

## **NFFN response Future Agriculture Policy Framework for Northern Ireland**

### **Introduction and summary**

The Nature Friendly Farming Network (NFFN) is a farmer led independent organisation, uniting farmers across the UK who are committed to managing their land for wildlife and the public good at the same time as growing and providing nutritious, healthy food. The Network represents over 250 members in Northern Ireland in the form of a Steering Group. The NFFN welcomes the opportunity to respond to DAERA's proposals on a future agriculture policy framework for Northern Ireland, which should play a key role in helping farming and land use address the nature and climate emergency, increase the resilience of the farming sector through the adoption of nature friendly farming practices and deliver a long term supply of sustainable, healthy nutritious food. While we welcome some of the key commitments put forward in this consultation, it does not go far enough in putting farmers on the pathway to regenerative nature friendly farming and land use. It fails to grasp the urgency need for transformational change, nor provides the clarity and certainty that farmers need to prepare for the future. The evidence is clear, the next 10 years will be pivotal in securing a brighter, better future for farming and land use and we must begin this journey immediately. Without a clear timeline for action, this policy risks kicking the opportunity of a lifetime into the long grass. Furthermore, it lacks consistency and risks a twin track approach, incentivising ambitious action for nature for some, while encouraging flawed approaches for others. Incremental changes to the status quo are not enough, we need clarity, vision and clear purpose for the future. We urge DAERA to take our comments on board, and deliver a policy which reflects the scale of the challenge we are currently facing.

### **Key points**

- DAERA must provide a clear and timebound transition period in which a future policy will be operational
- This policy must have support for regenerative, nature friendly farming at its core
- The resilience scheme should eventually be phased out over a 7-year transition period, with funding allocated towards the farming for nature package based on the scale of need
- Effective targeting & high-quality advice are a pre-requisite of environmental success and the journey to sustainable land use
- The adoption of a headage scheme represents a backwards step in the journey towards sustainable farming and land use and should not be implemented
- Instead the focus should be focused on achieving a balance, between production, climate mitigation and nature's restoration and adopt a different approach to farm business management, in which the emphasis shifts from output to profit margin
- Funding planned for the headage scheme should be used to increase engagement with existing environmental schemes, allowing farmers to prepare for a future where environmental land management is key
- Climate action must be consistent with efforts to achieve other policy objectives and avoid perverse consequences
- DAERA must incorporate nature friendly business management into the core agricultural curriculum, knowledge exchange and professional development
- Public procurement should set targets for sourcing locally sourced nature friendly food
- Public payments must build from a solid basis of farm regulation, which helps farmers understand their legal responsibilities and moves on a journey of improved compliance

**Do you agree that income support is needed in the form of a Resilience Payment set at an appropriate level? Explain your answer**

Area-based schemes have done little to encourage farming practices which work with nature to increase resilience, through protecting or restoring the environment on farms, or in moving farmers to more sustainable business management practices. The evidence is clear, area-based payments are an outdated means of supporting farm businesses, which in many cases have served to undermine economic resilience. Evidence has shown that they are an ineffective way to maintain income stability, especially when compared to other more focused schemes such as agri-environment, that they maintain farmers solely on a production pathway even if that is counterproductive, that the majority of payments go to those farms that need them least. Whilst we recognise the need for a transition period between area-based payments to a policy focused on the delivery of outcomes, farm support must focus on supporting a transition to regenerative, nature friendly farming practices. To this end, we welcome the commitment to move funding from the resilience scheme to the farming for nature package over time. However, the timeframe in which this will take place has not been outlined and it is unclear what level of funding will eventually be transferred into the farming for nature package and other measures outlined within the consultation document, or what is deemed an 'appropriate' level for such a payment. This must be outlined as a priority, to provide certainty to the agriculture sector and to allow them to prepare for future as well as ensuring that future payments will be capable of delivering high quality outcomes, provide value for money and importantly a justification for continued investment in the agriculture and land management sector. We recommend a transition period of between 7 years to provide the necessary focus and momentum to move towards a more outcomes focused policy, while still allowing ample time for farm businesses to plan and prepare for the future. Without a clear timebound transition period, or a clarification on the budgetary allocations associated with each scheme, this commitment to move funding into the Farming for Nature package is meaningless and risks perpetuating all of the problems currently associated with the Basic Payment Scheme.

**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? Explain your answer**

As outlined above we do not see the adoption of a resilience payment as an appropriate long-term mechanism in facilitating a shift to regenerative, nature friendly farming practices and that it should be phased out as part of a clear timebound transition period. Regarding scheme eligibility, we are not against this proposal in principle, but would caution against a definition of an active farmer which means that farmers and landowners currently managing priority grassland habitats at low stocking densities are not disadvantaged by the requirements.

**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? Explain your answer.**

See response to previous question particularly around what constitutes further agricultural activity and potential implications for livestock grazing on priority grasslands at low stocking densities.

**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: (i) had cattle or sheep registered on APHIS; and/or (ii) had at least 3 ha of an arable or horticultural crop during the reference period in an historic year or years? Explain your answer**

Yes

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

**Participation in soil testing, including Light Detection and Ranging (LiDAR) - do you agree with this being a condition to claim the Resilience Payment**

The requirement for farmers to undertake soil testing and LIDAR will be useful in helping understand what changes they can make to business practice to improve input use efficiency, avoid nutrient runoff and consequently pollution. This element should also be built as an entry requirement into the Farming for Nature package, to take account of the fact that not all participants in this scheme will have to be involved the resilience measure. As the resilience scheme is ultimately replaced by other schemes within the policy, the requirement to undertake soil testing should still apply to all farm businesses. However, in the longer-term soil testing is not something that should be paid for, given the fact that it will result in direct benefits to the business over time as a result of improved efficiency in terms of production.

**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? Explain your answer**

Yes – Nutrient Management Planning should be a mandatory element of the resilience scheme when it is in operation – effective implementation of Nutrient Plan should form part of the basis of the inspection. However, it should not be a paid for measure in the long term, as it will provide direct benefits to the farm business from improved efficiencies of production, which will outweigh the costs of implementation.

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

**Do you agree with the proposal that progressive capping of the Resilience Payment will apply above £60,000? Please Explain your answer**

Yes, provided that the money freed up from reductions is allocated directly into the Farming for Nature package and to the Environmental Farming Scheme to increase the number of agreements that can be processed in early years.

**Do you agree with the proposal to increase the minimum claim size threshold to 10 ha? Explain your answer**

Yes

Provided that funds freed up from implementing this minimum threshold are allocated directly into the Farming for Nature package and in increasing the scale of the Environmental Farming Scheme.

**Do you agree that payments under the Headage Sustainability Measure will be made only to businesses in receipt of payments under the Resilience Measure? Explain your answer.**

The introduction of a headage scheme represents a regressive step in a transition towards more regenerative, nature friendly farming. Livestock needs to be managed in a way which achieves a balance between food production, nature restoration and climate mitigation, which will ultimately improve the economic resilience of farm businesses. Whilst we recognise that the intentions of this

scheme are to improve profitability through increases in productivity, we believe that payments based on a headage basis is a deeply flawed logic. Previous attempts at delivering these outcomes have ultimately failed to improve the economic standing of the sector and have resulted in significant negative impacts on the environment, which is ultimately the base in which sustainable food production must build from.

### **Striking the balance between food production and nature**

Rather than adopting flawed approaches to improving farm profitability of the livestock sector, we need to adopt more sophisticated interventions, which improve farm business outcomes in tandem with nature's restoration across the farmed landscape. We must seek to secure the business benefits that can be achieved through supporting and adopting a different approach to farm business management, in which the emphasis shifts from output to profit margin. Recent studies have shown that farm businesses need to review production costs, outputs, and the role of farm support schemes, but also consider that their ultimate profitability are actually inextricably linked to their partnership with nature. The research has shown that farmers continuously working with high-input high-output systems often experience less profit or are unable to break even financially. Nature provides farmers with 'natural capital' for their businesses in the form of soils, grass, water and geology, which farm businesses work with for crop or livestock production to take place. Where these 'free issue' assets are not managed correctly, farm productivity will reduce. Taken beyond their natural production limit, for example by increasing stocking levels to more than the grass can cope with or cropping more than the soil can naturally support, the farming businesses will need to adapt to maintain production. This is achieved via additional inputs such as fertilisers or the requirement to purchase additional feed to maintain productivity. This increases the overall costs of production and potentially reduces the profitability of the farm business.

We believe that in facilitating an alternative approach to farm business management, that actively works with nature we can restore our land's capacity to store and sequester more carbon, whilst significantly reducing emissions from agriculture and importantly, providing long term business benefits to farm businesses throughout Northern Ireland.

In striking this balance, we can increase the profitability of the farm business, through reducing costs and maximising margins. The proposed headage scheme works in the opposite direction and incentivises the further intensification of the livestock sector in Northern Ireland. Such an approach is unlikely to provide tangible benefits to the farm business and is reliant on significant quantities of external inputs in order to reach the thresholds required to receive payment within the scheme. Furthermore, the fact that there are no safeguards in place to avoid overstocking, provides real risks to semi natural habitats and is likely to represent further pollution risk in areas such as water and air. Finally, the fact that over 65% of NI's land area is classified as Less Favoured Area indicates that the majority of livestock farmers here would not be able to achieve the levels of efficiency required to receive payments within the scheme, and that attempting to do so, could have significant implications for farm business outcomes, nature and the environment in these areas.

Finally, the fact that this scheme could take up around £50 million per annum is deeply worrying. This risks taking up a significant proportion of the budget whilst taking away funding which could be used to adopt more effective approaches deliver sustainable land management at the same time as providing benefits to individual farm businesses.

**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**

Given our opposition to the introduction of this scheme, we will not provide further comments on the detail of its design.

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

We are disappointed with the lack of detail being outlined for the farming for nature package, especially in comparison to what is provided for the farm resilience and headage scheme. Given the extent of the nature and climate emergency, there is an urgent need for effective land management schemes which can be delivered at scale and importantly serve to deliver clear and measurable environmental outcomes. What has been proposed so far, fails to provide a clear and consistent vision for sustainable land use, or confidence that schemes will provide the sufficient level of ambition to meet current and future environmental objectives.

Regarding the principles, whilst we agree with those which will guide the design of the scheme, there are additional principles which should also be incorporated; we recommend the following principles should be used to increase its effectiveness in delivering environmental outcomes.

**Clear and measurable environmental outcomes**

The farming for nature package should focus on achieving clear and measurable environmental outcomes. This will be key in ensuring that agreements have a clear focus on which success can be measured. This will be essential in ensuring that the right outcomes are delivered in the right place in the right way, and to tailor interventions based on what a holding or landscape is best placed to deliver. While not all national and local objectives can be secured on a holding, it will be important to ensure a clear link between what is being delivered at the farm scale and how it contributes to wider environmental priorities.

**Trusted and high-quality advice**

The farming for nature package has the potential to encourage significant changes to the way that land is managed throughout Northern Ireland. For many this will be the first step in engaging with environmental schemes and farming in a way which proactively seeks to deliver benefits for biodiversity and climate in tandem with farm business outcomes. High quality environmental land management advice can play a key role in helping farmers navigate this changing landscape and support decision-making regarding land management. There is a large body of evidence that highlights that the provision of quality and targeted advice can help to enhance the results delivered through agri-environment schemes. This evidence demonstrates that advice is essential in, building the necessary trust to increase participation in schemes and help change attitudes towards nature friendly land management, in targeting and tailoring interventions to local circumstances and in securing integration with the objectives for the farm business; to highlight the benefits of good environmental practices to a farm business; in coordinating delivery across a landscape and in supporting understanding and compliance with regulation. Such benefits have already been witnessed in the EFS Higher scheme, where advice is built into all scheme agreements to good effect, demonstrating that it is not a cost, but instead one of the key pre-requisites to success. Previous research has highlighted that to enable high quality advisory provision across Northern Ireland, would take up a small proportion of the total agriculture budget, but would represent a significant return on investment.

**Effective targeting**

Effective targeting of interventions will be a key factor in ensuring that the farming for nature package is capable of delivering high quality environmental outcomes. This is dependent on high

quality data to ensure that schemes and options are targeted effectively both within a landscape, down to the individual level of the farm holding. Targeting will be key in delivering greater value for money, while ensuring that the right actions in the right area to deliver the right outcomes (see further points below on how a targeted element of the farming for nature package can be effectively delivered).

### **Evidence based interventions**

A future farming for nature package should build on existing evidence of what works in delivering effective environmental outcomes.

### **Farm scale**

At the farm scale, there is clear evidence to suggest that devoting 5-10% of lowland farmland to agri-environment options has significant positive impacts on wildlife abundance on the farm<sup>12</sup>. Much of this evidence has been brought together to develop packages or ‘bundles’ of measures designed to provide a variety of resources needed to enhance environmental quality at the farm scale. Packages such as these have featured in agri-environment schemes in Scotland, England and Wales. The most well researched of these packages is the Farm Wildlife Package in England, designed to enhance common farm wildlife, by providing the necessary ecological requirements. The package approach has delivered measurable improvements in wildlife at the farm level and therefore offers a blueprint for broadly accessible payments if done well and with the appropriate level of targeting and flexibility.

By comparison, in Northern Ireland the current Environmental Farming Scheme (EFS) Wider Scheme has not adopted the package approach, with farmers allowing to apply relative free choice to the number and type of options being applied on their farm. Furthermore, the scheme is currently limited as a result of a funding cap, meaning that for many it is difficult to implement habitat options on 10% of the land. Future broadly accessible schemes should be based on scientific evidence regarding the required **quantity and quality** of habitats needed to result in on farm biodiversity and the delivery of other environmental outcomes.

### **Landscape scale**

Achieving many environmental outcomes such as species recovery or improving water quality requires landscape scale action. A recent study suggested that to reverse the current decline in the Farmland Bird Index (FBI) 20-35% of the population FBI birds in each landscape would need to be subject to agri-environment management. Already, several landscape scale schemes are being operated in Northern Ireland, through DAERA’s Environmental Farming Group Pilot. Although in the relatively early stages of the pilot successes are being delivered through targeting the right management interventions, in the right landscape area, with skilled advisers and enthused farmers drumming up the required level of uptake. This model provides a good foundation to deliver schemes focused at delivering environmental outcomes at a landscape scale across Northern Ireland.

### **Additional design principles**

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<sup>1</sup> Winspear, R.; Grice, P.; Peach, W.; Phillips, J.; Aebischer, N.; Thompson, P.; Egan, J.; Nowakowski, M. (2010) The development of Farmland Bird Packages for arable farmers in England. *Aspects of Applied Biology*, 100 pp.347-352

<sup>2</sup> Bright, J.A. et al. (2015). Higher-tier agri-environment scheme enhances breeding densities of some priority farmland birds in England, *Agriculture, Ecosystems and Environment*, 203, pp69–79

We are concerned that the consultation document appears to limit the application of the environmental legal principles to the development of agri-environment policy (p.48). The Environment Act, subject to Assembly approval, creates a duty on all policy not just environmental policy, and as such the principles listed here should underpin the entirety of the Future Agriculture Policy. The correct application of these principles throughout all Ministerial policymaking is essential to ensure environmental protection is advanced and improved.

**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?**

We support the prioritisation of actions aimed at delivering environmental improvements that reverse trends in nature decline by creating and restoring habitats that are important for species diversity. However, what has been outlined within the consultation document is simply a range of different habitats that can be found on farmland. Whilst we agree that these habitats are important and farmers should be supported to create, restore and manage them, scheme design and agreement quality is vitally important. Each of the actions outlined within the consultation document have been part of agri-environment schemes for decades and yet, despite this many have failed to effectively deliver environmental outcomes due to poor scheme design, limited budgets, a lack of targeting and advice. The NFFN has several key recommendations regarding the future design of Farming for Nature package which should focus on those which will increase the broader sustainability of farming and those which will deliver more ambitious action, targeted to specific areas. We recommend a scheme which consists of the following

**Comprehensive entry level scheme**

A comprehensive, broadly accessible element - available to all land managers that meet the entry threshold. The scheme should pay for good environmental land management with requirements above and beyond baseline regulatory requirements. This should address widespread issues such as protecting soil, air and water resources, reducing greenhouse gas emissions, and maintaining wildlife habitats and landscapes. The comprehensive element would include simple interventions such as hedgerow restoration and management, tree planting, creating wildflower field margins, establishing bird cover crops, creating wetland features, establishing stream-side corridors, low input winter and spring cereals and retaining winter stubbles on arable land. These are measures that could be implemented by the majority, if not all, farmers and land managers. The aim should be to encourage a step change towards more sustainable production - with more farmers enrolled in a more ambitious scheme than currently. This element of the policy would effectively replace direct payments as the primary public funding mechanism available to farmers and land managers to engage with. To achieve this there will need to be significant financial investment in support to move the large majority, if not all, farmers into the scheme. This will include advice and possibly transition payments to support farmers to both gain recognition for work they are already doing and to reach an ambitious level for this scheme

**Targeted scheme design**

Targeted payments should aim to conserve priority species and habitats, to ensure the appropriate management and condition of designated nature conservation sites and to support habitat recreation and restoration e.g. peatlands and wetlands. A targeted element will address specific problems that need more investment and more complex management, often over a landscape scale,

including management, restoration and creation of priority habitats; species recovery programmes, including predator control; ensuring high water quality; and supporting strategic natural flood risk management. This payment should be determined by both national and local priorities and should be flexible enough to tailor to a farm or landscape context with the ability to combine measures to maximise potential benefits.

### **A joined-up approach**

Future schemes should aim to work at a landscape scale and payments should be calculated to account better for this collaborative, coordinated approach. This helps connect the good work of farmers in each area, to contribute more effectively towards environmental outcomes, rather than creating fragmented areas of good quality habitat within biodiversity deserts. There should be a fund for landscape scale collaboration. Farmers that want to collaborate to produce landscape scale results, for example species recovery or to improve water quality, should have access to additional support to help them do this, for example groups working at a catchment scale. Promoting habitat connectivity of our countryside is essential. All farms should be encouraged to partake in the scheme so that there is better connectivity across the countryside. Hedges, grasslands, tree lines and wild areas should continue to play a role as they work better when coordinated over a wider landscape scale.

### **Funding need**

Key to the ultimate success of the farming for nature package will be the level of funding that is allocated towards it and whether that serves to meet current environmental objectives. Previous research has highlighted that at least an 8-fold increase in environmental land management funding is required in order to meet current environmental commitments. This minimum package of funding is essential in ensuring that all farmers are well placed to deliver the necessary environmental land management to address the nature and climate emergency.

**Do you agree with the proposed eligibility criteria and minimum claim size proposals? Explain your answer.**

Yes, providing a lower threshold for the farming for nature package compared to the resilience scheme will help ensure that small pockets of priority semi-natural habitats will be able to be entered into the scheme.

**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? Explain your answer.**

Yes –

We agree that in the early years of the scheme these actions could be prioritised to help farmers adopt changes in land management aimed at benefitting these habitats. However, it is unclear as to how this will be achieved. Many of these actions could be delivered effectively through existing agri-environment schemes if more funding was made available to secure a greater level of entry into this scheme. In the early years of transition, DAERA should transfer funding from the existing agriculture budget to enable greater roll out of the EFS Higher and Wider, allowing for existing agreements to be rolled over. In relation to the wider DAERA should adopt the recommendations of the Strategic Review of agri-food and allow for the EFS wider scheme cap to be lifted. This should be lifted to allow for all farmers participating in the scheme to manage 10% of their land in agri-environment options. DAERA should also publish a clear transition strategy which clearly articulates the end point in which the Environmental Farming Scheme will eventually be replaced by the Farming for Nature package.



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

Yes – there are several additional options which could be adopted into existing schemes to achieve quick wins from an environmental perspective – these include

- Hedgerow restoration
- Grassland reversion – e.g. movement from improved to low/no input grassland management
- Restoration of peatland, heathland and wet grassland as opposed to management
- Wild bird cover as a separate option to overwintered stubble
- Reed bed management

**What are your views on proposals to introduce ‘Test and Learn’ pilots?**

We support the introduction of test and learn pilots to inform the development of the Farming for Nature package. This will be key to ensuring that this key part of future agriculture policy is effective in delivering environmental outcomes at scale and is practical and deliverable for farmers. DAERA should begin this process immediately, setting clear objectives as to how the test and learn process will operate, the timings in which it will take place and the end point in which a new Farming for Nature package will be put in place.

**Have you specific suggestions for other components that could be incorporated into ‘Test and Learn’ pilots?**

We would welcome the following additional areas to be incorporated into the Test and Learn pilots.

- Integrating environmental and farm business advice in order to deliver environmental and farm business outcomes in tandem
- Environmental land management plans to target the delivery of environmental outcomes at the farm scale (see point to next question)
- The effectiveness of farmer-based assessment in measuring the delivery of environmental improvements/outcomes

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

There is good evidence that payments based on outcomes, or at least results, can improve environmental benefits, and increase farmer engagement and awareness of ELM schemes. However, there are technical challenges with this approach that must be addressed before it can be rolled out as the primary mechanism for rewarding farmers and land managements. Results are not always in the control of the farmer and could present a higher risk to them. Payment for results could be used to top up payment for management actions (e.g. paying to plant a wild bird cover crop and then paying an additional sum if certain results are achieved from this).

Any system of payment by results or outputs will be dependent on clearly defined metrics and targets, with consensus on what change is being measured and how. It will also depend on high quality advice to help farmers and land managers to follow best practice and to ascertain why management has or has not led to the desired outcome. Trust in farmers is critical to success.

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

There are opportunities to create a framework for the Farming for Nature Package which creates a clear link between country specific environmental objectives and targets, towards the development of local area plans which then inform actions at the holding level. Such an approach would help to create a clear link between individual actions at the farm scale and their contribution towards meeting overarching targets and objectives as well as fostering greater collaboration and join up between farmers and other stakeholders within a landscape. This could work in the following way

#### **NI level**

**A clear and ambitious vision, objectives and targets** – focused on driving the delivery of the Governments current and future national and international commitments to improve the state of the natural environment. Accompanied by a national spatial targeting framework to inform the development of Area Plans.

**Flexible system** – A single national system offering public payments for the delivery of public goods, including biodiversity, better soils, water management, carbon storage, landscape features, public access, education and the historic environment. Area Plans would provide a mechanism to refine national priorities to determine which public goods are most appropriate to local landscapes. DAERA should provide clear guidance or a “recipe book”, detailing the outcomes which can be paid for through the scheme in a given area, and how they can be delivered at a farm or holding level, based on the latest evidence. This approach should provide sufficient flexibility to tailor management at a farm or holding level

**Monitoring** - Co-ordinated scheme monitoring, evaluation and overall scheme review would be overseen by the lead statutory agency, with central data capture to facilitate monitoring and evaluation, and determine value for money. Monitoring and evaluation must be well resourced.

#### **Local level**

Area plans – Ambitious integrated area plans should be developed at the appropriate geographical scale, using spatial mapping to identify environmental need, blending national and local priorities to ensure “The right outcomes, in the right places, delivered in the right way”. These plans need to be developed against consistent national criteria set out by the lead statutory agency, drawing on relevant local expertise.

#### **Each plan should identify:**

- Existing natural environmental and cultural assets e.g. species and habitats, rivers, landscape features and services these can provide.
- Priorities for restoration, enhancement and creation adopting the Lawton principles of “more, bigger, better and joined up”.
- Opportunities for access and education

As well as thematic priorities we would anticipate the plan having spatial priorities. The plans would be agreed by DAERA, and then provide the basis for individual or group Land Management Plans.

- The area plans should also identify risks to these natural and cultural assets and necessary mitigation measures  
Protected Areas such as ASSIs should be clearly identified as assets to be maintained and enhanced in area plans. Existing plans such as partnership plans or AONB Management Plans

should form a key input to new Area Plans. These documents, developed through consultation and partnership working, establish a vision for how the areas should be managed and already identify land management needs within these landscape boundaries. They identify important natural, environmental and cultural assets, opportunities for access and education

### **Farm and landholding**

Land management plans - land managers would use the area plans as the framework for their own Land Management Plan - demonstrating which outcomes they would deliver and the monitoring that would be undertaken or commissioned to demonstrate delivery of the outcomes. The plans would enable adaptive progression from an ambitious entry threshold (maintain and enhance) to more advanced 'restore and recover' and interventions required to maintain high value public goods (such as ASSIs, priority habitats and species). The plans would be agreed with DAERA, potentially in conjunction with a delivery partner.

Assets – Each plan could identify the natural and cultural assets of the farm holding, and potential to undertake restoration, enhancement and creation.

Risks – Each plan should also identify what is inappropriate (e.g., what would result in air or water pollution or negative biodiversity impacts) with the landholder committing not to undertake those activities to get access to public support. Payments should only be made where land managers are compliant with the regulatory baseline.

Toolkit – Plans would be populated from a menu of payable measures or groups of measures, which set out agreed outcomes to be delivered at the land holding level, with an appropriate level of flexibility as to how the land manager could achieve the outcomes on their land holding.

Contract – each plan would form a multi-annual contract between the farmer or land manager and Government. Contract length may vary depending on desired results, with a minimum of 5 years. The farmer or land manager should be able to increase levels of delivery within the contract subject to agreement, using a 12-month review clause to increase ambition if relevant. It would not be possible to remove measures within a five-year contract given the need to secure value for money.

Performance – Annual progress reports would be prepared based on agreed outcomes. As noted above, the performance monitoring framework would be included within the Land Management Plan. The monitoring would need to be undertaken by a qualified person or persons, in some cases this could be the farmer or land manager, in others the agreement holder would need to commission it from a qualified body or individual. This could be funded through the contract.

### **Farming for Carbon**

**Do you agree with the proposals identified for low carbon emission farming practices? Explain your answer.**

Whilst the consultation document outlines several different interventions which could make a contribution towards reducing emissions from agriculture and land management, it does not clearly indicate how the policy will drive their uptake, whether through incentives, regulation, best practice measures or via the supply chain. Furthermore, they are not linked to any clear objectives e.g. the percentage of farmers undertaking specific actions by a given point in time, or the overall reductions that these interventions seek to achieve. Therefore, it is difficult to provide full comment on their

applicability in relation to policy framework itself. However, we have the following comments in relation the farming for carbon measure.

**Interventions to deliver low carbon emission farming practices should be consistent with supporting nature friendly farming**

Rather than looking at the reduction of GHG's in isolation, the focus should be on reducing emissions in a way which achieves several other policy objectives, such as reversing biodiversity declines, improving water quality and significantly reducing air pollution. There is a risk with several of the interventions outlined within this element of the framework, that it could lock in unsustainable farming practices without addressing the systemic issues which have failed to address GHG emissions from the farming and land use sector here, whilst significantly impacting the wider environment. For example, anaerobic digestion should be viewed with caution. There is a risk that it's widespread adoption could incentivise land management which provides greater pollution risk and delivers little from a biodiversity perspective e.g. increased intensity of grassland management, maize crops etc. rather than focusing on technological fixes, which do not encourage change within the farming system itself, the carbon farming measure should focus on changes to the farm business which can achieve multiple outcomes in synergy with each other, including policies which enable widespread behavioural change aimed at reducing emissions, e.g. dietary change and the adoption of agroecological farming practices.

**Do you agree with the principle of encouraging the farming of carbon as a business enterprise. Explain your answer**

Yes – however, it should be consistent with other elements of public policy, to ensure that efforts to reduce emissions work towards securing a transition towards regenerative nature friendly farming at scale. There is a danger, that in only focusing on carbon as a business enterprise, opportunities to benefit nature, improve water quality, reduce air pollution among others will be at best side-lined and at worst undermined.

**Capital support**

**Do you agree the guidelines when considering future capital support? Explain your answer**

Yes – we agree with the logic outlined within the consultation as it recognises that capital support may not be the most efficient means of securing a given objective, thereby seeking to avoid potential perverse consequences.

**Do you agree the draft design principles when considering future capital support? Explain your answer.**

Yes – these principles are sound in ensuring that capital support seeks to contribute to wider policy objectives, particularly in the delivery of environmental public goods.

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

Capital assistance could be prioritised to new entrants to the horticulture sector, in order to overcome some of the barriers that exist in this area to date. A specific capital fund for new entrants should be established in order to allow for access to appropriate capital investments.

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

We agree with the broad approach outlined within the document focused on supporting knowledge transfer and innovation for farmers and land managers in Northern Ireland.

Transitioning towards a new system of where environmental considerations are core element of the business can be supported through knowledge transfer and training. Regular support from a trusted advisor makes a significant difference towards achieving environmental success and ensures that land managers are fully equipped to do what is best in each area.

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.

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

Whilst DAERA have made considerable progress in facilitating knowledge transfer as noted in the consultation, there are some areas where improvements could help drive greater uptake and sharing of knowledge throughout the sector. At present, it can be difficult for farmers to easily access information which might be of benefit to their business. one option, may be to create a knowledge transfer hub, which brings together up to date research in different areas, highlights where events/learning programmes are taking place and provides a portal to a range of different organisations which provide services which can help farmers make improvements to their business. At present, this information is often difficult to access and is located across many different areas. The creation of a central hub would make accessing these resources simpler and easier for farmers.

Efforts to increase peer to peer learning could be increased, building from the success of the recently established business development groups. With this, there is a need to ensure that Government supported knowledge transfer initiatives a coherent with each other i.e. all contributing towards the overarching objectives of the policy itself.

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

One of the key barriers to encouraging innovation within the agriculture sector, is the slow process and administrative burden associated with accessing relevant resources e.g. funding, advice etc.

To encourage innovation DAERA could establish an innovation challenge fund to provide rapid access to financial support for innovative solutions that can scale. Supports like Techstart Proof of Concept and the Innovate UK Covid Response scheme demonstrate how innovation can be supported with low levels of administrative burden

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

Farm business management planning based on Maximum Sustainable Output. As described previously in our response, increased farm profitability can be achieved in tandem with delivering improvements in the natural environment. However, at present this remains a concept which has not been encouraged, or widely shared within the sector. DAERA's knowledge transfer programme should be

used to help facilitate more farmers adopt a less is more approach to farm business management, which would help contribute to several objectives of the policy at the same time as improving the standing of farm businesses in Northern Ireland.

**Do you agree that there is a need to encourage longer-term planning for farm businesses? Explain your answer.**

Yes –

Long term business planning will be essential in navigating the significant changes which will be experienced as a result of the changes in farming policy. If done in the right way it will not only improve the standing of farm businesses but can lead to significant benefits to the environment. However, evidence suggests that only a small minority of farm businesses undertake regular management practices, such as producing budgets, profit and loss accounts or cash flow forecasts. This suggests that there is a need for subsidised advice in this area to help farm businesses prepare for the future and adopt practices which significantly reduce costs at the same time as improving the environment. Research has highlighted that the provision of such services to vulnerable farming systems in Northern Ireland would incur limited costs but could deliver significant benefits.

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

We support efforts to support new entrants into the agriculture sector, who often bring new ideas, knowledge and skills which can help improve the sustainability of farming. The three phased approach provides a useful framework in linking up existing owners with potential new entrants in order to develop a succession plan. However, what this potentially misses is the support that some new entrants will need in order to establish a farm business successfully. We would encourage DAERA to consider the development of a specific new entrants' scheme which would provide opportunities for new entrants to the sector as well as giving them the best opportunities to succeed in establishing a new career within agriculture.

**Do you agree with the inclusion of knowledge and skills development within the Generational Renewal Programme? Explain your answer.**

Yes

Ensuring that new entrants are equipped with the right skills, knowledge and experience will be essential in delivering a sustainable, productive and resilient farming sector. As such, we agree that knowledge and skills development should be included within the generational renewal programme. However, we would question whether a level 3 qualification is sufficient. Furthermore, we would strongly encourage teaching on nature friendly/agroecological farming as key element of the knowledge and skills programme.

**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? Explain your answer.**

Yes

Incentives should be provided to those providing access to new entrants to pursue a career in farming, however, providing incentives for new entrants should not be provided, rather the scheme should focus on removing the barriers that new entrants often face when trying to establish a new farming enterprise.

**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?**

There is an important role for consumers and the food supply chain in influencing how land is managed. 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 return in the market. NI has an opportunity to learn some of the lessons from Origin Green, in creating an NI Food body which celebrates NI food, but also ensures that it delivers for the environment through truly sustainable production practises, thereby maintaining the authenticity of these products and their image.

Where possible, future agriculture policy should also encourage farmer cooperation to create and develop local sustainable supply chains, which often allow farmers to secure added value for what they produce. Similarly, there are opportunities to create geographic indicators for products emanating from particular landscapes. Opportunities for this have been largely provided through previous RDP schemes and should be encouraged in the future

**Do you agree with the three proposed policy areas when considering future supply chain measures? Explain your answer.**

Yes

We broadly agree with the policy areas outlined within the consultation. However, we would recommend a specific element which focuses on enabling shorter, more responsive supply chains in Northern Ireland, especially in relation to public procurement, which could act as an important catalyst in this regard. We would argue that there is no such thing as local food unless there are local food processing and manufacturing facilities. Hidden costs along the entire supply chains e.g. high food miles, can mislead consumers. Investment in this area, and facilitating local abattoirs and on-farm butchering and manufacturing facilities if there's a demand, is vital if we are to improve the environmental footprint of our supply chains. It is also important that farmers receive a fairer share of the profit generated in the supply chain, creating a more even playing field.

Better procurement policies improve transparency in supply chains by requiring a better understanding of where food comes from and how it is produced. This can help shorten supply chains, providing a better return for producers who currently often receive too little value for their produce. A growing demand for more fruit and vegetables and alternative protein sources will create new opportunities, especially in urban or peri-urban contexts. Integration between agriculture policy and the NI Food Strategy is essential to facilitate sustainable local production and supply chains to allow local food economies to thrive.

**Are there specific gaps in the approach that you feel need to be addressed? Explain your answer.**

Yes, see points above in relation to accreditation & public procurement in supporting shorter more responsive local supply chains

**Are there specific early actions that you would like the Department to take to support supply chain development in the agriculture and horticulture sectors? Explain your answer.**

An early, game changing action would be to set specific targets within public procurement to source food and other products from local farmers in Northern Ireland delivering to a specific set of standards. Research in Sweden has found that public procurement has had a key role in facilitating an increase in the land area under organic production within the country as well as stimulating increased demand for such products from consumers. For instance a similar target could be established for Northern Ireland with accreditation schemes such as organic, pasture fed for life and fair to nature to help stimulate these systems in Northern Ireland.

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

We support the use of LIDAR data in assisting the delivery of several key policy objectives outlined within the consultation document. However, it is unclear the cost associated with rolling this programme out across all farms in Northern Ireland, and whether this would ultimately reduce the level of available funding focused on delivering specific environmental actions at a farm and landscape scale. It would be useful for DAERA to provide a cost for implementation on the collection of this data in order to provide a more detailed response.

**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? Explain your answer.**

Yes – in the early years of the policy the completion of a Nutrient Management Plan should be a requirement of entry to the resilience scheme. Effective nutrient management planning can help reduce pollution risk, help improve farm efficiency and deliver benefits to the farm business.

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

Data collected by the Soil Nutrient Health scheme could be used as a useful targeting tool to target specific interventions aimed at improving the environment, or in focusing on actions required to address pollution risk. For example, it could be used as part of a risk assessment process to understand where intensive advice led enforcement action should be undertaken to reduce diffuse pollution within particular catchments.

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

Yes, Government must make necessary investment to develop a relevant and targeted livestock data and genetics programme. If appropriately designed, it could help better understand how to overcome many of the sector's challenges with performance inefficiencies, for example, fertility issues, particularly in upland areas where livestock numbers are in decline and marginal areas where inefficiencies disproportionately impact farm viability. However, it is essential that this programme is funded as only part of wider essential data collection measures, which will improve baselines for biodiversity, greenhouse gas emissions, and other environmental metrics which have been well studied and can more effectively help deliver environmental outcomes and improve economic efficiency and resilience.



Genetic improvements should be relevant and embedded in appropriate farming systems, not based on blunt or limited metrics, for example, animals with the genetics to perform well in an intensive, predominantly housed and grain-based system would not perform well in an outside forage-based system.

Therefore, multi-trait assessment should be adopted to consider not only breeding efficiency, and live weight gain, but the integrity of the grazing system, and health of the animal. This holistic approach will help to safeguard High Nature Value systems from culling of "genetically inferior cows" which may be native.

Furthermore, genetic selection has its limitations. There are some breeds, especially native and rare breeds where there will not be the numbers within a population to make such a programme effective, due to small gene pools. A 2020 review also explained how the heritability of methane-reducing genes is low in selected cattle, demonstrating the importance of investing in other well-established methods for methane reduction, such as low intensity systems and livestock reductions, as well as further, more targeted research

**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? Explain your answer.**

Yes – taking into account points raised above

**Do you agree with the proposal to develop knowledge transfer programmes to support farmers to adopt genetic improvement technologies? Explain your answer.**

Yes – taking into account points raised above

**Do you agree with the proposal to replace the current Cross Compliance system with the simplified 'Farm Sustainability Standards'? Explain your answer.**

We welcome moves to ensure that a minimum set of universal rules will apply to all farmers in receipt of public payments. However, we have several concerns that the proposals outlined risk replicating many of the issues previously associated with cross-compliance, will be limited in their ability to reduce agriculture's impact on the environment and could leave the environment with less protection than it receives currently.

We are concerned that the rationale for removing elements existing elements of the compliance system is based on previous incidences of non-compliance. Evidence suggests that areas where non-compliance is most often recorded are associated with standards and requirements which are the easiest to assess at a given moment in time e.g. livestock identification and registration, while other breaches often go unrecorded. As such, we would question the rationale for removing current elements of the baseline based on this data as it may not paint a full picture of the situation on the ground. Given the issues associated with poor water quality in Northern Ireland we are particularly concerned conditions which seek to provide resource protection such as GAEC1 (the Establishment of buffer strips along water courses) GAEC3 (protection of ground water against pollution) and regarding the use of Plant Protection Products SMR10. In this respect the precautionary principle should be applied, to ensure that actions aimed at simplifying the baseline do not result in harm to the environment.

This leads on to questions around how the future baseline will be enforced and the resources that will be required in doing so. While we welcome DAERA's proposals to use knowledge/education to

increase understanding of agriculture regulation, this requires a significant increase in resources to be effective. Furthermore, we are concerned that remote sensing will be used by default. While new technologies may play an effective role in monitoring/compliance checking they will not be appropriate in all circumstances and may be inconsistent with an approach which focuses on providing more advice and guidance to farmers from the regulator on how to comply. Finally it is important to recognise several other existing regulations that apply to the agriculture sector outside of the cross compliance regime e.g. Nitrate Action Programme – the same principles outlined above apply here, with a greater focus on increasing understanding farmer knowledge of their responsibilities and a drive to increase compliance across the board alongside a more effective approach to inspection and enforcement.

Existing evidence suggests that knowledge around existing regulations is one of the key reasons driving non-compliance. In some respects this is understandable considering that information and guidance regarding regulation is often dispersed across several different sources. A step to address this issue would be the creation of a guidance hub, which brings together existing regulations under one roof, whilst signposting farmers to the right providers for information and advice in the field of agriculture regulation.

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

Given the limitations associated with a prescriptive approach associated with cross compliance, we would welcome moves towards an advice led approach, whereby breaches of regulations are initially dealt with through advice and follow up visits, rather than immediate enforcement actions and penalties. This approach is popular with the farming sector and allows for a better relationship between the industry and regulator to be developed. SEPA's approach to implementation of the General Binding Rules, involved detailed farm walks over 14 priority catchments in order to record noncompliance. Following this, trained advisors visited farms to discuss the findings with the farmer and to consider solutions designed to benefit both the business and the environment, which was then followed up by three further visits to check if issues had been resolved. After this, if issues had not been rectified enforcement action could be taken with the issuing of fixed monetary penalties. This approach has led to 82% of farms achieving compliance with the rules after the first visit, thereby demonstrating the effectiveness of this approach.

**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? Explain your answer.**

Yes – the nature of the eligibility rules within the Basic Payment Scheme has had the perverse outcome of farmers removing existing areas of important habitat in order to receive higher BPS payments. This is a welcome step, which should help recognise the important role that a network of farm habitats both in field and boundary have in restoring nature and acting on climate change.

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

No

There are several welcome principles included in this section. However, all principles within this section must align with metrics agreed within the NI biodiversity and environment strategies, to ensure that targets for biodiversity and water quality are not undermined by competing policy

imperatives. To ensure coherence between these three important strategies, the principles of transparency (with regards to reporting) accountability, efficiency, effectiveness, equality, the role of science and non-regression should also be included.

### **What are your views on the high-level overarching metrics proposed?**

The metrics chosen should provide a comprehensive assessment of the effectiveness of the policy. Therefore, careful consideration needs to be made to ensure that they are fit for purpose in delivering these key functions. There are several omissions within the proposed metrics, which could fail in providing this holistic assessment of a policy which will have so much influence over how land is managed and the success of farm businesses in delivering a range of different policy commitments.

### **Total factor productivity**

There is growing recognition that TFP is insufficient in assessing some of the negative externalities associated with increases in productivity. Adopting a metric which focuses on a narrow interpretation of productivity, risks leading to a twin track approach to future agriculture policies, with some opting-in to the future farming for nature package, whilst others opt out and pursue potentially unsustainable approaches to improving productivity. Therefore, there is a need to adopt more holistic metrics for productivity that incorporate positive and negative environmental externalities. This should build on the work by the Organisation for Economic Cooperation and Development to develop a measure for Environmentally Adjusted Total Factor Productivity (EAFTP).

### **Environmental indicators**

We support metrics including N and P balances, ammonia emissions, and key indicator species, however they alone are not best suited to demonstrating and measuring pressures on biodiversity from farming and the health of the environment in part because they primarily identify site specific issues.

We welcome recognition of the role of metrics including habitat connectivity and the area of land protected and managed for biodiversity that reflect progress at a wider landscape/Northern Ireland level. However, there are weaknesses associated with these metrics (i.e need to identify condition not just area managed) and the disconnect between site and landscape scale focused metrics. A broader set of metrics is therefore required to fully assess and measure the effectiveness of the policy framework in improving the state and quality of Northern Ireland's environment.

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

#### **Metrics relating to nature and the environment**

We need metrics that measure significant components of nature, namely species abundance, species extinction risk and habitat quality and extent. In turn, these metrics should be supported by (and support the achievement of) legally binding long-term and interim targets to halt and reverse the decline in biodiversity. These should include metrics on

- Species abundance
- Species extinction risk
- Condition of protected areas & priority habitats
- Nonpriority habitats

**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 related to farm business management**

With an ambition to encourage greater business planning a metric should be included to assess what proportion of farmers are undertaking standard business management practices each year.

**Metrics related to compliance and farmer understanding of environmental regulations**

A strategic target for compliance with existing agriculture and environmental regulations should be set, to enable an assessment of the effectiveness of an advice led approach to enforcement as mentioned above and to move away from targets based solely on the number of inspections undertaken each year. Similar to this, there should be a metric used to assess farmer understanding of the suite of environmental regulations which apply to them.

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

We support the outcomes outlined to increase the Northern Ireland's horticulture sector over the next 5-7 years, as this will help enable a more diverse agriculture sector, which helps contribute to healthier more sustainable diets and helps improve Northern Ireland's farming sector to the environment.

**Do you agree with the policy proposals, regarding production horticulture? Explain your answer.**

Yes

However, we would encourage a reference to supporting new entrants who wish to pursue a career in this growing area, with an explicit reference to this within the generational renewal section.

**Do you agree with the design principles regarding production horticulture? Explain your answer.**

Yes, we broadly support the principles outlined, however we would encourage the following changes to help push forward a horticulture sector which makes a tangible contribution to outcomes related to nature as well as climate. a change in emphasis would help support horticulture production which seeks to use natural processes e.g. Integrated Pest Management, cover & catch cropping etc. to deliver benefits in yield, reduce reliance on synthetic pesticides and deliver more sustainable nutritious food.

Support the transition towards a low carbon, nature friendly economy

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

% of horticulture farmers undertaking genuine Integrated Pest Management

% of NI horticulture produce sourced by Government procurement under accreditation schemes such as Organic, Fair to Nature, LEAF Marque