



Northern Ireland Future Agricultural Policy Framework: Stakeholder engagement

Nature Friendly Farming Network Northern Ireland Response

Nature Friendly Farming Network

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 service at the same time as growing and providing safe, healthy nutritious. The Network represents members in Northern Ireland in the form of a NI steering group.

The farmers behind the network believe that post-Brexit 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 recover and flourish.
2. Maintain and redirect farming payments towards mainstreaming nature friendly farming.
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 Northern Irish farming, delivering broader benefits to the public, including flood protection, water and air quality, and access to thriving natural landscapes.
4. Make sure future schemes are accessible to more farmers.

The NFFN welcomes the release of DAERA's future policy framework for stakeholder engagement. During this engagement period, it is critical that DAERA listens to NI farmers who are calling for a radical change in food and farming policy. We cannot miss this significant opportunity to transform Northern Irish agriculture to help farms evolve and thrive, whilst restoring and protecting our natural heritage. NFFNNI farmers were surveyed regarding the future of agriculture policy in Northern Ireland in September; their feedback has been incorporated within this response.

The case for change

95% of all NFFNNI farmers surveyed believe that now is the moment for radical change in agricultural policy that rewards the conservation of natural resources alongside sustainable food production¹

The Northern Irish landscape is shaped by farming. Yet not all change in recent times has been desirable; soils have been depleted, water courses degraded and nature has struggled to cope with the pace of change. We have seen declines in over 600 farmland species over the last 50 years. However, farmers are key to reversing this trend and many have entered into agri-environment schemes to try and do just that. With over 70% of the NI landscape being farmed, we need to act now to deliver for the environment at a landscape scale. The NFFN believes that now is the moment for radical change in agricultural policy that rewards the conservation of natural resources alongside sustainable food production.

Regulation and environmental standards

100% of NFFNNI farmers surveyed want high environmental standards both at home and for imports to be a key requirement of future agriculture and trade policy

¹ Full survey results available upon request

Any future payments related to farming and land management must be based on the recipient meeting ambitious minimum regulatory standards. This is necessary to meet Northern Ireland's environmental aims and to ensure that the environmental benefits that farmers deliver through schemes are not undermined by damaging practises elsewhere. Regulation creates a level playing field, with all farmers and land managers bound by the same rules.

Regulation should define the rights and responsibilities of landowners, providing clarity about when they will be expected to maintain existing environmental and animal welfare standards and when they can access support to provide additional benefits. For example, going beyond regulatory standards to help improve water quality etc.

The design of cross compliance as it currently stands is unfit for purpose, creating a culture of fear. We need to address this, working together to create a system that prevents and where necessary, rectifies environmental damage. In a future system, enforcement should be proportionate, allowing farmers time and providing advice to become compliant. Follow up inspections should be undertaken to assess progress, before any penalties are applied. There should be a "3 strikes" rule, with the first infraction met with a caution coupled with advice on how to comply with the law; the second with a penalty and any third infraction leading to an exclusion (from 3-5 years from enrolling in schemes). Regulation should be better targeted at repeat offenders and those blatantly or purposefully breaking the rules.

Regulation and the provision of high quality advice should be closely linked, so that any farmer that has been found in breach a) has time to rectify the situation and b) access to quality advice to become compliant. This would engender greater trust between the industry and the regulator. Finally, inspections must be streamlined, at present farm businesses are being inspected by a range of different bodies all looking for different things. We recognise that meeting these requirements is essential; however, we would welcome an alternative delivery model, in which one comprehensive delivery visit is undertaken by the regulator. Again, a relationship built on mutual trust will be key, this will allow us to work together to achieve better outcomes towards the protection, restoration and enhancement of the environment.

Future trade deals will have a significant impact upon how land is managed in the future. The NFFN believes in high standards and it is clear that the public share this concern. A future trade regime must ensure that only products produced to comparably high standards as here are imported. NI farmers must not be exposed to the sort of cut price competition that will drive them towards more harmful ways of both farming land and livestock. We cannot export our environmental footprint overseas.

Public support for the Environment

85% of the NFFNI farmers surveyed are calling for a greater understanding of the critical role that farming plays in protecting the environment and delivering public goods

The NFFN strongly believe that we need the public to better understand the relationship between farming and the environment and the benefits that nature friendly farming can bring; both in protecting and enhancing the environment and safeguarding future food production. We want better support to be able to demonstrate to and engage with the public about our work. To properly show what environmental farming can do for the public. People have lost touch with food, farming and the environment and this needs to change. We want to work together to create a vibrant, prosperous countryside that the public can access and enjoy. **Public engagement should be central**

to future policy with the aim of improving public understanding about food farming and the environment. Education also has a key role to play, for the farming community and the public alike. Interaction with farming and the environment should be better facilitated within the education system at an early stage. Similarly, education programmes for those working in agriculture should better recognise the key role that the environment plays in supporting thriving sustainable farming businesses.

This will benefit nature through positive environmental land management, the public who will reap the rewards of a healthy countryside, and our businesses as people better understand the vital role that nature friendly farming plays in providing these benefits. Farmers should be encouraged to explore innovative ways of engaging the public, including through neighbouring farms acting together, engagement with the school curriculum, or partnerships with other businesses (such as food processors or retailers). Public engagement can also encourage new entrants into farming through engagement with the education system.

Opportunities for farmers to engage with the public must be encouraged, this will include physical access to farms for those that are willing. Within a new system, access to information will also be key. Citizens should be able to easily access information about the public money received by farmers in their area; their aims and objectives; the projects they are involved in; and what is expected or them in return for payments. An online portal or hub could present this information in an easily accessible way to improve the transparency of agriculture. This would help to make the link between public money, public goods and the public itself.

Profitable and sustainable farm businesses

The NFFN are committed to securing farming policies that support wildlife, sustainable agriculture and fairness for farmers. As such, we are concerned by the proposals within the framework regarding the 'grand productivity challenge'. A broad push towards increasing productivity in Northern Ireland does not necessarily represent the best approach towards protecting, restoring and enhancing the environment, or providing fairness to farmers. **The framework fails to recognise that a focus on profitability is of equal importance, and that in some cases focusing on this will not necessarily maximise productivity in certain farming systems and locations.** As such, we call on DAERA to recognise the importance of profitability in a future policy framework and focus on ways to help farmers achieve this.

We believe that nature friendly farming is not only better for nature, but is also the most productive and sustainable way of getting food from our land. For a future agriculture policy to be sustainable in the long term, **it is essential that any efforts to drive innovation and productivity are compatible with those that are aimed at protecting, restoring and enhancing the natural environment.** To achieve this, **there needs to be a greater recognition and understanding of the vital role that nature friendly farming has in benefitting productivity.**

For us, farming with nature represents the cornerstone of our businesses. By looking after our soils, crops and grasslands prosper, our stock benefits from well managed hedgerows and diverse swards, whilst beneficial insects enhance yields and suppress pests. **The role of science innovation and research must seek to identify and communicate opportunities for these win-win scenarios to deliver truly sustainable production.**

Agriculture policy is wider than just government support for the delivery of environmental public goods, **but should also incorporate rural policy, food policy animal welfare and support for farmers to be competitive and resilient.** These policies may help to provide new sources of income to farm businesses as we move away from area based payments. It is important to recognise that a range of factors will influence environmental delivery and the viability of the farming sector as:

1. **Payments for ecosystem services** (for example, from NI Water, property developers etc) which could help pay for some environmental outcomes such as water quality or biodiversity. These should work in conjunction with government supported environmental schemes, to spread cost fairly and avoid duplication.
2. **There is an important role for consumers and the supply chain in influencing how land is managed.** For example, accreditation schemes can ensure that food produced to high environmental standards is recognised in the market. This could include highlighting food produced on land managed under agri-environment schemes in the market. Improved public awareness of positive environmental land management would allow the public to better understand the link between their tax money, their spending on food and the management of the countryside.
3. **Government support to the sector to improve resilience and help transition away from area based payments.** This could include capital grants, training, business advice and support for technology uptake, such as investment in high speed broadband etc. The aim should be to improve the competitiveness of the sector using one off or time limited payments.

Building resilience

We call on DAERA to define what they mean by 'resilience' within the framework. For us, it means being able to make an adequate living from our land whilst safeguarding it for future generations; it means sustaining the landscapes that we farm and the communities where we live, as much as our own businesses and livelihoods. It represents a lot more than a 'stable and reliable' income outside of market volatility.

Area based payments have helped to keep some farmers on the land, but they have failed to build the overall resilience of our sector, of nature in our landscapes and the communities where we live. Because of this, they do not represent the best way towards developing a more resilient countryside or farming sector. We need to look at resilience in a more holistic fashion, seeking ways to revitalise rural economies, sustain farmer livelihoods and restore the environment, as well as securing a fixed income.

We believe that payments for public goods represents the starting point towards building a more resilient countryside and farming sector. Well-resourced effective land management schemes can provide the stable reliable income separate from the market, whilst also delivering a range of benefits to the taxpayer. This will build the resilience of individual farm businesses and the landscapes that support them. For example, moves to improve soil health can safeguard our farms against drought, disease and climate change whilst sensitive management of upland areas can reduce the impact of flooding downstream.

Such an approach could flip areas of natural constraint on their axis, turning them from economically marginal areas to vibrant prosperous landscapes. Support for nature friendly farming in these areas

will enhance the landscape for nature, allowing species and habitats to thrive, whilst also providing farmers with an attractive payment for their land management in supporting this. This in turn helps to make the landscape more attractive to potential visitors who want to immerse themselves in these high-quality landscapes. This may offer diversification opportunities for farmers as well as for local entrepreneurs, through tourism for example. With well targeted support, business advice and access to appropriate supply chains, farmers and rural communities would be well placed to capitalise on the improved natural assets of their landscapes, or to generate a premium price based on the improved environmental credentials of their food products. This is on top of receiving a stable and reliable payment for their beneficial environmental land management. These options represent a more comprehensive approach towards safeguarding economic, environmental and social resilience in the countryside which a simple area based payment could never achieve.

Working together

70% of NFFNNI farmers surveyed believe that co-design between the Department, environmental specialists and farmers and land managers is essential towards ensuring that a new system is effective

The NFFN believes that all farmers and land managers have a role to play towards developing a farming sector that delivers environmental enhancement alongside sustainable food production. It will take the collective knowledge, expertise and experience of a whole range of stakeholders to implement nature friendly farming across the country. This will apply in agricultural education, where nature friendly farming must be embedded within the core curriculum. This will mean that the next generation of farmers view farming with nature as one of the central elements of their business as opposed to an optional add on. Knowledge transfer and training will also be central towards achieving a change in how the environment and farming work together. Already some farmers are beginning to see the benefits of working together to share knowledge in the current Environmental Farming Scheme and other projects². Initiatives such as these should be pushed out on a wider scale to deliver success at the necessary scale. The win-wins of nature friendly farming will need to be well researched and communicated effectively, demonstrating the key role that positive environmental management can have upon a successful farm business. This is essential as more farmers are going to embed sustainable production methods as part of standard practise.

Working with nature

A future policy should focus on rewarding farmers to provide those benefits, especially environmental benefits that are not normally paid for through the market. **This is where the majority of taxpayer money should be focused.** We believe that the many farmers who are already playing an incredible role in helping wildlife flourish on their farms should be better supported and rewarded for their work.

Policy should be holistic, based on the whole farm operation including production and environmental aspects as far as this is possible. This means flexibility, for example to reach environmental targets across the farm rather than in individual fields, and more **focus on outcomes and achievements than mapping and calculating.**

² <https://www.cafre.ac.uk/technical-publications/understanding-soil-analysis-reports-training-gets-underway-upper-bann-catchment/>

For a new policy to be successful, well-resourced and practical agri-environment schemes will play an integral role. **Future schemes must make it simple for farmers to do the right thing for nature.** Payments for environmental works must be fair and generous and make economic sense to farm businesses as well as environmental sense. Farmers should be able to access payments in line with their achievements and effort. Payments should reflect the genuine environmental or social benefits that farmers provide. As such, **we believe that payments should be calculated beyond cost-incurred, income foregone.** Too often the true cost and value of such options has not been reflected in the payments attached to them. This often limits the uptake of interventions that require more difficult or expensive management, but which can often provide significant environmental benefit.

A new scheme will need to balance being environmentally effective, deliverable and auditable by government with being practical for farmers and land managers. **Flexibility should be built into the design of new schemes, so that farmers can alter management practises if required.** We feel this is a major flaw in the current design of schemes, which can be overly prescriptive and burdensome, which ultimately impacts upon uptake and buy in.

In the future, **farmers must be involved in the development of agri-environment options.** Our knowledge and experience will be crucial in delivering something that works, representing good value for money and greater buy in from the farming community. There is a significant opportunity to simplify schemes whilst ensuring that they deliver more. There should be a more straightforward, intuitive application process and clear guidance outlined to the applicant to identify the range of benefits to their business and the environment. This will encourage buy in from farmers and greater recognition of the benefits that are being delivered.

It is also important that future agreements are long term. This will give more certainty and stability to farmers and reduce the administrative burden on government. This means longer-term agreements of at least 10-15 years should be considered to encourage continued commitment, improvement and delivery over similar time periods. However, longer agreements will not always be appropriate. Increased flexibility within agreements is essential to enable land managers to adapt the details of the plan over time, while retaining a long-term commitment to the goals agreed at the outset. Previous schemes have not adopted this approach, often resulting in instability and uncertainty. Additionally, gaps between the closure of one scheme and the opening of new ones have impacted upon continuity. Many farmers have invested in environmental management for the long term and would like to see schemes which helps them better realise this commitment.

Future schemes should also aim to work at a landscape scale, both in the wider countryside and within priority areas. Farmers should be brought together, to help deliver for farming and the environment at the scale necessary to deliver success. Payments should be better calculated to account for and reward this collaborative, coordinated approach. A landscape approach will help better connect the good work of farmers in each area, to contribute more effectively towards meeting stated environmental outcomes.

Effective monitoring and evaluation will be crucially important and should drive management decisions. For example, soil testing could be carried out regularly and be used to help determine the correct levels of fertiliser application across the farm thereby avoiding over-use. Similarly, biodiversity monitoring should be included in schemes to accurately assess their impact on wildlife.

To achieve environmental outcomes, whilst delivering value for money, farmers must be provided with consistent, high quality advice. Regular support from a trusted advisor makes a significant difference towards achieving success and ensures that land managers are fully equipped to do what

is best in each area. This support should be provided consistently throughout the duration of the scheme agreement.

All types of scheme should be supported by expert advice, but in particular larger, targeted landscape scale approaches should be supported by significant levels of advice. Entry into schemes should look at the outset at what type of advice is needed and how it will be accessed.

There is good evidence that payments based on outcomes or at least results can improve environmental benefits, and increase farmer engagement with and awareness of 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.** Results are not always in the control of the farmer and could present a higher risk to them. Any system of payment based on outcomes or results 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 farmers to follow best practise and to determine why management has or has not led to the desired outcome. Trust in farmers is critical towards any success.

Funding needs

95% of NFFNNI farmers surveyed say that it is crucial to maintain at least the current level of investment, refused to deliver better value for money, to ensure a thriving sustainable agriculture sector

To meet our environmental objectives and create a sustainable agriculture industry for NI, the levels of funding associated with farming and land management need to be maintained in the long term. However, funding needs to be significantly repurposed to better help farmers meet our stated objectives and provide a range of benefits³. Farmers have the most crucial role to play in producing, high quality nutritious food, safeguarding our soils, improving water quality and ensuring that nature thrives in Northern Ireland. As such, it is essential that as a minimum, the current level of investment in agriculture is maintained, but carefully targeted to meet these desired objectives.

In conclusion

We believe that nature friendly farming is not only better for nature, but is also the most productive and sustainable way of getting food from our land. Many farmers are already playing an incredible role in helping to deliver a range of important public goods, from wildlife, to water quality and improved soil health. We believe that they should be better supported and rewarded for their good work. In addition, we think that food and farming policies should help all UK farmers to farm in a way that ensures that:

³ <https://www.wildlifetrusts.org/sites/default/files/2018-03/RSPB%2C%20The%20National%20Trust%20and%20The%20Wildlife%20Trusts%20-%20Assessing%20the%20costs%20of%20environmental%20land%20management%20in%20the%20UK.%20Final%20report..pdf>



Our NI steering group are keen to support and be involved in the development of future policies and schemes for NI moving forward. We hope you agree that further farmer input is essential to ensure the best and most practical policies and schemes are developed to ensure viable and sustainable farming businesses, good quality food production and environmental protection going forward.