

Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement

Stakeholder Responses

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Northern Ireland Future Agricultural Policy Framework: Stakeholder

Engagement – Questions

& Answers from Vincent Mc Alinden

Thank you for the opportunity to contribute to the consultation on a future agricultural policy for Northern Ireland. A joined up overarching strategy would provide a clear direction for all of these inter-related policy areas, thereby contributing to meeting a number of objectives outlined in the Draft Programme for Government. This will provide better overall value for money for society and begin, possibly for the first time, to make explicit the links between NI society as consumers of food and public goods and NI farmers as producers of food & providers of public goods. The development of these links is vital if NI is to develop the sustainable, resilient circular food economy it purports to want.

However, if this idea is not one favoured by NI society, then the market economy needs to be able to play out in the food production sector as it does in others. The reality of production below cost must be laid bare and the inevitable constriction of NI primary food production toward a few very intensive low margin enterprises with handful of niche suppliers will proceed. Demographic and social change will happen in the countryside no matter what model is desired but will be more disruptive if the global market prevails. In the long term this would of course also lead to many positive environmental effects but these will be ad hoc and have only secondary benefits to the rural economy.

The complexity of the problem should not deter those who wish to seek a solution. The option to bury heads further into the sand in the hope that the UK block grant magically increases or that global markets suddenly double returns across NI farm are not prospects one takes too seriously.

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

ET's have become the poker chip in which to play the EU subsidy game, as such they have lost any, even spurious, link to a sustainable, balanced, productive and even profitable use of farm land. Their continued use can only be justified by the expense and administrative waste needed to create a more useful replacement in the short term.

If, as is expected, their use is continued then it would be useful to acknowledge their deficiencies commit to their demise upon the agreement of a new agri policy for NI.

- 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 Greening concept as applied to NI has largely been irrelevant.

A continued ban on ploughing (expanded to include any form of mass soil disturbance) on SAC land must be a condition of receipt of agri payments AND should be in a strengthened EIA regulation.

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

A continued ban on ploughing (expanded to include any form of mass soil disturbance) on SAC land must be a condition of receipt of agri payments AND should be in a strengthened EIA regulation.

- 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?**

To do otherwise would be seen as counter intuitive.

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

The regional reserve should cease. YFP should be changed to encourage succession but without need for regional reserve top ups.

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

A match funded voucher to encourage farmers to engage legal and accountancy professionals to plan for succession. Simply giving more money to increase the number of loss making subsistence farmers in NI is illogical and frankly ludicrous. Succession to what end? Needs to be addressed by all 'farmers', the successor must be able to make a positive contribution to the NI agri vision.

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 only logical framework for ongoing payments from an agri payment is surely an outcomes based one based on the NI vision for agriculture (or a reincarnation of same). Just acknowledging the existence of agricultural activity as the hurdle for receipt seems illogical and counterproductive to the notions of sustainability and resilience.

However, if the NI vision is to be credible it must be translatable into visible, real outcomes. Agreed actions which produce these outcomes, as well as success in achieving the outcomes themselves can then be the activities / metrics which become eligible for future support payments.

E.g. Production of low input food, Enhancing Carbon capture ability of land; increasing ability to dampen downstream flood events; enhancing societal enjoyment of countryside; creation of enhanced habitats.

See RBAPS project for work in progress.

Land eligibility – the root of the problem... if land is only eligible if it meets the dubious 'managed for agricultural activity' test then there will continue to be a drive to maximise this to the detriment of sustainable farm business and resilient countryside... hectares has become the new headage.

Eligible land must be land that contributes to the desired outcomes of the NI vision.

Cross compliance measures produced a lot of paper in the early days of this CAP BUT in my opinion they held in check a huge amount of environmental damage, especially soil erosion, water pollution and biodiversity loss. Dumping/ burning of controlled waste and the destruction / burning of valuable habitat continue to be issues for the agri sector to address. Cross compliance and Statutory measures must be there to encourage compliance and allow the effective sanctioning of damaging practice.

Again, without the possibility of **inspection**, human apathy and the 'avoid if possible' principle will reduce 'voluntary' compliance – it is, after all, being paid for by the tax payer. The use of tech can make this simpler and the traffic light system can reduce the burden of inspections whilst incentivising good practice.

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.**
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?**

This is the wrong model for the small-scale farm system of NI with its mosaic of topography, soil type and of course land ownership. It should be the “Profitability Grand Challenge”

An approach focusing on profitability would lead to science and innovation addressing similar problems but with different solutions. I.e. reduce protein imports by breeding viable strains of beans, lupins etc, reducing cost of managing pests by better biological controls and pest avoidance strategies, maximise use of available nutrients, reduce leakage out of the circular food production model.

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?

I agree, but education and knowledge transfer should drive the outcomes of the NI agri vision NOT just productivity! There are significant advances in knowledge and understanding currently available which need to be shared with Farmers and landowners especially in the area of public goods provision. It can be argued that relatively small research and knowledge transfer investment in this area would produce a relatively big change in the profitability of many NI farms once payment for public goods outcomes commences. NI farms must be able to avail of reliable research and analysis of current best practice. E.g. Environmentally Adjusted Total Factor Productivity (EATFP); The Pasture for Life project; HNV models in the UK & ROI and the RBAPS project (Spain and ROI).

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?

Whilst an appetizing prospect this could easily become a siphon of £ toward training providers delivering 'bums on seats' qualifications with little regard for actual outcomes inside the farm gate.

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

Great, as long as it doesn't propagate the 'carry on' seen on many focus farm visits where the chief learning outcome is who can provide the best lunch spread!

Farmers could be incentivised for completing education modules AND using them to produce outcomes by vouchering course fees with re-imburement upon meeting agreed on farm outcomes (carcass quality, Milk from forage, Biodiversity metrics etc.)

Or Requiring each farm business to complete '1000 points' of training each year; score CPD courses appropriately; Courses are £1 a point to do and for every point NOT completed the farm business is penalised £1. AND match this with equivalent bonus payments for meeting outcomes.

Farm payments will be paying for the courses anyway and this way the farmer has a notional buy in to doing the CPD as well as a notional loss for not doing it.

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?

A bad idea – it just drives up cost of purchase. Better to copy biopharma and support R&D solutions to specific problems which are hampering the NI vision. This support could be designed to encourage partnering between farmers and academia (much in the same way biopharma horizon 2020 grants and government innovation grants encourage partnerships between academia and SME's).

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

Capital grants have inevitably saw the capital cost of items increase – almost pro-rata and are easily viewed as just a means of fast tracking £ from Agri payments into the wider economy. Can the increased consumption of materials (concrete, plastic, machinery etc) be justified against the negligible change in production efficiencies and environmental benefits? In most cases I doubt it and in a lot of cases the availability of capital grants can be seen to have cajoled farm business's into taking riskier / unplanned investments.

The alternative incentives suggested would seem to encourage a more planned approach. BUT to what end? - Back to the vision for NI agriculture – Compete on cost of production by driving efficiency by all means “the race to the bottom”

OR – Compete on consumer expectations of quality & value matched with responsible stewardship toward the provision of **better public goods**. Simply giving payment to maintain the status quo will be an aim of the lazy but should be resisted.

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

Online production and publication of Farming 'research briefs' on each sector which are sufficient in standard & depth to provide analysis of home, and international, current best practice. These briefs would be co-authored/ edited by Academic and Industry contributors.

They would include results and measures which align with the NI vision for agriculture.

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

If this is to be a basic payment with no strings attached it must be resisted. Indeed it is dangerous in the extreme! It continues the handout trend; it will further erode the trust of the public toward those who see themselves as 'custodians' of our Land; It will reinforce the 'money for nothing' conclusion; It will see a further decrease in the self-esteem of recipients; it will be a missed opportunity to use public money for public good. It's existence as proposed will be seen as a chink of light toward a step backward to uncoupled payments (uncouple from production, public good, public scrutiny).

Again the fundamental question will be asked: Why should all other assets be taxed apart from farmers land which should be gifted? If we cannot create a workable and useful solution to reward landowners for their production of public goods and food then we will have failed ourselves & society as well as the landowners.

Am I unsure if the need for farm resilience is well enough described?

Resilience against what? – land use change?

- Landowner poverty?
- Decline in rural population?
- Reduction in certain types of lifestyle?

These are social issues and worthy of consideration but are they more worthy than the challenges facing other groups of society? Are they more worthy of specific intervention using public monies? I suggest not.

However if we ask: What types of resilience could farmland offer society AND would be worthy of public expenditure as well as public support?

Then:

- Reliable food supply

- Flood mitigation
- Sustainable circular food economy with associated employment
- Offset C release
- Healthy habitats to produce healthy humans through recreation
- Production of primary goods that are not food e.g. wood, oils, green fertilizer, bio molecules,
- + likely others

Now these are measures all landowners and farmers could surely access, and if they choose not to or are unable to – so be it.

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

I believe that the most effective way to build resilience, is to protect and restore the natural capital on which all farming depends. Paying for these public goods, represents the best value for money from the taxpayer, as well as helping to build the long-term resilience of farming systems in NI for both food and environmental outputs. E.g. An increase in soil health will better equip our farming systems to safeguard themselves against the negative impacts of climate change and disease, whilst positive environmental land management in upland areas will safeguard against erosion, increase opportunities for diversification; enhance pollinator populations all whilst benefitting lowland systems in reducing flood risk.

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

Rather than being seen as areas of disadvantage, they can be considered for their high potential to offer significant public benefits. In supporting farmers better to provide these benefits, we can also help build resilience against market volatility in the short and long term. Using this approach alongside a set of actions and outcomes set out to meet the NI agri vision it can be seen that those areas traditionally seen as having natural disadvantage are no longer thus. In fact they may be some of the most advantaged lands we have for the provision of public goods.

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

ESSENTIAL!!!! Lip service to SMR's and cross compliance is endemic, the acceptance of 'the tax payer will give you money just for owning land' can only result in loss in knowledge, skills and care. All of which are detrimental to our Land as wells as the NI vision for agriculture

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?

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

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

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

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

Tax averaging for volatile income sectors should be rolled out, but the case to limiting it to the Agri sector will be challenged – rightly in my view. Again Agri-sector specific benefits must be carefully assessed vs the erosion of public empathy for farmers and farming. This empathy / trust / loyalty is crucial if farming for food in NI is to become a profitable asset to society and NOT a burden on the public purse.

The deposit scheme similar to that operated in Australia would seem be useful and worth investigating.

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

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

It is clear that future of NI agriculture will be a mix of Farming for food with Farming for public goods. In fact, there should be no need to separate the two as the public goods gleaned from Farming for food are clear: A reliable supply of safe primary foodstuffs which make a net contribution to the GDP of NI and provide materials to support a processing, wholesale and retail sector than can supply the NI public with **reliable, low carbon, environmentally responsible, safe, affordable food**. One of our failures has been to shy away from this and to try to place NI agriculture (in general) into a globalised food supply chain where the only measured value is Cost in £. If the NI public (and the UK public representatives in Westminster of course) are to see its farming sector as worthy of financial support then surely it **MUST** be transparent and open about the positive contribution it makes to them! i.e. The **PUBLIC GOOD**.

The environmental principles (i) to (iv) are credible and should of course be fundamental pillars of the new NI agri policy. **BUT** replace the word Environmental with Agricultural and re-read it – these principles are surely also fundamental to the future sustainability, resilience and profitability of NI agriculture!!!! The two are not separate, it would be folly do so.

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

Strongly support with the additions that it must be on the premise that it is for all in the agri-sector, not just a subset of 'eco farmers' or such like.

It should only be driven by a need to show positive change to the public goods provided by the sector (which as stated earlier includes the production of **reliable, low carbon, environmentally responsible, safe, affordable food**).

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

As stated earlier, unravelling the NI vision for agriculture into a set of outcomes and underpinning actions would reveal the benefits of an overarching outcomes based approach for farming. Importantly NOT just one that is restricted to some notional 'Environmental Action', Greening, or other fictional subset of agricultural activity. The truth must be laid bare for farmers, landowners and the public: That agriculture, no different from any other human activity, is inseparable from environmental activity.

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 Kernel and Key to the success of future NI agri-policy is how to transfer £ from the public purse to purse of the farmer/ landowner in return for a net increase in public goods (including production of reliable, low carbon, environmentally responsible, safe, affordable food).

It is imperative that the public, farmers, landowners and all in the food supply chain do not see a difference in environmental sustainability and the sustainability of the NI agri-sector. If such differences are made explicit in policy, or delivery, then over time the cards will fall. The trust from the public, and their 'Public Purse' will have been betrayed.

It would be unreasonable to think that DAERA or DEFRA will have all the answers worked out by 2020, so, there must be an acceptance of a transition. the Income forgone model is fraught with flawed logic: economic modelling and statistical analysis to produce £ lost but so to could be a model based on non-tradeable public goods. Indeed the Natural Capital Assessment projects carried out recently demonstrate the need for much more work to make valid assessments of what is there already never mind what constitutes a positive or enhanced public good. However, payment for actions or outcomes that are a legal necessity (e.g. not burning scrub, not polluting water, not causing damage to

designated sites) could not be supported, nor could payment for outcomes that would happen without any intervention from the farmer or landowner (e.g. the passage of clean water down a river, the growth of native species). The remit here should lie within DAERA and build on the collaborative approaches the department has recently embarked on. The department should be encouraged to explore the feasibility of 3 other models; a whole farm costs model; a transaction costs model and a long term land use change model.

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

It is also disappointing to see that it is only in the last paragraph of 6.4 where a more holistic view of measuring and returning Public value is addressed. Over the last ten years a number of EU, lottery, UK Gov funded as well as private initiatives have attempted to explore how a more useful transfer of monies could take place (variously: UK- Higher level Environmental Stewardship Scheme; Pasture for Life; Netcastle Estate Sussex; John Muir Trust rewilding projects in Scotland; Exmoor's Ambition; ROI - Burren Life; HNV Farming ; RBAPS). Rather than replicate these, it would appear good practice for the DAERA to review the learning, take the best current practice and design mechanisms to roll this out in NI.

It can be argued that the most tangible connections between the public and the countryside are made when the public are actually IN the countryside and enjoying experiences which increase their health and wellbeing. There seems to be only merit in

exploring how through enhanced outdoor recreational opportunities better public connections and experiences can be actively encouraged through the new NI agricultural policy. It is a no-brainer win-win situation any marketeer would drool over. The National Governing Body for Hillwalking and Climbing 'Mountaineering Ireland' has a particular interest in the future of the uplands and how responsible recreational use of these special places can benefit all, including those living and working there.

Recently there has been a noticeable shift by retailers toward more consumer focused marketing "Supporting Local Producers", "Supporting local business" or "Supporting local communities" are all commonly seen. Their widespread use suggests they are effective messages that are changing public behaviour in the retailers favour! They would seem to be making more positive connections between producer and consumer but are they having an effect on producer profits? These Market led 'supply chain pull' incentives will clearly be driven by the retail sector and it is difficult to see their model change from Shareholder profit to Public good to such an extent that would adequately address the gap in 'profitable agriculture' and the support monies currently coming from CAP. It is more likely that increasing public goodwill toward farmers and landowners will make for better public & political support for moving £ from the public purse to the bank accounts of farmers & land owners.

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

An obvious must, but again, the need to make a distinction between Environmental Outcomes and Agricultural Outcomes must be challenged! Separate to create division divide, unify and produce a cohesive response to achieving the NI vision for Agriculture. The aim must surely be to build a circular food economy. In which all the players contribute to the NI vision.

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

The more joined up and collective the actions are then the more effective they will be. This would be effective at catchment level, sectoral level (poultry, sheep etc) or sub regional levels (farmer groups rather than just geographical area).

A successful model will have to be based on farmer buy-in – and not just because of the money on the table! There must be some way of recognising real commitment (perhaps Farmer CPD, Farmer participation in design and delivery), there will have to be some degree of targeted delivery and include a robust monitoring and evaluation scheme alongside a mechanism to scrutinise performance and match to the outcomes desired by the NI vision.

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

If the government can't or won't do it who will?

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?

Strongly support with the proviso that it should be delivered in such a way to encourage groups of farmers to work collectively within the supply chain.

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?

Not developed.

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.

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

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

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

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

The comparable document for Wales makes a more positive statement for supporting outcomes relating to heritage and recreation. It makes the point that land managers have a key role to play in the conservation of cultural heritage and the provision of outdoor recreation opportunities. It would be appropriate to give farmers in Northern Ireland a similar acknowledgement even if the potential here is not yet fully realised.

Many of the environmental measures referred to in the consultation document would be welcomed by those who use farmland and hills for outdoor recreation. However, we would like to see a specific incentive scheme included that would provide for new or enhanced recreational opportunities and experiences. This would not be new; it was trialled in 1992 by the then DANI as the Countryside Access Scheme and similar schemes have operated in other parts of the UK.

Importantly, the scheme would be voluntary and provide payments in support of actions that create or enhance the quality of recreational experiences available, indeed, a suite of these actions could be envisaged which mirror the layout of the wider options in the current EFS).

Ideally, potential projects should be included in outdoor recreation strategies, community path plans or comparable strategic documents produced by district councils or other land management organisations.

In my view there is a correlation between enjoyment of the Northern Ireland countryside and securing goodwill towards public funding of future agricultural support schemes. It is therefore vital that this opportunity is taken to plan for a greater level of recreational activity which will benefit rural communities and public health.

I look forward to seeing the outputs of this consultation and to working with DAERA to produce a sustainable and resilient agri-sector in Northern Ireland which benefits

Yours

Vincent Mc Alinden Oct 2018

ENDS

GORDON MCKINLEY

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?

Response . This is a must to be fair to all 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?

Response not really applicable to most of N. Ireland

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?

Response. Should be preserved to help the environment

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?

Response Should continue to receive payment as long as they are eligible to do so.

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

Response should be encouraged but capped to first 50 hectares. Should not be allowed to be traded as present system is open to abuse and lacks the spirit of the scheme

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

Response financial incentives always work

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?

Response direct payments will need to continue well into the future especially for the beef and sheep sectors

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.

Definitely cap payments to new entrant young farmers to first 50 hectares. This will help to stop some people from being opportunists on large blocks of land just to attract subsidy

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?

Response will only be appropriate to a few

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?

Response Many farmers would be happy to go to Business Development groups but the cash incentive would need to be re established again

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?

Response many farmers do not really like the class room. If they did they would probably not be farming. Formal training would be more successful in the Business Development group situations

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

Response probably a good enough idea but must be friendly farmer delivered

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?

Response could be difficult to measure fairly

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

Response would need to work very closely with the banks and they may favour certain sectors eg dairy sector

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

Response I believe NI farming is already intensive enough given that we must become more environmentally friendly. More production will only mean cheaper prices as we have to play on the world market

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

Response would be very difficult to administer in a fair way. Presently heading to a flat rate payment per hectare is not the worst system

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

Response Flat rate per hectare will be hard to beat

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

Response Most of LFA lands support sheep and suckler cows however dairy can also hit poor profits at certain times so overall a flat rate system will assist everyone. Overall payment should be capped

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

Response cash incentives are a must so is a big encourager to respect and ensure cross compliance

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

Response would work well but first offences should not attract severe penalty DARD staff should work with farmers to correct errors and not as policemen to "catch farmers out"

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

Response Should aim to protect the environment and provide habitat for wild life. If say 95% of a field was compliant the other 5% should be made available to wild life etc without penalty eg a few whins down the back of a hedge should be encouraged as wildlife cover, equally a few rushes in the corner of a field should not be an issue. Brown rushes should not be penalised as rushes in the west of the province has proved to be a valuable bedding crop this year given the prices being asked for straw. Certainly white rushes should still be a problem

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

Response Support payment should be capped say at first 100 hectares maximum with a tiered system for the next say 50 hectares at a lower rate and then an even lower rate for the next 50 hectares etc

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

Response would be difficult to set for beef and sheep sectors

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

Response would be difficult to police and set as no two farms are the same

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

Response would be difficult to be fair to all as many farms perform differently. Some farmers may choose to be more environmentally friendly and wish to keep less stock to achieve this

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

Response difficult to set and respond to in a short space of time who would define cut off points

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

Response This is a must going forward to protect the environment for the next generations

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

Response Probably more evidence of the real harm that each farming sector is doing to the environment would be useful to encourage all to be more environmentally friendly

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

Response would be difficult to measure and be fair to all sectors

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?

Response This to me would be a welcome move as it will be an incentive to farmers to have more respect for the environment

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

Response others involved should be a good thing but again hard to police and be fair to all

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

Response any model has to be straight forward and not coupled with lots a red tape

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

Response full transparency will never happen . Local government authorities should be seen to support local farming

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?

Response CPD is a must but those willing to do so would need a financial incentive as lots of farmers "cannot be bothered" . No amount of training will increase the world wide market prices where much of farmer product has to be traded

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?

Response Government authorities should ensure that local authorities support the local farming industry. e.g. Education authorities must purchase

local produce. Greater tariffs should apply to imports of beef etc. e.g. Local hotels should have to pay tariffs on turkey meat coming in from abroad

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.

Response ANC areas should get additional support

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.

Response. 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.

Response continued financial support will be needed for the survival of a majority of farms into the future as world prices are not sufficient to cover overheads etc. The winter is too long in this country so expenses are much higher than that in a lot of other countries

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.

Response It is my opinion the NIEA should police the dairy industry much tighter on the nitrates directive

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.

Response ANC areas should have additional support encouraging them to farm extensively instead of intensively. These are the areas most difficult to farm and could compensate for areas of better type lands were intensive farming will harm the environment as much harm. Big chunks of ANC areas store a lot of carbon and this should be officially recognised and encouraged

Overall, we could encourage increase in production but we still play on a world market and processors will use more production to drive down prices eg local supply and demand situations



Consultation Response

Northern Ireland Future Agricultural Policy Framework:

Stakeholder Engagement

Issued by DAERA

Transitional Agricultural Support Regime, 2019-2021

Q1 What are your views on the retention of entitlements as the basis of direct support until a new agricultural policy framework is agreed?

Following the January 2018 statement of the Secretary of State for Environment, Food and Rural Affairs with regards to post-Brexit farming funding, and in agreement with Section 2.2 of the Department's Stakeholder Engagement paper, Mid and East Antrim Borough Council ("Council") would seek to maintain the *status quo* during the transitional period.

As an entitlements system helps to ensure that a greater proportion of the agricultural support is retained by the farmers themselves, Council feels this system would be of the most benefit to its constituents. Therefore, Council is of the view that the current entitlements system should continue for the 2020 and 2021 scheme years as the basis of direct support to ensure support is directed towards *active* farmers.

Q2 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?

Due to the disproportionate administrative effort required to implement the greening requirements, together with the fact that they only apply to a small number of producers, Council is in favour of abolishing these requirements and incorporating the value of the greening payment into the BPS entitlement values.

Q3 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?

Whilst Council believes that the greening requirements should be incorporated into the Basic Payment Scheme entitlements values, it is conscious of the environmental

and ecological value that form the rationale behind the greening requirements. Therefore, Council agrees that the ban on ploughing on environmentally sensitive permanent grassland e.g. peat bogs and wetlands, should continue.

Council notes the possibility of bringing this ban under the provisions of the Environmental Impact Assessment Regulations or by making it a condition of receiving the Basic Payment.

Q4 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?

Q5. What are your views on whether to allow further applications to the YFP and the Regional Reserve after 2019?

Given the importance of encouraging new entrants into the agriculture industry the Council believes that it is reasonable for those accepted on to the Young Farmers' Payment (YFP up to and including 2019 should continue to receive this payment for the period which they are eligible.

However, after 2019 there should be a focus on the longer term agricultural framework and consideration of a new programme that addresses generational renewal. The use of Regional Reserve monies during the transitional period to act as a top-up to BPS for a YFP should be ceased but there is concern that this may deter new entrants if there is not a more robust programme in place to encourage their participation. Council would urge the Department to develop generational renewal strategy as a priority.

Q6 What are your views on the most effective means of encouraging and facilitating generational renewal on farm businesses?

Council notes that there are a number of economic and sociocultural barriers that inhibit young farmers entering the industry. In particular, the access to land – for those not in a position to inherit – is particularly problematic given limited land mobility (land retained within families rather than placed on the open market) and other capital costs e.g. machinery, feed etc. Any generational renewal programme must therefore look at the issue land mobility in order that the capital investment for new entrants is minimised.

For example, Council is aware of a range of 'Joint Farming Ventures' such as 'farming partnerships', share farming, contract rearing, cow leasing and producer groups. Aspects of each of these approaches should be considered in the development of a generational renewal action plan.

Council also believes that the real issue for generational renewal is not so much the recruitment of new entrants but rather the barriers to exit for older farmers. The assessment of previous early retirement schemes for older farmers showed little impact on encouraging generational succession and it is unlikely that on their own the introduction of a scheme in NI would have the desired outcome. However, an

early retirement payment could be offered to older farmers who engage in a JFV but this would be dependent upon the eventual transfer of land to the new entrant.

Concacre is also likely to be an impediment to new entrants with a need for longer term tenancy agreements to provide stability.

It would also be wrong to see this issue *purely* an agricultural one. Other policies relating to, for example, taxation and social welfare, may also have a bearing on a farmer's decision to engage in such a programme.

Q7 What are your views on whether the elements of the current direct payments discussed in Section 2.7 could remain in 2020 and 2021?

Given the timeframe involved and the need to provide as much stability to the industry as possible post-Brexit, Council is of the view that the elements of direct payments referred to in Section 2.7 should remain in 2020 and 2021.

Q8 Have you any specific suggestions for simplifying other aspects of the current direct payments regime in 2020 and 2021 which are not mentioned here? If so, please explain your rationale for suggesting these.

Nil

Increased Productivity

Q9 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 'Productivity Grand Challenge' approach seems reasonable but it is the *application* of this research at the farm level to enhance productivity growth that is key to delivering change. The suggestion of a '*platform approach to science delivery and facilitate integration with knowledge transfer and education*' sounds promising however what does it actually entail in practice?

Q10 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?

Council is of the view that it is essential to place greater policy emphasis and investment in agricultural education and knowledge transfer. While farmers may have carried out particular activities in a particular way for many years it is not necessarily the case that they are the most efficient. Opening up minds to new way of operating is therefore essential. Peer-to-peer knowledge exchange is an important approach to this, for example through the establishment of regional demonstration farms. As an example, see [AgriDemo-F2F: enhancing peer-to-peer learning](#). Education programmes should encourage a life-long learning culture.

Q11 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?

In principle the concept of linking educational attainment with various incentives is an attractive proposition. However, issues such as social isolation or anxiety from older farmers with regards to attending an educational course for the first time may be impediments for some farmers' participation.

Conversely, it is widely acknowledged that the pursuit of formal and further education has become much more of a societal norm which continues into the agricultural sector, particularly within younger generations. Considering the Department's objective to further and encourage education within the sector, incentivisation could present an opportunity to work towards achieving that goal.

Consultation with the farming community about the best means of delivery of such educational programmes should be carried out and meetings held to challenge any myths regarding such programmes and highlighting their benefits.

Q12 What are your views on continuous professional development (CPD) as a policy intervention and the possible investment of public funds to incentivise CPD?

Progress in any career is underpinned by continuous professional development and farming should be no exception. Farm management practices and technological advances are developing continuously and the successful farmer must keep abreast of these if the business is to thrive. Council is of the view that it is preferable for a structured approach to CPD in line with the development of a farm business plan. This would ensure that the new skills/knowledge can be applied as the business develops and are not just a theoretical exercise.

Council would advocate financial support for farmers towards the cost of such courses – paid on successful completion.

All courses would have to be accredited, quality assured by the Department and recognised by the industry.

Consideration should also be given to the cost of administering and monitoring a CPD programme.

Q13 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 targeted on innovation and technology and aligned to strategic objective such as productivity and environmental performance is to be welcomed.

Council notes that the consultation document states "*It should not create perverse incentives to invest in unnecessary, unviable or unsustainable assets*". Council is aware that direct payment constitute the large part of farming income for the majority of farmers in NI. While the issue of direct payments is a separate matter and yet to be resolved in the longer term, their removal might render thousands of farms

unsustainable, particularly those in Less Favoured Areas (LFAs), and therefore deem them unsuitable for this targeted investment. Council is therefore interested in how the department might define “unnecessary, unviable or unsustainable assets” and concerned that those farms in LFAs might be considered as unsuitable for investment in technology or innovation.

Q14 What are your views on the provision of investment incentives other than capital grant (such as loans, loan guarantees, interest rate subsidies, etc.)?

Council recognises the benefit of loan funds/guarantees to stimulate investment and long term farm planning and restructuring in the industry. Council believes this would be of particular benefit to new entrants giving them for example, financial leverage to underpin a Joint Farming Venture referred to in Q6 above.

Q15 What other initiatives by government and/or industry should be pursued to facilitate restructuring and investment and drive productivity?

In order to encourage restructuring the government might wish to consider retraining grants for farmers who wish to exit the industry. This might result greater land mobility and consolidation of farms into larger more productive and viable units.

Improved Resilience

Q16 What are your views on the provision of a basic farm resilience support measure?

The concept of a basic farm resilience programme is welcomed by Council. It does however recognise the potential for such a safety net to restrain innovation and productivity. Council notes that the consultation states that the level of payment could be below that which is currently provided under the current CAP system but gives no indication what this might be. Clearly, it needs to be set at a level that strikes an appropriate balance between the two.

Q17 What are your views on an appropriate mechanism to establish the level of payment under a farm resilience support measure?

In order to establish the appropriate mechanism of support under this resilience measure the department might take account of the historical payment to farms under the CAP and apply a percentage reduction. If the measure of a sustainable farm is one that, at a minimum, breaks even after all costs are factored in, then a resilience payment might also be calculated on the basis of the difference between the loss versus the break-even point.

Q18 What are your views on the targeting of a basic farm resilience support payment to take account of issues such as natural disadvantage?

It is clear that if NI is to have a sustainable farming industry with a robust supply chain for the food processing industry then it is important that farm resilience support must take account of issues such as natural disadvantage which may restrict productivity but which are important to the supply chain. Council notes that of the

roughly 1800 farms in the Mid and East Antrim Borough around 1400 are in Less Favoured Areas and, on a NI scale, around 70% of farms are in LFAs (17,000 farms). Coupled with the fact that of the roughly 25,000 farms in NI around 22,000 are deemed small or very small the provision of resilience support is important if the primary production base is to be sustained to support our agri-food processors.

Q19 What are your views on linking a farm resilience support measure with cross compliance obligations?

Q20. What are your views on the content of cross compliance/good farming practice associated with this provision?

Q21. What issues would an appropriate cross compliance regime seek to encompass?

Q19 – Q21: Linking resilience support with cross compliance is a sensible approach. Notwithstanding the Council's view in Q18, a question arises as to the efficacy of providing resilience support to farms that are unsustainable. Given the historical reliance on direct payments by the NI farming sector the majority would likely be deemed unsustainable based on income/profitability alone. This is addressed in Q22.

The elements of cross compliance referred to in the Department's paper are reasonable. In particular, it is important to include productivity as well as elements that aim to provide environmental enhancement.

Q22 What are your views on the tiering or capping of a basic farm resilience support payment, or the establishment of an eligibility threshold?

Eligibility criteria are also important to establish. For example, a form of 'means testing' be applied e.g. if a farmer has income from another job this could be considered in estimating a resilience payment. This goes to the question of what is a part-time farmer and a non-commercial farmer. For example, if a farmer has full-time job and farms only in the morning before work and the evening after work such a venture may only be sustainable with a resilience payment but it is debatable whether this status warrants one. Notwithstanding the likelihood that this additional income is supporting the farm, it may be worthwhile considering other income streams a farmer may have in the context of a resilience payment.

An eligibility threshold is important to establish for the administration of resilience support. It may be that in deciding this a starting point may be the assessment of whether a farm is unsustainable, even with a resilience payment.

Making resilience payments to farms that are unsustainable, in productivity terms, may be considered an inappropriate use of funds. However, under such circumstances such farms could be vacated and potentially give rise to widespread rural dereliction. It is therefore important that other aspects of public good are considered in determining eligibility as noted above e.g. cross-compliance measures such as land management. Where farms are considered so unproductive and

therefore unsustainable to qualify for resilience support even with cross-compliance taken into consideration, the department could consider whether farmers could enter a JFV premised on delivering improved productivity as well as environmental benefits e.g. scaling up based on a collective of smaller farms to enhance productivity.

The provision of resilience support could also be premised on the farmer attending educational/training courses.

At the other end of the spectrum however large farms may not require resilience support. So resilience support could be on a sliding scale based on farm income/profitability i.e. the greater the income/profit the less the payment.

Payments should also be capped.

Q23 What are your views on the introduction of anti-cyclical/insurance type measures to help address volatility?

On the face of it the idea of insurance/anti-cyclical measures to address volatility measures is a good one. However, the individual cost to the farmer e.g. insurance premiums, would clearly be a deciding factor. Looking at [farm incomes](#) in NI for 2016/17 it is clear that without direct payments most sectors would have negative income. Given that it seems the department is considering resilience payments below that of current levels the likelihood is that farm incomes would be depressed even further if productivity gains are not realised. This would suggest that premiums would be high, if not in fact prescriptive, unless government made a contribution to these.

The reference to the viability of such schemes is important to note i.e. a critical mass of participants would be required to make such a scheme viable either regionally or on a sectoral basis. Notably, farmers who choose not to ensure themselves would not be able to avail of government support. Depending on the farm income and the cost of insurance, participation may not be open to some farmers.

There is also the possibility in a run of 'good' years farmers may drop out of such schemes. It may therefore be necessary to get farmers' commitment to such a scheme for a number of years. Conversely, if there is a run of high prices for a number of years followed by low prices (and therefore lower incomes) this could have the impact of generating large payments to farmers thus making the cost of scheme expensive.

It should also be noted that risk management is normal in any business and farmers are not exceptions to that. Good farming practices and diversification can offset the risk linked to the volatility of prices and these should be encouraged. The training and education referred to earlier in the consultation should consider the inclusion of risk management for farmers. There is also a potential moral hazard in the suggested approach as it may encourage farmers to engage in riskier behaviour.

Anti-cyclical measures may be more complex to administer given the requirement to set a reference price for a commodity which might then be market-distorting, as well as the need for detailed market data.

Q24 Should anti-cyclical/insurance type measures be sector-specific or aimed more generally at income protection?

Notwithstanding the comment above in respect of anti-cyclical measures, given the volatility in markets across a range of sectors in the industry on balance it is preferable to have such measures considered on a general basis.

Q25. What are your views on the enhancement of fiscal measures as a means of addressing the issue of income volatility?

The description of a deposit scheme where farmers can in effect move their income into an account in profitable years (before tax) and offset it against lower income in less profitable years should be explored. The number of years that money can stay in an account before being appropriately taxed – for example, if there is a prolonged number of years of higher prices – will be crucial.

Q26. What are your views on a possible pre-defined and agreed crisis response framework to respond to crisis events, either locally or nationally?

Council believes that there should be a pre-defined and agreed crisis response framework so that the industry, government and other bodies are able to respond to crisis events.

Northern Ireland is in a unique position within the UK in that it shares a border with an EU member state. Some consideration should therefore be given to the requirement for an all-island approach to crisis management e.g. where there is an animal health crisis, to ensure the integrity of the industry.

A national response framework could therefore be developed taking into account regional variations.

Environmental Sustainability

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

Council is of the view that responsible stewardship of the environment and good farming practices linked to enhanced productivity should go hand-in-hand. To that end, Council is supportive of the principles outlined in the consultation paper. Having rewards linked to verifiable outcomes in line with the objectives of sustainable agriculture policy, is key to achieving such objectives.

Q28. What are your views on the need for investment in research and education targeted on environmental and conservation management in the agricultural sector?

It is evident that farmers must be provided with the most recent applied research and best practice relating to environmental and conservation management. The Department may wish to consider linking 'rewards' not only with achieving outcomes but with attendance at classes, workshops etc. on these matters. This may relate more readily to 'older' farmers but new entrants could also be targeted by linking such programmes with participation in education, advice and continued professional development.

Q29. What are your views on a possible shift towards outcome based environmental measures for agriculture, including co-design with farmers and land managers?

Co-design of policy and programmes has been shown to work in other sectors, leading to a sense of 'ownership' by those either delivering or in receipt of services. Council is therefore supportive of this approach.

Focussing on outcomes is also important and Council acknowledges the flexible and largely non-prescriptive approach that is suggested to achieve these is appropriate.

The landscape scale approach to achieve environmental outcomes is ambitious which, as the paper notes, would require significant co-operation between farmers. Again, as noted above, if farmers enter JFVs (to achieve economies of scale for instance) this could be coupled with a focus on environmental objectives; or farmers, with contiguous holdings could be encouraged to work together to achieve environmental objectives over a larger area.

Q30. 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?

Incentives, over and above the costs incurred by the farmer, are clearly likely to have a positive impact. In relation to fiscal incentives referred to earlier, consideration might be given to a reduced level of taxation in relation to environmental payments to achieve a public good.

Q31. What are your views on the role of other actors in seeking to drive better environmental outcomes?

Q32. What are your views on the delivery models that would deliver the best uptake and outcomes?

Q31-32: It would be preferable if there was a holistic approach taken to achieving environmental outcomes. For example, farm input suppliers (fertiliser/machinery/feed suppliers) and food processors also have a level of responsibility if we are to achieve environmental outcomes. Practical action that industry could take would be to award grants for 'greener' production methods or the provision of expert advice to farmers on these methods.

NGOs could also be involved in order to break down the potential for a 'them and us' mind-set between farmers and environmental organisations. It might be that these

NGOs could be involved in the design and delivery of education courses/workshops for example.

Mid and East Antrim Borough Council has included three outcomes linked to 'Our Environment' in its community plan. These are:

- The natural environment and built heritage of our borough is protected and sustainably managed;
- People enjoy easy access to our borough's natural environment and built heritage; and
- People value our borough's natural environment and built heritage and behave responsibly towards it.

Council therefore believes that local authorities, in the context of their community plans, should have a role in the content and support of schemes that aim to improve the environmental quality of habitats, landscapes and catchments particular to their area.

Delivery models may seek to establish regional objectives but they should also recognise the differing circumstances at a sub-regional level.

Supply Chain Functionality

Q33. What are your views on the role of government in ensuring market transparency?

The food supply chain is potentially subject to unfair trading practices given the power imbalances between small and large operators.

Improved market transparency has the potential to redress these power imbalances. For example, having access to good, accurate, unbiased and up-to-date market information (supply and demand and price) would allow farmers to have a better negotiating position during contract discussions. This information would also benefit farm business plans including a more informed approach to risk management.

Given the number of actors involved in the food supply chain who have a vested interest in market data and rely on it for business decisions, it would be preferable for an independent organisation to have the key role in the collation, verification, publication and dissemination of such data. To that end, either government centrally or via an arms-length body should have the key role in this.

Q34. 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 role of the farmer is multi-faceted – he/she is a business person, custodian of the environment, a food producer, animal welfare officer, biosecurity officer etc., etc.

In short, a comprehensive approach to CPD is required for all aspects of farming including those mentioned above.

Q35. 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 noted in our response to Q33 there is a need for an 'honest broker' to ensure a well-functioning and fair agri-food supply chain. The government, in whatever guise, would appear to be the obvious choice for this role. In respect of the nature of this action one of the criticisms of the CAP relates to the bureaucracy involved in adhering to the requirements of the programme. It may be the case that the government would have to introduce legislation to compel release of relevant information e.g. to give an understanding of value added along the entire supply chain. If this is the case the legislation would need to be clear and as simple as possible.

The government might also have a role in helping farmers understand the published information and how best to use it in forward planning and risk management.

Equality, rural needs, rural proofing, regulatory and environmental impact assessment

Q36. 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.

Section 75 of the Northern Ireland Act 1998 provides that:

(1) A public authority shall in carrying out its functions relating to Northern Ireland have due regard to the need to promote equality of opportunity-

- (a) between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- (b) between men and women generally;
- (c) between persons with a disability and persons without; and
- (d) between persons with dependants and persons without.

(2) Without prejudice to its obligations under subsection (1), a public authority shall in carrying out its functions relating to Northern Ireland have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

As such, an equality screening exercise would be required in order to ensure any potential adverse effects are identified and mitigated.

Q37. 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.

Council is of the view that a rural needs assessment would need to be carried out on any proposals put forward by the Department. Specifically, Council would hold concerns in relation to how transition, changes and support be communicated and provided to those in rural areas. With the strong focus on educational requirements and CPD within the Department's consultation paper, Council would require more information on the delivery of courses to those in rural areas given the difficulties faced in accessing courses at convenient times, etc.

Q38. 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.

As regulatory impacts would be within the remit of central government rather than local government, Council has no comment in this regard.

Q39. 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.

Similarly to Q36 and Q37, Council would require a full Environment Impact Assessment to be carried out to any proposed changes the Department implements.

Conclusion

Q40. Are there any other comments you wish to make or any other evidence of need that you think the Department would find helpful? Please submit any evidence with your response.

Nil

IAN MONTGOMERY

**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?

It would be wrong to make further changes suddenly in the context of great economic and political uncertainty. I am opposed to payments from public funds to private enterprises without auditable benefits to the public.

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?

On the whole positive, provided these benefits are real, significant and verified.

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?

Those in receipt of payments should anticipate scrutiny. Disturbing protected areas is an offence and those breaking the law should be prosecuted and since public funds are involved expect heavy penalties. Farmers in general should bring peer pressure to bear on offenders.

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?

I'm not convinced that YFP have been efficient at preventing the gradual aging of the farm workforce as a whole. Also there is a degree of nepotism which is inappropriate in the use of public funds.

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

See 4. I would prefer to see investment in improving the sustainability of farming and expansion of efficient farms. People would then be attracted into a more forward thinking farming environment.

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

£400M is spent on subsidising farms per annum in NI. Instead of giving all of this directly to farmers use £100M or more per annum to improve the economic and environmental sustainability of farm enterprises subject to proper procedures and conditions. Encourage i.e. selectively fund, good farmers rather than rewarding inefficient farmers working in impossible conditions never likely to become competitive in world terms. The public should also expect full audited compliance with environmental goals. Good farmers are worth supporting – they will deliver welfare, production and environmental objects that will transform NI agriculture.

- 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?**

Viability should be taken into account when providing public money. Self-proclaiming, active farmers need to provide evidence that their enterprise warrants support and that they are fit to farm. Land eligibility should only be for land which could support a viable farm. Eligibility should reflect land quality and area. Why should the public support a physically incapable 'farmer' with a small land area on rough ground? The inspection regime

must be beefed up. People abusing public financial support should be penalised to provide a deterrent to others.

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.

The greatest boost to environment in the wider countryside would be to introduce a lower limit for hedge width (1m either side of centre) and height and increase the upper width limit to 5m either side of the centre. Closed seasons for also need hedge cutting need revisited to halt interference with later nesting birds (extend to end of August) and prevent removal of berries prematurely. There should be greater insistence on compliance with closed seasons and an imperative to cut on one hedge in three each year with no hedge cut every year leaving two thirds uncut. This would increase the services provided by hedges in terms of crop and stock protection and provision of pollinators and natural insect pest control.

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?

NI R&D in agriculture is in disarray through successive decades of underfunding. Governance of agricultural and related research in the public (Government) sector is poor whilst there is little if any real research in the private sector. University research is directed by money which mirrors activity in the Government and private sectors. In short, NI now lacks commitment to objective, independent research subject to external scrutiny. The focus is on a limited number of current enterprises and particularly on animal production. It is backwards looking to the 1960s rather than taking on the challenges of the 21st century. Greater research effort should be directed at sustainability and reduction of (import) costs i.e. self- reliance e.g. on animal feeds. Greater effort should be placed on farm diversification and on increasing efficiency and international competitiveness. How do we

move from a predominance of small family farms to large farm businesses capable of competing with the Americans?

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?

Unless there are changes in the wider agricultural enterprise education is not sufficient to bring about change.

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?

If there is evidence that education brings benefits in farming, this should be encouraged. If farmers are to benefit from public funds, conditions related to training can be set.

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

Why aren't you doing this already? Farmers seem to benefit most from seeing new ideas in practice. If farmers don't avail of the opportunity, don't fund them.

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?

This is a good thing where the technology really does make a sustained difference in the NI context. Good environmental practice often pays for itself e.g. less hedge cutting, more firewood; but demonstration of good environmental practice is useful and should be funded.

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

Substantial funds to enable rationalisation of NI agriculture. Buying out small inefficient farms, providing loans to make farms larger in terms of their area, more diversified in terms of their enterprise and more environmentally sustainable. We will end up with far fewer but more competitive and robust farms.

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

Extension of leasing contracts is a good thing. Farm cohesion is an issue in NI and funding specifically to address this would be good. Perhaps there should be a Land Bank where farmers could put land in and take land out increasing the areas of the 'home' farm and decreasing dependency on access to grazing sometimes in a county away. This would also improve biosecurity.

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

This deals with the consequences of a weak structure rather than the bases of the problem. Instead of address the leaks in the boat it is a lifebelt. Politically Government does not want small inefficient farms to go out of business. NI should not be benevolent any longer and Government and the farming community should embrace major restructuring of the industry. Support covering acute events should be related to welfare unless there is a realistic business plan to prevent the situation arising again.

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

See 16.

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

This would continue with farming as it is where it is least acceptable environmentally and in terms of profitability. However, farmers joining together to establish a larger more viable and efficient enterprise e.g. in upland areas, should be helped to make necessary changes in administration, infrastructure and stock. This could extend to non-farming enterprises such as afforestation and tourism.

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

Farmers must follow the rules if they are to benefit from public money. But I would restrict this to farmers in a hole who stop digging. Don't throw good money after bad.

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

There are no firm commitments to change... 'It is also possible that the content of cross compliance/good farming practice associated with this provision could look somewhat different than that currently applied under the CAP and could seek to help drive some basic environmental, biosecurity, land management, productivity or other objectives by attaching appropriate eligibility conditions to the payment.' If DAERA stated that these changes are a must, we might be getting somewhere.

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

See 20.

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

I think NI GOV and even SPADS may have got the point from the RHI enquiry. Don't get burnt again. Limits should be set from the outset.

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

Farm businesses and organisations of sufficient size and diversity should be able to make their own arrangements to survive down turns in income. Stop providing a safety net for small inefficient farms at public expense.

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?

Only where funds and fiscal measure bring about substantive change in NI farming businesses. Funding and protecting the status quo should no longer be an option.

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

Forward planning is essential and government has a major role with respect to predictable and unpredictable catastrophic effects. Local farmers might also be expected to think ahead – where are mudslides likely to happen? What can be done to avoid damage, loss of life? What can be done to avoid the mudslide?

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

There has to be public good for public money. The environmental threats are well documented and substantial. NI has the worst environmental record in the British Isles and one of the worst in Europe. NI Gov has to take the lead and agriculture is central. Much of what could be done to make an improvement is relatively cheap and involves simple technology. NI farmers have not really engaged as a group. Hence, tying payments to environmental benefits has to be mandatory and audited.

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

It is imperative that we have ongoing research on the environment across all areas – conservation, climate change, biodiversity loss, biosecurity, disease control, land management, water quality etc. – based in NI and informing education. This was the case up to 10 years ago and substantially more was done in the 1980s and 1990s than at present. The universities are able to do this work and are subject to research governance ensuring independence and objectivity. Frankly, through no fault of the people it employs, AFBI is not well positioned to take on this role. It is not directly involved in education to degree level and no longer has the expertise required or the structures and transparency to ensure research is done to the highest standards. Publically funded research in conservation and environmental management should be put out to tender and should be subject to due diligence as well as governance ensuring appropriate research ethics and standards. It is also not good enough to award public funding to individuals and groups which lack professional accreditation and qualifications.

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

This is what should happen. Funds should be awarded on the basis of farm plans which include both production and environmental activities. These should be audited before further funds are provided on the basis of an updated plan. Otherwise, perhaps, funds should go elsewhere.

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?

It is entirely possible that current funds involve no costs incurred (nothing is done when not ploughing a wet grassland meadow) and no income is lost when continuing to do what has always been done. Awards should be on the basis of condition. A hedge is substantial enough to support nesting birds, a pond has been created etc.

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

Assuming that DAERA does not have the staff to provide the level of advice and monitoring to ensure public funds are spent as intended and that opportunities for environmental improvement are taken, there is a role for qualified and accredited consultants in fulfilling this critical role.

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

A system of recognising accredited farm inspectors/environmental consultants should be set up. There are some professional bodies already in existence e.g. <https://www.cieem.net/>

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

The reputation of NI agriculture should be central to Government and farmers and food producers' organisations. Presumably these groups meet one another and can express their concerns without compromising their commercial interests. Government however have responsibility for public funds and should not be replacing private company costs without some public good or increased tax return. Government can play a significant role in marketing internationally.

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?

Provide Government is innovation and not simply telling farmers how to do what they are already doing. Government might be looking for alternatives to over reliance on beef, dairy, pigmeat and lamb. Government should be making sure that the 'green' image and welfare specifications are being met.

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?

See 33. In addition, Government must provide appropriate infrastructure and oversee standards in slaughter, food handling etc. NI cannot afford bad publicity. Perhaps Government should recover direct costs from the industry?

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.

I have provided additional information that covers a wide range of problems and issues in NI rural communities.

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

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

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

A more holistic approach to NI environment issues is badly needed. Environment and science are the least funded government activities on a per capita basis in NI and in comparison with other UK devolved jurisdictions. Yet these provide great benefits in health, well-being, economic activity related to tourism and recreation, sport, and culture. NI has an appalling record of neglect with regards to environment and agriculture is the main issue. DAERA cannot continue as if the environment does not matter.

Material attached.

JOHN MOORE

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?**

Land management in N Ireland should be more fully integrated to provide a greater range of benefits, increase resilience of rural land based business and incentivise diversification of business. Entitlements should apply equally for all land uses including forestry.

- 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 should be integral to all land uses and appropriate to the specific biodiversity priorities of the region.

- 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?**

All future support arrangements should incentivise minimum tillage and soil conservation as a general rule, particularly in environmentally sensitive areas. The principles contained within the UK Forestry Standard 2017¹ and associated Guidelines should be used as a basis for the development of similar Standards in agriculture and basis for future financial support. The UK Forestry Standard sets a standard for sustainable forestry in the UK. It includes standards and guidelines on the following

¹ UK Forestry Standard 2017. <https://www.forestry.gov.uk/ukfs>

elements of sustainable land management: biodiversity, climate change, historic environment, landscape, people, soil and water. A similar standard should be adapted for sustainable land management in NI.

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 age profile within the agriculture industry is skewed and does not reflect the wider population. Younger land managers of all rural land uses should continue to be encouraged

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

The age profile within the agriculture industry is skewed and does not reflect the wider population. Younger land managers of all rural land uses should continue to be encouraged

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

A land management policy which integrates all land management uses will be better placed to encourage a thriving rural economy and new entrants into land based industry.

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?

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.

The direct payments should be applicable to all land uses, including forestry, which can provide evidence of delivery of a range of public goods. The use of a general land management standard, such as the UK Forestry Standard in forestry should be used as a basis to demonstrate sustainable land management.

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?

Productivity should be based on sound environmentally sustainable principles and directed to all rural land uses including forestry. The use of science and innovation to improve productivity in all land uses is welcome.

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?

Investment in education and knowledge transfer is encouraged but should be available to all land use managers. This is absent in the current Business Development Groups which do not reflect land uses other than the principle agricultural sectors in NI. This should include forestry and other land uses to improve and share knowledge to encourage greater diversification and greater integrated land use.

Please see A Forestry Skills Study for England and Wales². This report was commissioned in 2017 to, ‘provide an evidence base that informs a skills action plan designed to support the national policy objectives of achieving growth of the forestry sector and active management of an increased area of woodland’. This study should be repeated in Northern Ireland. The recommendations arising from this English and Welsh study will inform the preparation of the Skills Action Plan. There are significant opportunities for a more integrated rural labour market, as there are many transferable skills between farming, forestry and other land management industries including planning, soil management, machinery operation, etc. Greater integration would enable the development of a robust rural workforce, better able to engage in a range of operations across several industries and reduce dependence on seasonal work. This integration must begin in colleges with more students studying ‘land management’ rather than farming or forestry specialisms.

² <http://www.rfs.org.uk/media/442100/forestry-skills-study-report-for-england-and-wales-2017.pdf>

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?

Supportive. Should also include the wide range of land uses including forestry and not restricted to agricultural training.

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

Supportive. Should include all land management professions.

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?

Supportive. Innovation and new technology should encourage diversification and to ensure all land based businesses are more profitable and resilient. This should be focussed on environmental performance and include all rural land based businesses.

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

Supportive and should be applied to all land uses including forestry.

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

Greater diversification and a more integrated land management policy should be core to any new agricultural policy development in N Ireland. Productivity should not be purely focussed on food production in agriculture. Investment and a drive in productivity should also focus on the delivery of a wide range of ecosystem services including timber, biodiversity, carbon sequestration, water protection, flood risk management, recreation provision and landscape improvements.

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

Resilience should be encouraged by a more integrated land management policy which includes all land uses including forestry. The creation of farm woodland and / or agroforestry should be encouraged to improve rural business resilience.

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

Payments should be linked to diversification of rural businesses to include all land uses including forestry to provide a wide range of public goods.

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

Areas of natural disadvantage have the potential to provide a wide range of ecosystem services and should include other land management uses including forestry. Forestry has the potential to provide timber, carbon sequestration, flood risk management and enhancement of biodiversity on these areas whilst providing greater business resilience.

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

Supportive. Farm resilience support measures, covering all land uses including forestry, should be linked to a sustainable land management standard similar to the UK Forestry Standard in forestry.

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

The UK Forestry Standard sets a standard for sustainable forestry in the UK. It includes standards and guidelines on the following elements of sustainable land management: biodiversity, climate change, historic environment, landscape, people, soil and water. A similar standard should be adapted for sustainable land management in NI.

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

The UK Forestry Standard sets a standard for sustainable forestry in the UK. It includes standards and guidelines on the following elements of sustainable land management: biodiversity, climate change, historic environment, landscape, people, soil and water. A similar standard should be adapted for sustainable land management in NI.

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

Basic farm resilience should be encouraged with the diversification of sustainable land uses such as forestry.

In designing such schemes, it must be borne in mind that any public payment effectively disadvantages unsubsidised activities. For example, if a profitable land use such as forestry is made ineligible, there is a risk that it is outcompeted by unprofitable activities.

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

The diversification of farm business into other land uses such as forestry should be encouraged to provide an insurance against volatility.

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

The diversification of farm business into other land uses such as forestry should be encouraged to provide an insurance against volatility.

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

Supportive of such a framework but they must apply to all land uses including forestry (for example fire, storm or disease damage)

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

The environmental principles contained within the UK Forestry Standard sets a standard for environmental principles within the agricultural policy framework. It includes standards and guidelines on the following elements of sustainable land management: biodiversity, climate change, historic environment, landscape, people, soil and water. A similar standard should be adapted for sustainable land management in NI.

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

Supportive. This should include all rural land uses. Environmental and conservation management should be integral to all land management uses and not treated as an add-on optional extra. Further research and education on environmental and conservation management should be encouraged.

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

Delivery of public goods through an integrated land management policy should be encouraged and should integrate all rural land uses including forestry.

There should be a long-term aspiration that all activities within future schemes are outcome based, but at the current time the evidence base and administrative processes are too undeveloped for wholesale adoption. There is not the evidence to show the optimum outcome in every case and in others, the beneficial outcomes are so widely acknowledged, such as with riparian buffer strips, that inspection costs can be kept to a minimum by paying for activity. Ongoing pilot schemes run by Natural England's have demonstrated that although environmental performance may

increase, efficient systems for administering outcome-based schemes are currently lacking, management costs are high and the evidence base about how to achieve excellent outcomes is un-developed. To improve the knowledge base and to support improved outcomes as part of the available advice, land managers will be able to undertake ecological training to improve species identification and expertise. When accredited, land managers should be financially rewarded for providing their monitoring reports. This policy will increase land manager engagement in environmental delivery whilst providing cost effective monitoring. Ultimately this will improve the evidence around land management and allow for focus on the most effective actions.

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?

Supportive. This should include all rural land uses including forestry.

Future schemes must be a contract between land manager(s) and the Government, with land managers being paid specified amounts, on specified days for providing specified outcomes or carrying out specified activities. This direct relationship is necessary to ensure accountability and the integrity of the scheme. This direct link also means that land managers have a single point of contact for entry into environmental land management and a reasonable expectation of good service. There should however be a presumption of local delivery for future schemes. To be effective and to ensure that applicants are treated in a consistent manner, local prioritisation and delivery should be achieved transparently and within nationally monitored limits and rules. There will also be a need for overarching priorities and targets to be set nationally

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

Commercial forestry has successfully operated a market-driven sustainability scheme for the past 20 years.

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

Delivery models should focus on the ecosystem services delivered and encourage integration of land uses such as forestry, agriculture and agroforestry to build resilience.

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

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

Supportive. This should include all land managers including forestry professionals.

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 should include all land uses including forestry.

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.

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.

There must be investment in rural communications infrastructure, particularly broadband and transport links.

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

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

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

Forestry provides a wide range of ecosystem services including timber, enhancement and protection of biodiversity, water protection, carbon sequestration, flood risk mitigation, recreation facilities and landscape enhancement. Forestry is a positive and important opportunity for many farmers and landowners, especially those on marginal land. It is a growing industry that provides a wide range of professional employment and career paths. Timber production will be the foundation of a future low-carbon society. It is vital, therefore, that forestry is central to future Northern Ireland land-use policy.

The following documents provide information on the potential of forestry in Northern Ireland and should be incorporated into the design of agriculture / land use policy in N Ireland:

Indicative map for Woodland Creation, N Ireland. <https://www.daera-ni.gov.uk/sites/default/files/publications/dard/indicative-map-for-woodland-creation-2009.pdf>

There is growing research evidence that woodland planting in the right place can “slow the flow” and reduce downstream flooding events. <https://www.daera-ni.gov.uk/publications/quantifying-hydrological-effect-woodland-creation-camowen-and-drumragh-catchments-omagh-northern>

Opportunity mapping for woodland creation to reduce flood risk in Northern Ireland. <https://www.daera-ni.gov.uk/publications/opportunity-mapping-woodland-creation-reduce-flood-risk-northern-ireland>

The following GB related documents are also relevant to demonstrate the benefits of forestry within the rural economy and the development of new land use policy in N Ireland.

A case study of a Welsh farm forestry business: <http://www.confor.org.uk/media/247024/farm-forestry-business-case-june-2018.pdf>

Farm forestry. A Confor special report <http://www.confor.org.uk/media/246612/confor-farm-forestry.pdf>

The carbon benefit of forestry and trees <http://www.confor.org.uk/news/latest-news/eskdalemuir-carbon-report/>

WRL MOORE

DAERA CONSULTATION RESPONSE

September 2018

Introduction

I welcome the opportunity to respond in detail to this consultation. I have read it through a number of times before attempting to answer any of the questions. In general, I find it to be a positive and useful document which includes new thinking and possible proposals for a new agricultural policy after leaving the EU. I see this as a great opportunity to develop a realistic and sustainable policy for the agrifood industry which delivers a forward thinking, enthusiastic and, above all, profitable agricultural industry which future generations would be keen, and indeed proud, to be a part of. I have, however, two criticisms of this document.

The first is that there is little or no mention of the importance of 'profitability' within farming going forward. Tiff figures for the last number of years prove that the industry is not in a good place due to lack of profitability and huge dependence on financial support. The second, despite the current poor state of the industry, is the lack of acknowledgement of the huge amount of good work that we farmers already deliver under all too often difficult conditions, producing food and looking after the environment as best we can. The four key desired outcomes listed in the introduction to the consultation are extremely important for the success of any new policy but all of them absolutely must be linked to sustained profitability. Finally, any new policy must be developed alongside full and meaningful involvement of farmers - we are the food producers and also the ones that will be asked to deliver that food in an environmentally friendly manner.

Annex A 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 current system works so it would make sense to retain it during a transition period.

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 current greening requirements are expensive, ineffective and not based on scientific evidence and so I would strongly urge the Dept to abolish them as soon as possible. This is not to say that greening measures should not be incorporated into agricultural production in future. It is generally accepted amongst farmers that we all should farm in an environmentally and sustainable manner, but any future measures put in place should be evidence based and practical and properly financed from the public purse as it will be to the benefit of everyone and our own environment. Any future policies need to be carefully considered by all interested parties, particularly farmers and land managers, as they are the people who have to deliver the policies on the ground.

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?

If there is clear scientific evidence for restrictions on ploughing up permanent grassland, then it should be given serious consideration.

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?

I would support this approach as those involved will have made long term plans, so long term agreements should be honoured.

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

This would depend very much what sort of overall agricultural policy is developed for the future. YFP should be considered within that framework.

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

There is no simple answer to this question. Again it depends very much on what sort of future policy is agreed. It is not just a question of 'generational renewal', which is important, but also of encouraging new entrants of whatever age into the industry. In simple terms, if farming is profitable and sustainable in its own right and younger people see the industry as a potential good career, they will be keen to join it. There is a basic lack of profitability within the farming industry which has been made over the years far too dependent on Government financial support and this is very negative for the industry's future development.

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?

Financial support must be retained at least in the short term, to allow the industry to adjust to any new policy.

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.

Farmers have become used to the current direct payment system and so it would not be of any benefit to change it for a short period of 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?

Improved productivity must be an integral part of a new policy and direction for agriculture and must not be taken on its own or regarded as the solution to all our problems. Improved productivity may help the industry to become more competitive but it will not, on its own, replace the current financial support system. Improved productivity must be linked to an integrated supply chain and true cost of production. If it is not, then the industry simply produces more for less reward and is no better off. I am concerned that investment in science and innovation has

been reduced in recent years and, in addition, some of the progress that has been made has all too often been ignored in policy decisions.

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?

Again, this must be taken in the overall context of a new agricultural policy going forward. While education and KE will always be important, it will not on its own solve the current challenges, which are mainly lack of profitability, facing agriculture. An expert, well educated farmer will ultimately not survive if the market place does not provide him/her with a sustainable return for their efforts and investment. So, investment in education and KE must be coupled with policies to ensure the supply chain returns a fair price for agricultural produce which it generally does not at the moment. That would be the greatest driver to achieve 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?

See answer to Q 10.

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

CPD currently works reasonably well and should be retained in future. Farmers seem to generally support this approach and it is helpful. It is also reassuring to the general public. It needs to be carefully managed and flexible.

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?

This is important and we must always look for new methods of production which enable farmers to produce food at a competitive price and in an environmental manner. However, with regard to environmental performance, one size does not fit all and what works on one farm may not work on another so flexibility is the key. I would advice caution on linking food production and environmental performance too closely together as we could end up driving up cost to an unsustainable level. This is an area that needs careful consideration as currently some

machinery that is regarded as environmentally friendly is very expensive and may not support the 'productivity' challenges.

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

Again, this should only be part of an overall agreed new agricultural policy. There is little point in encouraging investment in an industry where profitability is so poor that the industry is totally dependent on financial support. A policy needs to be developed which creates integrated and equitable supply chains that recognise cost of production and pay a realistic price for farm produce. Investment incentives as suggested would then certainly be important to encourage the industry to re-invest in machinery and technology to enable it to produce food at an acceptable price and in an environmentally acceptable manner.

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

The answer to question 14 also applies to this one. However, in addition, Government should provide financial incentives to encourage the creation of equitable and integrated supply chains. This could take the form of extra tax allowances/discounts to supply chains that prove all parts of the chain are working closely together and fully recognising cost of production at each stage. It would also make farming more profitable which, in turn, would make it more productive and competitive. This is critical to the success of any future agricultural policy. This would also have the benefit of reducing waste and producing exactly what consumers want and need.

Volatility is a huge problem for agriculture and as Government is ultimately responsible for ensuring an ample supply of good quality, affordable food for its people it needs to seriously address the issue of volatility. Some sort of insurance schemes need to be set up which both Government and producers pay into each year and which farmers could then draw down on in difficult years. This could also act as a retirement plan for some farmers allowing restructuring within the industry. A properly funded capital grant scheme would also be important to help farmers reinvest in machinery, buildings and technology. This could be tied into integrated supply chains as mentioned above and full business plans would need to be developed to prove the need for the investment. The FHDS of the 1980s was very effective and a modern day equivalent of such which is open to all farmers should maybe be developed. Measures to

encourage co-operation between farmers through land/machinery/labour sharing initiatives and development of contract and share farming should also be encouraged.

Improved Resilience

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

As we move from the current system of financial support to a new system the industry will need time to adjust and so a basic farm support measure will be required. However, in the longer term it would be preferable to move away from a standard basic payment for the reasons highlighted earlier to a more flexible system that allows for different levels of support when most needed. A new system must be very clear in what its aims and objectives are which must surely be to make agriculture sustainable and efficient and receive a proper level of reward for its products

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

Given the need for a considerable transition period, it would make sense to base a future payment on the current system which is already established and farmers are familiar with. Payments could be adjusted from the current level depending on the speed and development of a new system or mechanisms of 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?

This is more difficult as we get into the area of environmental and social support to keep farmers on land that is not naturally productive. This maybe needs a different approach and possibly should not be funded from an agricultural budget.

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

Clearly if direct payments of public money are made to farmers, the public would rightly expect cross compliance measures to be part of that policy - provided those measures are reasonable, flexible and justifiable.

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

There has to be good reason for cross compliance and above all it must be flexible and any breaches penalised proportionately. We need to develop a policy that encourages farmers to farm in a safe and responsible manner. This they will do if they are receiving fair reward for their work. It is questionable whether many of the current cross compliance requirements are either required or effective. Any future measures must be evidence based.

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

Clean air, clean water and safe food are probably the three main areas. However, it should be recognised that most farmers are doing just that at present. All cross compliance measures must be based on factual and scientific evidence, be sensible and straightforward to comply with. If farmers understand and agree with the requirements, they will readily comply which would, in turn, reduce the need for inspection and enforcement while still delivering the desired outcomes.

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

Not in favour of either tiering or capping. I can see no evidence to justify either. Larger farms could well be producing more food, employing more labour, providing more environmental benefits so could well justify a higher level of support. Just because a farm is larger than the average, does not necessarily mean that it makes more money. Also, where do we draw the line? What is either a 'big' or 'small' farm? If a policy was developed that included the principle of 'capping' support to larger farms (whatever size that is?), then the opposite should also be included i.e. no support to small farms which are not viable in their own right.

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

Generally supportive, but would need more info on the specifics. This idea seems sensible and encourages farmers to help themselves and their businesses covering them in bad times while

also possibly allowing them to put money aside for retirement or possibly re-investment. The level at which funds would be released would have to be carefully thought out as to base it on what is suggested would not help us much given the abnormally low incomes from farming over recent years. Govt would have to 'kick start' the process and probably contribute to an insurance scheme on an annual basis.

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

Probably aimed at income protection. Depends on the conditions of the measures. Given the wide variation of returns from farming in NI, it should be up to the individual farmer to decide when or if he/she draws down funds.

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

Supportive of this measure. Similar to above but may give more independence to the individual. Capital allowances/grants to support investment in a farm business are important especially given the steady rise in input costs and machinery in particular when farm incomes have not kept up with inflation - indeed have gone down in real terms. Australian example is good in the longer term, but how do we get such a scheme started when farm incomes are so low and there is little or nothing left for re-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?

Supportive. This would be important, especially within a policy of reduced or no subsidy support. Farming could suffer seriously through no fault of its own due to extreme weather, animal disease, economic crisis etc and Govt has a responsibility to guarantee food supply and cannot afford large numbers of farmers to suffer seriously or go bankrupt.

Environmental Sustainability

This clearly has to be a part of any new policy going forward. Target outcomes in this section are sensible and desirable - the challenge is in how we achieve them. The section rather focusses on the negatives, mentions few of the positives and doesn't seem to recognise much

of the good work farmers are already doing. Many farmers take a very responsible attitude towards the environment which is often reflected in the way they manage their businesses. Sustained profitability would deliver more environmental benefits. Agriculture may emit 27% of total in NI - I am more concerned with the 73% that are responsible for the majority. Many soils are in better condition than implied. Natural manures are made full use of. Increased research is also a key part. Future decisions must be made on the back of hard, factual and independent research. Any new policy must be flexible and able to reflect changing weather patterns.

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

Agree in principle. Current positive impacts must be recognised. However, in addressing all environmental impacts of farming, there will be a considerable cost in achieving the objectives, especially in the shorter term. These costs must be fully recognised and thought must be given to how those costs are fully covered. As these aims are for the 'public good' farmers should not have to carry the cost. A collaborative approach to any new policy is essential for it to succeed.

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

Good independent research is critical for future success. First we need to know where we are starting from and then develop goals we wish/need to achieve. We need to be able to measure the success of any new policy. Environmental and conservation management should be included in agric courses in future and courses available for farmers already in the business. Environmental policy makers should have significant experience of actual farming practices before getting involved with developing policy going forward.

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

Broadly support but depends on how the policy develops. Must be able to measure success or failure of any scheme/measures. Must be flexible though. Co-design with farmers/land managers is essential as they are the ones who will have to deliver the policy on the ground.

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?

Future schemes MUST be properly funded - current schemes are not. If farmers have to take land out of production, they must be fully compensated for whatever costs are involved. Farm land is a capital asset from which a farmer tries to generate a profitable return. If land is taken out of production or if inputs are limited or more expense required then the farmer must be fully compensated for both cost and profit. If future schemes are properly funded, farmers will take them up. However, the impact on levels of food production and the cost of that food, must also be fully taken into account.

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

Be wary of this! It must be proven that is what the market wants. Must not get into a situation where other parts of the supply chain seek to 'out compete' each other with higher and higher environmental standards. (look at how the FQAS has changed since its inception, but has just added cost to producers which has not been reflected in prices paid). Must also be based on proven scientific evidence. Any increased demand for certain 'outcomes' must be fully reflected in prices paid - hence need for integrated supply chains.

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

Models that properly reward production that delivers most environmental benefits. Farmers need to be convinced of the need for new models and that those models would deliver real and proven environmental benefits. If they believe in them they will deliver them. However, it must be recognised that depending on how far those models go down the environmental route, there could be a negative impact on both the supply of food and its price - particularly in bad weather years. Therefore, a balanced and flexible model would be the most effective delivering the broadest benefits. Whatever future models are agreed, the full cost needs to be recognised and covered by Govt as the benefits will be for the whole country.

Supply Chain Functionality

This is potentially the most important section in this whole document. Get this right and every other section falls naturally into place.

The first paragraph highlights the pivotal role of the processing sector. While this is true, it must also be recognised that without the primary production sector there would be no processors. Furthermore, identifying and exploiting market opportunities, while important, does not necessarily result in profit for producers, particularly if benefits are not shared.

Overall aspiration for Agriculture mentions integration, high quality etc but no mention of the absolute need for profitability. This aspiration can only be delivered if the producer sector is profitable in its own right. **NO PART OF A SUPPLY CHAIN CAN OPERATE IN ISOLATION!!**

Under the 'issues identified with the current supply chain' the "perceived imbalance of power and distribution of risk and reward across the supply chain" is highlighted. This, most certainly, is not a perception but a reality - and there is plenty of evidence of this. The issues identified are all real but not enough emphasis is put on producer profitability.

It is not primarily for the agri food industry itself to tackle the problems. The most important responsibility for any Government is to ensure a sufficient supply of quality affordable food for its people. Emphasis **MUST** be on producing as much of that food within our own country, closest to consumers and supporting home jobs and economy and only importing that which we are unable to produce ourselves.

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

Very important in creating an integrated, equitable and profitable supply chain. The GCA has an important role here and its powers should be strengthened and extended across the whole supply chain. Transparency will come about through creation of integration which Govt needs to 'kick start'. Prices are already reported but this in itself does little to support profitability - it is how the price is arrived at that is crucial. Through co-operation and integration a price will be arrived at that satisfies all and this may well be different in different chains depending on what the product and spec is. This should not impact on competitiveness or confidentiality. The consultation questions 'methods of pricing and grading' and effect on 'true commercial value' of

agricultural produce. THIS IS CRUCIAL TO SUCCESS. It also suggests that Govt could 'legislatively underpin' actions to deliver desired outcomes. I welcome that statement and believe it would be an essential part that would have to be adopted to ensure the success of a new agricultural policy.

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?

This is important and could be beneficial but what about those of us who are already doing that? CPD is more about delivering what the market wants rather than price of product or profitability. There needs to be a definite benefit to CPD to both the farmer and the product/consumer for it to be worthwhile and effective. Supply chain awareness will come from supply chain integration. If farmers want to be successful, they have to make the effort to learn and achieve the relevant qualifications. We need farmers who want to help themselves. Walking the Supply Chain is both desirable and helpful but should not just mean farmers walking through the processing part, but also processors walking through the production part, and both sides need to understand the challenges they both face and share information on true costs of production. Planning, benchmarking and risk management are also important but could become part of integrated supply chain initiatives and possibly funded by Govt. Again, business training and risk management are of little benefit if the supply chain does not return a viable price for farm produce.

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?

Govt action is essential to encourage/kick start a new approach to supply chain collaboration. This can only be a win/win situation. Better collaboration means achieving the right product for the market at the right price, cost savings and reducing wastage. In a world of reducing subsidies, this co operation is essential to developing an efficient, sustainable and profitable supply chain for all. As pointed out earlier, most current supply chains are dysfunctional, inefficient and unequal. In some cases they are downright greedy, particularly when one looks at the margins taken by many retailers. This is all wasteful and unsustainable. Some of this has

been driven by producer subsidies/support which have kept farmers in business but which have given the other parts of the chain no incentive to pay more or to integrate and become more efficient. It will be important in future to guarantee sources of supply of raw material i.e. producers. (Consider the NZ model).

Chapter 7.3 of the consultation (Incentivisation) considers possible Govt intervention to foster greater cooperation and collaboration within the agri-food supply chain. It states - 'Using evidence of a commitment to effective supply chains could be criterion for preferential access to other Govt support'. **THIS IS A CRUCIAL STATEMENT** and must be developed going forward. It would create supply chains that are equitable, sustainable and fully market focussed. It would be a definite win for Govt as it would not have to put so much financial support into the industry and a win for supply chains due to reducing cost. I am, however, very concerned by the last sentence which refers to the main objectives of a new policy, which are perfectly true and desirable but it doesn't mention PROFITABILITY! Productivity, resilience and environmental performance will not on their own deliver profitability. More production generally means a reduction in price. In every model going forward, cost of production HAS to be recognised. GCA powers MUST be extended and strengthened to also allow the above to happen.

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

Farmers should be regarded as equal partners in the overall production of food. Average farm returns should at the very least equal minimum wage - which everyone else is entitled to. This has not been happening the last few years in NI. We are being treated as a public service - but not paid like one.

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.

A thriving rural economy is essential to the overall economic state of the country. Simply creating conditions which create a small number of very large farms will not necessarily solve our problems or produce cheaper or safer food. It would also devastate rural communities, damage the environment and harm tourism.

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.

Regulation needs to be proportionate and flexible and farmers must understand and generally support regulatory measures. Over regulation and inflexibility can have a negative impact on efficiency and productivity.

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.

Environmental issues are best addressed through sustainable and profitable farming. Farmers will happily look after the environment (as they know it is in their best interests to do so) but can only do so if their core business of food production is profitable and sustainable.

40. Are there any other comments you wish to make or any other evidence of need that you think the Department would find

W R L Moore

THOMAS MOORHEAD

Q1. What are your views on the retention of entitlements as the basis of direct support until a new agricultural policy framework is agreed?

Yes a good idea

Q2. 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

Would simplify things

Q3. 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 be on the specified area identified and not on the full field. The farm business should receive additional payment for not allowing the business to plough or have other restrictions on the sensitive area in recognition.

Q4. 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 should be retained.

Q5. What are your views on whether to allow further applications to the YFP and the Regional Reserve after 2019?

Yes should be retained. Needs to be there to encourage the younger farmer into farming.

Q6. What are your views on the most effective means of encouraging and facilitating generational renewal on farm businesses?

Farming needs to be profitable

Low interest loans for the young farmer/next generation.

Top-up for the young/next generation farmer in capital investments

Q7. What are your views on whether the elements of the current direct payments discussed in Section 2.7 could remain in 2020 and 2021?

Active Farmer provisions – A minimum stocking density on appropriate land type. Would like to see provisions in place to continually reduce the number of non-‘active’ farmers.

Land Eligibility – Would like to see the rules relaxed. Would prefer the inspection process to be more relaxed and given time to rectify problems rather than a judgement being made on the day. New simple process of a yellow card warning system where an appropriate period is given to rectify problem. The current system is over complicated.

Cross Compliance – New simple process of a yellow card warning system and time given for action rather than penalised straight away.

Key dates – Effort needs to be taken to minimise impact on those going through inspection close to the payment date, a proportional amount of the payment should be made to the

farmer between inspection and results, rather than withholding the payment until the outcome is known. This will also minimise the impact on the farm business.

Penalty regime - New simple process of a yellow card warning system and time given for action rather than penalised straight away.

Retrospective recoveries – Current process is inefficient. Administration needs be carried out within a set period, number of days etc. Penalties should be proportionate. There should be no penalties for previous years.

Inspection Regime – Would like more reliance on remote rapid field visits. Farmers would like to know exactly what area of the land is ineligible rather than the whole field being declared ineligible. Would like a report given to farmers to allow for remedial action and an indication of the work they would like completed.

Q8. Have you any specific suggestions for simplifying other aspects of the current direct payments regime in 2020 and 2021 which are not mentioned here? If so, please explain your rationale for suggesting these.

Should be an opportunity for the farmer to avail of a new simple yellow card approach. Penalties should be appropriate for the non-conformance. Penalties for non-eligible land should only be percentage based.

Q9. What are your views on a “Productivity Grand Challenge” approach to delivering a step change in the rate of advance in science and innovation?

Collaborative work between industry must be funded from DAERA/CAFRE Core Budget. Profitability is key. There needs to be more specialized advisors on hand to discuss with farmers on the ground in relation to specific research and advisory areas. Timely research needs to be carried out in the appropriate areas so there is a more realistic outcome to meet any future challenges that farming may face.

Q10. 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?

Enough emphasis on education already More free soil testing blood forage and silage analysis

Q11. 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?

Level 2 Agriculture Qualification should be sufficient but not compulsory.

Q12. What are your views on continuous professional development (CPD) as a policy intervention and the possible investment of public funds to incentivise CPD?

Not sure money within agric budget needs to be ring fenced

Q13. 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?

Farmers are the ultimate environmentalists We would welcome investment towards innovation and new technology appropriate to the sector. There needs to be a better understanding of the balance of the environmental issues. Production, profitability performance, provision, protection. **No one knows land better than the farmer who farms it.** There needs to be recognition for previous established environmental works and maintenance that has been carried out over generations.

Q14. What are your views on the provision of investment incentives other than capital grant (such as loans, loan guarantees, interest rate subsidies, etc)?

Supportive.

Q15. What other initiatives by government and/or industry should be pursued to facilitate restructuring and investment and drive productivity?

Tax incentives for land made available for longer term leases and for infrastructure investment.

Q16. What are your views on the provision of a basic farm resilience support measure?

We are in support of a resilience support payment at £100 per acre.

Q17. What are your views on an appropriate mechanism to establish the level of payment under a farm resilience support measure?

Benchmarking figures should be used to identify vulnerable sectors

Q18. What are your views on the targeting of a basic farm resilience support payment to take account of issues such as natural disadvantage?

Target towards SDA and DA

Q19. What are your views on linking a farm resilience support measure with cross compliance obligations?

No linkage

Q20. What are your views on the content of cross compliance/good farming practice associated with this provision?

CC must be science based

Q21. What issues would an appropriate cross compliance regime seek to encompass?

Keeping the land in good agricultural and environmental condition

Q22. What are your views on the tiering or capping of a basic farm resilience support payment, or the establishment of an eligibility threshold?

Should be capped at 200 ha good land

Q23. What are your views on the introduction of anti-cyclical/insurance type measures to help address volatility?

They don't work

Q24. Should anti-cyclical/insurance type measures be sector-specific or aimed more generally at income protection?

No use

Q25. What are your views on the enhancement of fiscal measures as a means of addressing the issue of income volatility?

agree

Q26. What are your views on a possible pre-defined and agreed crisis response framework to respond to crisis events, either locally or nationally?

It would need guaranteed funding

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

Environmental protection costs money farmers need to be funded

Q28. What are your views on the need for investment in research and education targeted on environmental and conservation management in the agricultural sector?

Needed but priority has to be a profitable industry

Q29. What are your views on a possible shift towards outcome based environmental measures for agriculture, including co-design with farmers and land managers?

May be of use if it leads to extra funding

Q30. 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?

Against

Q31. What are your views on the role of other actors in seeking to drive better environmental outcomes?

Of limited value

Q32. What are your views on the delivery models that would deliver the best uptake and outcomes?

The current Agri-environment schemes have proven they have not been successful. The old ESA was a good scheme the uptake proves that

Q33. What are your views on the role of government in ensuring market transparency?

Must ensure NI agriculture gets fair play

Q34. 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?

Qf limited use

Q35. 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 a responsibility to ensure the protection of the fully functioning supply chain and avoiding abusive practices and is key to ensuring consumer confidence.

Q36. 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 broadband in many rural areas

Q37. 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.

Broadband

Q38. 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.

Under Going for growth farmers were encouraged to increase production yet many have been frustrated by planning and NIEA

Q39. 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.

If a farmer is being limited by environmental regulations outside GAEC then he must be compensated

Q40. 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.

Ring fence agric budget

Target funds towards vulnerable sectors

New Yellow card approach for all aspects of cross compliance

STEWART MORRELL

Response to the Northern Ireland Future Agriculture Policy Framework :

Stakeholder Engagement

Submitted on behalf of

Stewart Morrell

October 2018.

Stewart Morrell submits this response. Having farmed all my life and now raising a family who farm alongside me I wanted to respond to this consultation in the hope that my views along with other farmers may shape a more transparent, profitable and sustainable agriculture industry whilst I continue to farm and for future young farmers. This document worryingly focuses on increasing production rather than creating profitable farms. Farmers are the foundation of rural communities and a thriving, profitable agricultural industry will support rural schools and business, result in fewer farm accidents and more time invested in improving the environment.

Annex A Questions:

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

Essential that entitlements are retained as they are.

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?**

Retain greening

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

Retain the ploughing ban however, it should only apply to designated areas and not the whole field.

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?**

Continue to 2019

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

Wish to continue to encourage young farmers into the industry, scheme should be retained during transition period, however review details of the scheme post 2021.

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

A stable market to allow farming to provide an adequate income for a farming family and a retirement scheme to encourage older farmers to leave the industry and make access to land easier for young farmers.

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?

N/A. Detail to be decided later.

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.

N/A. Detail to be decided later.

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?

Focus on profitability rather than productivity. Not in agreement with a productivity grand challenge as an increase in produce will flood the market and drive down prices – further helping supermarkets sell cheap food.

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?

There should be NO emphasis on formal qualifications. There are many extremely knowledgeable and capable farmers who could not complete an academic course. It is important to remember that for many farmers they left school age 16 or below so have no experience with completing exams or long hours spent in a classroom environment. There are others ways to learn e.g. reading farming press, knowledge sharing, conferences etc.

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?

Opposed to linking qualification attainment with policy intervention to incentivise farmers to engage with formal training. The majority of farms in NI are family farms and family members are needed on the farm – the current financial state of the industry would not allow farmers to take time of their farm to attend lengthy training courses/ diplomas/ degrees.

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

If farmers have to endure some form of CPD, it should be funded by public money the same way health care professionals are funded through university e.g. nurses.

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?

Agree to increase efficiency.

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

Not well enough informed to make a comment.

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

Tax relief on infrastructure.

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

More information required

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

More information required

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

Additional support is required for SDA areas

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

No comment

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

No Comment

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

DAERA to collaborate with farmers. Review at a later date.

No Comment

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

Do not support tiering or capping. Allow a business to justify eligibility.

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

From knowledge of the models available insurance type measures are expensive and not practical. Self-insurance is the most efficient method to address volatility.

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

Sector Specific

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

More information required.

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

Whoever is responsible for the crisis should pay e.g. supermarkets/processors should have provided compensation to beef farmers for the horse meat scandal. Damage to buildings/death of livestock due to extreme weather is covered by insurance

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

Would like recognition for past environmental efforts. Environmental principles must be simple and straightforward, similar to the previous countryside management scheme.

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

There is a strong need for sound, local, relevant science. Environmental work can not interfere with the primary function of farming – to produce food.

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

Farmers and land managers want to work in harmony with the environment therefore they should be included in consultation. Outcomes would have to be outlined and explained before support is offered.

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?

Farmers are incentivised by profit – there is no profit in food production therefore profit for environmental work would incentivise farmers.

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

Who are the other actors in the supply chain? Why are farmers always subject to other actors interfering with their business? Any actor must have a relevant agriculture qualification. DAERA has said that farmers with a formal qualification have more profitable farms any advisors/ actor must contribute positively to the farm business therefore they will need a relevant qualification.

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

Delivery model must deliver for the farmer and the environment.

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

To date efforts by the government have been a disaster. Government must ensure that any imported food is to the same standards as NI produce and not import produces from very far away when product is available here carbon footprint. Only buy when out of season here e.g lamb

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?

Not interested.

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

No faith in government they have been and will continue to allow the supermarkets/ processors to exploit farmers in order to keep food cheap.

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.

Age and qualification discrimination when applying for capital grants.

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.

Crime rates - more police presence in rural areas and increased man power to deal with 'smaller crimes' e.g dumping, theft of machinery, that have a big effect on the individual farmer but are often not investigated by the police service.

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.

Inconsistency of planning application process especially for replacement agricultural buildings that are going to be more efficient and environmentally friendly.

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.

Science behind ammonia is poor yet it is being allowed to prevent productive, efficient farming and environmentally friendly

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.

Profitable farming contributes to a healthy economy, generation renewal etc.

Disappointed in DAERA no trust in DAERA or government. Disconnect between DAERA and farmers - never any positive news or recognition for hard work and persistence against poor markets and adverse weather that farmers prevail against to feed the public.

There seems to be little understanding that the majority of farms in NI are family farms, not factory farms that DAERA seem to want more of, there is a range of ages working on the farm with different skills – not everyone is a computer farmer.

Collusion between factories is obvious to farmers yet the government are blind to it.

Single farm payment is held over farmers as a threat used as a stick to control farmers.

In general there is just a lack of a common sense approach from the department.

Thank- you for the opportunity to voice our opinions on how farmers would like policy post Brexit to be formed.



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DAERA
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10th October 2018

Re: Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement Response

Dear Sir/Madam

Mountaineering Ireland welcomes this opportunity to contribute to the consultation on a future agricultural policy for Northern Ireland. As the representative body for hillwalkers and climbers on the island of Ireland Mountaineering Ireland has an interest in mountain, upland and coastal areas, and aims to achieve policy support that will enable a positive and sustainable future for these important areas.

Mountaineering Ireland's vision is that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

Northern Ireland's mountain, upland and coastal areas provide multiple benefits to society including flood mitigation and the supply of drinking water, carbon storage, vital space for biodiversity and beautiful scenery which adds to people's sense of place and supports rural tourism. Mountain landscapes also support human wellbeing by providing high quality places for passive and active recreation, with associated mental and physical health benefits.

The development of a new agricultural policy framework for Northern Ireland provides an opportunity to establish key principles that justify continued funding support:

1. Outputs-based model

Mountaineering Ireland believes there is a strong argument for re-focusing farm payment schemes towards rewarding hill farmers for delivering a sustainably managed environment, on the basis of the public good this provides. This investment would benefit upland areas and society as a whole, thereby contributing towards a number of objectives outlined in the Draft Programme for Government.

2. Public money for public good

The new policy framework should make explicit the link between Northern Ireland society as consumers of food and public goods, and Northern Ireland farmers as producers of food and providers of public goods. This relationship is essential to the future of farming in upland areas as taxpayers will increasingly seek to balance the payment of public money with the enjoyment of public goods, including outdoor recreation experiences.

Directors: P. Barron; I. Buckley; H. Donoghue; T. Kane; P. Kellagher; M. Maunsell; C. Mahon; G. McLoughlin
C. O'Connor; I. Sorohan; D. Stelfox; G. Thomas; S. Walsh.

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, Ireland, number 199053.
Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.

3. Farming with the environment

Mountaineering Ireland welcomes that the Department has identified environmental sustainability as a desired outcome of future agricultural policy in Northern Ireland. This shift in focus should also result in a situation where farmers in upland areas are farming in harmony with the environment, rather than striving to suppress its natural characteristics.

4. Providing outdoor recreation opportunities

Mountaineering Ireland supports the reference to landscape scale outcomes in the elaboration provided in section 6.4 and the inclusion of outdoor recreation as a possible initiative meriting support. That said, we are disappointed that the reference is so brief and appears to be confined to supporting other funding streams rather than as a stand-alone scheme.

The comparable document for Wales makes a more positive statement for supporting outcomes relating to heritage and recreation. It makes the point that land managers have a key role to play in the conservation of cultural heritage and the provision of outdoor recreation opportunities. It would be appropriate to give farmers in Northern Ireland a similar acknowledgement even if the potential here is not yet fully realised.

Many of the environmental measures referred to in the consultation document would be welcomed by those who use farmland and hills for outdoor recreation. However, Mountaineering Ireland would like to see a specific incentive scheme included that would provide for new or enhanced recreational opportunities and experiences. This would not be new; it was trialled in 1992 by the then DANI as the Countryside Access Scheme and similar schemes have operated in other parts of the UK.

Importantly, the scheme would be voluntary and provide payments in support of actions that create or enhance the quality of recreational experiences available, indeed, a suite of actions could be envisaged which mirror the layout of the wider options in the current Environmental Farming Scheme. Ideally, potential projects should be included in outdoor recreation strategies, community path plans or comparable strategic documents produced by district councils or other land management organisations.

In addition to the points above Mountaineering Ireland has responded to a number of the Stakeholder Engagement Questions (see attached).

Mountaineering Ireland looks forward to seeing the outputs of this consultation and to working with DAERA to produce a sustainable and resilient agricultural sector in Northern Ireland which benefits all of society.

Yours sincerely

Helen Lawless
Hillwalking, Access & Conservation Officer

Responses from Mountaineering Ireland to selected Stakeholder Engagement questions:

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

A continued ban on ploughing (expanded to include any form of mass soil disturbance) on SAC land must be a condition of receipt of farm payments and should be included in a strengthened EIA regulation.

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?

Outputs-based model

Mountaineering Ireland is strongly in favour of an outputs-based model for future agricultural payments, e.g. production of low input food; enhancing carbon capture ability of land; increasing capacity of the land to retain water, thereby mitigating downstream flood impacts; enhancing societal enjoyment of countryside; creation of enhanced habitats. Mechanisms for scoring the outputs generated by heathland habitats have been developed through the RBAPS project (see <https://rbaps.eu/documents/>).

Land eligibility

Different metrics are required to determine land eligibility for a public goods payment, the current 'managed for agricultural activity' test has diminished the public good value of some lands for questionable productivity, for example through the clearance of scrub to maximise hectares thus reducing the land's biodiversity value and water absorption capacity.

Cross compliance and inspection

Cross compliance has held in check a considerable amount of environmental damage, especially soil erosion, water pollution and biodiversity loss. Dumping, the burning of controlled waste and the destruction of valuable habitat through burning continue to be issues for the agricultural sector to address. Cross compliance and statutory measures are needed to encourage compliance and to allow the effective sanctioning of damaging practice.

Similarly, without the possibility of inspection, standards would slip over time. New technology, e.g. smartphone apps, drones etc should be leveraged to create a robust system at modest cost. Mountaineering Ireland would also like to see a direct payments system that incentivises good practice in preference to one which revolves around penalties.

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?

Mountaineering Ireland agrees with greater emphasis on agricultural education and knowledge transfer, however this should not be focused solely towards productivity. Advances in knowledge and understanding in the area of public goods provision need to be shared, so that farmers, landowners and their advisers can avail of reliable research and analysis of current best practice, e.g. Environmentally Adjusted Total Factor

Productivity (EATFP); The Pasture for Life project; HNV models in the UK and ROI and the RBAPS project (Spain and ROI).

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

Mountaineering Ireland is in favour of a farm resilience support measure, provided that it is related to improving the resilience of the land, and the enhancement of public good value, e.g. through sustainable circular food economy, improved flood mitigation, reduced carbon loss, enhanced habitat condition, healthy population through quality recreation experiences, production of non-food primary goods such as wood, oils, green fertilizer etc.

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

Rather than being seen as areas of disadvantage, these high nature lands should be valued for their high potential to offer significant public benefits. Supporting farmers to better provide these benefits, will help build resilience against market volatility, as well as improving the resilience of the land itself. It should soon become obvious that the land previously considered to be 'disadvantaged' is some of the best land we have for the provision of public goods.

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

While environmental principles (i) to (iv) are credible and should of course be fundamental pillars of Northern Ireland's new agricultural policy, they are fundamental to the future sustainability, resilience and profitability of the sector and should be mainstream principles rather than separated out as environmental principles. This is part of recognising that a well-functioning natural environment is essential to continued agriculture.

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

Mountaineering Ireland strongly supports the need for research on environmental and conservation management for all farmers and landowners.

This should be driven by a need to show positive change to the public goods provided by the sector (which includes recreation opportunities and the production of reliable, low carbon, environmentally responsible, safe, affordable food).

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 key to the success of future agricultural policy in Northern Ireland is how to transfer public money from to farmers / landowners in return for a net increase in public goods (including quality outdoor recreation experiences and the production of reliable, low carbon, environmentally responsible, safe, affordable food).

It would be unreasonable to think that DAERA or DEFRA will have all the answers worked out by 2020, so, there must be an acceptance of a transition period. The Natural Capital Assessment projects carried out to date demonstrate the need for much more work to make valid assessments of what is there already, never mind what constitutes a positive or enhanced public good. However, payment for actions or outcomes that are a legal necessity (e.g. not burning scrub, not polluting water, not causing damage to designated sites) could not be supported, nor could payment for outcomes that would happen without any intervention from the farmer or landowner (e.g. the passage of clean water down a river, the growth of native species). The remit here should lie within DAERA and build on the collaborative approaches the department has recently embarked on. The department should be encouraged to explore the feasibility of three other models: a whole farm costs model; a transaction costs model and a long term land use change model.

Whole farm costs

It should be possible to treat the costs of running a farm business as a cost associated with securing an environmental action or outcome, where that far, system is essential in securing environmental public goods. This would refer particularly to economically marginal but environmentally important High Nature Value farming systems such as the uplands of the Antrim Hills or the wet grassland systems of Lough Beg.

Transaction costs

Environmental land management may often incur significant transactional costs beyond those associated with a specific intervention. This will often be the case with regards to landscape scale cooperation, or where significant training and advice is required.

Costs associated with long-term land use change

Certain land management interventions, such as habitat creation, will incur costs that extend beyond five or ten-year management contracts. In conjunction with other policy mechanisms, there may be scope for higher upfront payments to recognise these long-term costs, on the condition that the land use change in question is maintained in perpetuity.

It is also disappointing that it is only in the last paragraph of 6.4 where a more holistic view of measuring and returning public value is addressed. Over the last ten years a number of EU, Lottery, UK Government-funded as well as private initiatives have attempted to explore how a more useful transfer of monies could take place (variously: UK - Higher level Environmental Stewardship Scheme; Pasture for Life; Netcastle Estate Sussex; John Muir Trust rewilding projects in Scotland; Exmoor's Ambition; ROI - Burren Life; HNV Farming; RBAPS). Rather than replicate these, it would appear good practice for DAERA to review the learning, take the best current practice and design mechanisms to roll this out in Northern Ireland.

It can be argued that the most tangible connections between the public and the countryside are made when the public are actually out in the countryside, and enjoying experiences which increase their health and wellbeing. There seems to be strong merit in exploring how through enhanced outdoor recreational opportunities and experiences can be actively encouraged through the new Northern Ireland agricultural



policy. Mountaineering Ireland has a particular interest in the future of the uplands and how responsible recreational use of these special places can benefit all, including those living and working there.

When more people are enjoying better quality outdoor recreation experiences, public goodwill towards farmers and landowners will improve, thus increasing public and political support for investment in agricultural payment schemes.



NI Future Agricultural Policy Framework: Stakeholder Engagement Exercise

Introduction

Mourne Heritage Trust is a charitable company established in 1997 by a partnership of central and local government agencies to meet an identified need for locally based, strategic management of the Mourne Area of Outstanding Natural Beauty (AONB). Its Board of Trustees brings together a range of stakeholders including local elected representatives, landowners, farming, community, tourism and environmental interests. :

In broad terms Mourne Heritage Trust finds much to commend in the NI Future Agricultural Policy Framework document, which we feel addresses the relevant issues and makes appropriate and balanced suggestions about possible directions of travel.

Before contributing our thoughts on some of the specific questions posed (Part 2 of this response), we would like to address (in Part 1) an overarching principle of particular interest to us prompted initially by the desired outcomes and long term vision for the NI agricultural industry – set out on Page 19 – but also cutting across a number of aspects of the issues and proposals outlined throughout the document.

Part 1 Overarching comments: 'A Plea for our Landscapes'

We feel that the elements represented in the four statements set out on page 19 (Section 3 Agricultural Policy Framework Beyond 2021, 3.1 Context) represent an appropriately focussed and balanced vision for the NI agricultural industry with one caveat. We suggest that number 3. 'An industry that is environmentally sustainable in terms of its impact on, and guardianship of, air and water quality, soil health and biodiversity' ought also to include reference to 'landscape'. While the items listed above are encompassed in the landscape, the sum of their parts do not capture the totality of what is bound up in our landscapes, notably the human aspects and historic landscape as articulated alongside natural heritage aspects in, for example, the European Landscape Convention and the DAERA's own 'Northern Ireland's Landscape Charter' and 'Shared Horizons'.

Moreover, measures that ensure agriculture's impact on biodiversity, soil health etc is sustainable, while generally likely to have some benefits in respect of landscape quality (particularly where the measures are on a large scale), are unlikely alone to comprehensively protect and enhance the variety of features of our landscapes that are valued by people. One example is field boundaries and sizes, changes to which can significantly change the character of a landscape; as can any significant farm consolidation or intensification of farming or change of dominant product. In particular the extent and nature of grazing will shape our landscape character in some areas, particularly the uplands.

There are also the various monuments that dot our historic environment which can be impacted by agricultural activity, as can access to and appreciation of them. And of course there are also the many imprints of man's interaction with the land that are not listed or scheduled, which include remnants of our relatively recent farming legacy like the imprints of lazy beds on hillsides. These of course are just some examples to illustrate that the visual amenity and cultural associations of our farmed countryside – i.e. how they appear to the eye and, in terms of heritage, to the intellect and emotions - are important as well as what is in it in terms of habitats, species, soil and water.

Also important in Northern Ireland, and closely related to the variety of our land and landscapes, is geodiversity which, also like our land and landscapes, is not necessarily protected and enhanced by measures that will ensure sustainability in terms of air, water, soil, carbon footprint and biodiversity. In other words the latter could all be achieved without protecting our landscapes and geology from the adverse impacts of agricultural activity and/or capitalising on the potential for agricultural practices to enhance our land and landscapes and, importantly, provision of access to them.

We appreciate that the issues relating to visual, built, cultural and geological aspects of our countryside are not entirely in the remit of DAERA to address, falling in whole or in part to Department for the Economy, Department for Communities, local authorities and others. But since the vision is for the NI Agricultural Industry and the latter is so influential in our landscape – farming covers 70% of the land area - we feel these considerations should be reflected in the wording of the vision for the NI agricultural industry as a foundation for appropriate cooperation across the various relevant departments and agencies – and of course among farmers, landowners and land managers.

We are encouraged to see that landscape is explicitly referenced in section 6 'Environmental Sustainability' of the Future Agricultural Policy Framework document. However, the first of two mentions comes relatively late in the section (in paragraph 6.4 ii) and since it comes in the context of 'recognising the interconnectedness of habitats and water bodies', it deals with landscape scale biodiversity outcomes rather than landscape itself which, as we hope we have illustrated above, is sometimes related but different sphere.

The other mention of landscape comes in the last paragraph of section 6 in the context of the potential for 'sub-regional schemes to recognise differing circumstances in particular catchments, habitats or landscapes'. This is the one place in the document in which, we feel, landscape is recognised as being related to but a distinct entity from the water, soil and biodiversity. As such it is a phraseology that is both somewhat out of keeping with the

language of the remainder of the document – and, as above, the long term vision for NI agriculture - but, we strongly feel, actually the appropriate approach. For example, were the opening of Section 6 to be consistent with this language at the end of the section, the first bullet point could read ‘There is significant scope for influencing biodiversity *and landscape quality* through agricultural practices’.

Interestingly section 6.1, ‘Principles’, does not, unlike the long term vision for agriculture referenced in section 3, specifically and separately refer to biodiversity, water etc. Rather the language is confined to broader phrases like ‘the *environmental impacts* of farming’; ‘*public goods* provided by farmers and land managers who achieve a verified *level of environmental performance...*’; ‘*environmental sustainability* of the agricultural sector....’ and ‘*farming sustainably*’. Intentionally or otherwise, this language ‘leaves room’ for inclusion of all the various means in which farming impacts on our countryside – biodiversity, water and soil quality, landscape and other.

We hope this comment does not come across as semantics for their own sake, hoping we have illustrated a sound basis for why we feel it is important. We do find that in policy and strategy documents relating that landscape is often the ‘forgotten element’ of our countryside.

We also acknowledge that landscape and landscape quality is somewhat subjective and certainly not as easily and precisely measurable as the health of habitats and species, water quality etc. But we do not feel that this is reason not to address the impact of farming on landscape features and would commend the ‘National Landscape Strategy for Ireland 2015 – 2025’ and the Scottish land use strategy 2016-2021¹ in respect of how it seeks to address the more qualitative nature of effecting positive landscape change.

A final comment we would offer on the vision outlined on page 19 is that the wording of point 3 could also usefully be expanded to include ‘An industry that is environmentally sustainable *and, where possible, beneficial* in terms of its impact on.....etc’. We say this because being ‘environmentally sustainable’ could be taken to imply that damage is mitigated and/or arrested when in fact agriculture has significant potential in certain areas to deliver environmental improvement.

One final overarching comment is that the document, with sections on productivity, Resilience and Supply Chain respectively is primarily focussed on productive agriculture. While potential for custodial/ public good agriculture is signalled in places these themes could perhaps be more developed.

¹ <https://www.gov.scot/Topics/Environment/Countryside/Landusestrategy>

Part 2. Comments addressing specific questions

In the remainder of this response we address specifically some of the questions posed in the Stakeholder Engagement document, although not all, alongside some more general comments on the content of particular sections. We indicate with the question number in brackets and bold after the various comments which questions we feel they address, also indicating in some cases where we feel a comment is relevant to more than one question.

Section 2 – Traditional Agricultural Support Regime, 2019 – 2021

We note and agree with the proposal to broadly retain the status quo in 2020-21 **(Q7)** and also with the aspiration to make limited changes in respect of removing requirements that are not particularly relevant or worthwhile in a Northern Ireland context **(Q2)**, while piloting new approaches and signposting clearly any further changes. In this we recognise that that while there are challenges posed for our rural areas and the agri-food sector in particular by Brexit, we also feel there is a significant opportunity to devise a framework for support of farmers and land managers that is appropriate to Northern Ireland's very diverse and distinctive countryside and our particular land ownership and land use patterns.

In respect of greening requirements **(Q2)**, we therefore agree with the principle of incorporating the greening payment in the Basic Payment entitlement values, on the basis that the requirements are of limited relevance to NI and administratively onerous. However, we also agree that the ploughing ban on environmentally permanent grasslands be retained to protect our peatlands and wetlands **(Q3)**.

Section 4 – Increased Productivity

We note and welcome the acknowledgement that productivity gains 'cannot be at the expense of environmental sustainability' and that policy should ensure that those two objectives are pursued 'in a way that is synergistic rather than antagonistic', which we agree there is much scope for. This, we suggest, includes the capacity for the development of a reputation for good environmental management to contribute to added value branding, possibly aided by internationally recognised landscape designations. This general principle of synergy should be reflected in training initiatives and continuing professional development dealing, where relevant, with productivity and environmental sustainability themes in tandem **(Q10 & Q12)**. We agree that investment in innovation and new technology uptake should be aligned with enhancing environmental performance. **(Q13)**

With regard to the 'Productivity Grand Challenge' **(Q9)** we feel this could be a beneficial approach as long as appropriate competitors are identified as comparators, which we would suggest the USA, France and the Netherlands are not. Choice should take account of factors like scale, geography, and climate or there could be a risk that our environment becomes unintentional 'collateral damage' in the pressure to keep up with others for whom these considerations weigh less heavily.

Section 5 – Improved Resilience

We agree in broad terms with the principle of progressively removing funding from area based payments and towards other policy interventions driving productivity, environmental sustainability etc. However, we also see some merit in retaining an element of an area based payment to provide an underpinning revenue stream not least for the social and community health of our rural areas (Q16) and also in evolving cross compliance from the current model to drive environmental and other objectives/ outcomes (Q19).

We strongly suggest that any area based farm resilience provision should be weighted towards areas of natural disadvantage. In support of this we would note the coincidence of many of our most prized landscapes (e.g. AONBs) and habitats (e.g. ASSIs) with the more marginal or High Nature Value farming lands, notably in upland areas. For these reasons, while these farms struggle comparatively to derive income from agricultural production, they have the opportunity to deliver proportionately more in respect of public goods in other areas than farms. Stewardship by landowners in these areas is vital to the health of the environment. (Q18) For similar reasons we see merit in consideration of tiering or capping of payments in to help ensure larger farms, particularly in the more productive areas, are not overcompensated (Q22 Part I).

We do not necessarily agree that a minimum threshold of eligibility be employed for basic farm resilience payments particularly if, as we believe it should, these are targeted at areas of natural disadvantage. Holdings in marginal areas – e.g. uplands - tend to be small and the fact that some may be ‘non-commercial’ may not be a significant issue if these holdings are managed to deliver public goods and a ‘stewardship’ approach is employed, supported in part by the basic resilience support payment. In areas where lands are more commercially productive and/or of low nature/ amenity value perhaps such an eligibility threshold could usefully be employed (Q22 Part 2).

Section 6 – Environmental Sustainability

We feel that the suggested environmental principles are broadly appropriate. We welcome the recognition that while agriculture can have some negative impacts, it also has the potential to deliver major environmental gains and the recognition of the contribution of a healthy environment to human health and well-being. We feel that one of the major opportunities arising from departure from the CAP is to tailor a support regime to NI circumstances that will better deliver on this potential but only, as acknowledged, through coordinated action. We also welcome the consistent references to farmers and land managers recognising that lands can be managed for environmental purposes without necessarily being what we would call traditionally ‘farmed’ and/or overseen by ‘farmers’. Of course, many farmers will also see some of their activities as ‘land management’ and in future, particularly in more marginal/high nature value areas, it may be appropriate for the balance of farming activity to tip towards environmental stewardship as opposed to productive agriculture. We would suggest this transition ought to be aided through appropriately remunerating landowners for the public goods they deliver. In relation to public goods, and as expanded on below, we would suggest that access to the environment is alongside clean air, water, protected and enhanced biodiversity and landscapes in the ecosystem goods and services that farmers and landowners provide and/or can potentially provide. (Q27)

We agree that there is a need for research and education in environmental and conservation management in the agricultural sector, while also acknowledging that much expertise exists. We would, in particular, welcome support for knowledge transfer between environmental NGOs and farmers. As outlined below in relation our own work, there are areas in which the former have developed significant expertise and also much scope to draw on the practical experience of farmers. We note and, as mentioned above, agree with the recognition that education in environmental management could sit alongside any CPD relating to increasing productivity. (Q28)

We support the suggestion that incentive schemes could increasingly become outcome based, along with the realism that recognises that management prescriptions may still be necessary and desirable in some circumstances. There is much work to do in identifying where an outcome based approach is appropriate (i.e. where there are few or no extraneous variables intervening between action and results) and where it is not and to establish appropriate baselines. The suggestion that farmers and land managers are involved in co-design of actions is crucial. Their knowledge of approaches that can be effective in enhancing their local environments was at best not well tapped under the CAP and at worst were frustrated by the prescriptions, just one example being the issue of scrub clearance from heathland in upland areas where there was often rationale for more extensive clearance than the regulations would allow. (Q29)

In relation to co-design we are conscious from our own work that environmental management approaches often need to be very bespoke. MHT has undertaken research, training and study visits across these islands and mainland Europe to garner knowledge of best practice techniques in managing issues including upland erosion control, wildfire mitigation and heathland enhancement. In almost every case the techniques and approaches brought back have subsequently been evolved considerably through trialling, implementation, monitoring and refinement in our own terrain. This 'adaptive management' approach has delivered outcomes on which considerable positive feedback has been received (as well as interest from overseas as well as other areas in NI and Ireland in what we are doing). We feel adaptive management is very much the basis on which successful environmental stewardship has to be based, not least with climate change throwing up new and evolving challenges. (Q28 & 29)

In line with our comments on landscape above, we welcome the suggestion that schemes could be designed to achieve outcomes at a landscape scale, along with the recognition that this will require facilitation to encourage and develop cooperative working. We feel that appropriately remitted and resourced area based bodies based around AONBs and other key landscapes can make a contribution in this respect, providing coordination as well as sharing knowledge of management approaches to issues such as those referred to above. (Q29, Q31, Q32).

We agree with the suggestion that strict adherence to the principle of 'income forgone/ cost incurred' in setting environmental payments may be insufficient in some circumstances to achieve appropriate uptake and believe the experience of EFS and similar schemes bears this out. Thus we support the imaginative exploration of the use of additional incentive elements complemented, importantly, by capacity building. We feel this should be targeted to specific areas e.g. AONBs, ASSIs, Areas of Natural Constraint. (Q30)

We support the development of market led initiatives to improvement environmental performance, among which could be added value branding based on certification of practices delivering a clean, green environment. Something similar to 'Origin Green' operated in Ireland could be considered for NI, although we would suggest that the extent to which the former actually demands and delivers green practices could be challenged. **(Q30)**

As has been demonstrated in the UK and further afield that market led initiatives can be given considerable added 'heft' through an area based approach, capitalising on the profile of iconic landscapes and, as touched on previously, potentially magnified further through strong and internationally recognised landscape designations. For example, it has been recognised for some time that the Welsh National Parks 'provide a strong brand image for rural goods/services, that much of the economic benefit occurs outside park boundaries and that they support the economy of Wales as a whole'². And this is to quote just one element of a raft of research attesting to this value of designated areas. **(Q30)**

We also agree that other funding streams could be used to support environmental actions. For example upland heathland and blanket bog restoration can contribute to flooding mitigation along with enhancing water quality and biodiversity. Wildfire prevention techniques can also enhance biodiversity alongside public safety. Path repair and creation can protect habitats in areas where there is significant erosion while facilitating the outdoor recreation that can contribute to human health. This was exemplified by our upland path works being funded by Tourism NI (visitor infrastructure), SportNI (outdoor recreation infrastructure helping participation), Heritage Lottery Fund (access to natural and cultural heritage), NIEA (habitat protection and countryside access) and NI Water (landowner). **(Q31).**

In line with our comments in Part 1 of this response on the importance of addressing the impact of agriculture on landscape character and quality, we suggest that the Target Outcomes in section 6.5 include reference to it e.g. 'Landscape character and visual amenity is protected and enhanced'. We would also suggest 'Maintenance and enhancement of access to the countryside' (or similar) as an environmental outcome that should be specifically referenced. Countryside access facilitates awareness and appreciation of the environment (as well as healthy lifestyles) and the strategic development of it is of course in DAERA's remit. Incentivising the provision of access is something that we feel there is an opportunity to build into any new support regime and there are good examples of how this approach has worked well as close to home as Ireland. Flood Attenuation is another long term environmental goal that is both desirable and can be significantly impacted upon by agriculture. **(Q29 & Q30)**

We note the suggestion that in working towards these outcomes new delivery models may be needed and wholeheartedly agree, as we also do (in line with our earlier comments) with the suggestion that there may be a need for sub-regional variation in schemes and that actors including processors, local authorities and NGOS have roles to play. **(Q31)**

² *Economic Impact of the National Parks of Wales. National Trust, October 2006*

In respect of structures we would suggest that a stronger legislative base and security of funding for structures to manage our AONBs and other high value landscapes – as exists in England and Wales and, in other forms, in much of Europe – could make a significant contribution to providing a basis for coordination of landowners to achieve environmental outcomes. (Q32)

Section 7 – Supply Chain Functionality

We feel that a government role in achieving greater collaboration and better functioning of the agri-food supply chain is necessary. This should include ensuring that there are ‘pull’ factors for high environmental standards i.e. that processors and retailers are educated, incentivised and enabled to require high standards and to derive premium return in markets for this. Some of the innate challenges that NI’s landscapes pose for productive agriculture can be turned to advantages with a targeting of markets that value good environmental stewardship and high quality food. (Q38)



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10 October 2018

RE: Northern Ireland Future Agricultural Policy Framework Consultation

Dear Sir / Madam

As one of the UK's top 15 food businesses and Northern Ireland's largest company, at Moy Park we view the Northern Ireland Future Agricultural Policy Framework as a significant opportunity to address some of the challenges and opportunities affecting business and the wider agri food industry. The agri food sector is critically important to our economy and with Moy Park being part of Pilgrim's Pride based in the US, we view this from a unique international perspective.

In response to the Northern Ireland Future Agricultural Policy Framework consultation we have considered the content of the strategy and have commented our views accordingly below. The paragraph numbering corresponds to the Annex A questions where we have a view pertaining to our business or industry.

1. We very much agree with the retention of the status quo until the new Agricultural Policy Framework is agreed.

4. Anyone currently accepted into the YFP should continue to receive the payments according to the agreement made, to see the commitment upheld.

- 9 -12. We need a strategy which contributes to the future competitiveness of the UK, particularly in the areas of investing in science, research & innovation and developing skills.

13. An appropriate weighting needs to be given to environmental performance, when prioritising investment in innovation and new technology

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Moy Park Ltd Registered in Belfast 4842. Registered Office: The Food Park, 39 Seagoe Industrial Estate, Craigavon, Northern Ireland BT63 5QE.



14. Agree that targeted investment linked to outcome is the best approach in trying to achieve the best return.

27. The environment must be protected, but proper scientific analysis must be used to make the decisions based on facts. We should not allow ourselves to be put into a position where we are put at a comparative disadvantage in the marketplace.

28. This is a key area as there is a need to increase the knowledge of farmers on what the specific issues are, and secondly we require a better factual understanding of Northern Ireland's position regarding emissions in terms of the variety of housing / animal / diet types used in our region.

29. This will assist farmers by giving clarity of policy which they can consider in their decision making.

31. NGOs have a significant role to play and their views, impressions and aspirations should be heard. However, they should be heard within context, and not be given primacy over the scientific based facts when weighing decisions that allow businesses to survive and thrive.

There is much to be commended in this Policy Framework which should promote world class standards, enhancing our industry and the broader economy. The government needs to ensure that we have the best possible business environment to support continued growth and development.

The Northern Ireland Future Agricultural Policy Framework consultation has highlighted discussion on many areas that can benefit from the proposals and we look forward to the future implementation of the policy.

Kind regards

David Gibson
Director of Agri Performance

Moy Park Limited

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PATRICK MULLIN

DAERA NI Future Agri Policy

From: patrick.mullin
Sent: 03 October 2018 07:02
To: DAERA NI Future Agri Policy
Subject: Future

Where possible , high less productive grazing ground , should be used for power production. There are much more much more efficient uses of wind power than producing electricity

Sent from Samsung tablet.

