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Submitted to Consultation on Future Agricultural Policy Proposals for Northern Ireland
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Introduction

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Resilience Measure

1 The proposal is that payment will continue to be area based, use entitlements and that funding will be directed to active commercial farm businesses.

1. (i) Do you agree that income support is needed in the form of a Resilience Payment set at an appropriate level?

Yes

Explain your answer.:

Farming as a business is extremely volatile due to market fluctuations, extreme weather conditions and other factors which are outside the farmers direct control. By investing a level of background income in farms, this buffers against volatility, improves business resilience and will assist with the transition to sustainable, climate smart, nature friendly farming if the associated sustainability standards are effective.

However, it is important that the payment level is fair and value for money for the taxpayer. Of particular importance is the need to ensure any payment regime delivers food security and effectively addresses environmental issues. Agriculture needs to be a net contributor to society playing a positive solution focused role in addressing climate, biodiversity, water and air quality issues being experienced currently reversing the trend of environmental degradation attributable to the sector.

It is also important that the farmer in return for the resilience payment adheres to statutory requirements and a set of minimum standards similar to cross-compliance which in effect deliver public good e.g. nutrient management planning to reduce pollution of watercourses..

The level of compliance and levels of payment are interdependent on other aspects of this consultation, especially those related to agri-environment, headage and carbon.

The timescale of transition and estimated payment levels need to be defined to give some assurance and security to participants.

1. (ii) Do you agree that farm businesses that solely produced grass/grass silage for sale during a historic reference period should not be eligible to claim the Resilience Payment?

Yes

Explain your answer.:

Selling grass is an agricultural output. If a business is efficient and profitable there is no reason for them to be excluded from this payment.

However, if the claimant also has a tenant that is responsible for agricultural management, the tenant should be the 'active farmer' and should be eligible for resilience payment if they meet other eligibility requirements.

It is also important that all farmland has to adhere to the equivalent of GAEC/SMR or new equivalents. Providing resilience payments ensures higher environmental standards are observed and are enforceable through meeting the conditions to receive payment.

It is also important that the land in question has access to soil sampling and where there is a tenant that they are required to produce nutrient management plans which are currently proposed to be a condition of Resilience payments.

The addition of a headage payment to the list of policies ensures that other monies are directed towards livestock farmers.

1. (iii) Do you agree that businesses that maintained land in a state suitable for grazing or cultivation but undertook no further agricultural activity during a historic reference period should not be eligible to claim the Resilience Payment?

Yes

Explain your answer.:

If the landowner is not partaking in the buying and selling of agricultural goods, they should not be considered an active farmer and are not at risk of market volatility. They should therefore not receive a resilience payment. However, they should become eligible once they start producing/trading in agricultural products and effectively addressing the issue of new entrants is important in terms of facilitating restructuring of the industry for the future.

These landowners should be eligible to apply for agri-environment measures.

If no agricultural activity is ongoing the requirement for soil testing is not critical.

1. (iv) To give effect to the proposals relating to grass selling businesses and those maintaining land in GAEC, do you agree that an historic year or years should be used to restrict the allocation of entitlements for Resilience Payment to farm businesses which met the following criteria: (a) had cattle or sheep registered on APHIS; and/or (b) had at least 3 ha of an arable or horticultural crop during the reference period in an historic year or years?

Yes

Explain your answer.:

A reference period is a suitable way of defining eligibility.

We are also in favour of a low area threshold for eligibility to ensure smallholdings adhere to the same standards as larger farms. A minimum area such as 3ha is a suitable compromise.

2. The proposed conditionalities outlined to be eligible to claim the Resilience Payment are aimed at environmental improvement.

2.(i) Participation in soil testing, including Light Detection and Ranging (LiDAR) – do you agree with this being a condition to claim the Resilience Payment?

Yes

Explain your answer.:

Soil nutrient management, particularly the optimal application of inputs is a key factor in farm efficiency. As the application of both organic and inorganic nitrogen is a major influence on both water quality and farm C emissions the more knowledge the farmer has of current soil requirements will allow better decision making.

Soil carbon and peatland soils under improved grassland have high potential for balancing farm emissions/sequestration and more data in this regard will be important for the sustainability of farming.

LiDAR has a number of useful functions including detail of runoff pathways/watersheds to improve water quality and it will also allow an assessment of peatland depths and a measure of on-farm C sequestering habitats such as hedges and woodland. This information is also useful for habitat restoration

These measures would be beneficial on farms not in receipt of/eligible for Resilience payments and consideration should be given to sustainability standards also being applied to landowners claiming agri-environment payments only for consistency of approach, especially as the base work is being completed on a regional basis and therefore available for use to inform decision making.

2. (ii) Preparing a Nutrient Management Plan (NMP) based on the soil testing and LiDAR information – do you agree with this being a condition to claim the Resilience Payment?

Yes

Explain your answer.:

The information gained from soil testing and LiDAR is meaningless without an action plan for the farmer to ensure they are minimising their emissions/maximising their soil fertility and this condition is strongly supported.

The creation of appropriate buffer zones on water courses, interception of surface run off through establishment of interceptors e.g. natural vegetation and protection of peat soils should be part of the NMP. Risk areas should be identified on the farm in terms of potential contribution to water quality and farmers and landowners strongly encouraged/required to put in place mitigation measures.

Due to the importance of this measure, other farms not eligible for Resilience Payments but eligible for other measures could also have this as a condition.

2. (iii) Recording of sire data on APHIS/NIFAIS for all calves born on both dairy and beef herds - do you agree with this being a condition to claim the Resilience Payment?

Yes

Explain your answer.:

It provides data on genetic provenance and will encourage good decision making, traceability and enable the sustainability of livestock numbers on areas farmed to be benchmarked and adjusted if necessary to achieve sustainability standards.

3 The proposal is that progressive capping of the Resilience Payment will apply above £60,000 and that the minimum claim size should be increased to 10 ha.

3.(i) Do you agree with the proposal that progressive capping of the Resilience Payment will apply above £60,000?

Yes

Explain your answer.:

On the basis that this payment is not directly linked to productivity or delivering cross-compliance on a land area and is considered a form of income support.

However we are not in favour of a cap for land in agri-environment or digressive payments on habitats such as peatland. These should be paid on a linear basis unless this would risk exceeding the total allocated budget.

Currently payments of peatland and woodland see reductions in payment as area increases. However, the income foregone is arguably linear with land area and the ecosystem service provided is increased as habitat area increases.

3 (ii) Do you agree with the proposal to increase the minimum claim size threshold to 10 ha?

No

Explain your answer.:

UW encourages the participation of small farm holdings in all measures. DAERA figures show 4,000 holdings could be excluded by this proposal.

We understand the argument that smaller holdings are less dependent on agricultural support as a proportion of household income. However, it is important that smaller holdings can still avail of other measures, particularly agri-environment schemes. Some of these smaller holdings will be traditional, low intensity farms with good examples of priority habitat.

We have previously commented that holdings under 10ha should also be able to benefit from soil testing and LIDAR due to the benefits to the farmer and the environment.

Options to reduce to 3ha to match the Farming for Nature measure, or 5ha to come into line with England could be considered as alternatives. 5ha represent a compromise that allows smaller farms but leaves some budget for implementation of other measures, such as capacity building or support for farmers in accessing/delivering schemes through the transition.

4 The proposal is that there will be a new crisis framework that will enable the Department to assess potential risks and determine the most appropriate intervention for a specific crisis.

4 (i) Do you agree with the principles proposed in the development of a Crisis Framework?

Yes

Explain your answer.:

Farming is a volatile industry impacted by events at both a local and global scale.

Based on the three underlying principles of Threshold, Targeted and Temporary we support this measure.

The measure cannot be used to prop up uneconomic or environmentally unsustainable practices, but can be used to provide temporary support to otherwise viable businesses where a global financial shock or local climatic or disease event results in economic hardship.

Headage Sustainability Package

5 Do you agree that payments under the Headage Sustainability Package will be made only to businesses in receipt of payments under the Resilience Measure?

Yes

Explain your answer.:

However, there is no opportunity to disagree with the principle of headage in the consultation. Whilst the measure requires positive farm behaviour to receive payments it still creates a risk of market distortion and non-customer focused production as the payment dilutes market signals.

It does provide the information required to drive down carbon footprint and needs to be subject to the sustainability standards to avoid unintended consequences.

Suckler Cow Measure.

6 The proposals and conditions outlined for any Headage Sustainability Measure for suckler cows are aimed at driving productivity to make the sector more efficient and environmentally sustainable.

6 (i) Reducing age of first calving – do you agree with this measure and the pace of phased implementation proposed?

Yes

Explain your answer.:

It is important for the sustainability and image of the industry to be efficient. Reducing time of first calving and calving interval is an efficiency measure that benefits the farm business and the environment through reduced costs and decreased emissions.

Note that a degree of flexibility (or two tier system) may be required to ensure that extensive upland systems with low inputs are not penalised or discouraged. These systems often provide suitable management of high nature value land and use smaller and less productive livestock that can't achieve (or where it would be unwise/inefficient/costly push) these performance targets.

6.(ii) Reducing the calving interval - do you agree with this measure and the pace of phased implementation proposed?

Yes

Explain your answer.:

It is important for the sustainability and image of the industry to be efficient, carrying no passengers that unnecessarily contribute to greenhouse gases. Reducing time of first calving and calving interval is an efficiency measure that benefits the farm business and the environment through reduced costs and decreased emissions.

Note that a degree of flexibility may be required to ensure that extensive upland systems with low inputs are not penalised or discouraged. These systems often provide suitable management of high nature value land and use smaller and less productive livestock with a longer rotation.

We are concerned that an unintended consequences of this measure will encourage farmers to rent/buy marginal land and take on increased and heavier/continental stock unsuitable for the land in order to qualify for the payment. This may result in habitat damage due to heavier stock or increased fertilizer addition to land to allow the land to carry the heavier stock. We would like reassurance that there will be a mechanism in place in this measure to prevent this type of negative impact on marginal land of high nature value.

6. (iii) Do you agree payment should be made only to qualifying suckler cows where live calves are registered with DAERA?

Yes

Explain your answer.:

Calf mortality forms part of the efficiency measure and payment should be on registration of live calves. For audit purposes the payment should only be made on registered animals.

6. (iv) Do you agree that payment quotas will apply to the suckler cow measure and be calculated on an individual farm basis based on historic reference data?

Yes

Explain your answer.:

Historically, headage has caused distortions in national herd/flock. In some cases this led to overgrazing which was damaging to habitats and the environment.

Overall trends show decreasing livestock numbers. A reference period will ensure farmers cannot artificially inflate their herd to maximise headage payment.

There is anecdotal evidence of a recent change to animal purchase/land rental behaviour due to anticipation of headage payments. The reference period should be a period pre 2022. The reference period should be communicated to the industry as soon as possible as it appears that the idea of a headage payment has encouraged stock purchasing.

There may be examples with new entrants or changes to farm businesses where this creates problems. It is preferable to have a system to assess these cases for eligibility and sustainable stocking levels rather than allow all farmers to claim for current/future herd numbers.

There may also be scenarios where there is a need to reintroduce cattle grazing for habitat condition or have greater flexibility in the grazing mix to deliver environmental outcomes. There therefore needs to be sufficient flexibility to facilitate specific grazing regime requirements with approval by DAERA.

6. (v) Do you agree that the payment quota may be traded and usage rules will apply?

Yes

Explain your answer.:

On the basis that trading cannot result in an overstocking scenario. It is assumed the 'usage rule' will take this into account.

As per answer to previous question, consideration should also be given to giving quota to new entrants and other enterprise changes separate to having to purchase/trade existing quota. However, there is no desire to increase the national herd so this should only be applied in exceptional cases.

6.(vi) Do you agree that there should be a retention period of at least 6 months?

Yes

Explain your answer.:

This provides clarity on which business makes the claim and incurs the cost of rearing the calf.

6. (vii) Do you agree that in the future, claimants under this measure will be required to provide data [to be determined] to support a genetics programme?

Yes

Explain your answer. :

There are significant efficiencies to be derived from good genetics in terms of calving productivity, weight gain and forage conversion. Emerging science suggests that careful breeding using genetics can reduce emissions per head by up to 50% and also increase resistance to bTB.

The focus should be on all types of breeds including light hill and traditional breeds. There is a danger that a focus on heavy, high yielding continental breeds will reduce the number of animals suitable for hill and marginal grazing. These animals provide a valuable role in managing semi-natural vegetation on high nature value farmland.

Beef Transformation Measure.

7 Do you agree on the proposal to slaughter clean beef animals at 24 months to make the sector more productive and environmentally sustainable?

Yes

8 Do you agree that only animals born and bred in Northern Ireland should be eligible for support under the Beef Transformation Measure?

Yes

9 Do you agree with the proposed pace of phased implementation to reduce the age of slaughter to 24 months?

Yes

Explain your answer. :

Whilst this measure is appropriate for the majority of producers, it should not penalise slower-growing animals, either through traditional breed or extensive grazing on marginal land.

Many small and traditional breed cattle are slower to mature, especially those reared in extensive forage based systems with few external inputs. Those not sold to lowland finishers as calves provide a valuable function for grazing of species-rich habitat. They need to remain viable for meat production. Some producers will market their slow-grown (OTM) carcasses at a premium based on breed and grass-fed/conservation grazing story.

Whilst these animals will have a bigger carbon footprint re methane through fermentation/respiration, they will have a lower footprint through external inputs e.g. feed, fertilizer and other management.

10 Do you agree a single minimum slaughter age of 12 months for all cattle?

Yes

Explain your answer. :

Distinguishes between bTB slaughter, casualties etc

11 What are your views on a single maximum slaughter age of 24 months for all cattle – should there be different maximum slaughter ages for bulls, steers and heifers?

Yes

Explain your answer. :

This flexibility could be extended to breeds.

Many small and traditional breed cattle in extensive natural grazing systems are slower to mature. These animals can also provide a valuable function for grazing of species-rich habitat. They need to remain viable for meat production. Some producers will market their carcasses at a premium based on breed and grass-fed/conservation grazing story, but they should also not be penalised at the abattoir.

12 Have you any other specific suggestions to provide support for other parts of the beef sector? Explain your answer.

12:

The principle of headage requires careful consideration as it dilutes market signals and may cause farmers to follow the subsidy. There are examples of unintended consequences throughout the history of agricultural subsidy/intervention. There are sound reasons for this proposed policy but it risks disincentivising small, traditional breeds that are not productive, but are valuable as conservation grazers and efficient at converting rough forage into animal protein.

Currently Irish Moiled cattle attract a premium (per head) including in the Environmental Farming Scheme. This provides a valuable incentive and price support for using lighter, smaller stock that can graze marginal land. These animals are adept at grazing low quality herbage from extensive low input systems and thus can be considered low emission (low input:low output). There are other similar breeds considered native to Ireland and/or UK which could be added to this list and a payment to incentivise their use?

As per comments in email

Possible Sheep Measure.

13 Do you have any specific suggestions for incentivising productivity in breeding ewes? Explain your answer.

Headage:

We do not generally support the principle of headage schemes and feel that land based payments offer a greater degree of sustainability and resilience for farm businesses. Appropriate payment rates and prescriptions in agri-environment measures and returns from the market should be driving on-farm decisions. Whilst we appreciate the Minister is a strong advocate of headage payments, it has in the past caused considerable environmental damage as an unintended consequence which has contributed to the environmental challenges of today such as greenhouse gas emissions from peatlands from erosion, drainage etc.

We accept that headage is a way of tracking animals numbers and it is ultimately down to how this is used to further progress significantly towards carbon footprinting and dealing with unsustainable farming systems.

Farming for Nature Package

14 What are your views on the suggested policy proposals and environmental principles to be incorporated within the Farming for Nature Package?

Farming for Nature:

The policy proposals are exciting and ambitious and recognise the positive aspects and shortcomings of previous iterations of agri-environment. However, there is a risk of failure if the measures are not implemented fully, the scheme is too prescriptive to allow participation or too lightweight and does not achieve environmental outcomes. Co-design with ecologists and farmers is required to create a successful Farming for Nature package.

The timescale of transition and estimated payment levels need to be defined to gain support and give some assurance and security to participants of current and future agri-environment measures.

Increasing the area of habitat in good management and encouraging the creation of habitat creation support Ulster Wildlife targets for at least 30% of land (and sea) under positive management by 2030. It also supports the principle of Nature Recovery Networks which looks to create 'more, bigger, better and more connected' habitats across the NI landscape.

Ensuring all farmers have access to agri-environment measures/support is important for delivering landscape scale conservation. It is also of increasing importance for farm viability as a greater proportion of farm income moves from SFP to agri-environment and other measures. Current uptake of EFS (H) is localised and seems to be highest in areas targeted with the Group approach. Other important areas such as the Mourne are very under represented in EFS (H). This could be incompatibility with prescriptions/rules e.g. commonage, or lack of Group support.

Changing the payment model from income foregone to public goods is vital in providing adequate and attractive reward for farmers. Whilst funding is always a constraint, thought should be given to removal of digressive payment levels on habitats of increasing size. Currently peatlands (a hugely important habitat) attract low (or zero) payment rates when compared to grasslands, with digressive reductions in value per ha over 50ha and again over 100ha.

Results-based schemes appear to be more popular with farmers than traditional prescription models. This is largely due to the degree of co-design involved in the process which gives the farmer more buy in and control. This increased responsibility also comes with more financial risk if results are not

achieved, but also ensures better value for money for the public purse. Having suitable support and advice for farmers is key to the success of this model. Numerous examples of 'results-based' schemes have been trialed in recent years in GB, but particularly in the RoI and much can be learnt if this model or a variant thereof is replicated.

If progress is to be achieved especially around designated sites, priority habitats and habitat creation which require long term decision making, it is important that that dual use claims are included within future proposals.

15 What are your views on proposals to prioritise actions through environmental improvements to reverse the trends in nature decline by creating and restoring habitats that are important for species diversity?

Framing for Nature:

This is a sound proposal. However, mechanisms for decision making, targeting and prioritisation should be put in place to ensure the most useful interventions can be applied in regions/landscapes which have different priorities.

Nature Recovery Network mapping is currently being tested and is one method of creating an opportunity/constraints map to display a hierarchy of appropriate management options that will deliver the greatest public benefit for public money.

Maintenance and enhancement of existing good quality habitat is the cheapest and most effective method of conservation, with habitat creation and restoration supplementing these core areas. We currently don't have effective management of all areas of priority habitat and these should be prioritised, with restoration and creation linked to these core areas to deliver the NRN principles of 'more, bigger, better, more connected'.

16 Do you agree with the proposed eligibility criteria and minimum claim size proposals?

Yes

Explain your answer.:

It is important and positive that other farmers/landowners outside of the 'Resilience' eligibility will be able to benefit. However, the difference in eligibility for Resilience and Farming for Nature may create challenges and standardising both at 3ha could be simpler.

Whilst it would be good to be wholly inclusive, a 3ha minimum appears to be a sensible compromise below which farms are not likely to be of a practical size to work with.

Currently farmers with commonage cannot avail of agri-environment measures. This results in lost opportunity to manage large tracts of upland and work with the owners to deliver a sustainable grazing and management plan. Through the Group measure, a majority of commonage owners could be encouraged to work together as long as the eligibility rules did not require 100% adherence - such examples now exist in the RoI.

17 Do you agree with focusing on the habitat management actions listed as an initial mechanism to kick start improved awareness and capacity to manage environmental assets?

Yes

Explain your answer.:

The main habitat types have all been captured on this list and it includes a good ratio of habitat creation for intensive farmland and management/enhancement of habitat on more marginal land.

The acknowledgement that peatland restoration through rewetting requires separate funding and a different set of technical skills is appropriate. However, given the large area of farmland on peatland habitats, its presence as a mosaic habitat with woodland/grassland and the importance of correct stocking rate, some elements of peatland restoration should be included in the list of habitat management actions.

18 Do you have specific suggestions for other quick win management actions?

Farming for Nature:

Current EFS (H) eligibility is based on land classified from NIEA habitat layers. These are relatively accurate for some habitats, but not for semi-natural grasslands. This results in lost opportunity for land to be entered into agri-environment and risk of damage/habitat loss. Reverting to whole-farm agri-environment agreements, or the assumption of eligibility of land and a requirement to prove non-eligibility would ensure these habitats are not missed.

Similarly, trialling outcomes based measures in EFS will help inform the new Scheme and rapidly increase the land area under agri-environment. For example, allowing 12 month grazing of hill land with sheep will allow land hefted and out-wintered flocks to enter schemes and the prescription can be adapted to deliver good habitat condition based on flexible LU/Ha.

Another option would be to include all land within a defined area e.g. a catchment and make all fields potentially eligible, but requiring assessment.

A final tool, related to the above could be to use the NRN concept and apply eligibility to areas defined using the NRN mapping outputs as 'potential' areas of habitat and associated buffer zones. This would allow restoration and ecological networks to be considered across a landscape and not just focusing on existing habitat.

19 What are your views on proposals to introduce 'Test and Learn' pilots?

Farming for Nature:

This is an exciting proposal. Sufficient flexibility needs to be built in to allow change and evolution, and a level of risk of failure to be tolerated in what could be an iterative process in the development of longer term measures.

The scope, focus and number of required pilots needs to be defined and implemented as soon as practicable to provide the information and a timely transition to the new measures.

The first tranche of EFS (H) will be starting a second 5-year agreement in 2022 and a pilot should be well established with learning outcomes for a new scheme in advance of their expiration in 2027. It is also critical as a matter of urgency that provision is put in place to continue the existing schemes until a suitable alternative is in place as otherwise this sends a strong signal that the environment doesn't matter and will give rise to a feeling of uncertainty that will not build confidence in future funding mechanisms which have been start stop in nature for the last 20 years. This will act as a barrier to uptake for the future.

The model of EFS Group, working in geographically defined areas, or the RoI EIP model working on a catchment of habitat/species focus provides a model for consideration where developing these pilots.

20 Have you specific suggestions for other components that could be incorporated into 'Test and Learn' pilots?

Farming for Nature:

The NFFN project on farm carbon and biodiversity may provide a test case for ways to provide baseline assessments on a farm scale.

Scorecards are a simple and verifiable way of delivering results-based schemes. These have been developed across a range of projects in the RoI and have been tested on EFS (H) land in Fermanagh and Tyrone to assess their applicability.

The use of Nature Recovery Network or other constraints maps to identify landscape areas for incorporation into a pilot.

Cost efficient mechanisms to trial Value for Money approaches can be explored during the pilots using remote sensing data and aerial photography to reduce cost especially given the scale of what lies ahead. This needs to be supplemented by a level of ground truthing and significant capacity building

21 What needs to be in place to support delivery of an outcome-focused approach? Explain your answer.

Farming for Nature Package:

Whilst the farmer is empowered to make decisions and to be responsible for the outcome and thus financial reward, they will perform better with support and targeted interventions to build capacity and confidence within the agricultural sector will be a critical success factor in ensuring the effectiveness of the policy lever.

Each farmer will require guidance and advice in the assessment of their baseline biodiversity and management options to appropriately manage and enhance it. Ongoing advice through the life of the scheme will ensure the farmer has the benefit of independent opinion, professional advice and education/professional development. The use of peer-support networks delivered through BDG's or EFS (H) type Groups would be appropriate working in tandem to ensure effective delivery. The science underlying the climate and ecological emergency we are currently in is irrefutable. The solutions to address the issues are proven and will continue to evolve over time. As such there is the need to support a cultural shift and build a capacity building network for the future with a strong partnership between farmers and professionals within subject areas. This needs to be co-designed and client centric with those on the ground that avail of the service which is the approach used in our EFS (H) Group.

The scoring of 'results' annually to inform the correct payment levels will also be required. This system needs to be simple, repeatable and easily audited. The system should allow for, but not be reliant on self-assessment. A farmer should be able to accurately assess their own success, but a third party will inevitably be required to provide an independent assessment and advice on options, possibilities and continuous improvement.

Current agri-environment processes in NI do not have adequate resources to deliver this level of scheme for 25,000 farms and thought has to be given to scaleability and resources. These schemes appear to work well in practice in the RoI, but with a tradition of farm advisors in both private and semi-state (Teagasc) may have a headstart with resourcing.

In NI, CAFRE and the eNGO's delivering EFS Group have the most experience and should play a part in the Test and Learn pilots both parties working in partnership with farmers.

22 Have you specific suggestions for partnership delivery models that will encourage collaborative working?

Farming for Nature:

There are a number of options for delivery, but partnerships will be required to achieve the scale of delivery required.

This will require CAFRE and relevant eNGOs working in partnership building a cost efficient support network. We have been considering for some time the concept of a 'hub' which would coordinate the role of various eNGOs with specialist expertise in specific technical areas. This is similar to the model used in EFS (H) which involves other eNGOs and associates with specialisms working with farmers to help them understand and appreciate their natural heritage and climate assets and learn how to adopt nature positive management.

Within EIP's (regional and specific schemes) in the Rof, the business model has seen the incorporation of a new business/legal entity that is given the funding to deliver the scheme for a defined area/number of farms. This organisation has the responsibility and liability of delivering a bespoke local scheme, with the funder(s) (the relevant Government Department plus some matched funding from other Agencies such as Tourism) providing the oversight and audit.

The current Group Scheme model provides another example of partnership delivery where the Department administers and inspects the Scheme whilst environmental specialists e.g. Ulster Wildlife, eNGOs, associates etc work with the farmers to maximise land management opportunities, farm income from environmental enterprises, and environmental outcomes through education and advice. This is a farmer centric service and they are closely involved in identifying needs and priorities for group activities.

Farming for Carbon Measures

23 Do you agree on the proposals identified for low carbon emission farming practices?

Yes

Explain your answer.:

As the consultation points out, agriculture in NI has an above average contribution to emissions (mostly due to the structure of the NI economy rather than any specific features of NI farming). Ulster Wildlife is a strong advocate of a long-term and sustainable future for farming in Northern Ireland and also recognises the need for strong carbon reduction targets to move towards net zero. It is therefore imperative that solutions for carbon reduction in farming are found to ensure the sector makes its contribution and does not incur any reputational damage from the public or internal/external markets and can continue to deliver food, landscape, biodiversity and other ecosystem services.

Almost all measures proposed in the consultation have a focus on emissions reduction which goes hand in hand with technology, innovation and efficiency.

The specific measures proposed in this section include woodland/agroforestry, peatland and technology/efficiency measures including amendments to land use such as change to nutrient spreading and use of herbal leys.

Trees have the biggest short term potential to sequester carbon. It is important to adhere to the 'right tree in the right place' principle to ensure tree survival and no negative impacts on habitats where trees are not suitable (species-rich grassland, peatland, breeding wader sites etc). Tree planting is particularly useful in intensive farmed landscapes. Natural regeneration should not be discounted and is very effective in the right situation where some tree cover already exists.

Hedges have been identified as an important carbon store on farms. LIDAR data will provide interesting baseline data. However, guidance for future management will be essential to high levels of sequestration. Planting and infilling gaps is straightforward, but management of overgrown hedges can be problematic, where coppicing and hard pruning is required. There is increasing anecdotal evidence of severe hedge management including the cutting of hedgerow trees. Ash dieback is also providing an increasing challenge that will change the landscape and needs to be addressed as part of this package.

Peatlands are a huge carbon sink, but the majority are degraded and emitting large amounts of carbon due to their past management where drainage and grazing pressure has dried out and damaged the peat surface. The store of carbon (and potential for release) is huge. If the peatland hydrology was repaired and optimal grazing/management implemented, current emissions would be significantly reduced in the short term and would result in a slow, sequester of carbon across a large land area in the longer term. This has been largely carved out of agri-environment in the proposals which is appropriate for the large investment and expertise required for restoration. However, the ongoing management to maintain good quality sequestering habitat is within the farmers abilities and should be an important part of agri-environment and agri-environment is a key success factor in providing pre and post restoration support and maintenance. Other options worth consideration within nature based solutions include restoration of grazed salt marsh and natural flood solutions.

It is important to ensure other emissions that impact on local and national environment are not neglected in these measures. Ammonia in particular has a major impact on habitats, particularly peatlands. Some monitored sites have levels x3 the critical load for this type of habitat. This is also relevant to Carbon measures as healthy peatlands can support carbon reduction efforts.

24 Do you agree with the principle of encouraging the Farming of Carbon as a business enterprise?

Yes

Explain your answer.:

Any farm is a business and a farmer has to make good business decisions to be sustainable and profitable. As with agri-environment and farm biodiversity, farm carbon has to form part of the balance sheet. Traditionally, measures that reduced productivity have been paid on an 'income foregone' basis. However, if a farm is producing public goods such as C sequestration or biodiversity, these should be seen as a profit centre and rewarded appropriately.

The private carbon market is still in its infancy in terms of development and this will evolve over time, however it is important that carbon is captured and utilised for the purpose of enabling the NI net zero journey which will impact on the economy rather than just farming. All sectors need to play their part, however there is a collective impact and the role of agriculture in delivering nature based solutions will be important for everyone.

Investment Measure

25 Do you agree the guidelines when considering future capital support?

Yes

Explain your answer.:

It is important that there is investment on farms to support their transition to a more low carbon and nature friendly business model. The capital for these investments will not be delivered by market prices and it is appropriate to provide support.

26 Do you agree the draft design principles when considering future capital support?

Yes

Explain your answer.:

It is particularly important to support the investment in shared equipment and facilities.

Whilst average farms are small and overcapitalisation is a risk to farm sustainability and the efficiency of the whole industry, the co-operative/shared approach also supports other strands of this policy, specifically around BDG's.

Ulster Wildlife have experience in running an EFS (H) Group Programme and the importance of local knowledge and cooperation at a landscape scale is important for delivering environmental goods.

We agree that the support must incentivise investment that delivers the outcomes of this strategy and not just those items currently favoured by the industry. Tiered support will help to drive cultural change when investment in new and cleaner technology/practice attracts a higher grant percentage.

27 Have you any suggestions on the capital assistance that might support the agriculture and horticulture sectors? Explain your answer.

Explain your reasoning.:

Peatland restoration may be relevant in other sections of the consultation but it is pertinent to acknowledge that restoration is not an agri-environment measure that can be managed solely through grazing management and fencing. Significant capital works to reprofile peat and block drainage channels is required and capital funding is required.

In some cases specialist machinery is required and bog mats required to work on peat.

Adding value to farm produce and accessing local high value markets can support smaller farms that are not producing large scale commercial volumes of produce. This crosses over with the Food Strategy and other aspects of Economic Development, but funding for the 'clean' food-production side of the business could be considered as part of this grant.

In recognition of rapid innovation in technology and the entrepreneurial nature of many farmers, a provision could be made for novel funding applications to be made that sit outside any of the defined funding categories.

Knowledge Measures

28 What are your views on the approach to Knowledge Transfer and Innovation programmes for land managers, farmers and workers set out in this document?

Knowledge:

This has been identified as an important pillar of support for the industry. Ulster Wildlife would support the view that knowledge transfer is important in delivering a skilled and self-sustaining sector and that capacity building within the sector through skills and education is a good investment of time and money and necessary as the agriculture industry is facing the largest change since the war in terms of societal needs and expectations.

Current measures are effective. But, it is notable that the Rof has invested significantly more in EIP's and appears to have had good success in this method for finding innovative and regional solutions to environmental issues. A similar model should be investigated where appropriate e.g. in areas where bespoke agri-environment measures may be required.

29 Have you specific views on how best to encourage the participation of land managers, farmers and workers in Knowledge Transfer and Innovation programmes?

Knowledge:

Ulster Wildlife has experience of operating an EFS (H) Group Scheme. We believe this is successful as we offer a local service, we are arms length from DAERA (who can be viewed by the industry as the enforcement agency) and provide tailored, interesting and locally relevant support to the farmer. Focusing on a local landscape or defined area is important in being accessible and building relations with farmers which encourages participation.

CAFRE BDG's are similarly successful, and ongoing local support at a 'Group' level is key to building relations, trust and local peer to peer support.

Better links between programmes to ensure maximum participation and benefit is required. Currently there is only a small cross-over in shared activity

between Ulster Wildlife EFS (H) Group and local BDG's. These functions should be better aligned, and use of UW specialism on species and habitats brought into BDG topics as required. Similarly, CAFRE experience on scheme delivery and inspection could be delivered to the UW Group - Note: we are fortunate enough to get 1-2 annual talks on inspections from CAFRE for our members.

30 Have you specific views on how best to encourage the adoption of innovation by land managers, farmers and workers?

Knowledge:

Many current schemes stifle innovation by being prescription based, or where farmers are afraid of breaching rules.

The use of local facilitators for mentoring and advice is key to building farmer confidence. The ability to co-design schemes and support mechanisms will also lead to greater engagement and involvement from farmers.

From an agri-environment perspective, the move away from prescription-based payments to a results-based system will encourage innovation and farmers will be motivated to develop best practice for increased payments.

31 Are there gaps in the current provision Knowledge Transfer and Innovation programmes that need to be addressed?

Knowledge:

Ulster Wildlife work in EFS Group and on a recent NFFN project has highlighted the gap between farmer interest and knowledge on environmental matters. We have seen interest grow as farmers integrate within the group structures but gaps in knowledge on issues as diverse as soil carbon, soil management, water catchments, habitats and species are very clear, however there is a willingness to learn and an inherent interest amongst farmers.

These are all areas where farmers would change their behaviour and management practices to positively benefit these on-farm attributes once they have been made aware of them and engaged on best practice.

As payments become more targeted on carbon and biodiversity, there will be more rapid payback if the right education and support is provided.

Generational Renewal

32 Do you agree that there is a need to encourage longer-term planning for farm businesses?

Yes

Explain your answer.:

The sustainability of farming and the long term value of farmland for biodiversity relies on stable farm businesses.

In some cases, the traditional management practices that have benefitted wildlife, such as hay meadows have died out with the farmer who had no succession, or the farm was sold, modernised or amalgamated into a bigger holding.

Current agri-environment schemes are max. 10 years which would take many agreement holders beyond retirement age. It is important that there are succession plans in place and younger generations benefit from current experiences and training.

In EFS (H) Group we encourage family members to join and take part in training to ensure the skills are distributed more widely than the named active farmer.

This inter-generational learning is important across all aspects of farming, not just the nature-friendly aspects.

33 What are your views on a Generational Renewal Programme and the proposed three phase approach?

Generational Renewal:

We support this three phase approach and the importance placed on the outgoing/retiring farmer in the process. They can contribute significant knowledge and the success of the programme is making sure they have the confidence to let go and any other support required to make the adjustment to their life.

From an environmental perspective, there are many traditional practices that are of benefit for farmland biodiversity. It is important these are identified and recognised as part of the succession plan to ensure farm features and management that is beneficial for wildlife are not lost in the inter-generational transfer.

34 Do you agree with the inclusion of knowledge and skills development within the Generational Renewal Programme?

Yes

Explain your answer.:

It is important that the successors in the farm business have as many relevant and transferable skills as possible. Many farm-specific skills and knowledge will be transferred between generations, but the use of the external support to provide education on best-practice, innovation, efficiency, environmental management and carbon (not an exhaustive list) will improve the sustainability of the farm business in the long-term.

It is important that any financial incentive for speeding up farm succession is conditional on aspects of knowledge and skills development programmes being undertaken.

35 Do you agree that incentives should be provided to those participating on the Generational Renewal programme on achievement of specific objectives or on progress made?

Yes

Explain your answer.:

It is important that the next generation is incentivised and the incentive is not offered to the exiting/retiring farmer. As the consultation concludes, this is a poorly targeted approach with minimal value for money.

The incentives should be linked to qualifications and/or skills and development programmes attended/passed.

Supply Chain Measures

36 What are your views on the scope and effectiveness of existing supply chain measures (market transparency/information, education and knowledge transfer programmes, incentivisation schemes and regulation) to help deliver a more efficient, competitive supply chain?

Supply Chain:

Ulster Wildlife supports enhanced education and knowledge transfer to improve supply chain, efficiency and marketing of NI produce through enhanced green credentials.

Our thoughts on these measures are covered in the relevant sections of this consultation.

37 Do you agree with the three proposed policy areas when considering future supply chain measures?

Yes

Explain your answer.:

38 Are there specific gaps in the approach that you feel need to be addressed?

No

Explain your answer.:

39 Are there specific early actions that you would like the Department to take to support supply chain development in the agriculture and horticulture sectors?

No

Explain your answer.:

Soil Testing and LiDAR

40 What are your views on the proposed uses for data provided via the proposed Soil Nutrient Health Scheme?

Soil Testing and Lidar:

The soil sampling for nutrients and carbon as well as the LIDAR survey are industry leading and more ambitious than any other soil sampling initiatives undertaken. It will be extremely valuable to have this data for the whole of NI. Currently there are limited proposals for the use of the data re future land management/policy and the main value is the creation of baseline information. It is important there is multi-agency consideration of the findings of this initiative to develop optimum land management and future strategy from such detailed data.

Soil nutrients are straightforward and the farmer will benefit from reduced costs and optimised returns, with reduced emissions and improved water quality as a result. It is imperative that no fertility improvement instructions are provided for unimproved land or priority habitat. This would include all mapped land by NIEA. However, the area of semi-natural grassland is under recorded and there is a risk that farmers will unintentionally be given advice on how to increase the fertility of important semi-natural grassland. It is important that the Living Maps project and any other mapping initiatives that improve the resolution of habitats are used to inform the soil sampling programme. Ideally all land is sampled and surveyed as the nutrient and carbon content of semi-natural habitats would be a useful evidence base and could be used as a baseline for assessment of habitat condition.

The soil carbon data is intended as 'baseline' data and there is not yet appear to be a plan on how to use the data. Whilst ways of increasing the organic content of mineral soils is welcome, a different approach is required for organic soils and those identified as being predominantly peat. To reduce emissions, these soils would have to have a 'zero plough' recommendation and other measures such as 'stitching' of multispecies ley of improved grass, or rewetting and extensification measures would be beneficial.

41 Do you agree that in order to maximise future support payments, applicants should have to demonstrate that they have a current, (updated regularly) Nutrient Management Plan?

Yes

Explain your answer.:

The benefits of a Nutrient Management Plan are many and the farmer should require little incentive to complete it. However, making it a requirement of support payments is a good idea to deliver the landscape benefit of this initiative.

The initiative is valuable and should be widened to those farms below the 10ha threshold for Resilience payments.

Farm nutrient management plans will help drive farm efficiency/profitability, reduce runoff into water courses and minimise emissions. These are all valuable outcomes for farms of any size.

It is important that the soil sampling data does not provide recommendations for improved nutrients on areas of habitat or peatland. It is important these areas are highlighted in the Nutrient Management Plan and zoned for no addition of fertilizer.

42 Have you further specific suggestions for how the data provided by the Soil Nutrient Health Scheme could be used or promoted by government?

Soil Testing and LiDAR:

The soil carbon measures are currently intended to provide a baseline. However, repeat surveys will provide insight into sequestration rates and studies on the link with management will help drive future policy.

The baseline survey may identify the presence of previously unmapped peat dominated soils, particularly those under improved grassland. These areas might never be successfully restored to active peat forming bogs, but their emission factor can be reduced/negated by implementing a 'no plough' or 'no drainage' policy.

Livestock Genetics and Data

43 Do you agree that the Department should pump prime the initiation of an industry led Livestock Genetics and Data Programme?

Yes

44 Do you agree that farmers should be required to provide data for the Livestock Genetics and Data Programme as an eligibility condition of future support payments?

Yes

Explain your answer.:

Yes, the data will help improve sectoral

45 Do you agree with the proposal to develop knowledge transfer programmes to support farmers to adopt genetic improvement technologies?

Yes

Explain your answer.:

Yes, KTP's are an excellent tool in all aspects of agriculture as an effective means of education and continuous development. There needs to be a focus on native and traditional breeds in addition to highly productive continental breeds to ensure suitable stock for grazing marginal land and wet habitats are encouraged. These animals may not gain weight and finish as rapidly, but they are an efficient convertor of low input rough forage into animal protein.

These animals are also important for maintaining priority habitat as their ability to browse rough herbage and their comparatively low ground pressure and little requirement for supplementary feed or housing and should be encouraged in certain landscapes.

Controls and Assurance

46 Do you agree with the proposal to replace the current Cross Compliance system with the simplified 'Farm Sustainability Standards'?

Yes

Explain your answer.:

Simplification of rules is desirable in what can be a complicated and bureaucratic industry.

It is sensible to focus future efforts on known areas of non-compliance and those listed are key, especially removal of landscape features and loss of priority habitat.

However as breaches and non-compliance could be based on a) inspection effort and b) visible breaches that encourage reporting by the public it is important to ensure that those areas to be dropped are not due to an element of under reporting.

In many instances SMR's are a repeat of statutory instruments which farmers (and other industry) is obliged to comply. In the current arrangement cross-compliance can be used to replace the need to investigate breaches of legislation. This can be more effective, quicker and cheaper than the courts and may also result in a penalty without appeal. However, in extreme examples, a farmer could currently be penalised twice for the same non-compliance.

Where cross-compliance is removed due to statutory overlap it is important that the investigating/responsible Agency fills the gap left by cross-compliance in monitoring compliance and enforcing breaches.

Consideration of best practice measures for farm hedges with reference to use of circular saw/shears and tree removal could be considered. Currently tree removal of diameter up to 100cm is permitted which is generous and does not align with scrutiny applied in Planning where trees (and particularly bats) are part of the Biodiversity Checklist and PEA process.

47 Have you specific suggestions for how compliance with the proposed Farm Sustainability Standards should be controlled? Explain your answer.

Controls and Assurance:

A mix of on-farm inspection and remote sensing, to ensure a good balance of coverage and detail would be recommended. Current methods for public reporting of potential infringements are not well publicized. Whilst drawing attention to this facility to the public will not be popular with the industry it is important that farmers are held accountable to their customers/tax payers and it will discourage bad practice.

48 Do you agree with the proposal that the current land eligibility rules should be revised to make all agricultural land (except hard features) eligible for direct payment under future area based schemes?

Yes

Explain your answer.:

This is one of the most significant and fundamental changes to agriculture policy that will have a positive impact on biodiversity and we strongly support its introduction. It is notable that the EU are also considering significant changes to their land eligibility rules.

Currently, farmers are discouraged from retaining many habitat features, such as scrub and are afraid to let heather grow too tall, resulting in overgrazing and burning. This will simplify the calculation of payment claims for farmers who have to calculate their MEA for each field and allow dialogue on how best to incorporate landscape features into the farm biodiversity and carbon plans as a positive farm attribute. Farming for Nature should continue to support farmers for scrub removal and rush control on areas of habitat where these are undesirable features. This should include conifers on bogs as a future option.

One of the biggest benefactors will be farmers with lowland raised bog. These habitats are generally absent from LPIS maps and deemed ineligible as they are not traditionally grazed. Making them eligible for resilience payments and a 'Farming for Nature' payment will change farmer mindsets that these are valuable habitats rather than waste ground.

Some farming sector representatives have identified that this newly eligible land will not have any new entitlements created to provide the equivalent value which could result in increased trading/value of entitlements. If the transition from Resilience to Farming for Nature occurs at a steady pace this will become an increasingly irrelevant concern as Farming for Nature will become a greater proportion of the farm income and will be able to pay on the whole area of habitat.

Metrics, Monitoring and Evaluation

49 Do you agree with the principles against which metrics should be developed?

Yes

50 What are your views on the high level overarching metrics proposed?

Metrics:

The breadth and reporting frequency of metrics are an improvement on those currently measured and reported against.

Ulster Wildlife has a particular interest in the sustainability metrics relating to carbon and biodiversity.

For carbon statistics, more effort is needed to ensure C sequestering elements of farmland are included on the balance sheet to support the positive aspects of farming on land use. Inclusion of grassland and hedges will encourage better ongoing land management. Addition of peatland will focus on peatland condition and work will be needed to tip damaged and degraded peatland from emitting to sequestering, but it will have a big impact on the sectoral emissions.

Current reporting on biodiversity is not rapid enough to pick up change and feed it back into policy mechanisms. The measurement key indicator species

annually will address some of these issues. However it is important these indicators are designed and agreed with a range of stakeholders so that a broad range of impacts can be monitored.

The use of annual scorecards on agri-environment habitats (by farmer or a third party assessor) also provides an opportunity for collection of data annually and will include a high-level assessment of condition as well as the presence and abundance of a number of positive and negative plant indicators.

51 What suggestions do you have for additional high level overarching metrics that need to be adopted or developed?

Metrics, Monitoring and Evaluation:

The balance of farm inputs from local vs imported sources would be a good measure of sustainability.

A focus on such a measure would help reduce reliance of inorganic fertilizer inputs and brought in feed supplements which have a negative consequence on farm emissions. A focus on local alternatives or measurements for higher efficiency (e.g. the soil sampling programme) will enhance the local economy and promote innovation and diversification.

52 What other metrics do you suggest are included in the suite of metrics but that would sit below or play a supporting role to the high level overarching metrics?

Metrics, Monitoring and Evaluation:

The use of scorecard assessment and annual monitoring of agri-environment habitats (ideally linked to payment rates) will provide annual data on a range of plant and habitat indicators (both positive and negative indicators can be included).

Horticulture

53 What are your views on the proposed outcomes regarding the Northern Ireland production horticulture sector?

Horticulture:

Despite being a small sector in comparative terms it is important for local production and high value exports. It is appropriate to continue to support the growth in this sector for food security and economic contribution.

However, this sector generally relies on intensive small-scale land-use, significant inputs of chemicals and use of peat and plastics.

It is important that the environmental targets in the outcomes more than compensate for growth. Consideration should be given to alternatives to peat and plastics in the production and packaging. Ulster Wildlife is a leader in peatland management and restoration and supports a ban on horticultural peat in line with submissions to the Peatland Strategy and Environment Strategy.

54 Do you agree with the policy proposals, regarding production horticulture?

Yes

Explain your answer.:

The policies generally target knowledge transfer, innovation and partnership. Reduction in emissions and waste should be a key part of the focus of these policies. In addition to contributing to the sectoral emissions reduction targets, the increased efficiency will improve profitability and marketability of sectoral outputs.

55 Do you agree with the design principles regarding production horticulture?

Yes

Explain your answer.:

Transitioning to low carbon production and alignment with other areas of policy development are key to ensure this small but important sector contributes to the overall targets (and green image) of the low carbon transition of Agriculture and 2050 targets.

56 Have you specific suggestions for how success can be measured regarding production horticulture?

Horticulture:

Reductions in chemicals, plastics and peat per unit of output should be used as a benchmark.

Peat target usage should be set at 0%

Impact Assessments

57 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.

Impact Assessments:

Agri-environment measures will become increasingly important over time with a reduction in direct support through a reducing Resilience payment. There is a need to ensure access to agri-environment (and other measures). Rural communities can be more disadvantaged with regards to accessing schemes due to lack of local support, poor internet access or lack of education opportunities. Not all parts of the country are currently taking advantage of agri-environment measures as the prescriptions do not align with local management practices e.g. winter grazing or reliance on cattle, neither of which are encouraged in current prescription.

EFS Group helps provide access to areas in need of support and uptake rates can be correlated with Group effort. Additionally, Group facilitators will have evidence of farmers who are unable or unwilling to apply to schemes due to inability to adhere to prescriptions.

The Department will be able to identify any regions where there are constraints by comparing Tier 1-3 eligibility with uptake. Areas such as the Mournes are noticeably under represented with EFS Agreements and would be financially disadvantaged if this trend continued under the proposed measures.

58 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.

Impact Assessments:

Agri-environment measures will become increasingly important over time with a reduction in direct support through a reducing Resilience payment. There is a need to ensure access to agri-environment (and other measures) to as many eligible farms as possible. Some individuals or communities can be more disadvantaged with regards to accessing schemes due to disability or lack of education opportunities.

EFS Group helps provide access to areas in need of support and uptake rates can be correlated with Group effort. Additionally, Group facilitators will have some evidence of farmers who are unable or unwilling to apply to schemes due to accessibility issues.

Where farmers rely on form fillers or family members to complete some aspects of farm paperwork, agri-environment requires time spent with the farmer/land manager. Group facilitators are important in helping provide assistance to ensure equitable access to schemes for farmers of differing abilities.

59 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.

Impact Assessments:

60 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.

Impact Assessments:

Environmental impacts are likely to be classed as positive or neutral based on the intended policy outcomes. However, there is a risk of unintended impacts or challenges with translating policy into delivery. This requires an ongoing monitoring and assessment process as the measures get introduced to ensure they are operating as intended.

Through our responses we support the majority of the measures, but recognise potential issues that could arise through incomplete implementation, errors or omissions in schemes. It is important measures are assessed regularly for their actual vs the perceived environmental impact to ensure no unintended consequences.