

Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement

Stakeholder Responses

D-G

[Click on each name to see their response]

Contents

DAB FARMERS' ASSOCIATION	2
DAIRY UK	9
DALE FARM COOPERATIVE LTD	18
DEMOCRATIC UNIONIST PARTY	22
DEPARTMENT FOR COMMUNITIES, HISTORIC ENVIRONMENT DIVISION	34
DEPARTMENT FOR INFRASTRUCTURE, WALKING AND CYCLING UNIT	38
DOBBS, MARY; GRAVEY, VIVIANE; AND PETETIN, LUDIVINE (JOINT RESPONSE)	39
FARMERS FOR ACTION	63
FERMANAGH AND OMAGH DISTRICT COUNCIL	69
CLLR SHEAMUS GREENE	82

DAB FARMERS' ASSOCIATION

Our group's membership is composed of practical farmers located to the southern side of Dungiven, our members all being cattle and sheep farmers. 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 50% 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.

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.

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 50% 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.

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. 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.

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.

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?'.

October 2018

DAIRY UK RESPONSE TO 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?**

We would support the retention of entitlements until a new agricultural policy framework is agreed as it helps to ensure that agricultural support is retained by active farmers.

- 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 would support the abolition of greening requirements as they have not shown themselves to be particularly effective in achieving their environmental objectives. Generally for environmental schemes to be effective they should be voluntary, multi-annual and targeted. Greening measures are effectively compulsory, annual, generalised and disproportionately administratively burdensome.

- 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?**

We have no views on this issue.

- 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?**

The Government should meet any legitimate expectations created by the YFP scheme.

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

Further applications to the YFP after 2019 should not be accepted (see answer to question 6 below).

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

There is a constant need for generational renewal in farming. However the YFP may only create incentives for artificial changes in farm ownership. Generational renewal would more effectively be achieved if the industry was perceived to be profitable, dynamic, innovative and held in esteem by Government and society. This requires a broader range of measures than delivered by the YFP such as tax allowances or tax incentives.

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 would support the retention of the other elements of the current direct payment schemes listed in 2.7. Aid should be focused on active farmers and actively managed land. Recipients should continue to be bound by cross compliance obligations as these basically require compliance with existing legal obligations. There would be little justification for changing the administrative elements for direct payments listed in the remainder of 2.7 in the time available.

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.

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?

We strongly agree that there is a requirement to improve the productivity of agriculture in Northern Ireland across all sectors. However, productivity is a rather narrow concept that focuses on the rate of output per unit of input. We would contend that 'economic sustainability' would be a more appropriate concept to drive the development of policy. This covers a broader range of criteria that would be relevant to the future of agriculture in Northern Ireland. As such it opens up a wider spectrum of policy objectives for consideration than would be available from a narrow focus on productivity.

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 this should be a priority area. Whatever the resources available to agriculture, whether land, capital or labour, ultimately it is the expertise with which they are utilised that determines the viability of agriculture and mechanisms should be found to increase the uptake of training.

However there are other mechanisms that could supplement the provision of training that would also drive forward the acquisition of expertise. A powerful supplementary mechanism

is benchmarking. This requires farmers to measure relevant key performance indicators for their farm and then share this data centrally to permit comparison. This effectively requires the use of electronic recording systems. Once the data is centralised it can then be used to:

- Enable the compilation of industry aggregate data that would help to identify sector deficiencies in performance that can be used to inform the development of Government policy, Research and Development objectives and commercial opportunities for agricultural suppliers
- Provide comparisons of the performance of individual farms against their peers. This would then provide the farmer with the information they require to identify the management issues they need to rectify which would inform investment intentions and also the acquisition of the training and CPD they require. This would create the demand for the provision of training as opposed to the penalty regime type approach set out in the consultation document.

The Government could play a major role in facilitating the further development of industry wide benchmarking systems that would encourage digitisation of the sector. The Government should therefore seek to build on the existing NI programme which currently is a partnership scheme between NI milk purchaser members of Dairy UK and DAERA to focus on DAERA benchmarking model to help farmers drive efficiency.

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?

It would be legitimate for Government to require that public support should only be provided to parties that are qualified to receive it and there is a clear need to encourage the uptake of training in agriculture in Northern Ireland. However linking access to support instruments could be seen as effectively seeking to penalise non-participants which would create a negative reaction against the concept leading farmers to under-value the training provided. Careful attention would need to be paid to exactly how the incentives for participation were presented to the industry to ensure a positive response.

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

As indicated in response to 11 above positive as opposed to coercive incentives should be used for any scheme. Care would have to be taken to ensure that any scheme was practical and easy to administer.

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?

Public funds need to be made available for on farm investment across a range of measures targeted at economic sustainability and environmental good practice. The policy framework

should be flexible and adaptive to allow the emphasis between different investment objectives to be changed depending on the circumstances of each sector. An institutionalised consultative mechanism should be put place to ensure that the views of each major agricultural sector were fully taken into account.

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

The precise financial mechanism used to incentivise investment should be tailored to the requirements of individual objectives. These could include those listed in question 14. Ideally the legal framework should not be exhaustive and give the flexibility for new financial mechanisms to be experimented with.

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

The Government should examine the barriers to industry exit that prevent farmers from leaving the sector when they would wish to do so. In particular it should examine whether farmers are under a stronger incentive to pass on their accumulated wealth through inheritance compared to selling a farm whilst they are alive.

Separately the Government should consider whether incentive schemes for industry exit could be devised that were cost effective and did not create perverse incentives for manipulation of legal identities. This would help to accelerate industry restructuring through the release of land and resources.

The Government should also seek to invest in the Land Mobility Scheme and examining tax incentives for making longer term leasing more attractive to both lessors and leases.

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

Given the exposure of NI dairy farmers to international markets and direct competition from EU subsidised competitors, some mechanism needs to be provided to improve the resilience of NI farmers to market volatility, both in input and outputs.

However the measure described would have the difficulty of the existing direct payment system in that over time a payment system based on land area would eventually be capitalised in the value of land. It would become immediately apparent in the value of rented land, but if farm restructuring accelerated, then it would also affect the value of owner-occupied land. Flat rate payments may also provide an incentive to continue to engage in risky behaviour and reduce the incentive to improve farm resilience.

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

If the Government wished to implement a farm resilience support measure then it should be minimally distorting between different agricultural sectors. This would require the payment

not to be linked to land usage.

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

If an adjustment is to be made to payments made on land area it should be based on the agricultural potential of the land. Less productive land should attract a lower level of payment to ensure that the payment did not subsidise unproductive activity.

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

Cross compliance obligations represent linking payments to compliance with existing legal requirements. These requirements remain in place whether or not payments are made. Enforcement of these requirements should not be linked to crisis support measures or income resilience payments which may only be periodic depending on market developments.

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

Cross compliance can become an instrument for incentivising improvements in agricultural practice if the Government linked it to policy objectives targeted at positive changes in land management and competitiveness, i.e.; requirements for operating soil management plans for enhancing soil quality. However, this would essentially change the characteristic of a farm resilience support measure from a minimal economic support instrument to an economic and environmental sustainability measure. This would be inconsistent with a light touch approach to regulation by Government. A more logical approach would be to keep the two policy measures separate.

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

The cross compliance regime should be determined by the need to enforce relevant standards and not by the resilience support regime.

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

Any basic farm resilience support measure should not be subject to capping or tiering. Larger farms should not be discriminated against. The Government should not seek to protect farms that suffer from diseconomies of scale as this reduces the incentive for industry restructuring.

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

The basic implicit objective of the farm resilience measure is to provide a minimum degree of income support. Ideally this should only be provided by Government when it is required, when farm income is subject to cyclical downturns. Any insurance type measure should be subsidised by the Government otherwise, if it was funded exclusively by farming, then it would only take on the character of a structured savings scheme.

One variant the Government could consider is to provide farmers with an incentive only to take their farm resilience payment when they need it by offering a high rate of interest if they decided to forgo the payment for a year, with an even higher rate for a second year. This would act as a subsidised saving scheme which would incentivise farmers only to take the payment when they needed it.

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

Anti-cyclical/insurance type measures should not be sector specific. They should be aimed at income protection whatever the type of farm enterprise as a sector specific approach would act as a distortion in the utilisation of land in Northern Ireland.

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

The government should explore the use of fiscal measures to help the industry address income volatility. Separately the Government should examine the use of fiscal measures to incentivise investment. The loss of the agricultural buildings allowance has had a major impact on the level of farm investment.

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

The Government needs a policy framework to address shocks to agriculture over and above normal price volatility. Pre-defined and agreed crisis response framework would reduce the pressure on the Government for action that was not justified by circumstances. However, it could also potentially deprive the Government of the flexibility required to respond to episodes just falling short of a full-blown crisis.

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

We support the principles set out in the consultation document. A further over-arching principle that could be added is that environmental policy should be within the broader framework of sustainability, which requires an appropriate balanced reconciliation of environmental objectives with social and economic concerns.

In addition, as an elaboration of the collaborative approach, there should be a recognition that major changes in the environmental policy framework should be phased in over an appropriate transition period to give agriculture time to adapt.

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 fully support the need for research and education in this area to equip farmers to meet the Government's policy objectives.

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

Outcome based measures co-designed with farmers and land managers would be the right approach for the development of environmental policy. However, this is not to deny that significant challenges that will arise in identifying appropriate outcome measures and the means to measure delivery by individual farmers.

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?

Historically the costs incurred/income forgone approach has not shown itself to deliver the level of participation desired from farmers in agri-environment schemes. In particular the level of compensation made available has been inadequate to incentivise participation by dairy farmers. If farmers are to be rewarded for providing public goods then a new approach needs to be found. They should be based around the Government setting targets for the level of participation required and then using financial inducements to ensure these targets are met.

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

It is important that the NI Government communicates to the public that livestock agriculture in NI is sustainable and that it demonstrates a willingness to support the industry from unjustified criticisms by environmental activists and lobbying organisations.

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

This is a complex area that requires further examination by the Government. Time should be taken to trial new models to ensure that they are adapted to the needs of agriculture.

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

The dairy sector is already amply provided with market data, either through the Market Intelligence service provided by AHDB, or through the Commission's Milk Market Observatory, which will still remain relevant once the UK leaves the EU as the NI dairy

industry has a strong international focus. At this point in time regulatory intervention by the Government for the provision of additional data is not required.

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?

Co-operatives account for the overwhelming majority of milk processing in Northern Ireland. Co-ops are in regular communication with their members. Supply chain awareness training is important and past schemes have been a success in the dairy sector. Initiatives to encourage farmers to engage in business planning, benchmarking and risk management would also be strongly welcomed.

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?

As farmer owned and controlled entities co-operatives ensure that highest degree of collaboration between farmers and processing. There is therefore **no** need for action by the NI Government to improve collaboration in the dairy industry supply chain.

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.

DALE FARM COOPERATIVE LTD



Tue 09/10/2018 07:57

Consultation on the NI Future Agricultural Policy Framework

o DAERA NI Future Agri Policy

Response

Message

Future Agri Policy Response.docx

Dear Norman

Please find attached the response to the consultation on the NI Future Agricultural Policy Framework on behalf of Dale Farm Cooperative Limited.

Should you have any questions around this response please contact myself via the email or phone numbers given below.

Kind regards,

Keith

Dr Keith Agnew
Managing Director
Dale Farm Agri Division
8 Northern Road
Belfast
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Response to the consultation on "Northern Ireland Future Agriculture Policy Framework."

Question	Remarks
1	Support the retention of entitlements as the basis of support until a new agricultural policy framework is agreed.
2	Support the abolition of the greening requirements stated and the incorporation of the payment into the BPS entitlement values.
3	No objection to the current ploughing ban on environmentally sensitive permanent grassland being retained. This could be brought under current Environmental Regulations or be made a condition of receiving the BPS payment.
4	No objection to the proposal that those accepted into the YFP up to and including 2019 should continue to receive payment for the full period of eligibility. However, there is the risk that including 2019 will lead to a spike in applications.
5	There is a need to attract new entrants and young people into Agriculture. Should the YFP and regional reserve be removed, then alternative methods of support should be examined. Should also be related to taxable income to ensure there is a real benefit.
6	The overall aim must be the creation of sustainable and viable farm businesses for the future, which are profitable, efficient and have sufficient scale. The current BPS system or one based on a flat rate per hectare basis do not encourage flexibility or productivity. A number of methods should be examined including; <ul style="list-style-type: none">- Introduction of retirement schemes- Tax breaks for people selling land to an active farmer or new entrant

	<ul style="list-style-type: none"> - Open and flexible schemes to encourage the leasing of land to ensure ground is available to efficient producers which would have both productivity and environmental benefits - Capital allowances to encourage modernisation of buildings and equipment. This could be aimed at various areas such as improved welfare, reducing labour requirement, increasing data gathering and analysis or reducing emissions.
7	<p>Not opposed to retaining the elements of the current direct payments detailed within section 2.7. It is noted that maintaining the key dates within the current system would provide clarity and some certainty over cash flows for businesses. The penalty regime and principle of retrospective recoveries require re-examination to ensure they are proportionate and equitable to all parties. Yellow card approach should be retained.</p>
8	<p>Support the option to freeze the value of entitlements at the end of 2019 level and abandon any further move towards a flat rate payment.</p>
9	<p>Supportive of the “Productivity Grand Challenge” approach. However,</p> <ul style="list-style-type: none"> - Government and the industry need to work in partnership - Needs to be a holistic and joined up approach taken where improvements in modernisation and productivity and their effect of improving environmental issues are recognised - Productivity needs to be seen in the context of profitability - Need for more research in to environmental mitigation strategies and, in particular, the role of grassland systems in Carbon sequestration.
10	<p>Supportive of investing in education and knowledge transfer. The viability of any farm business is built on the expertise with which the resources of land, capital and labour are utilised. Improving the knowledge and skills of those involved in the industry can only be of benefit.</p> <p>In this “Digital Age” there is a real need for Government to ensure that the infrastructure as well as the skills are in place, so the industry can take advantage of the advances in information gathering, analysis and decision making.</p>
11	<p>Would not be supportive of linking educational attainment to the ability to access funding or advice. This could be seen as discrimination against those that do not participate.</p> <p>Strongly support that a reduced risk rating for official inspections should be attained through earned recognition for a history of previous compliance rather than on educational attainment.</p>
12	<p>Supportive of investing in a CPD program which is targeted at delivering specific benefits to businesses and the wider industry. This could be linked into an earned recognition scheme.</p>
13	<p>Fully supportive. However, the current situation where planning applications, which would lead to the uptake of technology and innovation, have been put on hold due the level of ammonia emissions is likely to reduce the confidence in and uptake of such schemes. This is an area where collaboration with the different sectors within the industry could be used to ensure that the appropriate measures are put in place.</p>
14	<p>Interest rate subsidy schemes haven’t been flexible enough in the past and don’t have a good track record. The focus should be on reform of taxation to encourage investment. Current taxation often disincentivises farmers to take up grant funding.</p>
15	<p>Need to drive a positive image of agriculture to attract the next generation. Should also examine what farmers see as the barriers to exiting the industry.</p>
16	<p>Supportive of a basic farm resilience support measure which is targeted at active farmers and increasing productivity.</p>

17	Do not believe that area (per hectare) based payments will improve productivity and, therefore, will not increase the long-term resilience of farm businesses. Thus, payments under a farm resilience support should be linked to productivity measures.
18	Would not be supportive of targeting the basic farm resilience support payment to take account of issues such as natural disadvantage.
19	Supportive of retaining the link between a farm resilience support and cross compliance. However, cross compliance should be simplified and be proportionate to the level of support available.
20	As previously stated in Question 2, greening should be removed as not relevant to NI.
21	Should be determined by the objectives of the farm resilience support measure.
22	Supportive on tiering or capping of a basic farm resilience support payment. This should be used to ensure funds are targeted at viable agricultural enterprises and support the family farm nature of the NI industry.
23	Do not support the introduction of anti-cyclical/insurance type measures to address volatility. Have concerns that such schemes are highly bureaucratic and carry a high administrative cost and as such would prove to be poor "value for money". In addition, large amounts of data would need to be gathered and analysed at farm level to operate such schemes.
24	See response to Question 23.
25	Would support the enhancement of fiscal measures as a means of addressing income volatility. Measures such as Capital and Annual Building allowances have been successful in the past and would encourage investment. Would view the introduction of deposit or savings schemes, in which farmers could credit income (before tax) in profitable years and draw down these funds in challenging years (paying tax at this point) as a very positive measure in helping to address income volatility.
26	Believe the ability already exists at a National level to introduce measures to respond to crisis events and therefore don't see the need to change this.
27	While any future policy should recognise the impact of farming on the environment it should also recognise the positive contribution agriculture can play on the environment. It is widely quoted that agriculture is responsible for 27% of total NI GHG emissions in 2015, however, this also means that other sectors were responsible for 73% of those emissions. Concerned that the scientific evidence/knowledge is not available to support the introduction of environmental principles. Hence, there is an immediate need to invest in gathering and evaluating the evidence base to develop and underpin a sustainable future policy. In addition, to be able to include environmental principles within any future policy framework requires mitigation strategies to have been agreed between government and the industry, which is far from the case at present. There also needs to be a holistic approach taken rather than isolating individual environmental indicators and a recognition that improved productivity can lead to better environmental outcomes, for example in carbon intensity and GHG emissions.
28	Strongly support the need for investment in research and education targeted at environmental management within the agricultural sector.
29	Strongly support the need for collaboration between the farming industry and government on designing outcome based environmental measures. However, there is little evidence of this collaboration at present. Would be keen to examine how land management of marginal land could be developed for improved habitat or flood management, while allowing productive land to be managed in a sustainable and intensive way.

30	Support the principle but would have concerns that this could reduce the funding available to support other measures eg the basic resilience payment.
31	Believe that market forces will drive the agenda for change. Would avoid developing schemes which lead to trading credits or certificates which can result added costs within the industry with limited improvement. It is also vital that Government promotes a positive image of NI livestock agriculture to the public.
32	Believe that delivery models should be based on voluntary schemes which farmers can opt in to rather than blanket regulation. However, which ever delivery method is chosen the implementation should not be at the detriment of improved productivity. Should also be careful not to see food production being transferred from a highly productive area where to an area of lower productivity and potentially a higher environmental cost.
33	Government should recognise the transparent nature of farmer owned and controlled co-operatives. There is a role for government in gathering and publishing market data.
34	Would be supportive of CPD being introduced throughout all parts of the agricultural industry.
35	Again, there needs to be recognition of the role farmer co-operatives play in promoting collaboration and transparency within their membership. While there is a role for government in promoting collaboration within the supply chain, the use of written contracts (which is viewed as evidence of commitment to effective supply chains) is not the answer in all situations and can potentially reduce the flexibility of an organisation to quickly react to market changes.
36	No comments
37	No comments
38	No comments
39	No comments
40	No comments

DEMOCRATIC UNIONIST PARTY

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?**

The DUP supports the retention of entitlements as the basis of direct support until a new agricultural policy framework is agreed. It is important to put on record the importance of direct support to farmers and that food production /supply security should be seen as a public good. As part of the Confidence and Supply agreement between the DUP and the Conservative Party, the DUP ensured that the amount of money going towards agriculture is being maintained until the next Westminster election. The DUP delivered this finance in order to ensure that there was a smooth transition from the current support policy to a new support policy post Brexit. We believe that the retention of entitlements will allow for this transition. No new system should be introduced until there is a Minister and Assembly in place to scrutinise any new system. In order to support productive agriculture, applicants' single farm payments should be fixed at the 2019 rate. It is also important to put on record the need for UK frameworks to be put in place to ensure the proper functioning of the internal UK market, a missed opportunity in UK Agriculture Bill.

- 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 support this proposal. We believe that these measures are examples of how the EU overcomplicated support payments to farmers. By doing this farmers should not be financially worse off but see a reduction in unnecessary red tape. All options available to reduce the bureaucracy facing both the sector and DAERA should be used. If we are to deliver for the environment we should move

ahead in implementing specific schemes with clear environmental and productivity benefits like The Sustainable Land Management Strategy.

- 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 DUP support assisting productive agriculture in a sustainable manner. We support the retention of the current ploughing ban on environmentally sensitive, permanent grassland. This should be policed using the cross compliance system that will be associated with retaining entitlements until a new support system is introduced.

- 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?**

Those accepted into the YFP up to and including 2019 should continue to receive payments for as long as they are eligible to do so. Checks should however continue to be carried out to ensure that those who are accepted into the YFP are active and involved in productive agriculture.

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

We need a scheme which ensures productive farmers can enter the scheme and allow genuine young farmers access to land. We see merit in a new support system for agriculture allowing for generational renewal.

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

The most effective means that will allow for generational renewal is a profitable agri-food sector where primary producers are rewarded for their work. It is therefore vital that Northern Ireland is able to take advantage of leaving the EU

both from reducing bureaucracy associated with the current support system and being able to take advantage of any competitive advantages that are available to the UK outside the EU. One of the greatest barriers to preventing generational renewal is getting access to affordable land. A combination of the support entitlements being linked to land and the current conacre system is preventing land being freed up for new farmers wishing to commence and grow the area of land they farm. We also are supportive of long term leases and using tax incentives to help encourage 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?

Leaving the EU is an opportunity to reduce the amount of red tape associated with the CAP. Key dates for submission of the application form and payments should be retained, with 100% payments issued from mid-October. Steps should be taken to simplify the cross compliance system with the removal of dates for spreading organic and inorganic fertilisers and replacing them with a more science based approach as outlined in the Sustainable Land Use Strategy. Cross compliance should be streamlined with greater use of the “yellow card” principle and a review of the unfair penalty matrix which we currently operate.

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.

See question 7. Depending on the UK’s future trade policy it is vital that Northern Ireland is able to compete with farmers on a global basis. The Department should consider using WTO Amber Box type support to ensure that the local sector can compete with other regions of the world. DAERA should also be aware of the impact the CAP will have on our closest neighbour the Republic of Ireland and adapt to any specific challenges. We believe that the closing dates for spreading fertilisers and slurry should be replaced with a more scientific approach; the dates for cutting hedges should be brought forward to 15 August.

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?

We accept the need to drive productivity in all sectors within the Northern Ireland economy including agriculture. It is vital that the Department, across its entire remit, has a focus on improving productivity and profitability within the sector and not just focused primarily on the environment. One of the key ways of doing this is to target support towards productivity and not drive it towards an area based payment which would result in a further decline in productivity. DAERA must be willing to pilot projects in the first instance which are innovative. If successful there should be an wider rollout of the scheme. This is essential to drive productivity.

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 believe that steps should be taken to improve both the education and knowledge transfer for those working within the sector. The education and knowledge transfer should however be relevant, focused towards the target audience and be of benefit to the participant rather than being a requirement to avail of a particular scheme. In relation to education provision in Northern Ireland we would like to see a wider range of degree courses available, for example, pure agriculture and agriculture with added disciplines like economics or the environment. It is vitally important that all educational facilities provide good quality, relevant provision while having a clear path for educational attainment. Ultimately at all attainment levels education must reflect the needs of the wider industry and the primary focus should not be student numbers.

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 agree with this providing that the qualification is of benefit to those taking the course. We also need to ensure that we are raising educational knowledge for all in the sector.

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

We see merit in supporting continuous professional development. It is vital that we learn from best practice both within and outside Northern Ireland. Ultimately CPD should be relevant to the business and focus on key areas like profitability, efficiency and becoming more environmentally sustainable.

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 support the provision of investment that is specifically targeted on innovation and new technology uptake that is aligned to other strategic objectives including the environment.

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

With interest rates still at relatively low levels, we are not convinced that there would be an appetite for investment incentives, other than capital grants; this however could change quickly post the UK leaving the EU and should therefore be kept under review. The agri-food loan scheme was set up as a result of the Going for Growth initiative set up by the industry. This scheme resulted in very little Government support going to the sector but did free up additional finance from the banking sector. It is important that any future framework builds in the flexibility to adapt quickly to the needs of the industry through a wide and varied toolkit of options.

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

Currently one of the greatest barriers to sector growth is lack of clarity from DAERA around environmental legislation and its impact on planning issues. Resolving this issue would allow for sustainable growth in this sector. It is important that any future framework builds in the flexibility to adapt quickly to the needs of the industry through a wide and varied toolkit of options.

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

It is vital that there is an orderly transition between the current entitlement system and any new system. The provision of a basic farm resilience support measure needs to be considered as part of a longer term agricultural support policy. There are merits in retaining a basic farm resilience support measure but this should be set at a level that does not skew the land tenure market and needs to be targeted towards active farmers. The future support system for NI agriculture should be focused on supporting sustainable productive and profitable agriculture and have a mechanism of dealing with market fluctuations.

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

This could be targeted at the number of full time employees involved on a farm business and not the area of land farmed. Adjustments could be made to deal with different sectors or farming landscapes that justified different resilience support, for example those farming in areas of natural disadvantage. An alternative would be basing it on the number of livestock held on a particular holding. We believe this support could fall under WTO amber box criteria but that the UK (and Northern Ireland) will have sufficient headroom to allow for this support.

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

There are merits in this proposal but it should not be linked to land. See question 17

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

In order for the applicant to receive public support, we would expect that they have to meet certain standards. We do however believe that if the cross compliance criteria are set at an onerous level, many farmers will opt out of the scheme rather than working to meet the cross compliance standard.

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

Going forward cross compliance must continue to protect the environment, animal health and welfare and ensure robust traceability. However there should be a review carried out measuring the success of these measures in the past. Cross compliance should remunerate farmers for providing assurances which the market will not.

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

Cross compliance regime must encompass a penalty matrix which ensures the penalty is proportionate to the crime. The current regime is very heavy handed in some respects and makes farmers extremely frustrated. There must be a clear communication strategy put in place to inform farmers of their responsibilities. It is vital that a continuation of yellow card system is used allowing farmers the opportunity to correct a noncompliance with facing penalty. There must also be a fit for purpose appeal procedure which ensure farmers receive a fair hearing.

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 believe that an eligibility threshold should be introduced to ensure that money is not being targeted at non-commercial holdings. We believe that the measure should be based on the number of labour units on the holding or the number of livestock units on the holding rather than the area of land farmed.

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

We believe that the Department needs to actively explore options that will deal with volatility. We believe that these measures would operate best on a UK wide basis and not be for Northern Ireland on its own. We are not aware of any successful global schemes that have operated over a long period of time and therefore find it difficult to answer these questions. With the size of Northern Ireland, it is difficult to see how an insurance type scheme would work to address volatility. We believe that the processing sector is better suited to offer longer term contracts to deal with volatility.

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

See 23

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

We do believe that fiscal measures are a means to deal with volatility. We believe there is merit in looking at further changes to fiscal rules that allow for market volatility.

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 support this framework but it needs to be a UK wide framework and funded out of central UK funds. Northern Ireland, and the other regions, may have separate trigger mechanisms that trigger the UK wide fund.

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

We support the high level principles outlined in the document provided that they are implemented in a measured and reasonable way. We believe that the Department needs to carry out a Gateway review of the first tranche of the Farm Business Improvement Scheme and in particular how there was conflicting policy advice coming from different sections of the Department regarding this scheme. This conflicting advice has led to a great deal of nervousness and uncertainty within the industry. We believe that Northern Ireland can support a productive agricultural sector in an environmentally sustainable manner. It is vital that any future policy framework has targets both for the environment and for the economy. We do have concerns that if a future policy has only environmental targets, this will result in a significant decrease in the number of livestock. This will have two long term impacts, it will result in a decrease in the number of people employed in the agri-food sector and it will result in a further destocking of disadvantaged areas that will result in further environmental damage due to under-grazing.

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 support this proposal. Government should be investing heavily in research to deliver clear and accurate scientific evaluation of environmental issues but also scientifically robust mitigation measures. In respect of education we must see more practical environmental focus to ensure those entering the agriculture

industry in particular are aware of the benefits of managing agriculture and the environment in a coherent way.

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

We support this proposal. However, there has been a high level of investment going into many of the higher tiered environmental schemes over the last 10 years with little evidence that it has resulted in significant improvement to the environment. We recognise the need to review these schemes to enable more effective and results driven provision in the future.

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?

Experience of the Environmental Farming Scheme shows the need for realistic income forgone calculations which ensure that uptake of a scheme realises the cost of reduced production, additional work or capital expenditure. The principle of public money for a public good should apply.

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

Farmers supplying certain markets will have to meet various conditions and this is to be expected in any supplier agreement. Ultimately the role of delivering and implementing policy objectives for the environment should be with Government and not other bodies.

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

It will take a range of Government and industry partners working together to deliver environmental objectives.

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

There will be a greater role for Government to collect market data and ensure there is transparency in the market both here within Northern Ireland and throughout the rest of the UK.

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?

There is merit on this proposal provided that the course is of benefit to farmers.

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?

There is an urgent need to prepare the agri-food supply chain for Brexit by providing grant assistance to the processing sector. Government must also continue to tackle unfair trading practices within the supply chain - the UK has been a trailblazer in this area but more needs to be done. There should be a fair allocation of profit within the supply chain relevant to the input and risk in getting the product to market.

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.

None

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.

None

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.

None

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.

None

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.

DEPARTMENT FOR COMMUNITIES HISTORIC ENVIRONMENT DIVISION



NIFutureAgriPolicy@daera-ni.gov.uk

Date: 10 October 2018

Re: HISTORIC ENVIRONMENT DIVISION RESPONSE TO THE NORTHERN IRELAND FUTURE AGRICULTURAL POLICY FRAMEWORK CONSULTATION: OCTOBER 2018

Thank you for the opportunity to input to your consultation.

There are over 16,000 archaeological sites and around 8,500 listed buildings on the Historic Environment Division (HED) Sites and Monuments Record in Northern Ireland. Around 2,000 archaeological sites are protected through being scheduled and these have a legally designated 'exclusion' zone around them. The remaining 14,000 archaeological sites that are not scheduled are overwhelmingly located on agricultural lands and their protection is heavily (often solely) reliant on DAERA legislation and policy. Given the changes to farm payments brought in from 2017, these non-scheduled archaeological sites located on farmland seem to be presently addressed by DAERA only through the Northern Ireland Cross-Compliance Verifiable Standards (Jan 2018) where farmers are bound by DAERA Good Agricultural and Environment Conditions (GAECs) not to damage archaeological sites included on the HED Sites and Monuments Record. This is something we are keen to see addressed through your present consultation and future legislation and policy.

I would also point out that under the Northern Ireland draft Programme for Government (PfG) HED are continuing to develop and deliver heritage input and outcomes for communities across Northern Ireland. Historic heritage assets are playing an increasingly important economic and social role across our landscape – in terms of factors including wellbeing, tourism potential, shared spaces, volunteering, and community cohesion. It is therefore vital that the contribution of heritage assets to PfG outcomes is appropriately reflected in relevant Executive policy and legislation, with DAERA being a key Department in this regard given the large numbers of these assets on farmland.

Further to our comments offered below we would very much welcome greater contact with DAERA to discuss and progress the consideration of the historic environment within

your legislative and policy remit – we feel that there is much more that we can, together, achieve in support of active, living landscapes.

A number of more specific comments are included in the following pages.

Yours sincerely

IAIN GREENWAY
Director, Historic Environment Division

CONSULTATION RESPONSE FROM HISTORIC ENVIRONMENT DIVISION

Page 7 - The consultation paper mentions here that a key desired outcome for the future Northern Ireland agricultural industry is that it is "environmentally sustainable". We ask you to note that archaeological sites are a key feature of the Northern Ireland environment. These archaeological remains most often represent evidence of the remains of past farming communities going back as far as the Stone Age. Their continued presence in our landscape can be taken as a key indicator of sustainability and good land management. Indeed, the Northern Ireland tourism branding contains many rural historic environment features, such as Navan Fort Co Armagh or Dunluce castle and Lost Village, Co Antrim, as iconic images of our landscape. Despite this, the consultation paper contains no reference to archaeological heritage sites or the term "historic environment" as being an integral part of the wider environment which we all seek to manage sustainably into the future. We ask you to include a statement in any future consultation, policy or legislation that recognises and includes cultural heritage assets (i.e. archaeological sites, listed buildings etc) as an integral part of the wider environment term. In September 2018, the Agriculture Bill presented to Parliament includes the following text at Part 1 New Financial Assistance Powers article 1(c):

"1 Secretary of State's powers to give financial assistance

- (1) The Secretary of State may give financial assistance for or in connection with any of the following purposes— (a) managing land or water in a way that protects or improves the environment; (b) supporting public access to and enjoyment of the countryside, farmland or woodland and better understanding of the environment; (c) managing land or water in a way that maintains, restores or enhances cultural heritage or natural heritage"**

HED ask that DAERA include a similar provision in any future legislation and policy.

Page 11 - The consultation paper mentions here that stakeholder groups were established "to ensure effective exchange of information as the Brexit negotiations unfold". HED wish to be part of such effective information exchange. We see a clear role for ourselves within the Environment group of stakeholder advice.

Page 15 – here the paper discusses the current ban on ploughing within environmentally sensitive grassland. HED would welcome discussion here on the presence of thousands of archaeological sites within such and other grasslands and their vulnerability to ploughing.

Page 16 – at section 2.7 the paper mentions land eligibility rules are focussed on "land that is actively managed". Many archaeological sites exist on farmland and there are also sensitive designed landscapes around country houses dating from the last few hundred years which are also farmland. HED would welcome discussion as to what this 'active management' entails and whether it would in future threaten archaeological sites or landscapes which would then represent a non-paying part of a farmer's holding, unless they 'actively managed' the archaeological site perhaps to its detriment.

Page 16 – at section 2.7 the paper also mentions that cross-compliance may be retained subject to review. HED advise that we would need to be an integral information provider to decision makers in any such review. The removal of cross-compliance would represent a grave threat to the historic environment.

Page 16 – at section 2.7 the paper also mentions that penalty regimes may be reviewed for the future. HED advise that we would need to be an integral information provider to decision makers in any such review. Cultural heritage assets are finite resources that once damaged or removed cannot be replaced. HED are keen that any future penalty regime would reflect this finite nature of the historic environment.

Page 19 - The consultation paper mentions here (at section 3.1.3) that a key desired outcome for the future Northern Ireland agricultural industry is that it is "environmentally sustainable". We ask you to note that archaeological sites are a key feature of the Northern Ireland environment and should be included in the list of features and 3.1.3.

Page 21 – here HED can play a role within the Science and Innovation and Knowledge Exchange for the farming industry to help build a more informed agricultural sector.

Page 25 – HED can play a role within the Continuous Professional Development of the farming industry to help build a more informed agricultural sector.

Page 30 – the paper here discusses resilience and possible payments for farmers of lands where they are disadvantaged due to natural factors such as poor soil and climate. We would ask DAERA to note that (although HED strive to avoid it) heritage remains can also from time to time disadvantage farmers and consideration should be given to providing a mechanism to address this under resilience payments.

Page 35 – here the paper again discusses environmental sustainability but makes no mention of the historic environment.

Pages 36-39 – the sections here (6.1-6.5) discuss environmental sustainability principles, regulation, science and education advice, incentivisation and target outcomes but make no mention of the historic environment.

Page 49 – here DAERA ask about other comments relating to rural needs. HED advise that archaeological and architectural heritage sites represent potential opportunities for farm diversification. Such sites can be capable of attracting tourists/ visitors and lengthening stays in rural areas, thereby contributing to local businesses etc. HED would welcome discussion on incentivisation for farmers to examine visitor sites on their land which could contribute to the rural economy and communities. In general we would also advise that any future changes to Daera legislation and policy may well require SA/SEA to adequately consider potential implications for the historic environment.

DEPARTMENT FOR INFRASTRUCTURE, WALKING AND CYCLING UNIT



20/10/2016 16:11

Cowan, Eileen

NI Future Agricultural Policy Framework - Stakeholder Engagement - Questions

To: DERRAG Future Agri Policy



NI Future Agricultural Policy Framework - Stakeholder Engagement - Questions.docx

Sorry about the late submission for commenting on the Northern Ireland Future Agricultural Policy Framework.

We would like to comment on question 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 change to the way farmers are incentivised would greatly improve the opportunity for us to engage with them and agree routes to establish walking and cycling paths across their lands.

*Thank you
Eileen Cowan*

JOINT RESPONSE – DR MARY DOBBS, DR VIVIANE GRAVEY AND DR LUDIVINE PETETIN

Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement – Questions

This evidence is written by Dr Mary Dobbs and Dr Viviane Gravey, from Queen's University Belfast, and Dr Ludivine Petetin, from Cardiff University. Both Mary Dobbs and Ludivine Petetin are Lecturers in Law with expertise in agri-environmental issues who have been engaging with stakeholders in Northern Ireland and Wales respectively on the impact of Brexit. They are currently writing a book on Brexit and Agriculture. Viviane Gravey is a Lecturer in European Politics, co-chair of the [Brexit & Environment network](#), which brings together academics analysing how Brexit is affecting the UK and EU environments.

We have provided answers to most of the specific questions below, but would direct your attention in particular to our main points in response to the open-ended Q.40.

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

Such entitlements should be retained at least until a new policy framework is *implemented*, with a sufficiently long transitional period, although with the possibility to adapt these somewhat (as provided for instance in the English Agriculture Bill, Schedule 4).

Firstly, there is a legitimate expectation to receive funding up until the end of the CAP cycle. Farmers invest through capital expenditure, rent, crops etc in reliance upon what they have been promised they will receive. Circumstances have changed, but nevertheless funding has been guaranteed by the UK government until 2022.

Secondly, as reflected in the engagement document, farming in NI is an extremely important industry. Approximately 78,000 employed in farming and support services (McFarlane et al., 2018, p. 11), which has broader knock-on effects, through injecting money into the NI economy (Gravey & Dobbs, 2018) as well as via the multifunctional nature of farming, e.g. its links with the rural communities.

Further, farms are widespread across NI, but approximately 4/5 of the farms are considered to be 'very small' (DAERA, 2018, p. 41) and similarly the majority are in deprived areas, which is relevant to their relationship with the environment. A patchwork of small farms increases (without guaranteeing) the likelihood of biodiversity within the ecosystem, whilst ensuring the land is actively managed. Smaller farms also tend to be less intensive, which may reduce the negative externalities on the environment. Consequently, there is the potential for considerable positive environmental effects on the environment, if managed appropriately. Overall, small farms are something generally to be protected, especially if the alternatives are land abandonment (e.g. in deprived areas) or amalgamation into large, uniform farms (although these can be run in an environmentally sustainably fashion).

Thirdly, as noted in the engagement document, there is heavy reliance on the payments currently. The majority of farm income in NI comes from financial support, in particular the direct payments. The precise level varies according to the year and type of farming, being affected by multiple factors, but overall there is a high level of dependency on financial support. It has been suggested that DEFRA's proposals of a move away from direct payments will lead to a loss of 25% of the less profitable farms in England, due to becoming unsustainable.¹ This figure would be greater in NI, due to the nature of farming and the heavy reliance on the direct payments. The majority of NI farms would be in danger if the direct payments were removed without a suitable alternative. Alternatives can provide cushioning, but such alternatives would need to be carefully planned, progressively introduced, predictable, substantial and with a long lead-in period to ensure that they are effective.

Consequently, the payments should continue at least until 2022 and until at least a new agricultural policy framework with related financing has been *implemented* and not just agreed. England and Wales have set their transition to end in 2027. It would be sensible for NI to follow a similar course to ensure the receipt of financial support and compliance with future trade policy.

Fourthly, Schedule 4, Part 1, clause 2(1) enables DAERA to provide direct payments for areas with natural constraints. This is very much welcome to ensure a relative certainty to farmers but the requirements to receive such payments should not be too restrictive.

There needs to be a significant transitional period between now and the abolition of direct payments. Finally, even if a new policy and new support mechanisms are agreed, some limited direct payments/entitlements may still be needed due to the nature of NI farming – reflected perhaps in the idea of 'resilience payments' in the document.

The key questions are if and when a new policy will be agreed, in light of the absent NI Executive and Assembly. Additionally, who will fund the new policy?

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 requirements are a great idea in principle, but they have a bad reputation for being simultaneously burdensome and ineffective. Much of the surrounding discussion is on simplification and reduction of burdens. They are not considered to actually encourage more environmentally friendly behaviour. However, it is important to note that such requirements may incentivise land users at least not to act in a more environmentally unfriendly manner, i.e. it may prevent a reduction in environmental standards – whether it is proportionate or alternative measures exist is then another consideration.

¹ See comments made by Ludvine Petetin at the Game and Wildlife Conservation Trust All-Party Parliamentary Group in March 2018, <https://www.gwct.org.uk/policy/appg/march-2018/>; in the Farmers Guardian, <https://www.fginsight.com/news/news/defra-makes-decision-to-let-quarter-of-uk-farms-disappear-57116>; and in UK Business Insider, <http://uk.businessinsider.com/quarter-english-farms-bankrupt-after-brex-2018-4>.

Further the context is essential to consider. NI environmental governance is already highly problematic, with a history of governance failures linked in part to the Troubles but continuing on today (Brennan & Purdy, 2017). There has frequently been a lack of political will to address environmental issues, despite the uproar that has arisen on occasion, e.g. regarding the illegal Mabouy waste site or the 'cash for ash' policy. Brexit threatens to undermine environmental governance across the UK, with significant impacts on NI (Brennan et al, 2018) – e.g. through the loss of the role of the Commission and the Court of Justice, as well as the role of environmental principles and the cross-border mechanisms. Consequently, environmental governance/regulation may need the extra help it can receive from the softer approaches such as through the greening requirements. Therefore, it would be important to maintain these requirements at least until NI ensures that it has an effective environmental governance system that will ensure compliance.

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?

Permanent grasslands are a key habitat for biodiversity – maintaining the ploughing ban would be positive. This needs to be well advertised so no permanent grasslands are ploughed during transition from one policy to the next due to lack of information. Support to farmers to check which types of grasslands is to be ploughed or not should also be offered.

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?

Yes: the farmers arguably have a legitimate expectation to receive these payments until their eligibility ends or the CAP cycle concludes.

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

Incentivising younger generations to enter and stay in farming is important if farming is to be maintained on a community basis. These should be continued until at least 2022, as guaranteed by the government. Alternative mechanisms to encourage younger generations to engage could be developed in later policy – this may involve incentivising and rewarding education, but also improving resources in rural communities and the standard of rural life. Overall, facilitating generational change should be one of the priorities of a future policy.

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

This needs to be determined in conjunction with farmers themselves and by broader engagement with the younger generations – especially in the rural communities. Providing a high quality of life and suitable opportunities for new farmers and for farmers throughout their lives and careers is essential.

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?

Generally speaking, these could all remain. However a few core points of concern arise from the proposal:

- a) Cross-compliance. This is something that could be very useful, especially post-Brexit if environmental governance is undermined more generally, yet there are flaws in how it operates currently and different stances are taken across the paper. There is a lack of clarity as to what is being proposed.
- b) Suggestion is made to review penalties and ensure they are proportionate – proportionality is an important principle of law, but it is essential to reflect on what the objectives are what makes a penalty proportionate. Various theories are relevant, but one of the core ones is that of deterrence and behavioural economics more generally – penalties are not just about punishment/retribution or even about remedying the wrong, but are also intended to provide both general deterrence (deter others from this behaviour) and specific deterrence (repeat behaviour by this individual). Frequently when regimes are being reviewed to ensure penalties are proportionate, it is more about reducing penalties and easing burdens without considering the reasoning for the penalties.
- c) An annual review of inspection rate is proposed – again, reviews can be valuable and inspections should be appropriate, but the same caveats and considerations apply: what are the inspections to achieve and what are the reasons to curtail them? More fundamental, this is proposed for 2020 and 2021 – if the transition period really only lasts that long, an annual review may be pointless.

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 comments at this time.

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?

The role of science and innovation in principle could be extremely beneficial, however the question raises 3 issues: the nature of the focus on productivity; the limited potential of NI and need for realism; and the control over technology/science/innovation, with relevant knock-on effects.

Firstly, a focus on productivity itself could be highly beneficial. However, despite the references to synergistic approaches and the need to be 'compatible with improving environmental sustainability and delivering high animal welfare standards', the focus is still on 'growth' rather than efficiencies, quality (quality is a component of the supply chain, but not a key focus) or sustainability. Public health and food's contribution to this is also omitted. We have seen the negative environmental impact of pressures and incentives to increase productivity previously (as encouraged by earlier renditions of the CAP for instance). The emphasis and therefore balance could be altered.

Linked to this, even if with a shift in balance, it is very possible for individual approaches by farmers to seem to fulfil both productivity and environmental aims simultaneously, e.g. through growing specific crops that do not require much use of chemicals, are high yield, nutritious etc. The difficulty is that all farmers may seek to grow the same crops leading to increased presence of monocultures and thereby undermine plant genetic diversity as well as impacting on the existence of different habitats. A similar situation can arise in the context of farmers raising the same breeds. Biodiversity of all sorts is essential to environmental sustainability and also, through strengthening resilience for instance from diseases, to agricultural sustainability (Frison, Cherfas and Hodgkin, 2011). Implementing measures would need to reflect this and ensure that the increasing trend towards monocultures is not promoted and indeed that steps are taken to reverse this.

Secondly, there is a need to be realistic about how much agriculture productivity can increase in NI. The document (section 4, p.21) says that NI "should, at the very least, keep pace with the productivity growth of its competitors and indeed outperform them if it wishes to capture additional market share." The competitors here refer to the USA, France, the Netherlands and Italy. Firstly, NI does not have the same potential for growth as other countries, e.g. the USA, even if one just looks to the size of the country, the population and the nature of the land/farms (majority are small and in less favoured areas). Secondly, even if NI could increase productivity at the same rate, this is not necessarily a path that should be followed – whilst NI could learn for instance from France's adoption of agroecology, does NI really wish to follow the path of the USA and its approach to intensive farming, monocultures, growth hormones and chlorine washing for instance? E.g. USA saw a loss of 80+% for 72 of 75 vegetable varieties in the USA between 1903 and 1983 (Fowler and Mooney, 1990).

Clearly science and innovation can promote greater efficiencies, more effective monitoring, higher yield or nutritional crops etc. However, firstly care needs to be taken that any product meets certain safety criteria – for the environment and human health. A suitable prior authorisation procedure is therefore required. This is currently regulated under EU law for a range of types of products, crops, foods etc – with varying regimes depending on the type of product or how it is produced. Depending on the type of Brexit that results, NI may still have to comply with these rules (even just for trade purposes) but it may need to develop its own regulatory system also – potentially in conjunction with the rest of the UK.

Secondly, the use of science raises a series of secondary questions beyond initial safety: Is the product useful? Who determines the focus points? Who undertakes the research? Who controls the output? What are the long-term effects of such research? The engagement document warns against perverse outcomes and this is one such instance where this could arise. It is feasible for public or private funding to be used to research unnecessary and counterproductive aspects – ones that perhaps further corporate interests through enabling greater control of the market, without necessarily making a significant positive difference to agriculture or society. Two examples highlight these issues: 1) corporations may fund the simultaneous development of chemical X and then crops that are resistant to chemical X, where chemical X address some pest or disease harmful to the crop. Farmers then may purchase only the resistant crop and then be tempted to spray chemical X widely as their crop will not be harmed, even though this increases monocultures and liberal spraying may be harmful for the environment or human health. 2) where plant genetic resources are patented (due to some inventive step), then that patent attaches to the progeny and provides the patent holder with very significant control over any progeny – even where these are grown accidentally or have outcrossed with crops (Dobbs, 2017). This is a very complex issue, but primarily care needs to be taken about the control that is given to multinational corporations via technology, the market and the law.

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

For questions 10-12:

Most opportunities to improve farm resilience and increase the delivery of public goods in agriculture require increased knowledge transfer. Putting investment in agricultural education at the heart of this policy is a welcome move that would tackle a major hurdle to this new policy achieving its objectives.

Taking time out from farming to pursue CPD is often difficult – sessions should be offered continuously throughout the year to allow farmers to plan their training in relative downtimes. Incentivising farmer engagement may be necessary at first, if only for farmers who have not engaged recently in CPD to get (back) into this habit.

Knowledge transfer should not be unidirectional: for example, farmers engaged in pilot schemes should have the opportunity to report back on their experience, informing both the

farming colleges and other farmers directly. This would improve farmers' ownership of training and of the different policy interventions offered.

As farming policy moves towards increasing resilience and delivering public goods so must agricultural education evolve as well making sure that sustainability is central, at both degree level and through continuous professional development.

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

In principle, this could be very beneficial through promoting for instance efficiencies and precision farming. In practice, care needs to be taken to ensure that technologies are useful, sustainable and do not lead to perverse outcomes. As noted in Q.9, consideration also needs to be given to the control that this might give corporations over resources, e.g. through the patenting of CRISPR and its impact upon access to plant genetic resources, as well on certification and access to markets.

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

Helping farmers to invest is critical. In addition to loans, loan guarantees etc. specific support through CPD should be offered to help farmers interested in investing put together an investment strategy, and find like-minded partners to invest with (such as buying new machinery to use on different farms together).

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

The 'golden handshakes' considered in England², to help farmers wanting to move out of farming could be considered – it may help older farmers consolidate their pensions and facilitate passing the baton to younger generation. However, care needs to be taken to ensure that this does not just lead to land abandonment and a deterioration of the environment.

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

Farm resilience is a broad concept, which goes beyond *economic* resilience, and also includes key environmental aspects such as improving soil health etc.

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

No comment.

² <https://www.fwi.co.uk/news/farm-policy/agriculture-bill-golden-handshake-to-quit-farming>

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

Taking natural disadvantage into account for basic farm resilience support ensures other criteria beyond economic resilience are taken into consideration – in particular, farms in natural disadvantaged area are more prone to engage in biodiversity-rich High Nature Value Farming (see example from North West Highlands of Scotland³). Alongside making this basic farm resilience support available to HNV farms in naturally disadvantaged areas, additional policy interventions focused on increasing the environmental public goods delivered by these farms are needed, i.e. although such farms are inherently more likely to achieve environmental public goods, further incentives could encourage greater and broader desirable outcomes.

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

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

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

For Q19-21:

Cross compliance currently contains two elements: statutory requirements and good farming practices (good agricultural & environmental conditions). In the forthcoming period of policy uncertainty with Brexit, keeping cross compliance in place is critical to prevent environmental backsliding. Trimming cross compliance down to only the respect of statutory requirements would be problematic: you would in effect pay farmers and land managers simply to abide by the law. As such, a farming practice component to cross-compliance is critical – but it can be better tailored to local conditions and to local priorities. Considering the major challenge of ammonia emissions in Northern Ireland, good farming practices could be, for example, linked to the Action Plan for Ammonia.

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

Whilst fairness and efficiency arguments can be brought to bear here to support tiering or capping, the prevalence of small farms in NI makes this less imperative than in the rest of the UK.

An eligibility threshold ensuring that the farm is actively managed could be useful. But minimum size requirements are problematic, especially considering the nature of farming in

³ <http://ec.europa.eu/environment/agriculture/pdf/High%20Nature%20Value%20farming.pdf>

NI and the benefits derived from small farms – instead of preventing farms under e.g. 3ha to access support, small holdings could be supported in applying jointly to reach the threshold.

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

a) An option of insurance could be a useful tool to manage various types of risks (including market volatility, financial and environmental threats), but the proposal does indicate that setting it up may be problematic: will insurance even be possible in principle? Will it provide farmers with the security that they need? E.g. housing insurers may refuse to insure houses on flood plains/that have previously flooded, or charge exorbitant premiums – will farm insurance suffer from the same challenges?

A potential solution might be to get farmers to feed into a public insurance fund that can be drawn upon in some instances. However, irrespective of who runs the fund: insurance systems require considerable quantities of detailed information, which takes time to develop and would not be available in NI at this time.

b) Further, the proposal suggests that farmers will not be protected if they '*choose*' not to be insured, but it may not be feasible for them to insure themselves. Many farms in NI are barely surviving economically and may not be able to afford insurance – there might not be a real choice. NI might decide not to support all farmers or help them with insurance, but this should be done openly and without the excuse of 'they chose not to help themselves'.

Membership of an insurance scheme could be made a condition of receiving financial support, but then increased support might be needed.

c) Depending on the conditions of any insurance scheme and what is being covered, this may encourage increased risky behaviour – whether economically or environmentally risky. i.e. by holding insurance – farmers may shift from being risk averse to risk tolerant, whether this be through planting unsuitable but high yield crops or excessive spraying or ploughing at the wrong time.

Insurance should be an option and perhaps even facilitated/promoted (with caveats/conditions), but the focus for NI should be on resilience and sustainability of farming on a practical and environmental footing. If insurance is in place, then the regulatory regime may need to be adapted to develop further deterrents to ensure that land users do not simply use their insurance to avoid punishment (besides increased premiums) and build it into their running costs.

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

Speak to insurance experts. Need to know: will it be affordable for the farmers? Will differentiating benefit the more vulnerable farmers or lead to them being exploited?

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

These should be availed of and maintained where appropriate. Care needs to be taken not to incentivise excessive investment in land or equipment in order to reduce income for the year, thereby losing liquidity and the financial cushions necessary to address later shortfalls or urgent expenditures. Incentivising capital investment that delivers dividends and enables increased efficiencies is valuable, but so is having the 'rainy day' fund.

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

An appropriate crisis response framework would be extremely advantageous. This should not merely deal with the financial components, but should address broader risks, e.g. food safety, human health, environmental health etc and should address cross-border implications. A starting point for the broader framework would be to look the EU's RASFF system.

It would be necessary to determine in what circumstances the local councils/NIEA/NI/UK would step in and what steps would be taken, e.g. coordination, mandating measures by farmers/land owners, taking pre-emptive measures themselves, compensation (in part or in full), providing necessary resources without charging farmers (then or perhaps at all), etc. Whilst building agricultural resilience is essential and insurance might provide some protection, very practical aid/steps will be required in some instances, e.g. heavy snowfall trapping starving animals, lack of electricity for long periods, epidemics and so forth.

A common framework with the ROI should be developed and maintained regarding action addressing cross-border issues post-Brexit. Further a UK-wide approach should be taken on this front, with financial support for any appropriate measures. Differentiations can be made then that relate to the individual agricultural policies in the 4 jurisdictions and that respect the variations across the UK.

This is also an animal health and welfare issue, as much of NI farming involves livestock. Where crises arise, this will frequently relate to being able to feed or care for those animals, or may indeed relate to preventing the spread of diseases to them.

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

The 4 proposed 'principles' are generally acceptable. However, it would be beneficial to link in actual environmental principles and objectives, especially as these will lose considerable application in the case of a hard Brexit. The sole one that could be considered as a traditional principle/objective is that of future generations, which could still be tightened up.

Regarding principles 2-4, the following comments can be made:

Outcome-based rewards: these obviously have their advantages, as they incentivise individuals to achieve specific standards considered to be beneficial by society rather than purely a tick-box, procedural approach. However, outcomes cannot always be guaranteed, despite the best efforts and intentions. Farmers may not risk investing if there is no guarantee of at least off-setting their costs. Further, the assessment methods for outcomes based will be crucial to the success of any future policy. However, the policy is silent on the basis of such methods. An alternative to simply outcome-based measures would be to provide some initial investment funds, and then instalments for steps/procedures, milestones and finally the eventual outcomes – the rewards could vary so that there is a significant increase when it comes to the outcome itself. Flexibility in relation to the approaches for achieving the outcomes and as regards the milestones will be necessary, with broad principles applying generally and then more specific criteria being tailored for specific localities or farms.

Co-design: this is a valuable tool, which facilitates early engagement and buy-in by those involved. It enables the creation of approaches that are acceptable to stakeholders and feasible to be undertaken by those concerned, through using their practical experience and knowledge rather than simply relying on theoretical or statistical input. If this goes beyond the initial formulation of the measures to also include review and revision, then it enables a form of responsive regulation (Ayres & Braithwaite, 1992), whereby the approaches can also evolve and respond in light of continuing feedback.

However, co-design and responsive regulation is also challenging, including because it risks regulatory capture (e.g. Dana, 2000; Baldwin and Black, 2007), whereby the broader public interests of society are made subservient to those involved in designing the regulations/relevant measures. A partial solution would be to engage others in the design also – as with the creation of this engagement document. For instance, public interest groups (Ayres & Braithwaite, 1992, Chapter 3), including rural community organisations, consumer organisations and environmental NGOs. This would enable counterbalances to be created, whilst still engaging relevant stakeholders. However, it still enables stronger groups to sway the design, may still go contrary to the public interest or lead to strategies detrimental to minority groups, or lead to the public interest groups becoming de facto regulators. It is essential that DAERA (and eventually the Minister) recognise this potential and take steps to counter such risks (see Baldwin and Black, 2007).

Behavioural change and access to information: Information is essential for engagement by all stakeholders. This links in to the principle of co-design, as broad collaboration and cooperation also demands a sharing of knowledge and information. This in itself means that all parties must have basic shared knowledge, including terminology. Complications may arise if fundamentals are not explained and if common understandings do not exist – education, but also simply respectful communication, is required (Petetin & Dobbs, 2018a).

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

This is essential in its own right and also in order to demonstrate its integral importance within farming/land management. Consideration should be given to the Nature Matters NI submission here and also to their comments regarding the adoption of agroecology in France. Integrated, holistic approaches that avoid silo-ed or antagonistic approaches are essential if both economically and environmentally sustainable farming is to be promoted.

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

See response to Q.27 above.

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?

Firstly, 'income foregone' approaches are typically limited in which costs they address. If applying this approach, a very wide and open interpretation may be required.

Secondly, under the Agreement on Agriculture of the World Trade Organization (WTO), 'income foregone' (the extra costs or loss of income in the text of the agreement) mostly comes into play for level of payments under the environmental and regional development programmes that fall within the Green Box. Payments made under different programmes within the Green, Blue and Amber boxes would not be restricted by 'income foregone'.

Thirdly, 'income foregone' was included in the AoA because historically farmers are supposed to sell their products onto the markets and the difference between the sold price and the farmer's expenditure would be paid by agricultural support. However, under a framework of payments for enhancing environmental sustainability, farmers would not necessarily create products that can be commercialised. Therefore, if payments were limited to income foregone, farmers would be operating at a loss and would be unable to recuperate the income generated by the sale of their products. There is no reason why NI/ the UK should adopt a strict interpretation. Further, income foregone focuses on financial and economic incomes, not environmental outcomes. Higher levels of payments (i.e. beyond a strict interpretation of income foregone) should be compliant with WTO obligations (Petetin, 2018).

Fourthly, 'income foregone' approaches only balance the scales - they compensate without rewarding. This will only suffice where the individual wants to undertake the activity already, but cannot afford to. Yet, the aim here is affect change – not merely to have inertia. To do this some further incentive is required that will reward the individual for their actions. This does not mean necessarily further state funding, as the rewards may be through the farmers' own health, the use of quality produce labels/certification, long-term resilience of

crops/animals etc. However, some additional incentive is required if behavioural change is sought.

Alternatives might be to add in bonuses for achieving suitable outcomes, with for instance the sums increasing (with eventual caps) for every year that the appropriate steps are taken/outcomes achieved and if there is break (once or possibly twice) then the bonuses are lost and the individual has to build them up again – akin to no claims bonuses for car insurance!

Further, group schemes might be feasible – whereby all farmers/land users in a specific catchment area might obtain further bonuses where there is large scale buy-in to the scheme, with increased bonuses for every individual/farm in the group that complies. This would be particularly useful in the context of habitats, water quality or air quality for instance and links in to the ideas of natural resources as common goods or public goods - with access for everyone, but also responsibilities.

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

The engagement of actors across the supply chain is valuable. Consumers, retailers, caterers, wholesalers etc can all provide extra pressures or incentives to change behaviour, e.g. in calls for less packaging (Lidl announced recently that it was going to reduce/remove packing from fruit and veg, whilst some shops can be seen to now use compostable bags in lieu of ordinary disposable plastic bags), green marketing, emphasis on 'slow food', value of short supply chains etc. This ties in again to education, emphasizing the value of environmental and other objectives, and facilitating people in making better choices. Again, Nature Matters NI have provided several examples of the potential for a positive impact. Research with NI stakeholders has also demonstrated potential interest in green marketing and the development of 'quality' produce and labels (Foord, 2016).

However, care should be taken. Firstly, the interests of those involved will not necessarily match society's broader interests, e.g. what of the packaging industry if packaging is removed? This could lead to opposition to important changes depending on the strength of the industry. Secondly, if packaging is reduced for instance and the packaging industry is undermined, what of the broader societal knock-on effects? NI may need to then assist individuals adapting within that industry or leaving it. Finally, countervailing effects are possible and we need to be careful not to create greater problems, e.g. plastic was originally intended as a replacement for ivory in billiard balls, piano keys etc.

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

Ideas that could be looked at this context are legitimacy (encouraging compliance and engagement) and behavioural economics/psychology (use of incentives, deterrents,

consideration of best efforts, strict/fault-based liability etc). These cross disciplines, but this is something that underpins environmental governance, which is reliant on changing attitudes and behaviour and trying to achieve outcomes that are not always guaranteed.

Different schemes will be appropriate depending on the context but 5 key, interrelated elements are essential:

- Appropriate objectives;
- Buy-in from the farmers/land users;
- Viable, effective schemes;
- Integrated, holistic approaches; and
- Appropriate and effective enforcement.

The achievement of these elements is going to be reliant upon deep collaboration, sufficient and appropriate resourcing, a multifaceted, multi-layered approach for schemes, and a firm hand.

Collaboration across the levels, across the disciplines and across the different stakeholder groups would be considerably advantageous (Petetin & Dobbs, 2018a). By engaging in co-design in the first instance as outlined above, this can lead to greater buy-in due to deliberative governance and input democracy (essentially legitimising the process in the eyes of stakeholders) rather than having external objectives and values imposed on them from afar. This can be used not merely at later stages for the details of the schemes/individual projects, but also in designing appropriate objectives – this can also be through learning from the English consultation and seeing what responses were made there, e.g. further suggestion regarding public health and rural development (for more information please see (Petetin and Dobbs, 2018b). As noted above, steps must be taken to protect the process from regulatory capture – whether in designing the objectives or the later schemes.

Such collaboration can also help in identifying and developing more innovative schemes, whether for individual farms or in a broader catchment area, that are also practicable in light of daily experiences and knowledge. This could be continued on through group incentives/rewards for enhanced outcome achievements, which also motivates widespread compliance and self-monitoring and self-disciplining by the group. It also enables participants to flag issues at an early stage, through having an established relationship and understanding of expectations.

However, collaboration is insufficient by itself. Adequate resources must be deployed – in funding the relevant research in designing the schemes in collaboration with stakeholders, in providing financial support for individual schemes (at all stages) but also broader training, in ensuring appropriate levels of independent monitoring, and in providing enforcement mechanisms as required. A suitable agricultural policy that rewards land users for beneficial behaviour will be a costly endeavour, although it may be feasible for instance to avail of consumer preferences and market mechanisms to support the schemes further.

A multi-layered, multi-faceted approach has the benefit of opening up the possibility of funding for different stages and different actions, e.g. for efforts and for outcomes. The main goal of any schemes should be outcomes, but as noted for Q.27, it is important to provide rewards/funding at all stages – as an incentive and also simply to ensure the viability of the actions. Efforts and milestones should also be rewarded. Collaboration may help identify suitable milestones, what outcomes are feasible, what support would be necessary and what incentives might be sufficiently attractive.

More fundamentally, it is also essential that any schemes address all environmental media and the environment as a whole, rather than taking a silo-ed approach. As the environment is not controlled on a per farm basis, need to consider environmental media and ecosystems as a whole e.g. farmers in a specific catchment area or migratory path. This is also about broader crop diversification and not simply crop diversification on one farm. Again a collaborative approach that looks beyond individual farms would help develop wider schemes applying to broader catchment areas and potentially entire ecosystems. As noted in Q.27, this might also avail of group rewards to provide additional incentives for positive behaviour.

However, whilst buy-in, legitimacy and self-monitoring (individually or in groups) are all valuable. NI must be prepared to take a firm hand or otherwise there is no real incentive to change or deterrent from poor behaviour. This is dependent on adequate monitoring by independent experts and effective sanctions (Brennan, 2016) – not merely where individuals commit offences, but also in losing suitable amounts/types of rewards – hence why rewards need to both be about steps/procedures and outcomes.

Examples that demonstrate some of these elements can be seen in Nature Matters NI's submission to this engagement, as well as in the National Trust's land management schemes and the Welsh Games and Wildlife Conservation Trust's 'Farmer Clusters'.⁴

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

If evidence indicates a lack of transparency, with negative impacts upon producers and consumers (or indeed any parties), then the government may need to take some action to enable easier access to information. Competition law may also be relevant depending on the context.

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?

Beneficial.

⁴ <https://www.gwct.org.uk/farming/advice/farmer-clusters/>.

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?

This would be important in any context, but in light of Brexit, greater collaboration and better functioning is essential. This is especially the case considering the interdependence between NI and the ROI in for instance dairy production. This needs to go beyond simple collaboration – see brief comments in response to Q 40.

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.

Not at this stage.

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.

At this stage, only two brief points. Firstly, rural needs/development should be an objective of agricultural policy. It is currently supported via CAP, Pillar 2. It indirectly supports agriculture and similarly agricultural support feeds back in to the rural community. There are considerable concerns surrounding mental and physical health of those in rural communities and their broader needs cannot be ignored (NIA, 2010).

Secondly, identifying appropriate support involves a high level of collaboration with those in the rural communities – urban presumptions/perspectives should not be imposed on those in the rural setting. It is also important to remember that not all those in the rural community are farmers or in farming families. They are not homogenous (Petetin & Dobbs, 2018a).

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.

Not at this stage.

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.

See below regarding general comments.

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 have a number of general comments on this policy, which are also reflected in some of our responses above. Overall, the document is a positive start and we recognise the constraints within which DAERA are operating, but:

- a) There is a lack of clarity at times, especially regarding the actual length of the transitional period or what happens after this.
- b) It could be made more ambitious with a broader range of objectives in light of agriculture's multi-functionality.
- c) Much greater detail is needed regarding the nature of the schemes.
- d) The context needs to be borne in mind more also, e.g. the English Agriculture Bill, WTO law, cross-border components, the impact of Brexit on environmental governance, and the continued lack of an operational Assembly and Executive.
- e) It highlights the need to develop other areas similarly.

A. Transitional Period:

The document refers to a 2-year transitional period for 2020/2021 (p.7) and then an evolution towards a future approach (to be determined) that needs to be managed and well-signposted (p.19).

Firstly, the policy document is not always clear on what the transitional period will be or involve, since it refers to a set period, then an evolution and then discusses potentially continuing on with an approach of resilience payments that seem quite similar on some fronts.

Secondly, if it really is a 2-year period (up to 3 years from now), that is very short for a transitional period. Thirdly, there's no NI executive to approve the future plans currently. Fourthly, therefore also no sign-posting is possible. Certainty, whether legal, policy or financial certainty, is something that farmers rely upon. Farmers need to know how long financing will be guaranteed for and what objectives are priorities, in order to determine what investments are worthwhile and will guarantee financial reward. Rental agreements, purchases, supply orders etc are made in advance and the time is passing quickly. Depending on the investment and the type of farming, the financial rewards may not materialise for years. If the policy might change in the meantime, then there is no (economic) point in investing.

Consequently, very clear plans are required regarding how long precisely the transition period will last for and what will happen afterwards – an overlap period would be appropriate also, whether using the 'resilience payments' or otherwise. It is

also necessary that such a transition period be sufficient as to allow farmers to adapt to the new approach.

For comparison sake, England and Wales will have at least until 2027 under the AgBill with potential to extend it.

See the response to Q.1 also.

B. Objectives:

Broadly speaking, we approve of the objectives outlined. However, they are unnecessarily curtailed, perhaps due to the need to act *intra vires* and the desire not to go beyond what the former Minister outlined as the future goals. Mention was made of food security as very important, although not a 'primary objective'. Whilst food security is important, we would highlight that other objectives such as food quality, public health and rural development could also have been included. Rural development was adopted by Wales as an objective and the quality of food was indirectly adopted for both England and Wales in the AgBill, but this was limited⁵ and all three jurisdictions could go further.

Whilst the proposal notes that the approach is to be synergistic and environmental sustainability is reiterated as a central objective throughout the proposal, including when discussing innovation and productivity, nonetheless the focus does still appear to be on a narrow understanding of productivity. The concept of productivity for England and Wales in the AgBill encompasses quality, however this is not apparent here, with growth seeming to be key. As outlined above (response to Q.9), an excessive focus on productivity can prove problematic and undermine the other objectives – including sustainability and resilience of the agricultural industry. There is also a need for NI to be realistic about what can be achieved as regards growth relative to its competitors.

Overall, the proposal appears overly ambitious in relation to production, whilst being insufficiently ambitious in relation to other objectives.

C. Details of schemes

Design – consideration has been given to the design of the schemes and the value of engaging with farmers. As discussed above, it is important to engage with wider stakeholders in designing general elements of schemes and to be aware of the risks of regulatory capture – see response to Q.27. Expertise of all sorts should be engaged,

⁵ See Prof Tim Lang's post on the lack of vision for food in the AgBill <https://greenallianceblog.org.uk/2018/09/18/the-new-agriculture-bill-has-no-vision-for-food/>.

collaboration will be required, and a common language used to facilitate this. Details of potential elements should be outlined in the future policy. Pilot schemes may be useful to test the effectiveness of proposed approaches, although noting the limits of pilots and the extra delays this might involve in implementing a future policy.

Outcome focussed – purely? A key component of the proposed approach for NI, and reflected in the approaches in England and Wales, has been a shift in focus to outcomes. As discussed above (Q.27), this can be very beneficial but poses its own problems and limitations. The proposal does not indicate that the sole focus is to be that of outcomes, and a mixed approach should be taken to ensure appropriate incentives across the scheme.

Cross-compliance: There appears to be considerable internal debate going on within the paper – with cross-compliance favoured, challenged, criticised and then returned to again, e.g. linkages to 'relevant minimum environmental standards as set out in regulations' (p.37). Distinctions are made, e.g. regarding ploughing versus grasslands, but there is still some broader variation in approach that seems to reflect a fundamental conflict over whether cross-compliance is valuable or not.

Cross-compliance is a contested tool that has not proven as useful as hoped, but it still has potential. Further, in the context of Brexit and NI's history of environmental governance as outlined below, cross-compliance could become more important. Careful consideration should be given to discarding cross-compliance – both initially and in the long-term. An effective environmental regulatory regime that can achieve its own goals will be essential. See also the response above at q.21.

D. Contextual Considerations:

This policy is being created in the contentious and challenging context of Brexit and the continued lack of an operational Assembly and Executive. These are relevant to both agricultural powers and environmental governance, including where they intermesh. These also impact directly on cross-border supply chains, which merit a special mention.

Brexit, devolution and discretion

The document refers to unprecedented regional discretion and, following Brexit, some powers will indeed return to the UK and via devolution to the 4 jurisdictions. However, the matter is not so simple.

There are restrictions imposed by international environmental and trade law, especially the WTO and the Agreement on Agriculture. Further, the UK controls relevant overlapping elements, reflected in the Customs Act and in the Agriculture Bill. Trade agreements with external partners will lead to further restrictions. Even the

nature of NI and NI farming imposes its own contextual, practical restrictions – with clear differences with England and elsewhere. For instance, most NI farms are considered small and are in deprived areas as noted above. As outlined in this proposal (p.8-9), there is a huge dependency on CAP payments – mainly direct payments, but also via a variety of other mechanisms. So, there is flexibility and there are opportunities, but they are not boundless.

A significant consideration and indeed concern for NI should be the Agriculture Bill – targeted mainly at England but with considerable impacts for the 4 devolved jurisdictions, including NI. The AgBill has proposed that the SoS for Agri could determine the caps for different forms of support across the 4 devolved jurisdictions – despite this not being required by WTO law and despite this being a devolved power (WTO law only requires a cap for Amber box support, not Green or Blue) (Dobbs et al, 2018).

Northern Ireland needs to fight its case for 1) control over the caps for Green and Blue box support at the very least, 2) and input into the Amber box caps.

The AgBill also provides the gradual abolition of direct payments by England and Wales, with the potential for both jurisdictions to create financial assistance schemes (similar in ways to what is proposed in this engagement document). However, despite enabling DAERA to amend the existing system, it does not provide for the abolition or the replacement – as agriculture is a devolved power, arguably this does not prevent NI from bringing in such changes, but the implication from the Bill is that Westminster considers this to be at least quasi-centralised in the circumstances (presumably in light of the desire for a single UK market, in order to ensure compliance with international law and in light of the absence of an operational NI Assembly).

There is also the simple fundamental question of: who pays? Currently the EU and the UK as a whole do, but in future where will the funding come from? NI is not economically strong and is reliant on Westminster for funding. Payments have been guaranteed until 2022 or the end of this current Parliament (p.11), but what of payments after that? Negotiations with Westminster are required, but this also gives Westminster a strong influence over the context of any NI proposals – as they can effectively veto approaches by refusing to fund them.

Environmental regulation & Brexit

We would also highlight that this plan has very positive ambitions from an environmental perspective. However, firstly, the general implementation and enforcement of any environmental scheme is always challenging and has been discussed above.

Secondly, these proposals indicate reliance on environmental regulation to achieve environmental protection/sustainability, but without any detailed consideration of the existing environmental governance in NI or how this may develop post Brexit. 7 lines in total address environmental regulation specifically, noting that it 'should form a backstop to ensure that farming practice does not cause unacceptable pollution or damage to habitats'.

The proposal effectively operates on the presumption that environmental governance is effective now. Yet, as noted for Q.2, NI has a very poor record of environmental governance. Further, a hard Brexit, or indeed any Brexit whatsoever, will impact significantly on environmental governance in NI (Brennan et al, 2018). The proposal notes the need to consider environmental governance. This needs to be done immediately – as something valuable independently and also essential in developing an environmentally friendly agricultural policy. Amongst other elements, we would strongly support the development of common frameworks between NI and the rest of the UK and also NI and the ROI in order to address cross-border issues and ensure minimum standards for the future – on this, please see a policy paper co-written by two of the current authors, alongside two other authors: Brennan et al, 2018. It outlines in greater detail the potential for Brexit to undermine environmental governance, the potential role of common frameworks, environmental principles and accountability mechanisms, as well as the significance of the land border with the ROI.

Cross-border supply chains

One of the key proposed objectives of the future policy is an 'integrated, efficient, sustainable, competitive and responsive supply chain'. The agri-food sector in NI is part of an all-island economy, with "agricultural and food products account[ing] for the largest share of cross-border trade on the island of Ireland." (McFarlane et al., 2018, p. 13). This interconnectedness is currently beneficial but may prove problematic post Brexit – especially in the case of a hard Brexit. Dairy produce is one of the most notable cross-border products and, for instance, '[i]t is estimated that 25% of Northern Irish milk... is processed in the Irish Republic' (Dobbs et al, 2017). Tariffs aside, any delays could lead to milk perishing and becoming waste products instead. Attempts are still being taken to try and avoid a (hard) border on the island of Ireland, as well as a border between the island of Ireland and GB. Steps also can be taken to make NI production more self-sufficient, e.g. as in the case of LacPatrick, (Kelpie, 2017). However, this proposal barely acknowledged the cross-border issue (p.44) and did not address effectively how DAERA or an eventual NI government might assist farmers and other stakeholders in meeting these potential new challenges, unless DAERA is actually suggesting that insurance or other resilience measures will address a hard border scenario adequately? Again, the limitations of what DAERA

can do with limited resources and powers, but consideration of options and suggestion of how to become more self-sufficient would be useful.

E. Development of NI policies?

As noted in the paper, DAERA has proactively continued with 4 stakeholder groups even since the collapse of Stormont. This is to be applauded and there has been significant progress made. However, firstly, it is essential that progress similarly be made in the other areas. Where are the three other 'engagements'? If it is in the public interest to publish the agricultural document, is it not also in the public interest to publish the other documents?

Secondly, whilst the SoS for NI indicated support for DAERA to make some policy decisions, we are seeing from (i) the Mallusk decision, (ii) the initial reluctance to publish this document, (iii) the use of the term 'engagement' rather than consultation, (iv) the objectives being curtailed to those the former minister outlined before the fall of government, and (v) the difficulties in setting out clearer details for the policies post the transition period, that there is a clear need for the ability to create fresh policies and legislate, i.e. for an active and working government. DAERA can only do so much. This is especially the case where there is also no clarity as to the future trade relations between the UK and the EU.

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Farmers For Action

What do we wish to achieve in terms of a sustainable agricultural sector contributing in part or fully to farm family income while maintaining improving/enhancing our environment for future generations. We enter the debate as majority land owners, producers and custodians of environment/landscape and the bedrock or foundation on which the complete structure relies.

As such we do not wish to create a multi-tier system of producers with inbuilt inequality due to age profile, educational attainment or size of business. We are also acutely aware of the impact of European funding on primary producers and therefore the rural communities and the reliance placed on such funding as it impacts on the complete food chain.

Ideally as primary producers we would wish to receive a financial return commensurate with our inputs in terms of finance and time with capital to reinvest to modernise and develop our production system or even to maintain existing structures to enable them to be fit for purpose.

Unfortunately over the past number of years due to capital restraints the term resource efficiency which now appears to be a target outcome for farm business has had to be applied to government support, changing the advisory system and information from individual to group methods and out sourcing more training and responsibility for managing Department for Agriculture designed projects. Emphasis is perceived to be placed on supporting large business and groups with the only proposed strategy for smaller units being amalgamation or phasing out.

We can of course use this policy framework to achieve our objectives whether it be increased productivity from a smaller base, protection of the environment, protecting our communities or simply improving profit margins for a few.

We therefore approach this response with an open mind fully aware that that all proposals have a cost attached and we know nothing of proposed costs, environmental or economic.

We do know however the funding association with CAP and wish to emphasise that nothing less will suffice regardless of how it is eventually distributed. We do not wish to have policies which through impacting on many are dictated therefore we feel that this policy

framework document has many concepts and discussion points some of which will receive more prominence than others from respondents yet we feel none can be agreed without full input and cooperation of stakeholders.

We represent UK wide farmers and this has been an integral part of our ethos and stated as such since 2002. We fully appreciate the need to protect and manage our environment in a positive way as it is our workplace from which we derive all or part of our income and which is available for recreational purposes by others while supporting various species and habitats.

We recognise the various elements of the food chain which we refer to as the pyramid and the importance and reliance of each on the others and we take on board the message regarding production on a world state but we must ensure that whatever measures are finally proposed or adopted they result in a positive financial return to primary producers not as an incentive but as a right.

We also recognise that we cannot be isolationist but feel that this must work in every way and be reciprocated by other participants not only in the food chain but in government.

We cannot ignore the fact that ours is a land based industry and production capabilities vary in different parts of the province, hence the designations of lowland, disadvantaged and severely disadvantaged. Payments such as ANC meant that family farmers could positively enhance the environment by maintaining an agricultural presence and activity in areas where basic production never mind increased production of the types of livestock needed provides a much reduced income than in other more productive areas.

With regard to the questions asked we are responding to these but feel the document presented be regarded as initial ideas and should not preclude further discussion, input and consultation on any proposals which may arise as a result of this paper.

In fact we refer to Paragraph 1 of Page 8 of the document where it refers to a Minister NI Executive and NI Assembly and state our opinion that there must be further consultation with all stakeholders whatever arises as a result of this exercise otherwise the concept of stakeholder involvement, transparency and further collaboration is obsolete.

1. We support the retention of entitlements and continuation of present framework until a new policy framework is agreed

2. We would support the abolition of the present greening requirements as stated with the incorporation of the BPS and Greening payment into entitlement values.

3. While the ploughing ban protects flora and fauna etc. on environmentally sensitive permanent grassland which we support, regard must be given to the producer who farms the land and is unable to improve productivity which can be considered an income forgone. Consideration must be given to businesses restricted by such constraints.

4. We support the continuation of payments to those receiving YFP as long as they are eligible.

5. There is no justifiable reason to discontinue applications to a regional reserve after 2019.

6. Generational renewal or inter-generational transfer does not only impact on the young personnel assuming control but also on the former controller who is relinquishing power and indeed or perhaps two or more families. We are fully supportive of young farmers becoming increasingly involved in farm businesses in a management capacity but in any policy development we must also accommodate the middle age bracket e.g. 40 – 55 who are involved in farming, yet many still do not still fully manage or control the business. What do we offer these people? Most farmers do not consider a life after farming simply because they own and reside in their workplace and though must be given to working on this and considering their position and planning before pressing other initiatives.

7. Cash flow and profit is of premier importance in farming as in any other business. Inspections pending or awaiting results should never impede the issuing of an advance payment to all businesses at the same time. The retention of 30% of payment should suffice to cover any if not all penalty situations with the option of recoveries as at present. We are always informed that this is EU policy which we now have the opportunity to adjust. Due to the subjectivity of inspections there has always been a variance in interpretation. We need consistency. This also fully applies to assessments for active farmers etc. which are again subjective and inconsistent. There is definitely a role for more stakeholder involvement at an earlier stage to have industry agreement on definitions. We must also adhere to the principles of proportionality.

9. Profitability should go hand in hand with Productivity and the question always asked by our members is “who is currently profiting?” The productivity grand challenge is based on UK productivity versus competitors such as US, France, the Netherlands and Italy and this has been visited previously in discussion including those of the Agriculture Strategy Board and we note the point regarding benchmarking data. As producers however we must ask the question – what part of the food chain will most benefit in financial terms from increased production? If producers feel they are not presently receiving a fair price, will there be any price commitment, guarantee of margins etc. to increase sustainability of the primary link in the food chain which will provide this increase? What would the anticipated increase to the NI rural economy be? Most agriculture commodities do not fit the “just in time model”

making this a long term project. We feel we must talk of profitability and productivity in the same sentence. We do not recognise the fact that we have to compete with others and must look inwardly at our own industry but we need a cohesive, transparent food chain on which to do this. From a producer perspective, improved efficiency and achieving more from present production is a present priority.

10. Knowledge is power is an old saying and obviously education is a contributing factor to the knowledge accumulated. These both have an impact on an ever changing working environment. Provision of information is also a major contributing factor to as is access to a professional independent advisory service supplied by the competent authority available to everyone regardless of whether they are an individual or in a group. Knowledge transfer through group participation is also a useful model which has been in operation for a number of years. Results of the development and improvement models are based on KPIs such as numbers attending etc. and incentives are offered to attend to real outcomes are hard to quantify but they definitely offer an opportunity for learning and exchange of views. At this present point when we discuss education and training we note that much of this could be out sourced as at present. We would need to examine the situation where the present administrative capabilities and training capacity within our statutory agency. It would be more cost effective to supplement their present numbers than to train others who then work for out sourced administration to deliver projects

11. We do not wish to ever set up a multi-tier farming where some believe they are inferior to others due to education attainment. Neither do we wish to have a "licence to farm" because of this. We fully understand that educational training is voluntary and policy initiatives could have a positive impact on influencing participation. However our members are of a mind that what once had a positive impact can evidently be used as a method for penalising – e.g. FQAS once carried with it a bonus. Likewise we believe in equality other than preferred access to what should be standard services.

12. Likewise with any potential training is it more value for money if delivered externally and if so why? Are these courses being delivered by tender at a lower than Department for Agriculture baseline cost of the same quality? Again going back to and equality would the incentivisation be financial?

13. Innovation and new technology are trends which are occurring in all businesses not just agriculture. These will have to be promoted in a positive manner to give those who wish to avail of them the opportunity to do so; if environmental enhancement is a targeted outcome and benefits measurable then so be it.

14. Investment in any farm business requires major consideration whether self-financed or supported by a loan facility. The volatility of the industry is sufficiently documented to identify the servicing of debt as a major problem in difficult times when cash flow can be

interrupted. There may be some whose circumstances may suit borrowing but a capital grant as an incentive for an investment reduces the investment cost when paid and the value of any repayments over time. NOTE – It is income Northern Ireland's farmers need, not debt!

16-26. Resilience – this as it states is one possible option. Again emphasis seems to be agricultural productivity growth and structural adjustment. The word resilient is synonymous with farmers and in particular the disadvantaged areas and of course we support a payment to farmers in disadvantaged areas or ANC which we feel was wrongly removed. However this payment would seem to be a very basic allowance for all active farmers with pre conditions for payment. It would seem to be production based with environmental conditions but as we have no proposed budget, no proposals on farm payments etc. we cannot add further comment other than to say we always supported capping of payments. It is as yet an option which cannot be adopted without full stakeholder input and agreement. With regard to anti cyclical insurance type intervention to specifically help address volatility as opposed to crisis this is proposed as an alternative to no support whatsoever. This is again an option for discussion which eventually would appear to operate with a producer contribution. At present with no financial basis and now the potential involvement of third parties we cannot further comment or commit to this proposition although we appreciate the volatility of the industry and the need to try and protect farm families. Government must not use this as an opportunity to avoid intervention in relevant situations.

27-30. Protection and enhancement of the environment is in the main a non-remunerative part of a farmers' daily life as this is their workplace. It is a shared space as land is also used for recreational purposes. Without farming activity it would be impossible to manage various areas in a positive environmental manner. From our perspective we wish to retain the maximum number of farming families who obtain all or part of their income from activity in their workplace. In order to do this they need to have a sustainable profitable business and be rewarded both for farm produce and environmental goods they produce. Both can work in harmony to deliver positive outcomes. We feel the retention of more businesses will provide more land managers providing positive inputs to landscape and environmental management. Again information and education have a part to play. In addition advice and assistance prior to recourse to any penalty system would be much more productive. Collaboration between all, especially consultation with farmers who are ultimately the land owners and managers prior to introduction of schemes would provide much more positive outcomes than the prescriptive interventions presently available. Incentivisation usually has a positive impact on scheme uptake but long term impact of intervention on farming practice is generally not understood by many participants. Understanding by government of the work of public goods provided by farmers is an essential part of any future policy discussion must involve landowners

31. Our members questioned the terminology of "actors and roles" preferring participants and inputs. What role would be envisaged for the other participants if it would ultimately fall to the primary produce or custodian of the land to be responsible. We do not want to have any further potential compliance issues forced on producers which could eventually create penalty situations or reduction in payment for produce. We feel we are already at the mercy

of other “actors” with regard to our incomes. Nowhere does it ask the question if we feel we receive a fair price for our produce and this must be addressed.

33. If the government feels it cannot intervene in risk management then it should be able to ensure transparency in the market. Interdependence not industry provision is what is needed to ensure transparency. We have previously stated that we view the food chain as a structure in pyramid form. The base being the primary producers but no glass ceiling. We also believe that in this chain everyone is entitled to profit margin. It seems however that the chain is compartmentalised and therefore in some way divided which is where we feel we need more transparency and co-operation

As stated previously this questionnaire is based on prior discussion and we can only comment on the questions asked. There are various proposals for financial interventions, investment initiatives, resilience payments plus more which would have to come from a finite budget. There are currently no guarantees regarding farm gate prices. We know the value of present EU payments, the impact of these and the necessity of these. We respect the work which has gone into preparation of this document and the diverse opinions regarding it. We would wish to participate in further stakeholder engagement with more clarity on budgets etc. using this as a starting point.

40. Northern Ireland’s family farm businesses are at a tragic crossroads where 20+ years ago they were charity givers now many are charity receivers – 2012 stats stated that 25% of the UK’s farming families were living below the poverty line, since then this has surely increased. For the continued existence of family farmers in Northern Ireland profitability must be addressed immediately to keep family farmers on the land and therefore the environment in good condition. The introduction of legislation on farm gate prices to return farmers a minimum of the cost of production plus a margin inflation linked is the only way forward currently available and is designed to be flexible as subsidies come and go. Please find attached a link to the Gosling Report (shortly to be updated) and also the non-optional blue print for rural Northern Ireland.

<http://www.paulgosling.net/2016/01/on-the-eve-of-destruction-a-report-on-northern-irelands-farming-sector/>

**Northern Ireland Future Agricultural Policy Framework: Stakeholder
Engagement**

Fermanagh and Omagh District Council Response

Fermanagh and Omagh District Council welcomes the opportunity to respond to the Agricultural Policy Framework, the Council recognises the importance of the economic and social well-being of our rural communities and taking into consideration the difficulties the rural sector is experiencing the Council wishes to ensure that appropriate measures are in place to assist, support and champion rural communities and businesses. At the outset the Council would note that while the Framework identifies rural society as being important it provides little detail or consideration of the work of rural development through EU funding and this needs significant consideration in the preparation and finalised document, particular in light of the UK's Withdrawal from the EU, more commonly known as Brexit.

Following consideration of the Framework, the Council's response identifies the need for the Department to reflect on the findings from previous consultations with the agricultural sector, identify and secure a ring-fenced budget from regional and national budgets, reintroduce the Area of Natural Constraint Scheme, and support set prices and marginal profits for producers.

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

The Council firmly supports the retention of entitlements as the basis of direct support until and beyond the new Agricultural Policy Framework, as it believes that direct support through CAP payments has been critical in maintaining, sustaining and growing the local industry's competitiveness, and has provided assurance and confidence to the sector which in the context of Brexit, is now more important than ever. The Framework should also clearly identify and maintain the level of entitlements (basic rate), through internal resources if needed, to sustain and grow rural communities, for the post Brexit environment.

- 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?**

The Council has viewed the greening requirements to be challenging to a significant number of the Fermanagh and Omagh District Council agricultural sector due to them being peripheral regionally and nationally, their size, quality of land and the level of bureaucracy. While the Council would welcome the incorporation of the green payment into the BPS entitlement it must be an addition, and this payment being increased to include greening. The preparation of the Framework must provide an opportunity to review the administration (bureaucracy), making it more proportional to the level of funding and fit for purpose. Further, it must recognise the needs of areas that benefitted from Areas of Natural Constraint (ANC) schemes and any penalties must be proportional to the alleged infringement.

- 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 Council would welcome environmental schemes that would support these areas and that these schemes should have parity to interventions in areas with low lands.

- 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?**

This Council recognises the importance of the Young Farmer, the need to incentivise this grouping to keep them in the industry, which will be critical to help maintain the future sustainability and growth of the industry. This payment should continue for as long as the participants are eligible (five years) from a direct fund rather than a reserve, and this scheme should continue for new participants into the future and post Brexit. The Council believes the Framework should identify the additional funding required to deliver this initiative post Brexit for a period of five years.

This has been consulted upon previously, and commitments made should not be rolled back in any future proposals.

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

Please see response to question 4.

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

The Council recognises the importance of generational renewal to maintaining farm businesses and the importance to the wider rural community of succession planning (consideration of five year plans) through meaningful initiatives that will incentivise and provide relevant advice and funding that will provide confidence and assurances to the next generation of farmers. The Framework document should support set prices and marginal profits for producers.

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?

The Council welcomes the Department's review of the approach to penalties, retrospective recoveries and inspection regime (based on proportionality/size of farm) as this would help reduce the administration and genuine fear that these actions can have on the farm owner and the wider family farm members. The Council notes the severity of penalties at present and the impact that this has on the farmer/producer and family farm members.

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 comment at this time.

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?

The Council as well as the industry is concerned on the importance placed on productivity to making the sector more efficient, competitive and profitable. It is suggested that productivity should be linked to markets. Further, producers should not be disadvantaged into the future following such an approach, where cheaper exports that have less traceability are more competitive to local producers. The Council would agree that the reduction of administration would move the industry to an acceptance of higher risk. The ability to access science and innovation would be welcomed but it has been more challenging for farming communities in peripheral areas, those operating small farms, in areas of disadvantage and any new delivery approaches (funding and on line delivery/new technologies etc) must be considered and would be welcomed to encourage greater innovation and the application of science on farm methods. It is suggested that an indicative budget should be included in the Framework for this work.

It should be noted that Fermanagh and Omagh rural communities are greatly disadvantaged with the poor quality of broadband and their ability to access on line delivery of new technologies. There must be cross Department working with the Department for the Economy to eliminate the broadband gap and initiatives identified in the Framework.

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?

The Council as well as the industry recognises the importance of driving better industry outcomes to making the sector more efficient, competitive and profitable. The ability to access agricultural education and knowledge transfer has been more challenging for peripheral areas, small farms and areas of disadvantage and new delivery approaches (funding and on line delivery/ new technologies etc) would be considered and would be welcomed to take on farm education and knowledge transfer forward. It is suggested that an indicative budget should be included in the Framework for this work.

The Council would suggest that Level 2 attainment is a recognisable and acceptable level for maintaining the farm/producer standards. The Council wishes to state its disappointment that Business Development Groups have ceased.

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 Council would welcome this approach with industry engagement with formal training initiatives (up to level 2 attainment, see Question 10), again consideration must be given to peripheral areas, small farms and areas of disadvantage, it is suggested new support must be above and beyond the existing investment (funding) and there is a need for on line delivery and the use of new technologies. It is suggested that an indicative budget should be included in the Framework for this work.

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 Council would welcome this approach with CPD, again consideration must be given to peripheral areas, small farms and areas of disadvantage, it is suggested new support must be above and beyond the existing investment (funding) and there is a need for on line delivery/new technologies. It is suggested that an indicative budget should be included in the Framework for this work.

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?

The Council would consider this approach challenging to peripheral areas, small farms and areas of disadvantage, support must be additional to existing investment (funding) and should not disadvantage rural communities based on their location, size and the nature of their farming.

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

The Council would welcome these schemes if it could be delivered at best value rates, with low levels of administration and it should be additional to the existing investment and regional/national funding available to the industry.

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

No comment at this time.

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

The Council recognises the challenges faced by the local industry and uncertainty brought about by fluctuating costs, extreme weather (Spring 2018 Fodder Crisis) and animal and crop disease, the farm resilience support measure needs to be in place but recognising as a priority those smaller farms, and those at highest risk (peripheral and poorer land quality) and to have arrangements in place to react much more quickly. The failure to react quickly in providing the resilience support will very often lead to farms collapsing. It is suggested that an indicative budget should be included in the Framework for basic farm resilience support and this will bring about assurance and confidence in the industry.

The Council supports the reinstatement of ANC Schemes which would in turn help mitigate against some shocks.

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

The Council firmly believes arrangements must be in place to react much more quickly, provide guidelines and a national/ financial resource must be immediately available and easily accessible for such circumstances. It is suggested that an indicative budget should be included in the Framework for this work and this will bring about assurance and confidence in the industry.

As previously noted the Council supports the reinstatement of ANC Schemes.

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 Council recognises that the farm resilience support measure must be in place but recognising and giving priority to those smaller farms, and those at higher risk (peripheral, poorer land quality and disadvantage) and having arrangements in place to react much quicker. It is this sector that if not supported through this scheme would be likely not to survive, with direct and indirect impact on their rural communities. Again, it is suggested that an indicative budget, easily accessible should be included in the Framework for this work and this will help bring about assurance and confidence in the industry.

As previously noted the Council supports the reinstatement of ANC Schemes.

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

The Council would support this approach as long as it would not compromise any resilience support, particular as the farm resilience support may be required due to crisis outside the cross compliance obligations.

As previously noted the Council supports the reinstatement of ANC Schemes.

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

The Council would recognise that the preparation of the Framework document allows the opportunity to review the existing good farming practice and introduce new themes, this approach must recognise that one approach will not fit all, and must consider the impact on peripheral areas, smaller farmers, quality of land, disadvantage etc and the Council would welcome consideration of a sub-regional/landscape area approach based on equality for all land types.

The Council would suggest that further clarification on the content of this question is provided, as the language makes it difficult to understand.

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

Again, this approach must recognise that one approach will not fit all, and must consider the impact on peripheral areas, smaller farmers, quality of land, disadvantage etc and the Council would welcome consideration of a sub-regional/landscape area approach.

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

The Council firmly believes this approach must recognise that one approach will not fit all, and must consider the impact on peripheral areas, smaller farmers, quality of land, disadvantage etc. The tiering or capping of a basic farm resilience support payment, or the establishment of an eligibility threshold must not be detrimental to these industry types and must not leave them more disadvantaged at no fault of their own.

As previously noted the Council supports the reinstatement of ANC Schemes.

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

The Council would disagree with the introduction of anti-cyclical/insurance type measure as it would be to the disadvantage of those in peripheral areas, smaller farmers, disadvantaged etc, that the local industry would be challenged with additional insurance costs and if they were unable to pay and maintain would be vulnerable to an unforeseen crisis and the financial consequences.

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

The Council would disagree with the introduction of anti-cyclical/insurance type measure whether sector specific as it would be to the disadvantage of those in peripheral areas, smaller farmers, disadvantaged etc, that they would be challenged with additional insurance costs and if they were unable to finance would be vulnerable to an unforeseen crisis and the financial consequences. Again, it is suggested that an indicative budget should be included in the Framework for this work and this will help bring about assurance and confidence in the industry.

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

The Council would disagree with this approach that is operated in Australia, which allows farmers to credit income (before tax) to an account in profitable years that

can be drawn down in more challenging times. This should be provided from a national/regional fund and it is suggested that an indicative budget should be included in the Framework for this work and this will help bring about assurance and confidence in the industry.

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

The Council would welcome a crisis response framework that would be progressed at regional level, but that would include both national and regional funding, it is suggested that an indicative budget should be included in the Framework for this work and this will help bring about assurance and confidence in the industry.

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

The Council recognises the importance of environmental sustainability and with due regard to the industry's stewardship of habitats and landscapes and the environmental principles to be incorporated in the Framework. The environmental principles must recognise that one approach will not fit all, and should recognise the benefits of applying the principles on a sub region or landscape areas which will better identify specific local needs and in turn help identify environmental sustainability at a local level.

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

The Council as well as the industry recognises the importance of investment in research and education targeted on environmental and conservation management. The ability to access research and education has been more challenging for peripheral areas, small farms etc and new delivery approaches (funding and on line delivery/ new technologies) must be considered and would be welcomed.

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

The Council recognises the shift towards outcome based environmental measures for agriculture. The approach may benefit from sub regional/landscape area approach that will better reflect the challenges for peripheral areas, smaller farms, quality of land, disadvantage etc providing relevant and achievable outcomes. The Council would suggest further clarification is provided on the content of this question, as the language makes it difficult to fully understand.

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 Council recognises and would welcome an additional incentive element within any payment to help deliver environmental incomes from a national/regional source. It is suggested that an indicative budget should be included in the Framework for this work and this will help bring about assurance and confidence in the industry.

The Council would suggest further clarification is provided on the content of this question, as the language makes it difficult to fully understand.

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

The Council recognises the role other actors will play in the supply chain seeking to drive better environmental outcomes and welcomes this approach.

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

The Council would recognise that that models identified would benefit from sub regional/landscape area approach that will better reflect the challenges for peripheral areas, smaller farms, quality of land, disadvantage etc.

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

The Council would recognise that government has an important role in ensuring market transparency. The Council would challenge the effectiveness of the Food Ombudsman to protect the producer at this time and would suggest a review of the responsibilities and powers of this agency.

The Government must protect the producer by maintaining regulation, traceability and health and safety, and managing the level of administration proportional to the size of the farm, particularly post Brexit.

The Government should support set prices and marginal profits for producers.

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?

The Council would welcome this approach with CPD with formal training initiatives, again consideration must be given to peripheral areas, providing support above the existing investment (funding) and the use of on line delivery/new technologies. It is suggested that an indicative budget should be included in the Framework for this work. As above, it should be noted that Fermanagh and Omagh rural communities are greatly disadvantaged with the poor quality of broadband and their ability to access on line delivery of education and knowledge transfer.

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 Council would challenge the powers of the Food Ombudsman to protect the producer at this time and would suggest a review of the responsibility and powers of this agency.

The Government should support set prices and marginal profits for producers.

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 Council believes that the application of equality policies would benefit from sub regional/landscape area approach that will better reflect the challenges for peripheral areas, smaller farms, quality of land, disadvantage etc.

(See Appendix 1 Fermanagh and Omagh Agricultural Statistical Data)

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.

The Council believes that the application of the rural needs assessment would benefit from sub regional/landscape area approach that will better reflect the challenges for peripheral areas, smaller farms, quality of land, disadvantage etc.

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 comment at this time.

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 Council believes that the environmental impact would benefit from sub regional/landscape area approach that will better reflect the challenges for peripheral areas, smaller farms, quality of land, disadvantage etc.

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.

Fermanagh and Omagh District Council welcomes the opportunity to respond to the Northern Ireland Future Agricultural Policy Framework. As per the Council's response, it is recognised that the Framework document will provide the strategic direction for the agricultural sector post Brexit and should provide the much needed support resources and funding to maintain, sustain and grow the agricultural sector.

The Council would also highlight the need for financial support for required health and safety requirements on farms, and to this end would request that grants are provided for the installation of safety slats and repairs of existing sheds.

The Council firmly believes the Framework must be very clear on arrangements, policies, programmes, actions and initiatives post 29 March 2019 (Brexit), must identify budgets and additional budgets (regional and national) to deliver the innovative proposals, support a sub-regional/landscape to identify the needs of all in the agricultural communities and recognise and identify new rural development programmes funded by EU. Concluding, the Council would welcome the opportunity for further discussion on the consultation and any proposed future implementation of the consultation findings.

**Northern Ireland Future Agricultural Policy Framework
Consultation Response.**

I firmly support the retention of entitlements as the basis of direct support until and beyond the new Agricultural Policy Framework, as it believes that direct support through CAP payments has been critical in maintaining, sustaining and growing the local industries competitiveness, provided assurances and confidence to the sector and going beyond Brexit will continue to be important to the industry. Also, the Framework should clearly identify and maintain the level of entitlements including the basic rate payment to be retained as an area-based payment and not linked to headage or production, to help sustain and grow the rural communities, required for the ten years post Brexit through domestic resources.

I recognise the importance of the Young Farmer, the need to incentivise this grouping to keep them in the industry, which will be critical to help maintain the future sustainability and growth of the industry. This payment should continue for as long as the participants are eligible (five years) from a direct fund rather than a reserve, and this scheme should continue for new participants into the future and post Brexit. The Council believes the Framework should identify the additional funding required to deliver this initiative post Brexit for a period of five years.

This has been consulted upon previously, it should not be rolled back in any future proposals.

I recognise the importance of the Young Farmer, the need to incentivise this grouping to keep them in the industry, which will be critical to help maintain the future sustainability and growth of the industry. This payment should continue for as long as the participants are eligible (five years) from a direct fund rather than a reserve, and this scheme should continue for new participants into the future and post Brexit. I believe the Framework should identify the additional funding required to deliver this initiative post Brexit for a period of five years.

I would welcome this approach with industry engagement with formal training initiatives (up to level 2 attainment, see Question 10), again consideration must be given to peripheral areas, small farms and areas of disadvantage, it is suggested new support must be above and beyond the existing investment (funding) and there is a need for on line delivery and the use of new technologies. It is suggested that an indicative budget should be included in the Framework for this work.

I recognise the challenges faced by the local industry and uncertainty brought about by fluctuating costs, extreme weather and animal and crop disease, the farm resilience support measure needs to be in place but recognising as a priority those smaller farms, and those at highest risk (peripheral and poorer land quality) and to have plan/ arrangements in place to react much quicker. The failure to react quickly in providing the resilience support will very often lead to farms collapsing. It is suggested that an indicative budget should be included in the Framework for basic farm resilience support and this will bring about assurance and confidence in the industry.

I support the reinstatement of ANC Schemes, that would help mitigate against some shocks.

I firmly believe arrangements must be in place to react much quicker, provide guidelines and a national/ financial resource must be immediately available and easily accessible for such circumstances. It is suggested that an indicative budget should be included in the Framework for this work and this will bring about assurance and confidence in the industry.

I recognise that the farm resilience support measure must be in place but recognising and giving priority to those smaller farms, and those at higher risk (peripheral, poorer land quality and disadvantage) and having arrangements in place to react much quicker. It is this sector that if not supported through this scheme would be likely not to survive, with direct and indirect impact on their rural communities. Again, it is suggested that an indicative budget, easily accessible should be included in the Framework for this work and this will help bring about assurance and confidence in the industry.

I would disagree with the introduction of anti-cyclical/insurance type measure whether sector specific as it would be to the disadvantage of those in peripheral

areas, smaller farmers, disadvantaged etc, that they would be challenged with additional insurance costs and if they were unable to finance would be vulnerable to an unforeseen crisis and the financial consequences. Again, it is suggested that an indicative budget should be included in the Framework for this work and this will help bring about assurance and confidence in the industry.

All Agricultural budgets should be ring fenced so that the farming industry can have some sort of security in the future otherwise farming as we know it will die.

I would support the reintroduction of the ANC system for farmers in the severely disadvantaged area so the sustain the farming industry on marginal land.

Dated: 4TH October 2018.

