

The Nature Friendly Farming Network (NFFN) is a farmer led independent organisation, established in November 2017 uniting farmers across the UK who are committed to managing their land for wildlife and public good at the same time as growing and providing safe, healthy food. The Network represents members in Northern Ireland in the form of a Steering Group.

The farmers behind the network believe that future agriculture policy for Northern Ireland should:

1. Help all NI farmers to produce safe, healthy food at the same time as helping our soil, landscapes, rivers and wildlife to flourish.
2. Maintain the current levels of agricultural support and redirect farming payments towards mainstreaming nature friendly farming adds measurable value to the environment.
3. Recognise that the shift towards a more nature friendly approach is not just good for wildlife but is key to the long-term survival of the Northern Irish farming community, delivering broader benefits to the public, including flood protection, water and air quality, carbon storage and the maintenance of thriving natural landscapes and the wildlife.
4. Ensure future schemes are practical and accessible to all farmers.
5. Ensure that the quality of produce from our industry reflects the quality of the land we farm, with market recognition of value through suitable reward for nature friendly products.

The network welcomes the opportunity to engage with DAERA's discussion document on a future Environment Strategy for Northern Ireland, the response has been developed by the Steering Group and through a survey of the wider membership.

Q1: Do you agree that the Environment Strategy should sit alongside existing Executive-endorsed strategies, such as the Sustainable Development, Public Health and Economic Strategies?

Yes

Northern Ireland's environment is facing considerable challenges. The recent state of nature report highlights that 11% of species are currently threatened with extinction, while many others are facing significant declines; less than a third of our water bodies are currently meeting good ecological status; much of our protected sites network is currently in unfavourable condition; and we continue to fail to adequately address the challenges posed by climate change.

Things cannot continue as they are. Biodiversity loss and climate change represent two of the biggest issues of our time and must be met with sufficient action. Failure to do so will have long term impacts on future well-being and prosperity. These challenges cannot be viewed in isolation and require consolidated action from across government¹, the private sector and civil society. The release of DAERA's environment strategy public discussion document is welcomed as it represents an important opportunity for government to develop a clear and ambitious policy for protecting and

¹ https://webarchive.nationalarchives.gov.uk/20100407163608/http://www.hmtreasury.gov.uk/d/Summary_of_Conclusions.pdf

restoring the environment for future generations, whilst setting a long-term strategic vision as to how we will get there.

The ambitions contained within an environment strategy cannot be achieved in isolation. We therefore agree that it should sit as an Executive endorsed strategy. The environment strategy must be cross cutting with the power to influence different government departments whilst also contributing to the delivery of numerous government outcomes. As stated within the discussion document, the environment strategy will play a key role in helping DAERA to deliver the draft programme for government outcome2: “we live and work sustainably – protecting the environment”. As the discussion document states: “the environment is all encompassing and in good and healthy condition can contribute to many, if not all, of the PfG outcomes”. An environment strategy can make significant contributions to outcomes, such as public health, tourism and investment, educational attainment, economic development, employment. It is therefore important that the environment strategy sits at the appropriate level to ensure coherence with other government departments and priorities.

A joined up cross cutting strategy is also important to ensure that all relevant government departments and strategies contribute towards its aims. For example, if the proposed strategy sits solely within the DAERA remit, the potential for other departments to contribute towards the delivery of environmental objectives and outcomes will be undermined. This is particularly important in relation to cross cutting issues such as biodiversity loss and climate change.

Finally, an Executive endorsed strategy will allow for coherence between other DAERA strategies and frameworks. This will help ensure that DAERAs future workstreams are contributing towards and not competing against the delivery of environmental outcomes eg. Fisheries, agriculture, forestry etc. While we support an Executive endorsed strategy, the lack of a functioning Executive cannot be used as an excuse for failing to progress an environment strategy. In driving the strategy forward throughout all government departments, DAERA should consider appointing environmental champions throughout government. This would help to ensure that the aims of the environment strategy are recognised, understood and delivered across a number of different but interrelated departments and strategies.

Q2: Do you agree that these broad environmental areas are appropriate for the Environment Strategy? If “No”, what alternatives would you like to see included?

No

The strategy outlines a broad suite of environmental themes; many of these are interlinked. For example, delivering on climate change will require action in relation to resource efficiency as well as in relation to how we manage landscapes etc. Similarly, how the marine environment is managed will have an impact upon fisheries and vice versa. This should be acknowledged, with a focus on developing synergies between these broad areas.

In terms of the areas of focus, the NFFN has the following comments:

Agriculture and land use

100% of NFFN members surveyed either agree or strongly agree that Nature Friendly Farming is essential to support environmental protection and biodiversity

We are surprised that the discussion document has not included agriculture and land use as a separate area, given the recognised importance of agriculture and land management in terms of both environmental delivery and impact. This is relevant as a range of land use sectors and associated policies will have an important role in delivering the proposed outcomes. For example, up to 75% of all land in Northern Ireland is farmed. Agricultural land use therefore presents a major opportunity to deliver the environmental ambitions of the strategy. Previous agriculture policy has not been sufficiently joined up with environmental aims, and in many cases has actively impeded them. This has had a profound impact upon the state of nature. Through the development of an environment strategy, alongside domestic agricultural and land use policies², there is an opportunity to ensure that agriculture plays a key role in meeting a host of environmental commitments, whilst providing reward to farmers and land managers for delivering these.

How farming is supported in the future will directly determine the future state of nature and the extent to which the UK delivers on its climate change commitments. This was explicitly recognised in England's 25-year environment plan which highlighted future support for environmental land management as a key tool to deliver its vision. This has resulted in a legislative programme in England aimed at transforming agricultural policy. This will be realised through the development of an Agriculture Bill, giving power to transition away from direct payments towards an Environmental Land Management Scheme, whereby farmers will be paid for the public good that they provide for society. In Wales, future agricultural policy seeks to deliver commitments under the well-being of future generations Act and its principle of sustainable development. Welsh support for agriculture will also focus heavily on the delivery of environmental public goods, aimed at restoring natural capital and delivering environmental outcomes through the development of a sustainable land management scheme.

In contrast, the discussion document makes no clear reference to how farming and land use sectors will contribute towards delivering the proposed objectives. Nor does it make it clear how the proposed strategy will interact with, or influence, other relevant policy frameworks. **There is a need for greater coherence between the proposed environment strategy, DAERA's future agricultural policy framework and the development of other land use policies**, eg. Peatland, forestry etc. Although this is briefly referenced within the discussion paper, it does not provide a detailed view as to how the environment strategy and future agriculture and land use policies will align with each other in future.

94% of NFFN members surveyed either agree or strongly agree that an Environment Strategy and future agricultural policy should be closely aligned

Future agricultural and land use policies must play a vital role in delivering the aims of the environment strategy, delivering outcomes and upholding environmental commitments. To reflect this, agriculture and land management must be included as a separate area within the strategy. There should be an onus on incentivising sustainable land management, supporting sectors to manage land in a way which benefits nature and the environment. This would help set a clear direction of travel for agriculture and land use, creating strong links between relevant land use policies and the environment strategy, whilst recognising the important role that these sectors must play in securing nature's recovery and acting on climate change. In this context it is appropriate to highlight the UK Climate Change Committee's recent call (February 2019) for a strategic land management policy in Northern Ireland.

² Such as the upcoming peatland strategy

Climate Change (mitigation and adaptation).

90% of NFFN members surveyed either agree or strongly agree that Nature friendly farming is essential to help deliver a net-zero carbon target

We agree that climate change should be one of the central pillars of an environmental strategy. Climate change represents one of the most pressing challenges of our time, which if left unaddressed will have severe ramifications for our economy, society and environment. It is critical that temperature rises are kept at 1.5°C. Recent research by IPCC highlights that warming beyond this threshold will have major consequences³. There is a need for urgent, consolidated action to avoid the worst impacts of a warming climate and to keep within safe limits. This will require leadership from government and action across all sectors⁴.

The agricultural sector is the largest emitter of greenhouse gases in NI, contributing 27% of total emissions. Emissions from agriculture have increased by 2% compared to the 1990 baseline and have increased annually since 2009. Furthermore, emissions from the land use, land use change and forestry (LULUF) sector have increased by 32% in the last 30 years. The LULUF sector is a net carbon emitter rather than a sink, unlike other countries in the UK. These figures highlight that farming and land use in NI have a long way to go in achieving the emissions reductions required. The current approach to farming and land use is not sustainable. If land continues to be used as it has been in the past, it will not be able to maintain long term, sustainable food production or provide the required solutions to address the climate emergency.

Although widespread change is necessary, farming and land use have a key role to play in delivering climate commitments. The NFFN believes that all farmers can play a role in the fight against climate change and **that the UK farming sector should work to achieve net zero by 2040 at the latest, with Northern Ireland playing its full part**. Achieving net zero carbon from agriculture and land use will require a range of interventions to bring about fundamental change. Incremental change is not sufficient⁵. Whilst some nature and carbon friendly farming reforms will be simple to implement, most will require significant support in the form of funding, advice and incentivisation. While trade-offs are inevitable, it is possible to plot a course to net zero carbon that also delivers thriving wildlife, a vibrant farming sector and good quality food. To help plot this path, DAERA, AFBI and others should work to build the knowledge base around climate friendly agriculture and land use in NI. Further research would help better inform future policy and decision making in this important area.

To mainstream climate friendly farming, future initiatives should move beyond voluntary means. Across the UK, emissions reduction measures are largely supported through an industry-led voluntary approach. In Northern Ireland, this is delivered by the Greenhouse Gas Implementation Partnership, which is a partnership between DAERA and the industry. So far, these initiatives have been unable to deliver necessary emissions reductions despite their promotion of best practise management. There is a need for the implementation of a stronger framework to ensure that all farmers are adopting practises which reduce emissions from agriculture.

How land is managed will have a key role towards achieving ambitious reduction targets, with land well managed for nature storing carbon and helping mitigate against climate change⁶. New farming

³ <http://ipcc.ch/report/sr15/>

⁴ <https://www.theccc.org.uk/wp-content/uploads/2019/02/Reducing-emissions-in-Northern-Ireland-CCC.pdf>

⁵ [https://www.nffn.org.uk/wp-content/uploads/2019/10/NFFN-position-on-netzero-farming-Final.pdf](https://www.nffn.org.uk/wp-content/uploads/2019/10/NFFN-position-on-net-zero-farming-Final.pdf)

⁶ <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalforpeatlands/naturalcapitalaccounts>

and land use policies should promote fundamental transformation and reward landowners for public goods that deliver climate mitigation and adaptation objectives. This reinforces the need for future agriculture and land use policies to be closely aligned with the objectives of the strategy. We are calling for more explicit reference to the role that agriculture and land management can play in meeting net emissions targets, with associated SMART targets for the sector, in order to achieve **Net-Zero emissions for agriculture and land use across the UK by 2040**⁷⁸.

88% of NFFN members surveyed either agree or strongly agree that Government needs to do more in NI to set a clearer direction of travel to help farmers act on and adapt to climate change

Whilst it is important for the proposed environment strategy to focus on mitigation and adaptation to climate change, NI is still without devolved legislation in this area. In contrast, the rest of the UK has developed climate change legislation, with the UK government recently committing to Net Zero by 2050 and Scotland by 2045. This creates a significant gap, as there are no specific reduction targets for NI to adhere to, other than contributions to the UK budget. If we are serious about tackling climate change, we have to enhance performance and can no longer rely on the other countries of the UK to cut emissions while not setting binding targets for NI. **Introducing a NI Climate Act with legally binding targets to cut emissions should be a headline measure of the Strategy.** This will drive meaningful cross-sectoral climate action to achieve meaningful reductions in all relevant areas, including energy, transport and others. Targets should be ambitious and contribute to the UK achieving Net Zero by 2045 with agriculture and land use meeting this target by 2040.

Resource efficiency

81% of NFFN members surveyed either agree or strongly agree that Nature friendly farming can help increase food security by enhancing the productive capacity of the land

Increasing resource efficiency will be an important area within the environment strategy. For farming this can produce significant gains including increased profitability and environmental wins. For example, regular soil testing allows for informed decision making regarding the use of inputs meaning more targeted application, thereby reducing costs and minimising environmental impacts. In many cases, nature friendly farming techniques provide ready made solutions without the need for large amounts of external inputs. For example, rather than relying on pesticides, we can use IPM techniques to provide for beneficial predatory invertebrates, or we can reduce fertiliser use, vet bills and other inputs through the adoption of herbal leys, which also benefit soil health and pollinating invertebrates. Techniques such as these should be incentivised through future agriculture policy, and through the roll out of information, training and advice so they can be readily adopted as part of standard business practise.

We support the ambition to imbed a circular economy, to minimise waste and ensure that resources are kept in use as long as possible. This will involve more farmers working collaboratively to make best use of the resources available, eg. Arable farmers using waste from livestock sectors to build soil fertility etc. As such, any biological materials relevant to farming should be recognised within the scope of any forthcoming circular economy strategy. The agriculture sector could learn from the

⁷ [https://www.nffn.org.uk/wp-content/uploads/2019/10/NFFN-position-on-netzero-farming-Final.pdf](https://www.nffn.org.uk/wp-content/uploads/2019/10/NFFN-position-on-net-zero-farming-Final.pdf)

⁸ [https://www.nfuonline.com/nfu-online/business/regulation/achieving-netzero-farmings-2040-goal/](https://www.nfuonline.com/nfu-online/business/regulation/achieving-net-zero-farmings-2040-goal/)

work of international synergies, which have facilitated a process of exchange between various businesses in NI, aimed at improving resource utilisation⁹.

Whilst improving resource efficiency is integral to meeting environmental aims, it is not an end in itself. The above area does not make reference to the importance of minimising total environmental impact. There are many opportunities to increase efficiencies and reduce the environmental impact of the farming sector. However, if these factors are viewed in isolation and are not pursued in conjunction with overall reductions targets (eg. Methane, nitrogen use etc.) a perverse situation could arise where unsustainable growth of the sector continues to drive an overall increase in emissions/use and associated environmental impact. To remain within environmental limits, efficiency improvements should not be viewed in isolation and must contribute towards overall reductions in resource use/environmental impact.

Marine Environment

A coherent environmental strategy should recognise synergies between land and the marine. Whilst agriculture and the marine environment are two separate entities, we must recognise that what we do on land can impact upon the health of our seas and the species that live there. For example, the quality of our rivers can have an impact on species of migratory fish such as salmon, whilst plastic waste from agriculture can find its way into our seas and oceans. These linkages should be recognised within the strategy, with appropriate measures adopted to reduce negative impacts. eg. Facilitating more recycling of plastic waste on farmland or through developing appropriate alternatives.

Environmental quality

Environmental quality is an important theme within the strategy. Areas of particular relevance for farming are water, soil, air and land well managed for nature. Nature friendly farming has a key role to play in improving overall environmental performance. Enhancing environmental quality will require a range of mechanisms, such as better regulation and payment schemes for the appropriate management of protected sites and the wider countryside. We would like to see ambitious, SMART targets incorporated into the strategy regarding environmental quality, in areas such as protected sites, water, air and soil quality.

Q3: As described below, do you agree that these are appropriate strategic themes for the Environment Strategy? If “No”, what alternative or additional themes/issues would you like to see in the strategy?

No

While the strategic themes are not inappropriate, it is the policies proposed under these that really matter and will determine the success of the Strategy. The challenge facing nature in Northern Ireland requires a bold and ambitious response and, given the current poor state of our environment, it would be worth considering an additional theme: Environmental Recovery. This is linked to Environmental Quality but as a standalone theme emphasises both protecting and **restoring** nature in Northern Ireland.

⁹ <https://www.international-synergiesni.com/industry-symbiosis/>

Q4: Do you have any comments on what specific issues should be included under a proposed Environmental Engagement strategic theme?

Mainstreaming of agroecological farming in agricultural education

often, agriculture and the environment are pitted against each other, with the environment often viewed as a restriction or burden on progress. However, many farmers have demonstrated that it is possible to farm profitably whilst benefitting nature and the environment. Educating more farmers on the value of environmental farming is key to delivering environmental outcomes. At present, the primary focus regarding agricultural education is on the conventional approach to agricultural production, whereby environmental land management is viewed in the best cases as “nice to do” and in the worst, a restrictive burden. This results in a failure to fully recognise the range of benefits that nature friendly farming can deliver and continues to push the narrative of profitable farming and environmental enhancement being antagonistic to each other. Consequently, there needs to be a step change in approach to fully recognise the multiple benefits that positive environmental management can have on business. Education and training initiatives need to reflect this, embedding the principles **of environmental sustainability throughout the core curriculum**. This could include a range of subject matter, including climate change adaptation and mitigation or maximising environmental management to optimise efficiencies. This will help change the narrative around farming and the environment, with the win-win benefits of positive environmental management being acknowledged, accepted and implemented. This will allow for measures aimed at increasing profitability and productivity to be based on delivering and maintaining a healthy, productive natural resource base.

Environmental advice, training and knowledge transfer

100% of NFFN members surveyed either agree or strongly agree that there is a need to better support farmers by creating a knowledge base to share best practise, research, insight and experience with others

Building environmental knowledge and expertise within the agricultural workforce is important to ensure that farmers and land managers know how to incorporate the needs of nature and the environment into their businesses. The ability to access high quality environmental advice will be important, allowing for better quality outcomes and to secure buy-in from farmers and land managers for environmental delivery. Advisory support should be provided consistently within future land management schemes. Advice should be delivered across a landscape, with an advisor working with a group of farm businesses. This will allow for a more joined up approach to delivering environmental benefits, reducing costs, increasing efficiencies and encouraging farmer collaboration. Incentives for farmers to work collaboratively across a landscape should be built in to scheme design, especially within high priority landscapes.

Continuous training on sustainable farming practises should be available to farmers, so that they are equipped with the knowledge to farm sustainably, covering all aspects of the operation. This should be provided centrally through formal education delivered by CAFRE and through a process of continued professional development for farm business holders. Effective knowledge transfer will also be important, so that farmers can learn from each other, solve problems, innovate and demonstrate how the needs of nature can be effectively incorporated into farm businesses.

Educating the public on nature friendly farming and food production

94% of NFFN members surveyed either agree or strongly agree that there is a need to raise awareness of nature friendly farming to the public to increase the demand for sustainably produced food in the marketplace.

There is an important role for consumers and the food supply chain in influencing how land is managed. An environment strategy should seek to encourage public behavioural change, so that they make healthy, more sustainable choices when buying products. This will be important to support sustainable farming, but also for a number of other areas. Accreditation schemes can ensure that food produced to high environmental standards is recognised in the market and that farmers producing in this manner receive generous reward. Government can play a key role in facilitating this and should work with stakeholders to determine what opportunities exist. For example, food produced on land managed under environmental schemes could be marketed based on its role in delivering environmental benefits. Improved public awareness of environmental schemes would allow the public to understand better the link between the taxes they pay, their spending on food and the management of the countryside. Retailers also have a key role to play in ensuring food produced sustainably receives preference and a fair market return. NI has an opportunity to learn lessons from Origin Green. The creation of a NI Food body could make a considerable contribution by celebrating NI food, ensuring that it delivers for the environment through truly sustainable production practises, whilst maintaining the authenticity of these products and their image. DAERA and AFBI should also investigate the benefits of shorter more integrated supply chains and the social, economic and environmental benefits that they can deliver, to determine how these could be facilitated more in the future.

There is a role for farmers to play in promoting sustainable farming practises to young people and the public at large. This could include more engagement with local schools, to facilitate a better connection between young people, food, farming and the environment. other initiatives which encourage greater engagement with the agriculture sector and the environment such as Open Farm Weekend should be championed and built upon to demonstrate the role that farmers can play in delivering sustainable food production.

Enabling long term sustainable land management

In Northern Ireland the median age of the agricultural workforce was 58 years old in 2015. This presents challenges relating to the long-term sustainable management of the environment and long-term viability of the sector. More needs to be done to make agriculture a more attractive career proposition and to encourage new entrants into farming.

Q5. Do you have any comments on what specific issues should be included under a proposed Environmental Prosperity strategic theme?

Long term investment in sustainable land management

83% of NFFN members surveyed either agree or strongly agree that the farming industry is currently ill-equipped and under resourced to build the movement and transition to sustainable food production at scale

Supporting farmers and other land managers to restore nature and address climate change will require a significant uplift in investment in environmental land management. Recent research

indicates that for Northern Ireland to meet current environmental commitments, there will need to be at least an 8-fold increase in funding dedicated to deliver environmental priorities¹⁰. Previous funding for environmental land management has not been at the scale required to meet commitments, resulting in numerous missed targets and continued environmental decline. If we are serious about restoring our environment, then funding must be commensurate to the scale of need.

To enable long term investment in sustainable land management at the farm scale, there is a need to transition away from our outdated conacre system. The current arrangements associated around conacre in which the tenant leases the land for 11 months of the year impedes long term decision making and investment in the land. The short-term nature of these agreements also makes it difficult for tenants to enter into schemes aimed at environmental delivery, which require the applicant to prove they have management control of the land for the duration of the scheme agreement. DAERA should continue its work in delivering more opportunities to invest in the long-term sustainable management by replacing the conacre system with long term tenancy agreements. In doing this, there should be recognition of the possible financial implications of moving to a new system for farmers and landowners in terms of tax, succession planning etc. The potential negative consequences of which should be avoided.

Developing an economy based on natural capital principles

Investing in natural capital can have significant economic and environmental benefits. For example, recent research determined that in Dorset, a natural capital approach, which aimed to improve the extent and condition of semi-natural ecosystems, would result in a 5% increase in Gross Value Added to the local economy, worth up to £0.8 billion whilst creating up to 25,000 jobs¹¹. Appropriately valuing and investing in natural capital approaches could have significant benefits to the NI economy. For example, there are significant opportunities being presented through NI's increasing recognition as a tourist destination. This has been built largely on the value of our natural capital through our landscapes and through the quality of our food. With this, there is an opportunity for farmers and other stakeholders to deliver and benefit from agroecological food tourism, in which high quality food is recognised for its role in maintaining high quality landscapes. Support to enable producers to capitalise upon this through the development of local supply chains and geographic indicators for particular areas would help contribute towards this.

In contrast, continuing to allow further environmental degradation will have significant negative impacts upon economic prosperity and must be avoided at all costs. More investment is needed to integrate a natural capital approach into policy making throughout government.

Q6. Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?

Achieving efficiency gains will be important if we are to deliver ambitious environmental targets. However, it is not an end in itself, as increased efficiencies do not always result in overall environmental gain if production and consumption practises grow at unsustainable levels. This should be reflected within the strategy, **outlining that efficiency measures serve to meet environmental targets through reductions in emissions and resource use.**

¹⁰ <https://www.wildlifetrusts.org/sites/default/files/2019-09/Paying%20for%20public%20goods%20final%20report.pdf>

¹¹ <https://valuing-nature.net/sites/default/files/documents/Reports/DorsetNatCapTrendsReport.pdf>

From an agricultural perspective we emphasise the need to find and adopt nature-based solutions which result in efficiency gains. Many of these could be utilised to deliver efficiency goals, whilst delivering for nature. For example, introducing wide spaced trees into permanent grassland can increase the length of time animals can remain on pasture by 14-17 weeks per year. This can also have a significant effect on grass utilisation and ammonia emissions¹². Similarly, appropriate soil and grassland management for breeding waders has numerous benefits on productivity, including better quality grazing for cattle and more eligible land to farm. In some cases, there is a role for proven technologies to help secure reductions in resource use and associated environmental impact. However, a risk exists in relying on technical fixes without looking to cure the issue. Whilst many technological fixes are driven by good intentions, they can often deliver perverse outcomes. To avoid these perverse outcomes occurring in the future, a robust planning response is required for bioenergy infrastructure such as Anaerobic Digestion plants. This will enable a holistic assessment of the environmental implications of the plant beyond its physical footprint to be made.

Finally, efficiency and productivity are often closely associated in a farming context with the premise that increased productivity equals increased business performance. However, a focus on profitability is of equal importance. In some cases, focusing on this will not necessarily maximise productivity in some farming systems and locations. This is particularly relevant for extensive livestock farming in economically marginal areas which can be more profitable than more intensive, high-input, high-output business models; For example, recent research has demonstrated that adjusting stocking rates in upland areas in line with the natural carrying capacity of the land, results in improved business performance as the business delivers a maximum sustainable output (MSO)¹³. This occurs as the business reduces its reliance on corrective inputs such as fertiliser, bought in feed, concentrates, additional housing and vets' bills, thereby reducing costs and improving profit margin. As well as being more profitable, these farm businesses are also likely to deliver better environmental outcomes¹⁴.

Q7: Do you have any comments on what specific issues should be included under a proposed Environmental Quality strategic theme?

Land well managed for nature – favourable management and condition of priority sites.

The quality/status of our protected sites network is of paramount importance. Currently, less than 0.5% of our protected sites are considered to be under favourable management, with only two thirds in favourable condition. Farmers and land managers in these areas should be fully supported to ensure that they can be restored to favourable condition through positive land management. This will require the creation of a farm support system that adequately rewards the appropriate management of these sites. Further work should be undertaken to develop management plans for these sites along with consistent high-quality advice to ensure their long-term favourable management.

¹² <https://www.afbini.gov.uk/articles/agroforestry-and-agforward#toc-5>

¹³ <https://www.wildlifetrusts.org/sites/default/files/2019-11/Hill%20farm%20profitability%20report%20-%20FINAL%20agreed%2015%20Nov%2019.pdf>

¹⁴ RSPB (2018) Farming at Haweswater: an economic report 2013-16. Available at https://ww2.rspb.org.uk/Images/Farming_at_Haweswater-an_economic_report_2013-2016_tcm9-451498.pdf

Land well managed for nature – all farms delivering for nature:

land outside of the protected sites networks must also deliver for nature, with farmers in these areas supported to help restore nature and the environment. This is essential if we are to halt biodiversity loss in NI. Again, the need for a well-resourced, joined up agricultural policy focused on the delivery of environmental outcomes will be key.

Soil health

soil health is an important, but often overlooked indicator of nature friendly farming, providing benefits in relation to carbon mitigation, water quality and farm business performance. More farmers should be equipped with the knowledge and expertise to build and maintain excellent soil health. This will be achieved through education, advice and knowledge transfer.

Water quality

Farmers have a key role to play in meeting water quality targets with appropriate measures rolled out as part of a broad level scheme and through appropriate regulation and enforcement. In catchments of particular importance, group initiatives should be developed to increase efficiency, provide value for money and secure better environmental outcomes.

Air quality

Air pollution is currently linked to over 500 premature deaths a year in NI. Appropriate regulation and enforcement are required to ensure that farming contributes to air quality targets. For some farm businesses, investment in capital infrastructure will be needed to help meet air quality targets. This should be provided for as part of a future agricultural policy framework.

Bringing it all together

In order to deliver these outcomes through land management, it is important that a strategic approach is undertaken, to determine which locations action will deliver the most benefit and secure best value for money. Previous work (2016) highlighted the need for a land strategy for Northern Ireland, based on a vision for land and landscapes to be managed for the benefits of people's well-being and prosperity, respecting the views of communities, groups and individuals and making best use of its multi-functionality. Such a strategy would help to provide a framework to manage conflicting policy priorities and balance competing demands on land. This call was recently endorsed in the UK CCC 'Reducing Emissions in NI' (February 2019). The development of a land strategy for NI would play an important role in the delivery of the environment strategy's stated objectives as well as aiding targeted land management interventions to areas where they will secure the highest quality outcomes. This will be important, both to the environment strategy, but also to guide future agricultural policy framework in which environmental delivery will play a core role. As such, we would encourage the development of a land strategy for Northern Ireland, adopting the recommendations previously outlined by the land matters coalition. This will help to inform more effective decision making and secure high-quality outcomes from land management.

Q8: What do you see as the main environmental governance priorities for Northern Ireland?

88% of NFFN members surveyed either agree or strongly agree that effective regulation is essential to ensure that all farmers are operating on a level playing field and that ambitious minimum environmental standards are met by all

Effective environmental governance is essential for any framework of environmental policy; a strategy that is not backed up in law with effective enforcement mechanisms is no more than a wish list. In terms of governance, Northern Ireland remains the only part of the UK and Ireland without an independent Environmental Protection Agency (EPA). This creates difficulties in ensuring effective environmental regulation, and penalising noncompliance. Therefore, a clear priority for environmental governance in Northern Ireland must be the establishment of an independent EPA. As an independent regulator, an independent EPA could monitor the implementation of environmental protections. This is important, to ensure that all farmers are operating on a level playing field and that good work by most is not undermined by the non-compliance of others. Such an agency should be adequately resourced and have sufficient powers of enforcement to deter and prosecute non-compliance with the law

Q9: Do you agree that these are appropriate draft outcomes for the Environment Strategy? If “No”, what alternative or additional outcomes would you like to see?

No

Broadly these outcomes focus on appropriate areas and aim generally in the right direction. However, if DAERA is serious about bold and radical measures, these outcomes will need to be much more ambitious. To be meaningful, the Strategy outcomes must be less broad and more specific. There should be a clear and measurable objective underpinned by interim SMART targets. For example, the outcome to reduce greenhouse gas emissions is too vague – how much will GHG emissions be reduced by and by when? The UK Government has committed to a target of net zero carbon emissions by 2050, will the Strategy set out how NI will contribute to this target and what emissions reductions will be required by relevant sectors?

Similarly, the inclusion of an objective to halt the loss of biodiversity is welcome but again this should be more ambitious and commit to a deadline. This objective should be underpinned by SMART interim targets. The aim that the trend for protected sites under favourable management “should be improving from 2018 onwards”, is a clear example of an ineffective target. To be measurable and meaningful the target should set a proportion of sites that should be under favourable management and a deadline for this to happen. Ideally this should be a legally binding target to ensure that there are consequences if it is not met. Linking to international targets such as the Sustainable Development Goals and Aichi Targets would certainly be desirable and should be seen as essential, given that NI is legally bound to meet these targets.

We would recommend a reference to healthy, sustainable consumption and production on land and sea. There should be an ambitious SMART target associated for the % of the population adhering to healthy eating guidelines within a certain timeframe. The widespread adoption of such guidelines

would benefit public health but would also significantly reduce the environmental impact of food production¹⁵.

The Strategy should also be time limited or it will be nothing more than a wish list of things we would like to achieve at some point. Given other timelines (new global targets will be to 2050, net zero by 2050, ecological recovery times) a 30-year strategy seems reasonable but would need much earlier interim targets to ensure we are moving in the right direction. We recommend that DAERA provide annual progress reports on the strategy along with a period of review every five years; these measures should be mandatory. Such measures will be important to ensure the Strategy is on course to achieve its stated objectives.

Q10: What are your big ideas for the future protection and enhancement of the environment?

A long-term commitment to funding for sustainable land management

Previous funding for environmental land management and sustainable farming practises have been insufficient to deliver environmental commitments. To deliver the environmental outcomes outlined within the discussion document alongside a profitable, progressive and resilient agriculture sector, a significant uplift in the funding dedicated towards environmental land management is required. This needs to long-term funding to provide certainty and build trust from farmers and land owners regarding the future direction of travel for farming and the environment in Northern Ireland.

Innovative funding for sustainable land management

A future policy should significantly increase incentives for private investment in natural capital and ecosystem services. Future investment in nature friendly farming should be supported by a combination of public payments and private capital, making it profitable and rewarding to manage land sustainably for both private and public benefit. For example, utility operators investing in upstream land to reduce the costs of flood protection; food businesses investing in soil restoration on the farms in their supply chain; peatland/woodland owners being able to trade in carbon credits; or water companies investing in land management to improve water quality. There are numerous opportunities for private investment in sustainable land management, with government playing a role in facilitating this process.

Landscapes – support for landscape scale approaches to land management

To truly deliver environmental outcomes at the necessary scale, we must adopt a bigger, better and more joined up approach to land management across Northern Ireland. The successful EFS Group Pilots provide a proof of concept as to how land managers working together can provide environmental outcomes at scale. These successes should be built upon with more landscape scale approaches to landscape management being applied as part of future EFS and a future agricultural policy framework.

Citizens Assembly on climate change and sustainable land use

Citizen's Assemblies provide a structured forum for citizen inclusion in decision making and can help governments to address politically contentious issues. They can also increase the legitimacy of

¹⁵ <https://www.carbontrust.com/media/672635/phe-sustainable-diets.pdf>

political decisions and actions. In ROI, a citizen's assembly on climate change resulted in a number of widely backed policy recommendations aimed at addressing this issue of increasing importance. 97% of members involved in the process recommended that climate change was put at the centre of policy making in Ireland and as a matter of urgency. Bearing in mind the considerable challenges NI is facing in reducing emissions and adapting to climate change, a citizen's assembly focusing on climate change and including land use would make a significant contribution to the debate whilst helping to provide much needed direction regarding future legislation and policy making. The consideration of Citizen's Assemblies and other forms of participatory democracy should be considered to play a part within the Environmental Engagement Strategic theme within the strategy. Measures such as these would help the public engage and participate in environmental issues and would help build greater understanding and knowledge of the environment and how it is managed.

Carbon auditing for all farms in NI

In the future, farm businesses should play a greater role in driving down GHG emissions. With this, it will be important for farmers to determine the impact of their current business practises to determine where appropriate changes can be made. In Scotland, farm businesses are able to avail of one free carbon audit per year, to help deliver emissions reductions, make savings to the business and regularly assess performance. A similar service should be available in Northern Ireland to all farmers with an ambitious target assigned for the number of farm businesses participating annually.

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