find ourselves in as a result of leaving Europe.

Q2. Greening and other additional payments should be abolished and wrapped up within the single BPS payment. Such an approach is more efficient for both farmer and DAERA with less paperwork on both sides.

Q3. A ploughing ban seems sensible at face value, however, the negative impacts of ploughing in sensitive areas should be fully considered before retaining such a ban. Indeed, there may be instances where ploughing and sympathetic use of drainage could better support the retention of such sensitive landscapes.

Q4. It is absolutely vital that YFP payments continue to be made to those who are eligible. I must stress that I do not support the 5 year cap in any way. Indeed YFP should continue to be paid right up until the farmer is at least 40 years of age. DAERA should appreciate that many individuals have given up alternative careers to retain their farming enterprise (all too often as a result of an incredibly strong emotional attachment to land and those who have worked it for generations before). Few decide to take up farming under 40 years of age because they see it as a viable way to make a good living against another career.

Q5. It is essential that further applications to the YFP and the Regional Reserve are permitted, and indeed promoted, after 2019. Reducing access to YFP or Regional Reserve payments in any way will be hugely damaging to the future of the agricultural industry in Northern Ireland as a lack of access to appropriate financial support through such payments will drive away the intelligent young individuals that are fundamental to securing a sustainable, efficient and world class agricultural sector into the future. At present, an individual under 40 with access to or ownership of a parcel of land may commence farming that land efficiently as a result of receipt of YFP or New Entrant support rather than entering

a concrete agreement with another farmer which is often damaging to both parties as land is often abused in winter months and productivity suffers as a result.

Q6. DAERA should engage directly with all farmers over a given age i.e. 55 and develop a basic business plan with them which should form the basis for any generational renewal on an existing farm. If a new generation can see sufficient profitability within the enterprise it will be a much more straightforward and local decision to make as to whether or not the farm should carry on in to another generation.

Q7. Active Farmer provisions are a double edged sword. While the aim is to provide support directly to the farmer, the landowner must recoup his loss of entitlement payment and land rental prices inevitably rise sharply as the landowner is well aware the farmer now receives, for example, a £100 per acre payment he did not receive previously. Often, a large percentage of this payment is handed over to the landowner. In my view this is fair and proper practice as the owner of the land has to be properly respected within the farming operation however this scenario does reduce the sum of money that remains with the "active farmer".

Q9. The use of a productivity challenge may be useful, however, it must be based on a per acre basis and take consideration of the quality of land in question with a higher proportion of financial support being provided to those farming smaller areas based on appropriate regional statistics e.g. bands of; up to 30 acres, up to 60 acres, up to 100 acres, up to 150 acres and over 150 acres.

Q10. I support more investment in education and knowledge transfer.

Q11. I support this. Farmers should be better trained and more knowledgeable about best practice.

Q12. CPD is a good approach but must be incentivised correctly as time significant time away from the farm may be required to achieve it.

Q15. As noted above, more local processors should be created to retain as much profit as possible within the farm enterprise.

Q16. Farm resilience measures may lead larger farmers to take very large financial risks safe in the knowledge of a "safety net". This approach would divert much needed support away from perfectly viable smaller farms.

Q17. These should be area based with those farming a smaller area of land receiving the highest levels of support. Large farms should receive minimal support as their profits are much higher during times of "normal operation".

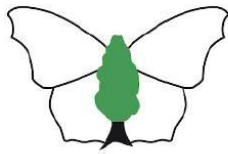
Trust you find the above input useful.

Look forward to hearing from you.

Kind regards,

Robin

BUTTERFLY CONSERVATION



Saving butterflies, moths and our environment

Butterfly Conservation

Response to the NI Future Agricultural
Policy Framework Consultation

October 2018

Dear Sir/Madam,

Thank you for the opportunity to respond to this consultation.

Butterfly Conservation is a UK wide charity working to conserve butterflies, moths and the environment.

Butterflies and moths are widely recognised as key indicators of the health of the environment. Where butterflies and moths are thriving there is a very high probability that a very wide range of other species are also likely to be doing well, especially other insect groups such as our wider pollinators.

Healthy sites and landscapes, healthy for both people and wildlife, should be filled with different types of butterflies and moths. Higher diversity of butterflies and moths in a landscape is often a key indicator of high habitat quality.. Landscapes and sites devoid of butterfly and moth species, or where there is very low diversity, are usually damaged in some way, poor in wildlife as a whole as a result, and less healthy, interesting and inspiring for people too.

We are currently in a time of great uncertainty. Westminster is divided, there is no Assembly currently functioning in Northern Ireland, and no clarity on what deal, or no deal we may have with Europe as we approach the 29th March 2019. However, this consultation is inspiring in the direction it seems to show we are headed, with a far greater recognition of the wider benefits of the farmed environment and the value of the other public goods it provides. A healthy environment is a critical element of a prosperous, effective and sustainable farming future.

Also, many of our most threatened wildlife species are completely dependent on farming methods to maintain their habitats, especially through appropriate grazing regimes. We need active, informed land managers and land management; many threatened species and habitats cannot exist without this.

We welcome the opportunity to have a voice in the shared farming future ahead of us, one in which we hope we will see our land managers recognised for all of the wider benefits; (e.g. pollen, nectar, shelter and food-plant services for our pollinators, water filtration lowering water treatment costs, carbon sequestration reducing the impacts of climate change to name but a few) they are providing through their hard work and effort, quite apart from a thriving, profitable, resilient and sustainable food producing sector.

A handwritten signature in black ink, appearing to read 'Catherine Bertrand'.

Catherine Bertrand

Head of Conservation, NI

Butterfly Conservation

October 2018

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?

Butterfly Conservation feels there should be a guaranteed transition period for retaining entitlement payments, but with clear definition as to how the old system will change to the new.

The EU CAP Pillar 1 entitlements have been available for a considerable time and account for a significant portion of income for many landowners. To simply end these payments would cause a severe negative shock to our economy and amongst our communities. However, it is unlikely that resources will allow for them to continue at the level or in the format that they have been paid out to date.

We would hope that a future system, rather than a simplistic 'quantity' payment, would instead be based on 'quality' with clear indicators that link to wider NI policy aims; e.g. health, environment, social deprivation etc, as outlined in the draft programme for government and other high-level over-arching strategies.

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?

'Greening' was a wholesale change within the EU's CAP programme to provide the following;

- make soil & ecosystems more resilient by growing a greater variety of crops
- conserving soil carbon & grassland habitats associated with permanent grassland
- protecting water & habitats by establishing ecological focus areas (EFAs).

The EUs own evaluation of Greening Measures concluded they had had limited positive impact in their current form¹. However, there were a series of considerations within the document cited that would see greening as a concept deepened and broadened in its ability to deliver tangible benefits, especially in relation to the retention and protection of semi-natural habitats (especially Environmentally Sensitive Permanent Grassland – ESPG) . Retention of arable greening measures would also be of benefit in Northern Ireland which has seen a decline in the amount of arable land in recent years towards silage and fodder. Figures from the Statistical Review of NI Agriculture 2017 show that the decline in Arable crops is happening alongside an increase in livestock farming².

¹ https://ec.europa.eu/agriculture/sites/agriculture/files/leaflet_en.pdf

² <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Stats%20Review%202017%20final.pdf> – Page 34, Table 3.2

Butterfly Conservation would have concerns about the increasing homogeneity of our landscape in regard to the current emphasis on silage production. Although 'greening' has not worked, the aim of a diverse landscape containing mosaics of habitats is an important one. Silage production provides very little resource in terms of biodiversity value. Intensively managed and mown monocultures have little value for our wildlife and instead act as barriers across the landscape between richer and more diverse pockets of land. Hedgerows – often the '5%' of land put aside as the EFA greening measure, are often badly managed, intensively cut annually, or even monthly, providing little in the way of shelter or food provision for our wildlife.

The All Ireland Pollinator Plan, 2015-2020, clearly identifies the loss of nectar, pollen and nesting sites from our landscapes as one of the key reasons for declines in our pollinating insects³. In addition, habitat fragmentation, especially for our smaller pollinators such as solitary bees who can only forage up to a kilometre from their nest sites, is a cause of concern as it lowers resilience in wild populations as they become increasingly isolated.

We would add to this the need for the provision of larval food-plants throughout the landscape that provide for a wide range of invertebrates including butterflies, moths and other pollinators (and they in turn prey for higher level predators such as our birds, amphibians etc.) Nectar/pollen provision options that are only annual, e.g. mixes that are dug up and reseeded, or field margins that are mown annually or several times in-year, will not support this wider group of important pollinating insects. These require a more complex sward structure and diversity of natural vegetation which is only found by the retention or creation of semi-natural habitats.

We would urge policy makers to address landscape scale conservation concerns and work with environmental groups to ensure that our Northern Irish landscape remains diverse and permeable to our wildlife. Greening as it has been implemented so far may not be the answer, but the concept and original aims are important and necessary. We need to seriously consider how we incentivise a landscape that is diverse both in the crops it supports and the habitats it provides if we are to see both our landowners and our wildlife flourish in the future.

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?

Butterfly Conservation strongly supports the ploughing ban on Environmentally Sensitive Permanent Grassland (ESPG) and would very much want this retained in any future policy framework.

We have grave concerns at any policy where the focus is purely on our designated grassland sites. These sites are already legally protected and there should be no question of any operations taking place on them that threaten their environmental integrity, especially nothing as destructive as ploughing.

³ <http://pollinators.ie/app/uploads/2018/05/Pollinator-Plan-2018-WEB.pdf> - Page 16

A far greater challenge is in our understanding and enforcement of protection for our undesignated ESPGs and it is here we see a very important opportunity for improvement in our agricultural policy.

ESPGs should already be afforded some level of protection through the current Good Agricultural and Environmental Condition (GAEC) protocol, but due to historical issues over definition, and resourcing issues meaning a wholesale lack of enforcement, Northern Ireland has continued to experience a sustained loss of semi-natural grasslands in the wider landscape.

Butterfly Conservation has recently been directly involved in the identification and mapping of ESPGs into the new DAERA Natural Environment Map Viewer (NEMV) through our involvement in the INTERREG-funded 'Co-Operation Across Borders for Biodiversity (CABB) project. Currently it is clear that, outside of designated sites (and even within them), our knowledge of the location, quality and area of our ESPGs is woeful, especially for smaller land parcels.

A feature of the Northern Irish landscape is our small field parcels, a factor that has presented significant challenges and failures in previous aerial land mapping exercises such as CORINE. Unfortunately this presents a very serious problem. Landowners with ESPGs on their land, but ESPGs which are not recognised, nor mapped on the NEMV, are unable to access funding streams currently available to them that they are perfectly eligible for. This creates a serious inequality in the fairness of current entitlements as some landowners, through no fault of their own, are penalised due to the underlying data being unfit for purpose. For landowners with smaller holdings who are far more reliant on current systems of subsidy and more vulnerable to external shocks, this presents a serious discrepancy in the support they may be able to access. These payments may be critical to their on-going viability as land managers.

Moving forward it is **ESSENTIAL** that we work to rectify this acute and critical failure in our underpinning data, especially as it appears there is an internal desire to move away from one-to-one support of officers on the ground to a more remote online support system to limit on-going administrative costs. We cannot do this effectively, nor hope to have any kind of robust future agricultural policy if the data underpinning these systems is inadequate. All we will be doing is continuing to compound the errors that currently exist, which will ultimately be even more costly to rectify in the future.

The recent combining of our Agricultural and Environmental Departments marks a very positive and much needed change in our approach and language in describing our landscape. Historically the Department for Agriculture and Rural Affairs (DARD) and the Department for the Environment (DoE) have used completely different definitions to describe the same areas of land, based on either their perceived agricultural productivity or natural heritage value. There is often a serious discrepancy in these, a lot of environmentally important habitats being described in extremely negative ways in terms of their lack of productivity, and treated with fairly brutal disregard as a result, regardless of their intrinsic value in terms of the ecological services they provide.

Now with the two departments, two mind-sets, having to align as DAERA, with both the agricultural and natural heritage value of our landscape recognised and equal, there is an opportunity to unite and rewrite these definitions.

ESPGs are a case in point. These areas are critical throughout our landscape as sources of pollen, nectar and nesting habitat for our bees, as a source of larval food plants for our insects, as home for our birds, mammals and amphibians, they provide carbon sequestration and water filtering ecological services as well as helping with water permeation and retention, helping to limit flooding and increase overall water quality. We currently do not know the extent of these, especially outside of designated areas. We do not know the quality of these sites. We cannot plan to connect areas effectively in the landscape because we do not know where the potential connections are. We cannot support landowners who manage these areas because we haven't identified either them or their land.

Butterfly Conservation not only strongly support the ploughing ban but also identify a very serious need for us to use the transition time ahead of us to properly resource a DAERA mapping system that is able to respond to these landscape needs. Moving forwards if we are relying on online systems and remote sensing technology to 'police' our agricultural activities, there will be considerable money wasted and significant impact on those currently outside the mapped systems if we continue using the flawed systems currently available. This must change if any future Agricultural Policy Framework is going to be able to function, and report effectively on how measures are working, not only in our protected landscapes but almost more importantly in the wider countryside.

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?

Butterfly Conservation agrees that those accepted into the YFP up to and including 2019 should continue to receive payment.

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

We understand that payment has been secured within the DUP 'confidence and supply' deal up until 2022. As succession planning is a key challenge to farming in Northern Ireland, especially in the less intensively managed area of the country, we strongly support the YFP concept moving forwards.

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

The first step is to identify exactly where the problems of generational renewal are most acute and what factors are driving this problem. Butterfly Conservation would suggest a review of this issue before any steps are taken to ensure measures implemented are fit for purpose.

From our limited experience working with land owners to date, there appears to be an issue with generational renewal in what are currently seen as more marginal areas, such as South Tyrone and Fermanagh where farming profitably is more challenging. We would urge a future framework to put resource into identifying the indicators of generational renewal and mapping these across the country in order to better understand the drivers of the problem. We are certain a 'one size fits all' approach will not work, and future policy may need to look at specific, localised, farmer-led schemes which specifically address the issues within an area.

Continuing to encourage, incentivise and support younger farmers through targeted measures that address the specific concerns and issues of a locality would be more effective than attempting to continue broader brush measures, especially if the underlying problems driving this issue have not been identified before administering a perceived 'cure'. It is essential that whatever means are applied have effective indicators for measuring success in order to track how well they are working to ensure value for money now and in the future.

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?

No comment at this time

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.

No specific comment other than urging that any aspects put forward for potential change should be rigorously considered to ensure no slipping or loss of standards.

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?

Butterfly Conservation feels this is a worthy goal but would urge caution that resourcing was not biased to this avenue at the expense of other measures which also ensure environmental coherence and sustainability.

We would say again that without accurate underlying baseline data we will struggle to effectively understand whether the measures we are implementing are really working or effectively targeted. A first step is ensuring we have systems in place that are fit for purpose in currently reporting on what is happening. We feel this is innovation that is well worth investing in that increases the effectiveness of future measures and provides far greater reassurance to those making financial decisions that they are putting resources in the right place.

We are also concerned at a drive towards productivity only. A large proportion of Northern Ireland is currently defined as 'Less Favourable Areas' where there are significant constraints to managing land in traditionally 'productive' ways. Implementing 'productive' practices for short term gain in these areas can lead to damage being done to the current ecological services that land is already providing, such as soil structure, water catchment quality and ecological coherence. This damage can then lead to far reaching long term costs in on-going management (e.g. the invasion of soft rush and bracken, poaching, soil erosion etc.) We would urge a more holistic approach that considers the profitability of measures over the short, medium and long term, rather than concentrating on productivity alone.

The example countries listed in this example; (the USA⁴⁵, France⁶⁷, the Netherlands⁸ and Italy⁹) have all sacrificed environmental sustainability in the face of short term increases in productivity which causes great concern. These countries have all had high profile news stories in the last year of the significant detrimental environmental impact of these measures (see attached footnotes). We would not encourage policy makers to base our future framework on obviously flawed systems that are only going to lead us to far more costly mitigation measures further down the line, as we have already seen through the current ammonia scandal caused through the well-meant but inherently flawed 'Going for Growth' model here in Northern Ireland¹⁰.

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?

We agree that a better educated sector is more likely to be successful so certainly this should be a consideration built into any future policy framework. However, we urge not just innovation in pure agriculture, but sustainable, resilient farming and land management methods that deliver holistic benefits for the environment, for society and for the economy. We stress again, we should be educating our industry to be profitable in all senses, not just productive.

⁴ <https://www.theguardian.com/us-news/2018/aug/13/florida-gulf-coast-red-tide-toxic-algae-bloom-killing-florida-wildlife>

⁵ <https://www.dw.com/en/trumps-lasting-damage-to-the-environment/a-44315788>

⁶ <https://www.sciencedaily.com/releases/2018/06/180614213817.htm>

⁷ <https://www.theguardian.com/environment/2018/mar/21/europe-faces-biodiversity-oblivion-after-collapse-in-french-bird-populations>

⁸ <https://www.dutchnews.nl/news/2018/06/environmental-damage-due-to-pollution-costs-society-e31bn-a-year/>

⁹ <https://theecologist.org/2018/may/24/special-investigation-part-ii-how-common-agricultural-policy-promotes-pollution>

¹⁰ <https://www.bbc.co.uk/news/uk-northern-ireland-42691497>

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?

Butterfly Conservation supports incentives that encourage sustainable, resilient land management practices. Ideally we should be linking future NI policy through high level strategies such as the programme for government where any measures or interventions are clearly linked to specific indicators that help us understand their effectiveness and impact against our wider country targets. We would urge a review of our educational providers to ensure we would have the capacity to effectively manage any future formal training initiatives, especially those regarding sustainable agriculture which is not currently at the core of agricultural educational provision in Northern Ireland.

If we are truly moving towards a 'public money for public goods' model of future farming, then sustainable environmental principles need to be within the core of all modules, not an 'optional extra' as it could currently be argued these principles are currently.

Also, as we increasingly move towards online automated systems, the ability to specifically link individual land managers and farm businesses to intervention uptake and effectiveness become ever more streamlined. These metric-tracking considerations should be built into future schemes wherever possible to help with monitoring and analysis of measures taken.

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

Although Butterfly Conservation is strongly in favour of increasing CPD awareness and implementation within the agricultural sector, we would want there to be a clear, evidence-based rationale as to why the public purse should pay for this, especially in the long term. The tax payer is not expected to fund CPD in any other business sector. It may be necessary as a short term measure to incentivise the change in mind-set and practice that is inevitably coming once we leave the EU and no longer have access to the CAP system that land managers have been accustomed to, but in the medium to long term, CPD should be seen as a necessary part of investment into farm businesses by land managers and not something they can be indefinitely subsidised in receiving.

Public funded CPD should be specifically linked to the public benefits we will receive as taxpayers as a result of these incentives, again potentially linked to indicators in the programme for government and other high level country strategies.

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?

Butterfly Conservation fully supports the response from Nature Matters NI on this issue;

“Government has a key role to play in ensuring that on farm practises serve to help meet overarching strategic objectives. Investing in tried and tested technology to improve efficiencies and boost environmental performance has the potential to deliver environmental outcomes across the sector. At present, there are a range of measures that can be adopted to improve the environmental performance of agricultural businesses. However, there is relatively little incentive to adopt these at the farm scale, or widespread knowledge to farm businesses of the opportunities to invest in these measures. More should be done, firstly to promote the business benefits of better environmental management and secondly to encourage farm businesses to adopt these as part of standard practise. As noted above, regular soil testing and detailed mapping of farm topography can help farmers to reduce costs in terms of fertiliser application whilst ensuring that it is better targeted to help increase fertility and yields. Measures such as these should be easily available for farmers to avail of, improving efficiencies and environmental performance; DAERA’s knowledge advisory service will play a key role in ensuring that farmers are fully equipped to make the best decision for their business and the environment.

Within this, the role of enhancing the green infrastructure of farm businesses and its role in improving profitability and environmental performance must also play a key role. In many instances these options represent a more efficient, cost effective alternative to investments in new technology. For example, well designed green infrastructure such as filtration ponds can help improve water quality and boost biodiversity at a lesser cost than hard engineering options, whilst the adoption of green infrastructure can provide shelter for stock allowing for a longer grazing season whilst removing the need to invest in more costly housing. In many cases, these options represent a more cost-effective option for farm businesses at a fraction of the cost, whilst also adding benefit to economic resilience and environmental performance. “

In addition we would recommend ‘green infrastructure’ solutions consider larval food-plants as well as simplistic pollen and nectar mix options.

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

We would point policy framework designers to the UK Environment LINK paper on this issue.¹¹

¹¹

<https://www.wcl.org.uk/docs/Link%20farming%20and%20land%20use%20policy%20paper%20FINAL%20Sep%202017.pdf>

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

Whatever measures are put forward, we strongly support those which promote environmental resilience and sustainability. Ideally any measures should be linked to various strategic indicators so effectiveness can be monitored and assessed. Also, and most importantly, we should be focusing on the profitability of land in a holistic sense; systems that promote true value for money without impacting the tax payer through creating problems the public purse has to be used to fix. Productivity as a single outcome has not led to a healthy environment, nor a secure environment for land managers to work within. We would urge tempering pure productivity with whether it really is delivering real value for money and ensure we are looking at sustainable, profitable systems in the long run.

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

Butterfly Conservation supports a basic farm resilience payment, but would caution against continuing with an area-based payment as we do not feel this is an effective indicator of success or profitability and believe this style of payment can skew the reward structure and limit innovation. We would urge for a move towards quality-based payments, with land managers receiving incentives for achieving measures which promote sustainable, resilient, innovative and humane practices. Again, we support the ideas put forward by Nature Matters NI;

“Recent analysis by the OECD¹² has broken down financial risk management into three separate categories, these being catastrophic, marketable and normal risk. Within this analysis the role for public intervention to manage catastrophic risk is potentially significant, the intervention logic for it to intervene in other forms of risk management is limited. As such this suggests that financial risk management as a specific outcome should not be the primary focus of a future farming and land management policy¹³.

It is our view that public money should not be allocated directly towards risk management on the basis of providing a predictable and reliable income source. Payments for environmental land management and other payments for public goods can also provide an important alternative source of income, independent of any market volatility, thereby helping to spread risk for the farmer whilst also delivering clear benefits to the taxpayer and helping to reduce risk and build resilience in other ways.

We believe that the most effective way to build resilience is to protect and restore the natural capital on which all farming depends. Paying for these public goods represents the best value for money from the taxpayer, as well as helping to build the long-term resilience of farming systems here.”

¹² OECD (2011) Managing risk in agriculture: Policy assessment and design, OECD Publishing. Available at https://www.oecd-ilibrary.org/agriculture-and-food/managing-risk-in-agriculture/a-policy-framework-for-risk-management-in-agriculture_9789264116146-3-en

¹³ Mathijs, E (2016) Managing volatility and risk in the CAP. A report for the RISE Foundation.

Butterfly Conservation would like to see those actively working towards the provision of ecosystem services and other public goods such as recreation and access recognised for these endeavours. Protecting and promoting these public goods increases our resilience as a country to face future pressures. Losing these services and having to replace or repair them will be far more costly than actively working to maintain and conserve them.

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

We reiterate the evidence cited above that public subsidised risk management is not an effective future management tool. Instead we would like to see the development and implementation of payments that reward sustainable land management in regard to environmental provision, including that for biodiversity. We believe that a quality, rather than quantity, based payment scheme will lead to a more sustainable, motivated, streamlined and effective industry in Northern Ireland.

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

Butterfly Conservation firstly takes issue with the terminology of the current language to describe our agricultural landscape. What is currently defined as 'natural disadvantage' in a purely productivity based agricultural system, is often highly valuable in terms of public goods such as water purification, carbon sequestration and ecological integrity. If we are moving towards a new system where public goods are recognised as having intrinsic value, and land managers incentivised to care for them, then we will also need to completely rethink the language we use to describe these landscapes.

The inherent negative connotations of 'natural disadvantage' are unhelpful and create unnecessary barriers to our understanding of these spaces before we have even begun to think about managing them. If we are moving towards a a future framework where environmental benefits are recognised as a key indicator of farming success then this definition will be completely outdated. It could be argued in the future that it is the currently 'productive' intensively managed, ammonia soaked agricultural lowlands become the 'disadvantaged' areas as they provide very little in the way of public goods.

We urge policy makers to approach the new framework with a more balanced attitude to describing land quality and to take significant steps in redefining the language we use if resilience and sustainability are ever to be fully embraced as core principles.

We also, in line with Q6 and Q11 suggest a review of the farm businesses operating in areas of perceived risk, such as the currently termed 'naturally disadvantaged areas'. By identifying the shared public good outputs, a

system based on the quality of public good provision could be developed that recognises the worth of these areas where pure 'productivity' is neither profitable nor sustainable.

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

The concept of cross compliance is an effective way of ensuring common principles across our agricultural community. It will be important to align with the other four countries of the UK to ensure a level playing field for future internal markets, and also to at least maintain what we have if we are to hope to continue to trade with EU countries. Butterfly Conservation would strongly support retaining elements of cross compliance that promote resilient, sustainable, innovative and humane farming practices. We believe we should be striving for ambitious minimum regulatory standards, this change in policy should not be seen as an opportunity to weaken or lower our minimum standards.

Moving forward we see an important link between meeting minimum regulatory standards to guarantee payment, with quality provision payments for specific public goods and services over and above this. We would also wish to see that any activities that would change the landuse of undesignated semi-natural habitat or uncultivated land subject to scrutiny by DAERA as we have concerns these have not been effectively enforced in the past, leading to further isolation of the islands of priority habitat that remain and weakening the resilience of our ecological environment.

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

Here Butterfly Conservation is in full agreement with the views presented by Nature Matters NI;

"We need a strong legislative baseline to safeguard the environment and animal welfare, and protect the interests of society. Currently, the system of Cross Compliance creates links between existing legislation and CAP area based payments. This link between legislation and payments provides an important enforcement mechanism, punishing non-compliance. This underpinning of legislative protection is essential in order to provide the foundations upon which incentives can then build. Proper enforcement is also a matter of equity for those who abide by the law, setting a level playing field for farmers and land managers across NI.

An effective regulatory baseline also acts to define the rights and responsibilities of landowners and managers, and so provides clarity about where public investment should be deployed to deliver further enhancements. Confidence in regulatory enforcement is an essential component in building trust that public investment in restoring natural capital is not undermined by the non-compliance of others.

Although Cross Compliance sets a precedent in linking payments to regulatory compliance, it has been criticised for being ineffective and overly bureaucratic and is in need of reform¹⁴ failing to address some of the most significant environmental issues we are facing at present¹⁵. We need to develop a more effective, proportionate approach to regulation which reduces bureaucracy to farmers whilst providing more benefits for the public.

To overcome these issues a future regulatory baseline should include the following features;

- Where there is a functional link between regulatory compliance and publicly funded investments (for example, investment in improving water quality and compliance with slurry storage regulations), penalties should be applied to any payments to take account of this where a breach is detected, in addition to any prosecution for a statutory breach.
- Regulation should be based on knowledgeable enforcement, with visits and monitoring undertaken by qualified inspectors
- A proportionate approach to penalties is required, based on the six Macrory Principles. Future enforcement models should be based on Scotland's General Binding Rules (GBR). Where GBR breaches or pollution risks are identified, farmers are given time to address these issues before a second visit is arranged. If remedial action has not been taken, a third and final visit is then scheduled, and if no action is apparent a Fixed Penalty System is levied.

A crucial component of the regulatory baseline will be to ensure coherence across the UK. It is imperative that Northern Ireland, Wales, Scotland and England work together on an ambitious common framework for agriculture that prevents a deregulatory race to the bottom. This must include an appropriate degree of flexibility so as to allow implementation to be tailored to the specific environmental and legislative context in each nation. This must also include robust shared governance arrangements (e.g. clear monitoring and reporting obligations and associated enforcement mechanisms) as a means of holding all four nations to account and resolving disputes following the loss of the functions currently carried out by the EU institutions in this respect. There is a clear need for a common framework, in order to achieve sustainable management of shared natural resources and address trans-boundary objectives, such as climate change and biodiversity conservation, and ensure that the UK Government can meet international environmental obligations to which it is committed.

Currently, the CAP provides a policy 'framework' that enables a degree of flexibility, whilst ensuring a level of consistency within the UK. As we leave the EU, replacing this function – or some degree of it – will be necessary. But as agriculture is a devolved competence, the development of any future common UK framework must be achieved through an open and collaborative process between the UK Government and devolved administrations. This should include shared environmental ambition to meet the UK's national and international commitments and obligations associated with biodiversity, climate change and sustainable development. At the same time, it must also allow for a significant degree of flexibility to tailor policy to different situations across the UK, and reflect the differing environmental, social and political contexts in each of the four countries."

¹⁴ https://www.eca.europa.eu/Lists/News/NEWS1610_27/INSR_CROSS_COMPLIANCE_EN.pdf

¹⁵ <https://www.daera-ni.gov.uk/publications/northern-ireland-environmental-statistics-report-2018>

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

Again, Butterfly Conservation echo the ideals of the Nature Matters NI consortium;

“Any future regulatory baseline should be based upon the principle of ‘polluter pays provider gets’. In adopting this principle, regulation can contribute towards a range of policy objectives in its own right. A future regulatory system needs to draw a clear line as to what the taxpayer can expect to receive from regulation and what farmers can be incentivised to deliver under payments for environmental land management. A strong regulatory baseline based on this principle will help to meet a number of environmental policy objectives, e.g. contributing to improving water and air quality, by ensuring that it is unacceptable to cause environmental harm.

However, we have to recognise the past mistakes of previous agri-food strategies and their contributions towards some of the environmental issues facing Northern Ireland today. Land managers cannot be punished for adopting unsustainable farming practises led by historic poorly designed policy. This is particularly relevant considering the problems created by ‘Going for Growth’ strategy in terms of ammonia emissions. A future regulatory system can help farmers to reduce future emissions and should be the goal of a new policy, but in many instances the costs of cleaning up past mistakes should be in the hands of government and the agri-food industry which developed it in the first place.”

Would a driving license style system work for tracking and managing penalties against payments as part of this new system? If land manager is to go through a system of training (see Q11) to bring them in line with the new system this consultation will bring about, could we not have some sort of licence for the new public goods style of farming? Penalties would be issued and tracked like points on a driving licence, and within certain time parameters would be nullified if there was no repeat offence. Certain offences would mean removal of the license, like people who intentionally cause accidents by careless or negligent behaviour behind the wheel. This is a system we all understand and already observe. Could it not be applied to a farming landscape which is working in the public interest? The actions of our land managers very much impact on the wider public health and public good benefits. Behaviour that wilfully damages these systems should be recognised as absolutely unacceptable, with serious financial and reputational implication.

Butterfly Conservation would be particularly keen that future cross-compliance, underpinned by an accurate and robust land-use map that clearly identifies and defines areas of semi-natural habitat, would ensure no further loss of undesignated semi-natural habitats which are so crucial to the ecological integrity of our biodiversity.

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

Butterfly Conservation would reiterate that area based payment schemes are flawed and should not be the basis for future payment schemes. We also have concerns that the basic payment, which is essential income support to our most vulnerable small land managers, has been abused by larger wealthier landowners who simply receive payment for inheriting large estates. This imbalance of 'income support' flies in the face of fair payment, especially if compared to other government disciplines such as the welfare system.

Again, in order to adequately understand these pressures, it is essential our baseline data on habitat quality and extent, especially in undesignated land, is accurate and fit for purpose.

We again echo the wider Nature Matters NI response;

"In a future system we have to ensure fairness between small and large landowners whilst delivering value for money to the taxpayer. Checks and balances will need to be developed to ensure that the majority of resilience support is not unfairly directed to a relatively concentrated number of recipients.

When considering the role of environmental land management schemes in the future, a cap on maximum payments is also important. At present, there is a cap on payments for environmental land management within the current Environmental Farming Scheme. The maximum any farm business can claim within the scheme is £20000 over the course of five years¹⁶. This has already caused a number of problems at present for farmers who have invested significantly in environmental management on large areas of land during previous schemes. This may result in farmers removing valuable conservation options which have been in place for a number of years as a new scheme has developed a lower cap on payments. This ultimately undermines attempts to meet environmental outcomes whilst also potentially discouraging farmers from entering into agreements again the in the future.

Similarly, the current EFS has created a four-option rule for participating farmers, meaning that they are limited to the number of conservation interventions they can undertake on their land. Again, this may serve to undermine attempts at meeting environmental objectives, as good work undertaken in previous years has to be undone to the fit the new requirements of a scheme.

In terms of eligibility, the current minimum threshold for entry into schemes (3ha) may impact upon the ability to meet environmental objectives. For example a landscape which contains numerous small land holdings may also support a large total area of environmentally valuable land. Failing to recognise this and subsequently support these small-scale farmers from managing it correctly may result in a loss of habitat of value or a missed opportunity to support such farmers to provide added environmental benefit.

As such, we would encourage a landscape scale approach towards environmental land management,

¹⁶ <https://www.daera-ni.gov.uk/topics/rural-development/environmental-farming-scheme-efs>

particularly in areas of high environmental value. Ultimately, funding based on the scale of environmental need should help to mitigate these problems, allowing schemes to be developed with the intention of meeting outcomes, with appropriate funding allocated alongside.”

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

No comment at this time

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

No comment at this time

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

No comment at this time

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

As stated above we need to be very cautious in guaranteeing public money for external risk pressures. There must be clear links from the risks identified as to what benefit the public will receive for helping to mitigate the consequences of these pre-defined crises.

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

Butterfly Conservation is supportive of the environmental principles outlined. We would encourage language that emphasises that working in ways that protect and enhance our natural environment ultimately mean we live richer lives as our taxes can be used for other important needs such as education and health, rather than constantly being required to clean up the more negative impacts of agricultural practices,^{17 18} quite apart to the benefits to our health, wellbeing and quality of life. Healthy farms produce healthy food and demonstrating the simple ways that responsible farming benefit us all should be at the core of any future environmental framework.

We would also like to see action against the All-Ireland Pollinator Plan (AIPP) specifically mentioned as

¹⁷ <https://www.belfasttelegraph.co.uk/news/northern-ireland/major-pollution-incident-sees-100000-gallons-of-slurry-released-into-northern-ireland-river-36943270.html>

¹⁸ <https://www.irishnews.com/news/2018/06/27/news/warnings-of-gorse-fires-released-as-high-temperatures-set-to-continue-in-northern-ireland-1366920/>

agricultural land potentially holds the key to the long term survival of many of our wild pollinator groups, especially those with limited foraging capability. The AIPP steering group have worked to produce specific farmland actions that will help pollinators thrive¹⁹ and although completely bee focused, the guidelines contain measures that will also boost other wild invertebrate populations, increasing the amount of prey for predators further up the food chain and helping to maintain diverse floral assemblages, quite apart from the essential pollination service our wild pollinators provide (around £7 million annually just in the pollination of NI apple orchards²⁰).

We are very aware that many of the priority species of both butterfly and moth in Northern Ireland, especially European threatened species such as the Marsh Fritillary, are utterly reliant on agricultural practices to keep the habitats they rely on in favourable condition. Much of our most important and iconic wildlife are intrinsically reliant on farming systems, having evolved alongside human farmers since the Neolithic period. We need farmers if we are to maintain and enjoy these habitats and the species they support into the future.

We would urge any future system to build on the proactive and forward thinking foundations of the current Environmental Farming Scheme where habitats are linked to specific priority species (currently just Breeding Waders and Marsh Fritillary, but a very good beginning to broadening out this approach). These provide a catalyst for mapping semi-natural priority habitat and encouraging land owners who still have and maintain these important and diverse land parcels to increase their understanding of biodiversity issues, make specific and informed habitat management choices, and engage more fully in playing an active part in species and habitat conservation. Further developing the group option is a key element of this and Butterfly Conservation is pleased to see that the pilot group options are being trialled seriously in the current EFS programme.

We are particularly pleased to see specific reference to lowering ammonia emission levels. This unseen background pollution is one of the key drivers responsible for changing vegetation on our semi-natural habitats. If the vegetation changes to only nitrate-tolerant species and we lose our finer wildflowers and grasses, we will lose a very significant proportion of our wild invertebrate species which rely on these for their larval food-plants, leaving us only with species that are tolerant of these conditions, a much degraded fauna.

With future farming incentives likely to be coming directly from the UK/NI public purse, having sound, evidence-based, measureable outcomes for money given that genuinely enhance and increase the sustainability and resilience of our environment also becomes even more important. To support land use practices that degrade the quality of life for taxpayers, or which increases the burden on the public purse e.g. through increasing water treatment costs due to water pollution of wildfires, creating crises by the loss of pollinators for fruit growers and other insect-pollinated crops, lowering tourism perception of the country through damaging the 'green brand', is

¹⁹ <http://www.biodiversityireland.ie/wordpress/wp-content/uploads/Farmland-Actions-to-Help-Pollinators.pdf>

²⁰ <http://pollinators.ie/app/uploads/2018/05/Pollinator-Plan-2018-WEB.pdf> - Page 7

simply irresponsible. The new framework gives us a unique opportunity to make all of us more accountable for the impact we have on the natural world.

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

We agree and support the need for investment into research and education targeted on environmental and conservation management. Again, we encourage a review of current provision to streamline our future practices and ensure we're not needlessly duplicating effort, or increasing a demand for a service that is not yet available. There is time to develop themes and training that is currently at low provision or absent, especially in relation to environmental sustainability and resilience farming. This is, conceptually, a very new way of thinking about agricultural profitability and significant resource will be needed to change the current rhetoric and stereotyped thinking around environmental considerations being a block to agricultural success.

Butterfly Conservation would support, especially with the wholesale movement to online agricultural submission, already seen in the current farming support payments, a series of online training packages being made available to farmers to help them through the transition into this new agricultural framework. Online training materials, webinars, pre-recorded videos to communicate programmes of knowledge transfer, mentoring etc could all take place remotely, rather than increasing time demands for farmers having to travel to our education centres. Distance, flexible learning schemes would incentivise CPD, and being online there would also be a mechanism for tracking specific progress of the individual and also the overall farm business.

In order to qualify for the resilience payment, an introductory programme of web-based resources, two-way to show engagement of the individuals could be introduced, almost like a driving license with theoretical elements as well as practical elements. In the transition phase ahead of us, and if we are serious about truly reinventing our agricultural framework to better represent this new DAERA era of environmental and agricultural objectives with the same weighting, we need a genuine new accreditation to show the land managers have actively engaged with this new ethos and have taken measures to make themselves familiar with the new concepts being put forward. Although the environment has always been an element of previous farming schemes, this is the first time it has been so very much at the heart of the future concept, and never before has the onus on providing value for money due to the reliance on the public purse been so evident.

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

There are some excellent examples in Ireland of proactive, farmer-led schemes with very specific and inspiring environmental agriculture targets such as the Burren and Aran LIFE projects or the recent River Bride scheme on very intensive dairy farmland near Cork city. Co-design has been critical to the success of these projects, not

only by harnessing local knowledge and wisdom, but also by developing and enhancing local pride and ownership of both ideas and the landscape by identifying specific localised issues.

We would be cautious about only advocating outcome based schemes in all cases, but clear indicators of success such as meeting minimum but ambitious environmental standards could be seen as 'outcome based' – the land manager received resilience payment for delivering favourable management by not causing pollution or other cross-compliance breaching behaviour.

For species such as the Marsh Fritillary, which can fluctuate so wildly in population from year to year, having the species present on the land is not viable as a criteria for payment. However, assessing the quality of habitats for supporting this species is easy, with simple criteria for measurement and simple measures to increase habitat condition, as well as a host of other important invertebrate 'by-catch' also utterly reliant on that habitat that act as 'added value' and show the landowner that the measures they are putting in place are having a beneficial biodiversity impact. This is the objective of the Marsh Fritillary project we have currently running as part of the 'Co-Operation Across Borders for Biodiversity' (CABB) project; it is the habitat quality that matters most, not the presence of the butterfly year on year. In areas where the Marsh Fritillary is not known, there is no point implementing these measures, but in areas where Marsh Fritillary are known to breed, and using these breeding records as the locus of a 10km buffer zone of 'influence', we can target the landowners most likely to benefit the butterfly through changing their management practises. We welcome the inclusion here of landscape scale thinking in model design. Our species and habitats cannot and will not be saved by single sites acting in isolation, no matter how good land management may be on those isolated sites.

A similar model could be used for other species, or for linking up our pollinating landscape, but again it comes down to the need for a robust, accurate and regularly updated underpinning mapping system that we currently do not have. **We emphasise again – accurate under-pinning habitat/land-use data is absolutely crucial for any future environmental policy framework to work effectively and cost-efficiently.**

Involving land managers in the mapping and updating of their farm records with this new habitat quality data, with the incentive that the higher the quality of their habitats the higher the rates of payment or something similar, would greatly increase the resolution of data, and also incentivise not damaging habitats further in the future. This is not going to happen overnight. The Burren LIFE project, one of the most successful farmer-led projects in Europe, has been running for over two decades and took considerable time and resource to embed locally and nationally as a ground-breaking approach to such programmes. We must recognise the need to resource effectively for longer than just a few years if we want to see these types of schemes bear real fruit.

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?

Butterfly Conservation broadly supports the view of Nature Matters Northern Ireland.

“The direct link between expenditure and an action or result is one of the best ways of securing value for money, and creating transparency about what public money is paying for. Importantly, it also fits with the principles that the more someone does to provide public benefits, the more they should receive in return. This has been the approach adopted through current agri-environment schemes which work upon the basis of income-foregone and costs-incurred, which is a more effective way of achieving environmental outcomes than other currently available options (area based payments with associated conditions).

However, using income-foregone and costs-incurred does present some issues. Creating enough of an incentive to secure sufficient uptake, or uptake in the right areas can be problematic, especially in sectors of agriculture that are potentially highly profitable. At the other end of the scale, where income from farming is low or non-existent, payments can be very low, even if the environmental benefits are significant.

It is necessary to create environmental payments which are attractive to farmers and land managers, whilst also providing clear value for money to the public.

To further understand how this can be achieved, we encourage to DAERA to explore three areas;

1. **Whole farm costs:** It should be possible to treat the costs of running a farm business as a cost associated with securing an environmental action or outcome, where that far, system is essential in securing environmental public goods²¹. This would refer particularly to economically marginal but environmentally important High Nature Value farming systems such as the uplands of the Antrim Hills, wet grassland systems of Lough Beg or purple-moorgrass and rush pastures of Fermanagh and South Tyrone.
2. **Transaction costs:** Environmental land management may often incur significant transactional costs beyond those associated with a specific intervention. This will often be the case with regards to landscape scale cooperation, or where significant training and advice is required.
3. **Costs associated with long-term land use change:** Certain land management interventions, such as habitat creation, will incur costs that extend beyond five or ten-year management contracts. In conjunction with other policy mechanisms, there may be scope for higher upfront payments to recognise these long-term costs, on the condition that the land use change in question is maintained in perpetuity.

As an alternative to these approaches some have suggested making payments based on the nominal value of ecosystem services provided. We believe that this approach would be flawed for the following reasons:

²¹ Barnes A.P., et al (2011), Alternative approaches for non-economic farming systems delivering environmental public goods. Report for the Land Use Policy Group.

1. Farmers and land managers do not 'own' the full value of ecosystem services flowing through their land. For example, the value of clean water may be considerable. It is not reasonable though to expect downstream beneficiaries to pay the full value of this for two reasons-
 - a. It is an offence to cause or knowingly permit pollution. Much of the value of clean water is not something that should be paid for therefore, but something that society can reasonably expect to be provided through compliance with legislation, or societal norms.
 - b. Allowing land managers to levy a fee for services based on the nominal value of ecosystem services when they often have a monopoly over supply of that service would not be acceptable, and is not tolerated in any other sector.
2. Valuing ecosystem services is difficult and contested with no reliable or accepted means of doing so at a finite spatial scale such as an individual farm. Monetising those values, where they are possible to define, is an additional complex task.

Monetising outcomes from land management interventions is useful in understanding what the benefits of these for society, and therefore the case for public investment. However, it does not – for the reasons described above, present a sound basis for calculating payments to farmers and land managers. “

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

Butterfly Conservation broadly supports the response of Nature Matters NI;

“Creating a fair and transparent supply chain, that encourages and rewards positive environmental land management will be a significant tool towards developing a truly sustainable farming sector for NI.

With well-targeted support, innovation and will, we can create a premium sustainable brand for NI food based on food of the highest quality, with high welfare standards and sound environmental management.

This could take the form of accreditation schemes, which can ensure that food produced to high environmental standards is properly recognised and rewarded by the market. For example, beef produced in Marsh Fritillary hotspots could be recognised for the valuable contribution that land managers are making towards saving these and associated species. Alternatively livestock used to manage species-rich grassland could generate a better price because of their unique and rich flavour and health benefits that they produce²².

Such moves are already being witnessed in NI, where farmers producing high quality, high welfare, and environmentally sound products are succeeding within the market place.^{23,24} Government could support programmes to build and develop these brands and products, with the product being the character and health of the landscape as much as the food itself. Improved branding and support in accessing markets can

²² <https://www.pastureforlife.org/media/2016/01/pfl-it-can-be-done-jan2016.pdf>

²³ <http://www.glenarmshorthornbeef.co.uk/>

²⁴ <https://www.broughgammon.com/>

help to create a sustainable food image that genuinely lives up to its reputation, generating better market return, sustaining farmer livelihoods and restoring the environment.

Such a move is being championed within Exmoor National Park which has been developed by a range of stakeholders with an interest in the area.²⁵ This approach, entitled Exmoor's Ambition, outlines a path to build economic and environmental resilience as a 'public money for public goods' programme. Within this, the development a top-quality brand based on the environmental integrity of the food produced in the landscape plays a key role.

In the Netherlands significant work has been undertaken to improve the environmental sustainability of the dairy industry. Working in collaboration, Friesland Campina, Radobank and the World Wildlife Fund are developing innovative measures to help farmers in the restoration and conservation of the environment²⁶. Working with farmers they will map out the measures taken by the dairy farming sector in order to protect biodiversity. These include measures to improve functional agrobiodiversity, the diversity of the landscape, the diversity of species and regional biodiversity. A new Biodiversity monitor has been developed to facilitate and evaluate this, demonstrating the performance of dairy farmers in respect to environmental sustainability. The intention is that dairy farmers who are performing well will receive recognition through the supply chain for this valuable work, through for example favourable interest rates at the bank or a premium price for their product. Similar moves could be adopted in many key landscapes and industries within Northern Ireland, helping to sustain farmers commercially as well as the environment physically.

Customers have an important role to play within this process, as they ultimately are the ones who purchase and consume many of these products. Branding and marketing will be important, as will a greater awareness of their roles in supporting the local food system. Developing a greater recognition and awareness of positive environmental management in farming can help do this. Improved public awareness of the positive impacts of agri-environment schemes would allow more people to better understand the link between their tax money, their spending on food, and the management and resilience of the countryside."

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

Butterfly Conservation echoes the views of the wider Nature Matters NI Consortium:

"Numerous examples of well-designed agri-environment schemes provide a proof of concept on which to build upon. The evidence suggests that well designed and implemented schemes, supported by an effective regulatory baseline, provide significant benefits for farmers, land managers and the environment. Positive results have been achieved in a number of areas, including the uplands of Glenwherry and the wet grasslands of Lough Beg and Lough Erne where farmers have helped reverse local declines in breeding waders, to County Down, where agri-environment options are providing widespread benefits for priority seedeaters. We have

²⁵ http://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0010/1112869/ExmoorsAmbition_Web.pdf

²⁶ http://biodiversiteitsmonitormelkveehouderij.nl/docs/Biodiversiteitsmonitor_engels.pdf

high hopes for the new Marsh Fritillary measure within the current EFS scheme and will be supporting DAERA in collating evidence to support this.

The best examples of these schemes provide a starting point for an expanded and more ambitious future environmental land management system, delivered at a landscape scale. These examples highlight the need for any future environmental payment system to include.

- a. A **degree of targeting**: to ensure that management interventions are at the right scale, and in the right place for a given objective. This will be crucial in delivering value for money.
- b. Investment in **expert, trusted advice**, central to securing value for money and the buy in of the farming and land management community.
- c. A **strong evidence base** as to the effectiveness of different management interventions, and the scale at which they need to be deployed.
- d. Investment in **monitoring and evaluation** in order to understand the effectiveness of any policy intervention, and to drive constant improvements in design and delivery. To achieve this, a degree of national oversight and scrutiny will be needed.
- e. **Farmer buy-in** as a prerequisite to success, that can drive uptake even where the management interventions are challenging and ambitious.

The above points will help to achieve this in providing the confidence that a given intervention will deliver the target outcome, as well as processes for managing applications and contracts that are fit for purpose.

A prime example of a project which embodied these core features is evident within the mixed and arable farmland of East County Down. Here, a range of farmers have effectively used well placed agri-environment options and access to expert ecological advice to significantly increase populations of threatened seed eating species on their farms. This project epitomised these core principles, being targeted to the right landscape, with dedicated expert advice being administered to ensure that options were located in the right place and that the farmer was managing them correctly. Monitoring and evaluation was carried out throughout to assess and measure progress, whilst farmer buy in was achieved because of the relationships built between themselves and the advisors. Because of these features, this project provided huge wins for wildlife, with population increases of 79%²⁷ for the red listed Yellowhammer on farms which received the most dedicated advice. These increases took place in the face of wider declines throughout the rest of the countryside.

One of the keys aspects towards increasing uptake in future land management schemes will be the role that the Department plays in promoting and advertising them. Farmers need to be made fully aware of schemes, when they open and the benefits that they can bring to their farm business. This needs to be communicated by staff in the department when working with farmers, through the newly formed Knowledge Advisory Service and through a range of communication channels.

²⁷ <https://www.tandfonline.com/doi/full/10.1080/00063657.2017.1415296>

In the future, we need to be aware of poor scheme design, inadequate systems and processes, the presence of low value for money options and poor targeting. To varying degrees, these have all reduced the effectiveness of schemes in the past. Additionally, previous budgets have never met the scale of need. The case for investing for investing in a more ambitious environmental land management through public policy is solid. The future system must be well designed and properly funded to achieve our environmental obligations, including having a robust land use map at a resolution that is fit for purpose.

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

No comment at this time.

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?

No comment at this time.

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?

No comment at this time.

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.

No.

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.

No.

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.

No.

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.

No.

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.

No.