

Nature Matters NI



Northern Ireland Future Agricultural Framework

A response from Nature Matters Northern Ireland, October 2018

Nature Matters NI is a campaign led by a coalition of environmental organisations in Northern Ireland (NI). We are on a mission to protect nature in NI and secure the best future for our environment after we leave the European Union (EU). Nature Matters NI is the public facing campaign of the **Northern Ireland Environment Link (NIEL)** Brexit Coalition, representing circa 100,000 members in NI. Specifically, we are campaigning for;

- A sustainable agriculture and land use policy that is fair to farmers, good for nature and benefits society¹
- Nature and environmental protection to ensure our most treasured species and habitats can thrive
- A nature-friendly marine and fisheries policy to protect our seas and marine biodiversity
- Funding for nature conservation to replace existing EU funding programmes such as LIFE+ and INTERREG
- The island of Ireland to be considered as a single biogeographic unit with effective mechanisms in place to resolve and manage cross border environmental issues

Nature Matters is working in partnership with the UK Environment Links and [Greener UK](#). Our view is that agricultural subsidy post Brexit should be distributed on the basis of 'public money for public goods'. This aligns with [England](#), [Scotland](#) and [Wales](#), and the principles set out by the Greener UK² paper 'Agriculture at a crossroads: the need for sustainable farming and land use policies'. In the lead up to the publication of 'Health and Harmony', the DEFRA consultation prior to the Agriculture Bill, we collaborated with UK colleagues on the development of the [Wildlife and Countryside Link evidence paper](#), although developed for England, much of this is relevant for NI. We are also supportive of the direction of travel of the recently proposed [Agriculture Bill](#) in Westminster which has put the environment at the heart of agriculture policy post-Brexit. This is a once in a generation opportunity to set agriculture on a sustainable footing for the foreseeable future whilst improving NI's environmental credentials and fulfilling our obligations to global agreements such as the Conventions on Biological Diversity and Climate Change.

We will continue to collaborate with UK colleagues on a range of issues relevant to our goal of realising a nature friendly Brexit for NI.

¹ <https://www.nienvironmentlink.org/cmsfiles/Sustainable-Land-Use-Group-Key-Asks-Paper-Dec-2017.pdf>

² <http://greeneruk.org/>

Context

NMNI have actively engaged with the Department of Agriculture Environment and Rural Affairs (DAERA) Trade and Agriculture Committee (TAC) in the development of the future agriculture policy proposals outlined for NI. As such, we welcome this stakeholder engagement exercise for wider comment and engagement.

NMNI believes leaving the EU represents a once in a lifetime opportunity to transform agricultural policy here, to create a sustainable farming sector which supports farmers and land managers to work with nature to provide high quality, nutritious food from a vibrant, healthy countryside. To date, past policies delivered through the EU Common Agriculture Policy (CAP) have failed to achieve this goal, providing little in the way of benefits to farmers, wider society or the natural environment. The release of this proposed policy framework represents an important first step towards achieving this vision.

However, for NI to fully achieve these objectives, future agricultural policy represents a constituent part, but not the whole. To develop a truly sustainable food and farming system, where farmers work with nature to produce high quality nutritious food, we need to move out of our current siloed approach and recognise numerous inter-related problems that need to be addressed. These include volatility in farm gate prices, public health crises³, poor diets⁴, food poverty⁵, food waste⁶ and climate change and environmental degradation⁷. These issues cannot be solved purely through the reform of any one policy, but instead rely on coherence across different areas, including health, environment, public procurement, agriculture, welfare and education.

Already this is being recognised in Scotland, who have committed to developing a Good Food Nation Bill⁸, which aims to work across different departments to fully embed the principles of health, environmental sustainability, social justice, knowledge and prosperity into a future food and farming system. This has been followed by strong calls in England to follow suit through the development of a people's food policy⁹, however we acknowledge that there is no mention of food in this regard in the recently published Westminster Agriculture Bill which is a missed opportunity.

In NI, we need to recognise the important linkages between agriculture, land management and other key areas of policy. Regardless of our political context we need to outline our long-term vision of for a healthy, productive countryside, that supports and is supported by, a resilient, profitable farming sector, that produces nutritious high-quality food. We also need to outline a stepping-stone approach for how we are going to get there and when. The development of agricultural policy will be important, but ensuring that it's vision is supportive and coherent with other important areas of public policy will be equally so. We note the inclusion of rural policy/powers in the Welsh approach, and the lack of inclusion in the DAERA framework. We believe this gap needs addressed in NI as rural communities have benefited greatly for the Rural Development Programme and significant need remains.

³ 63% of adults and 25% of children in NI are classified as overweight or obese

<https://www.health-ni.gov.uk/topics/doh-statistics-and-research/health-survey-northern-ireland>

⁴ NI has relatively poor dietary health compared to other parts of the UK

<https://www.food.gov.uk/sites/default/files/media/document/ndnsexecsummary.pdf>

⁵ https://www.adviceni.net/sites/default/files/publications/Growth_of_Foodbanks_in_NI.pdf

⁶ Before food waste collections began, 125,000 tonnes of food was thrown away each year in Northern Ireland. <https://www.nidirect.gov.uk/articles/food-waste>

⁷ <https://www.bto.org/sites/default/files/publications/state-of-nature-report-2016-northern-ireland.pdf>

⁸ <http://www.nourishscotland.org/campaigns/good-food-nation-bill/>

⁹ <https://www.peoplesfoodpolicy.org/>

Food can help fill this vital role, serving as the focal point for several overlapping policy issues where there is a role for public policy in ensuring beneficial outcomes for society. The food we produce and eat has implications for our health, our environment and rural economies. To avoid the past failures of policy in these areas we need a strategy to identify the overlaps and bring coherence to the work of multiple government departments. A joined up overarching strategy would provide a clear direction for all of these inter-related policy areas, thereby contributing to meeting a number of objectives outlined in the Draft Programme for Government¹⁰. This will provide better overall value for money for society.

A joined up coherent food strategy would complement and help build upon payments focused on delivering environmental public goods, recognising the crucial role that this support will play in maintaining and restoring the natural capital that food production depends upon. Working in isolation, to other important areas of public policy, the Agri-food strategy has failed to achieve this, burdening farmers with unrealistic targets and avoidable environmental harm.

In developing and moving towards future policies, DAERA need to develop a clear strategy for managing the transition. It is vital that framers and land managers have a clear understanding of the direction of travel so they can adjust their businesses accordingly. Securing a stable transition will be essential to ensure a successful move away from the Single Farm Payment in its current form to a payment that delivers public money for public goods.

Key Asks

- **DAERA must continue to engage with stakeholders to ensure to ensure farmers and land managers have a clear picture of changes to agriculture policy resulting from Brexit**
- For a future agriculture policy to be sustainable in the long term, efforts to drive innovation and productivity must be coherent with those aimed at protecting, restoring and enhancing the natural environment.
- **There needs to be a stronger recognition that effective environmental land management can lead to increases in productivity. Science innovation and research based upon maximising productivity must seek to identify opportunities for these win-win scenarios**
- The framework must recognise that a focus on profitability is of equal importance, and that in some cases focusing on this will not necessarily maximise productivity in some farming systems
- **Payments for positive environmental management can provide a stable reliable income source independent of market volatility whilst providing societal benefits. This represents a better use of public expenditure to manage risk and build resilience, as well as delivering beneficial outcomes.**
- We call on DAERA to adopt a broader view of vulnerability and risk management to develop a wider concept of resilience
- **Rather than being viewed as areas of disadvantage, economically marginal systems should be recognised for their high potential to offer significant public benefits**
- Any future payments related to farming and land management must be based on the recipient meeting ambitious minimum regulatory standards. This not only applies to proposed payments for resilience, but for any public payments moving forward
- **To ensure that farming is productive, profitable and resilient in the long term a future framework must have environmental enhancement at its core**

¹⁰ <https://www.northernireland.gov.uk/sites/default/files/consultations/newnigov/draft-pfg-framework-2016-21.pdf>

- We need to shift emphasis from ‘what farming can do for the environment, to what the environment can do for farming’
- **It is important that existing levels of funding associated with the CAP are maintained and repurposed in order to meet environmental outcomes**
- Funding to support farmers and land managers to provide environmental public goods needs to be allocated on the scale needed to meet specific environmental outcomes
- **There needs to be some recognition that the rural landscape is an important and distinctive element of Northern Ireland, and there should be reference to the importance of protecting the rural historic environment and distinctive landscape features.**

Transitional Agricultural Support Regime, 2019-2021

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

We understand the logic for continuing with entitlements until a new agricultural policy framework is agreed, however it is important to acknowledge that this does not come without risk. With no guarantee when the NI Assembly will be functional again, and no Minister in place to approve the way forward, NI will be out of step with the rest of the UK. This makes the schedule 4 ‘keeping pace’ powers of the agriculture bill, at present, redundant.

Agricultural support in the form of entitlements have been available for a long time, and any transition away from this approach must be managed appropriately in partnership with the industry and stakeholders.

Q2. What are your views on the possible abolition of the greening requirements of crop diversification, ecological focus area and retention of permanent grassland and the incorporation of the greening payment into the BPS entitlement values?

It is Nature matters view that greening has not delivered much in the way of environmental improvement in NI, and elsewhere in the EU as recently evidenced by the European Commission¹¹. However, there could be some justification to retain some of the arable options within greening due to the decline in arable in NI. Arable has declined by circa 20 000 ha since 1987, as has the wildlife associated with this land use to make room for an increase in livestock farming.

NMNI shares our partner Butterfly Conservations views that the increasing homogeneity of our landscapes presents a significant risk for nature. The All Ireland Pollinator Plan, 2015-2020, clearly identifies the loss of nectar, pollen and nesting sites from our landscapes as one of the key reasons for declines in our pollinating insects¹². In addition, habitat fragmentation, especially for our smaller pollinators such as solitary bees who can only forage up to a kilometre from their nest sites, is a cause of concern as it lowers resilience in wild populations as they become increasingly isolated.

NMNI believes that greening funds should be re-directed to fund pilots which would champion a public goods approach to agriculture as farmers transition away from the CAP. Pilots are already shaping up elsewhere in the UK in places such as the ‘Payment by results’ project in Norfolk and Suffolk and in Wensleydale in the Yorkshire Dales. Farmers are being paid for the delivery of nectar-rich flower meadows and margins and creating habitat for breeding wading

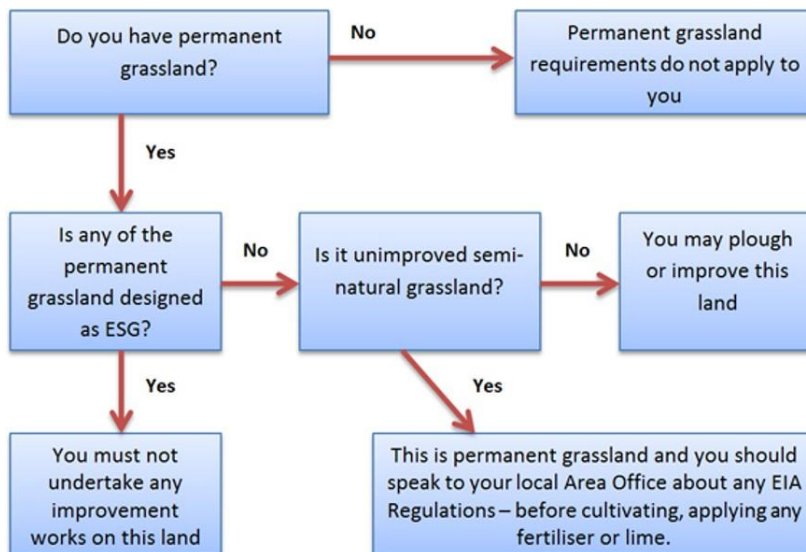
¹¹ https://ec.europa.eu/agriculture/sites/agriculture/files/leaflet_en.pdf

¹² <http://pollinators.ie/app/uploads/2018/05/Pollinator-Plan-2018-WEB.pdf> - Page 16

birds.¹³ Pilots in NI should seek to trial various options that work with nature to improve the profitability and resilience of agriculture and land management in Northern Ireland.

Q3. What are your views on the retention of the current ploughing ban on environmentally sensitive permanent grassland (i.e. within Special Protection Areas and Special Areas of Conservation) and how this could be achieved?

We support the retention of the current ploughing ban on environmentally sensitive permanent grassland. The retention of environmentally sensitive permanent grassland is clear within the DAERA guidebook¹⁴. We also believe the approach taken in Scotland¹⁵ to be pragmatic and workable as exemplified below;



Environmentally Sensitive Permanent Grassland (ESPG) should already be afforded some level of protection through the current Good Agricultural and Environmental Condition (GAEC) protocol, but due to historical issues over definition, and resourcing issues meaning a wholesale lack of enforcement, Northern Ireland has continued to experience a sustained loss of semi-natural grasslands in the wider landscape. ESGP critical throughout our landscape as sources of pollen, nectar and nesting habitat for our bees, as a source of larval food plants for our insects, as home for our birds, mammals and amphibians, they provide carbon sequestration and water filtering ecological services as well as helping with water permeation and retention, helping to limit flooding and increase overall water quality.

Q4. What are your views on those accepted into the YFP up to and including 2019 continuing to receive payment for as long as they are eligible to do so?

We agree that those accepted into the young farmers payment up to and including 2019 should continue to receive this payment up to and including 2019.

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

¹³ <https://www.gov.uk/government/news/environmental-farming-scheme-given-green-light>

¹⁴ <https://www.daera-ni.gov.uk/publications/2018-guide-greening-payment>

¹⁵ <https://www.ruralpayments.org/publicsite/futures/topics/all-schemes/basic-payment-scheme/basic-payment-scheme-full-guidance/greening-guidance-2018/greening---permanent-grassland/>

Given that payments have been guaranteed in the ‘Confidence and Supply Deal’ until 2022, we would question why the payment is not be offered beyond 2019, and if not, how will the funding be reallocated.

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

No comments at this time

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

No comments at this time

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

No comments at this time

Increased Productivity

Key points

1. For a future agriculture policy to be sustainable in the long term, efforts to drive innovation and productivity must be coherent with those aimed at protecting, restoring and enhancing the natural environment
2. We call on the framework to pursue increases in productivity that are innovative, resilient, sustainable and humane
3. There needs to be a stronger recognition that effective environmental land management can lead to increases in productivity. Science innovation and research based upon maximising productivity must seek to identify opportunities for these win-win scenarios
4. The framework must recognise that a focus on profitability is of equal importance, and that in some cases focusing on this will not necessarily maximise productivity in some farming systems and locations.
5. A new policy must work with a range of stakeholders to develop strategies for improving productivity and profitability in ways that are coherent with enhancing the natural environment.
6. Investment in education and knowledge transfer must effectively identify and communicate tried and tested scenarios in which positive environmental land management has provided significant benefits to farming systems.
7. Investments in CPD must help to provide measurable benefits to the farmer and the public. To ensure this, environmental sustainability must be embedded throughout all training programmes.

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

For a future farming and land management policy to be sustainable in the long term, efforts to drive innovation and productivity must be coherent with those aimed at protecting, restoring and enhancing the natural environment. In achieving such coherence, we can ensure that the

natural capital on which farming and food production depends, is maintained and restored, improving the resilience of farming to future change, and improving our long-term food security through building the productive capacity of our land.

Although the framework outlines that productivity gains cannot be at the expense of environmental sustainability, we are concerned as to how this will be achieved. For example, it uses 'competitors' such as the USA, France, the Netherlands and Italy as a gold standard of productive output over the last decade. On closer inspection, improvements in productivity within each of these four nations have had severe ramifications for the environment and society¹⁶. To date, none of these nations have achieved levels of production which are compatible with environmental sustainability objectives. As a result, some are moving away from their overwhelming emphasis on conventional agricultural productivity based on the recognition of the negative externalities which this has created¹⁷.

As such, we need to determine whether a move towards meeting a 'grand productivity challenge' is appropriate for the whole agriculture sector in Northern Ireland. For example, 58% of all farm holdings in NI are found in LFAs representing 55% of the total farmed area. These farms, particularly those in SDAs face inherent limitations to increasing their productivity in comparison to their low-lying counterparts¹⁸. They would face significant difficulties in rising to the grand productivity challenge outlined within the framework and a broad push towards this aim could have significant negative ramifications for the environment in these areas. For example, many HNV farming systems fall within LFAs. These HNV areas often support a mixture of priority habitats including blanket bog, heather moorland, and extensively managed rough grassland and in many cases, are reliant on sympathetic agricultural management to maintain their biodiversity value. A broad push towards increased productivity based on high-input high-output models¹⁹ would be counterproductive towards meeting biodiversity objectives in many of these areas.

To avoid these unintended impacts, we need to determine the most beneficial outcomes for different sectors and geographic areas. A one size fits all approach towards increasing productive output will fail to do this. Already we have seen the negative impacts of a 'going for growth' strategy focused primarily on increasing outputs. This broad productivity push has resulted in significant environmental costs which we are now trying to deal with. Although this strategy sought to drive sustainable growth for agriculture in NI, this to date has not been achieved. We need to take a more detailed view as to where increases in efficiency and productivity can provide a range of benefits and must ensure **that they are achieved in a way that is innovative, resilient, sustainable and humane**.

To help achieve this there needs to be a stronger recognition that **effective environmental land management can lead to increases in productivity**. For example, introducing wide spaced trees into permanent grassland can increase the length of time animals can remain out on pasture by 14-17 weeks per year. This can also have a significant effect on grass utilisation and ammonia emissions²⁰. Similarly, appropriate soil and grassland management for breeding waders has numerous benefits on productivity, including better quality grazing for cattle and more eligible land to farm. **Science, innovation and research based upon**

¹⁶ Some farmland birds in France have declined by 33% in the last decade largely due to agricultural intensification

¹⁷ See growing support for agroecology in France

¹⁸ <https://www.cumulus-consultants.co.uk/documents/The-potential-impacts-of-Brexit-for-farmers-and-farmland-wildlife-in-UK-23.10.17.pdf>

¹⁹ AFBI soil testing research

²⁰ <https://www.afbini.gov.uk/articles/agroforestry-and-agforward#toc-5>

maximising profitability and productivity must seek to identify and maximise opportunities for these win-win scenarios.

Similarly, we note the absence of any mention towards the role of **improving profitability within a new agricultural framework for Northern Ireland**. The framework must recognise that a focus on profitability is of equal importance, and that in some cases focusing on this **will not necessarily maximise productivity in some farming systems and locations**. This is particularly relevant for extensive livestock farming in economically marginal areas which can be more profitable than more intensive, high-input, high-output business models; especially if producers engage in activities that add value, taking on roles within the supply chain. As well as more profitable, they are also likely to deliver better environmental outcomes²¹.

To ensure that moves to increase productivity **and profitability** which helps to protect and restore our natural capital we recommend that a future approach to science and innovation:

- a. Recognises that improving profitability is of equal importance to productivity
- b. Works with farmers, land managers, industry, academics and other stakeholders **to develop strategies for improving productivity and profitability in ways that are coherent with enhancing the natural environment**
- c. Better understand the relationship between the top 25% economic performers in each sector and their environmental performance²²
- d. Place any efforts to improve productivity within the limits of the target to secure net zero emissions from agriculture by 2050 at the latest, and associated interim targets and milestones
- e. Develop metrics for productivity that incorporate positive and negative externalities, building on the work by the OECD to develop a measure for Environmentally Adjusted Total Factor Productivity (EATFP)

Q10. What are your views on the principle of placing greater policy emphasis and investment in agricultural education and knowledge transfer as means of driving better industry outcomes?

Education and knowledge transfer can play a key role in delivering better outcomes for farming and the environment in Northern Ireland. Linking with science, innovation and research, the key role that positive environmental management can play in contributing towards a productive, profitable farming sector can be recognised and communicated to all within the industry. Ensuring that education and knowledge transfer recognises the important role that environmental management must play in ensuring that NI's agriculture remains productive and profitable in the present and future will be a key aspect of a future policy framework for NI. Many upland livestock farms lose significant sums of money, largely as a result of high fixed and variable costs and low returns.²³ Reducing stocking numbers, particularly sheep, can help to reduce costs as well as provide better environmental outcomes. However, in certain circumstances (i.e conservation grazing for waders) higher stocking rates will need to be maintained when managing for particular species and habitats. With some-well targeted business support to enable such farmers to realise the added environmental much more easily

²¹ RSPB (2018) Farming at Hayeswater: an economic report 2013-16. Available at https://ww2.rspb.org.uk/Images/Farming_at_Haweswater-an_economic_report_2013-2016_tcm9-451498.pdf

²² <https://www.teagasc.ie/news--events/news/2017/farm-sustainability-report.php>

²³ RSPB (2018) Farming at Hayeswater: an economic report 2013-16. Available at https://ww2.rspb.org.uk/Images/Farming_at_Haweswater-an_economic_report_2013-2016_tcm9-451498.pdf

through the supply chain, such farms can become more financially and environmentally sustainable.

Similarly undertaking management practices such as soil testing and yield mapping in an arable context can help identify areas of a field that provide no or poor economic returns, which may often be suitable areas for environmental measures such as wild bird cover or rough grass margins. Additionally, soil testing can facilitate reduced fertiliser applications, reducing costs thereby helping productivity and profitability, as is being seen in a number of projects delivered by AFBI aimed at improving farm profitability through developing strategies to enhance soil fertility and grass production whilst also improving water quality. **Investment in education and knowledge transfer must effectively identify and communicate tried and tested win-win scenarios** such as these, to ensure that future land management supports productivity objectives in a way that is coherent with restoring and enhancing the natural environment.

Q11. What are your views on linking qualification attainment with a broader range of policy interventions as a means of incentivising farmer engagement with formal training initiatives?

Linking qualification attainment with policy interventions represents a significant change in direction for the agriculture industry in Northern Ireland. The goal of creating a professional, qualified agricultural sector is one that should be welcomed by all, especially if such qualifications effectively help to meet the stated objectives of the policy framework, in developing an industry that is profitable, productive, resilient and environmentally sustainable.

In moving towards this system, qualifications can help to further develop a process in which research based evidence informs decision making. However, to be worthwhile, formal training initiatives must provide clear benefits to farmers and land managers. Otherwise formal training initiatives will be viewed as a burden on time and resource.

Similarly, knowledge transfer and training should be encouraged wherever an outcome needs to be met. For example, in future landscape based schemes there could be a significant training element for farmers as part of their advisory programme. This may not necessarily require a formal qualification, but will help equip farmers to deliver the results expected of them within a land management scheme.

Importantly, educational providers must adapt to meet the demands of a future policy in which environmental sustainability plays a key role. This will be reliant on a cultural shift within agricultural training education, in which positive environmental management is embedded throughout all aspects of it. At present, the primary focus regarding agricultural education is based upon the conventional approach to agricultural production, in which environmental land management is viewed in the best cases as “nice to do” and in the worst a restrictive burden. This results in a failure to fully recognise the range of benefits that positive environmental land management can deliver and continues to push the narrative of profitable farming and environmental enhancement being antagonistic of each other. Consequently, there needs to be a step change in approach to fully recognise the multiple benefits that positive environmental management can have upon business. Education and training initiatives need to reflect this, embedding the principles **of environmental sustainability throughout the core curriculum** This could include a range of subject matter, from the concept of climate change in agriculture and how to adapt and mitigate the risk, to realising the full potential of environmental management towards increasing productivity. This will help change the narrative around farming and the environment, with the win-win benefits of positive environmental management being acknowledged, accepted and most importantly

implemented as part of best practise. This in turn will help to deliver coherence, allowing for measures to increase profitability and production to be based on a healthy, productive natural resource base.

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

Our principal point of view is that the policy focus should be towards encouraging continued CPD however, it would need to be clear justification and evidence to back up the public investment in supporting this intervention.

Encouraging continuous professional development for those working within the agricultural sector can contribute towards the aim of creating a professional, qualified industry. As such, we agree with the statement that CPD can help to maintain professional skills and competence throughout a career. Continued investment in training will allow farmers and land managers to keep in line with developments that can help to benefit farm businesses and the environment.

Already, CPD is available for farmers and land managers to benefit from, with many organisations delivering accredited training courses aimed at building knowledge, skills and capability for all working in the sector. However, at present there is no explicit incentive for farmers and land managers to engage with CPD, whilst barriers may exist relating to the cost of training, and as a result it represents a relatively small-scale activity.

When considering the role of public investment to incentivise CPD we must be clear as to the nature of the benefits that the public will expect to receive from this. Environmental sustainability should be incorporated fully within any CPD training programmes in the future. This will ensure that training is serving to provide public goods to society, rather than only providing economic advantage/skills to the farmer involved. We must ensure a coherent approach to education and training in which environmental sustainability is a core element rather than optional add on.

Q13. What are your views on the provision of investment that is specifically targeted on innovation and new technology uptake and that is aligned to other strategic objectives, notably environmental performance?

Government has a key role to play in ensuring that on farm practises serve to help meet overarching strategic objectives. Investing in tried and tested technology to improve efficiencies and boost environmental performance has the potential to deliver environmental outcomes across the sector. At present, there are a range of measures that can be adopted to improve the environmental performance of agricultural businesses. However, there is relatively little incentive to adopt these at the farm scale, or widespread knowledge to farm businesses of the opportunities to invest in these measures. More should be done, firstly to promote the business benefits of better environmental management and secondly to encourage farm businesses to adopt these as part of standard practise. As noted above, regular soil testing and detailed mapping of farm topography can help farmers to reduce costs in terms of fertiliser application whilst ensuring that it is better targeted to help increase fertility and yields. Measures such as these should be easily available for farmers to avail of, improving efficiencies and environmental performance; DAERA's knowledge advisory service will play a key role in ensuring that farmers are fully equipped to make the best decision for their business and the environment.

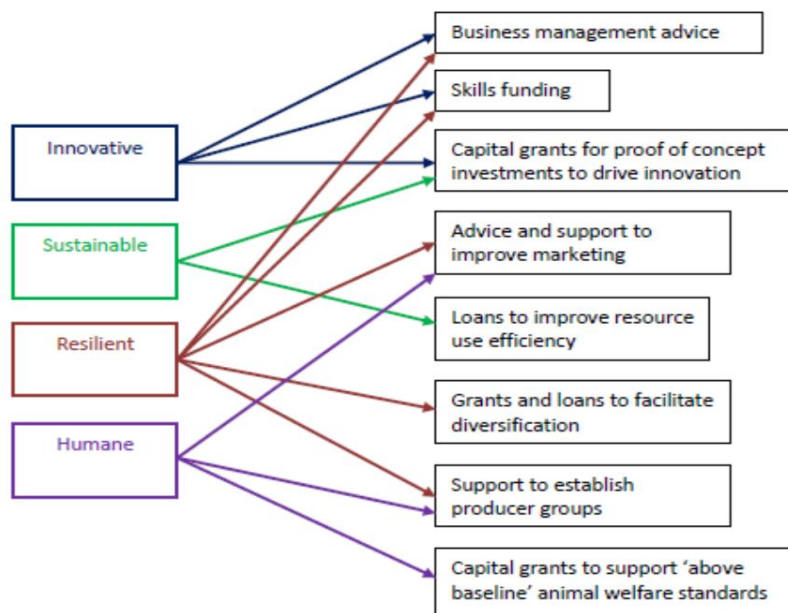
Within this, the role of enhancing the green infrastructure of farm businesses and its role in improving profitability and environmental performance must also play a key role. In many

instances these options represent a more efficient, cost effective alternative to investments in new technology. For example, well designed green infrastructure such as filtration ponds can help improve water quality and boost biodiversity at a lesser cost than hard engineering options, whilst the adoption of green infrastructure can provide shelter for stock allowing for a longer grazing season whilst removing the need to invest in more costly housing. In many cases, these options represent a more cost-effective option for farm businesses at a fraction of the cost, whilst also adding benefit to economic resilience and environmental performance.

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

Wildlife and Countryside Link²⁴ outline a range of measures which can be used to support production which is resilient, sustainable, innovative and humane. A key factor in this is the provision of a framework of support for farmers and land managers to access on a contractual basis, with support tailored to a diversity of farm types and sizes. Investment measures would consist of capital grants, loans and advice which will be a crucial aspect in building the capability of farmers and land managers on the ground. Grants would be provided on a contractual, competitive basis, but business advice would be open to all. Grants would be provided for unproven investments which help to establish a proof of concept and drive innovation, whilst loans would be available to all for tried and tested investments.

An overview of the tools proposed to develop this type of production is outlined below



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

See above for a range of measures that can be adopted to help facilitate production that is innovative, resilient, sustainable and humane.

²⁴<https://www.wcl.org.uk/docs/Link%20farming%20and%20land%20use%20policy%20paper%20FINAL%20Sep%202017.pdf>

Improved Resilience

Key points

1. Resilience payments for positive environmental management can provide a stable reliable income source independent of market volatility whilst providing societal benefits. This represents a better use of public expenditure to manage risk and build resilience, as well as delivering beneficial outcomes
2. We call on DAERA to adopt a broader view of vulnerability and risk management to develop a wider concept of resilience
3. Positive environmental management builds the long-term resilience of the sector. For example, moves to increase soil health will better equip our farming systems to safeguard themselves against the negative impacts of climate change and disease, whilst positive environmental land management in upland areas will safeguard against fire and erosion, whilst benefitting lowland systems in reducing flood risk
4. Rather than being viewed as areas of disadvantage, economically marginal systems should be recognised for their high potential to offer significant public benefits.
5. Any future payments related to farming and land management must be based on the recipient meeting ambitious minimum regulatory standards. This not only applies to proposed payments for resilience, but for any public payments moving forward
6. The design of cross compliance and its enforcement is ineffective, bureaucratic and in need of reform
7. Future regulation should be based on knowledgeable enforcement with visits and monitoring undertaken by qualified inspectors
8. A proportionate approach to penalties is required, potentially adopting a similar approach to Scotland's general binding rules where farmers are given up to three opportunities to rectify regulatory non-compliance
9. A future regulatory system must be underpinned by the principle of polluter pays provider gets to ensure a fair and level playing field for farmers and value for money for the taxpayer

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

Building resilience and managing risk are two key aspects which a future policy framework will have to support and address. The potential for the creation of a flat rate area based payment has been suggested in the framework as one of the potential measures to help build resilience. This is based on the premise that farmers can continue to rely upon a 'predictable and reliable income source to fall back on during times of extreme volatility'. Whilst this is true, **without safeguards in place, it does not represent the best use of public money, and in many cases, may result in perverse outcomes which undermine the long-term viability and resilience of the agriculture sector here.**

Recent analysis by the OECD²⁵ has broken down financial risk management into three separate categories, these being catastrophic, marketable and normal risk. Within this analysis the role for public intervention to manage catastrophic risk is potentially significant, the intervention logic for it to intervene in other forms of risk management is limited. As such this suggests that financial risk management as a specific outcome should not be the primary focus of a future farming and land management policy²⁶.

It is our view that public money should not be allocated directly towards risk management on the basis of providing a predictable and reliable income source, **without safeguards in place**. Any focus on building resilience should meaningfully contribute towards the policy's other objectives, particularly environmental restoration and enhancement. Safeguards such as payments for environmental land management, and other payments for public goods can also provide an important alternative source of income, independent of any market volatility, thereby helping to spread risk for the farmer whilst also delivering clear benefits to the taxpayer and helping to reduce risk and build resilience in other ways, such as adaptation and mitigation to climate change, or improving soil health.

We believe that the most effective way to build resilience, is to protect and restore the natural capital on which all farming depends. Paying for these public goods, represents the best value for money from the taxpayer, as well as helping to build the long-term resilience of farming systems here. For example, moves to increase soil health will better equip our farming systems to safeguard themselves against the negative impacts of climate change and disease, whilst positive environmental land management in upland areas will safeguard against fire and erosion, whilst benefitting lowland systems in reducing flood risk.

We recognise the importance of a basic farm resilience payment, especially in marginal areas such as the uplands or what could be described as High Nature Value (HNV) farming systems. The 2010 DARD review of the Less Favoured Area (LFA) payment could be helpful in this regard which recommended that where grazing was an issue for example, in order to receive a payment, grassland had to be both grazable *and* grazed. Said resilience payment could then be topped up by a wider land management payment and or a higher level agri-environment payment.

To recognise the importance of environmental management safeguards to the resilience agenda, **we call on the framework to adopt a broader view of vulnerability and risk management to develop a concept of resilience that is embedded within a natural capital focus**.

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

As stated above, evidence suggests that **public subsidised risk management tools should not be a primary focus of a future land management policy without appropriate safeguards in place**. We believe that developing policy which builds resilience, as opposed to resilience payments specifically, could be achieved through the effective management of our natural resource base and adequate support for the provision of environmental public goods. This would be achieved through the successful adoption of well-resourced wider and targeted environmental farming schemes. Farmers entering these would be able to avail of a

²⁵ OECD (2011) Managing risk in agriculture: Policy assessment and design, OECD Publishing. Available at https://www.oecd-ilibrary.org/agriculture-and-food/managing-risk-in-agriculture/a-policy-framework-for-risk-management-in-agriculture_9789264116146-3-en

²⁶ Mathijs, E (2016) Managing volatility and risk in the CAP. A report for the RISE Foundation.

stable and reliable income, to safeguard in times of extreme volatility, whilst also restoring and enhancing the environment upon which farming depends.

This would have potential added value for farming systems in areas which experience natural constraints and disadvantages, because of location and climatic factors, or sectors which represent a small but valuable component of the sector i.e. HNV, arable and horticulture. That is, given the right management, these 'vulnerable' farming systems can provide much in the way of environmental public goods in NI. In doing so, these farming systems may stand to benefit more than under a traditional resilience support agenda especially if we move beyond the approach of costs incurred income foregone for environmental payments (for more information see the response to question 30).

As such, we again reiterate the need for DAERA to adopt a broader view of vulnerability and risk management, to develop a concept of resilience which is embedded within a natural capital focus. Payments for environmental enhancement can play a significant role in safeguarding farmers from extreme risk and vulnerability in providing a stable and reliable income that is independent of any market volatility. This represents better value for the taxpayer and a more practical approach towards safeguarding farming here in the long term, rather than a flat rate area based payment with no or little outcomes attached.

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

When adopting a natural capital approach to risk management and resilience, areas of disadvantage can be viewed in a different light. **Rather than being seen as areas of disadvantage, they can be considered for their high potential to offer significant public benefits. In supporting farmers better to provide these benefits, we can also help build resilience against market volatility in the short and long term.**

Areas of natural disadvantage may provide comparatively little value in terms of productive output; however, when managed sympathetically, they often provide significant public benefits through the delivery of environmental public goods. For example, farmers in the uplands of the Antrim Hills face numerous difficulties due to factors such as climate, soil type and their remote location and as a result, farming here is often an economically marginal activity. However, whilst these High Nature Value systems may be economically marginal they can deliver significant public benefits. For example, successful projects such as the Glenwherry Hill Regeneration Project which has been developed in partnership by a range of stakeholders have demonstrated that, through cooperation and consultation and underpinned by the appropriate science, multiple social, economic and environmental benefits can be delivered. In the project, farmers and land managers manage the land in a way which helps grow the carbon stocks in their soils through careful, targeted habitat management. The project has notably provided optimal conditions for enhancing biodiversity including species such as such as Lapwing, Curlew, Snipe. These and other species have increased in the area through sensitive grazing practises and appropriate grassland management, such as the regular removal of rush and the creation of scrapes. The farming systems here have made a significant contribution towards the survival of breeding waders in Northern Ireland, particularly Curlew, which is classified as globally near threatened. Projects like the GHRP are showing that consultation and agreement, underpinned by the appropriate advice and science can have crucially important role in ensuring that highly valuable species and habitats have a future in our countryside. Under financing of special projects within proposed environmental support measures, consideration should be given to funding projects on the model of the GHRP in other sensitive areas of HNV farmland in NI.

However, through the current prism, these systems are viewed particularly susceptible to risk and volatility and are likely to be particularly exposed to policy change as a consequence of Brexit, specifically in relation to changes to trade policy and domestic support. An RSPB commissioned report by Cumulus consultants found that in some parts of the uplands, and under some plausible Brexit scenarios, significant land use may be possible²⁷. In some cases, this may create opportunities for more sensitive land management, but in many others, it also creates risks, for example through inappropriate planting of non-native conifer plantations or abandonment. This would be likely to drive further declines of threatened species such as Curlew. Although farming in these areas is economically marginal, it has been demonstrated that with appropriate engagement and advice farmers can help to provide numerous environmental and social benefits as well as safeguarding their businesses from market volatility.

Rather than viewing these farms through the narrow lens of productive output, we should value the **overall contribution that they can provide to the environment and society under a natural capital focus and look to build resilience in these ways**. For example, investment in building natural capital in areas of natural disadvantage can provide a range of added benefits to farm businesses and rural communities. For example, in England and Scotland rural tourism represents a significant economic driver, generating significant income and creating numerous jobs. The maintenance of a high-quality landscape and wildlife is crucially important in helping deliver these added benefits²⁸. Additionally, investment in agri-environment schemes and the restoration, maintenance and enhancement of the environment provide direct economic benefits. For example, in England for every £1 spent on agri-environment schemes there is a return on investment of £1.42 rising to £2.23 for higher level schemes²⁹.

We must also look at the structure of businesses in these areas and determine what activities and practises can be undertaken to help build stability and resilience. **Importantly, the distinction between profitability and productivity will be important in these scenarios.**

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

Any future payments related to farming and land management must be based on the recipient meeting ambitious minimum regulatory standards. This not only applies to proposed payments for resilience, but for any future payment for environmental land management, productivity or any other objective. Tying payments to regulatory standards ensures that all farmers and land managers are operating on a level playing field. Cross compliance provides this link at present, ensuring that regulation forms the foundation for effective public payments. **We believe that this important link between the receipt of public money, and regulatory compliance must be maintained.** However, we recognise that there are numerous issues with Cross Compliance in its current form especially in regards to inspections and enforcement³⁰ and would welcome moves towards a more effective, proportionate inspection and enforcement regime.

²⁷ Cumulus consultants Ltd. 2017. The

²⁸<https://www.wcl.org.uk/docs/Link%20farming%20and%20land%20use%20policy%20paper%20FINA%20L%20Sep%202017.pdf>

²⁹ 46 CCRI (2010), Estimating the Incidental Socio-economic Benefits of Environmental Stewardship Schemes. Report for Defra.

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

We need a strong legislative baseline to safeguard the environment and animal welfare, and protect the interests of society. Currently, the system of Cross Compliance creates links between existing legislation and CAP area based payments. This link between legislation and payments provides an important enforcement mechanism, punishing non-compliance. This underpinning of legislative protection is essential in order to provide the foundations upon which incentives can then build. Proper enforcement is also a matter of equity for those who abide by the law, setting a level playing field for farmers and land managers across NI.

An effective regulatory baseline also acts to define the rights and responsibilities of landowners and managers, and so provides clarity about where public investment should be deployed to deliver further enhancements. Confidence in regulatory enforcement is an essential component in building trust that public investment in restoring natural capital is not undermined by the non-compliance of others.

Although Cross Compliance sets a precedent in linking payments to regulatory compliance, it has been criticised for being ineffective and overly bureaucratic and is in need of reform³¹ failing to address some of the most significant environmental issues we are facing at present³². For example, NIs water quality targets are now going backwards even though water protection remains an important aspect of cross compliance. We need to develop a more effective, proportionate approach to regulation which reduces bureaucracy to farmers whilst providing more benefits for the public.

To overcome these issues a future regulatory baseline should include the following features

- Where there is a functional link between regulatory compliance and publicly funded investments (for example, investment in improving water quality and compliance with slurry storage regulations), penalties should be applied to any payments to take account of this where a breach is detected, in addition to any prosecution for a statutory breach.
- Regulation should be based on knowledgeable enforcement, with visits and monitoring undertaken by qualified inspectors
- A proportionate approach to penalties is required, based on the six Macrory Principles. Future enforcement models should be based on Scotland's General Binding Rules (GBR). Where GBR breaches or pollution risks are identified, farmers are given time to address these issues before a second visit is arranged. If remedial action has not been taken, a third and final visit is then scheduled, and if no action is apparent a Fixed Penalty System is levied.

A crucial component of the regulatory baseline will be to ensure coherence across the UK. It is imperative that Northern Ireland, Wales, Scotland and England work together on an ambitious common framework for agriculture that prevents a deregulatory race to the bottom. This must include an appropriate degree of flexibility to allow implementation to be tailored to the specific environmental and legislative context in each nation. This must also include robust shared governance arrangements (e.g. clear monitoring and reporting obligations and associated enforcement mechanisms) as a means of holding all four nations to account and resolving disputes following the loss of the functions currently carried out by the EU institutions in this respect. There is a clear need for a common framework, in order to achieve sustainable

³¹ https://www.eca.europa.eu/Lists/News/NEWS1610_27/INSR_CROSS_COMPLIANCE_EN.pdf

³² <https://www.daera-ni.gov.uk/publications/northern-ireland-environmental-statistics-report-2018>

management of shared natural resources and address trans-boundary objectives, such as climate change and biodiversity conservation, and ensure that the UK Government can meet international environmental obligations to which it is committed.

Currently, the CAP provides a policy 'framework' that enables a degree of flexibility, whilst ensuring a level of consistency within the UK. As we leave the EU, replacing this function – or some degree of it – will be necessary. But as agriculture is a devolved competence, the development of any future common UK framework must be achieved through an open and collaborative process between the UK Government and devolved administrations. This should include shared environmental ambition to meet the UK's national and international commitments and obligations associated with biodiversity, climate change and sustainable development. At the same time, it must also allow for a significant degree of flexibility to tailor policy to different situations across the UK, and reflect the differing environmental, social and political contexts in each of the four countries.

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

Any future regulatory baseline should be based upon the principle of 'polluter pays provider gets'. In adopting this principle, regulation can contribute towards a range of policy objectives in its own right. A future regulatory system needs to draw a clear line as to what the taxpayer can expect to receive from regulation and what farmers can be incentivised to deliver under payments for environmental land management. For example, a strong regulatory baseline based on this principle will help to meet a number of environmental policy objectives, such as contributing to improving water and air quality, by ensuring that it is unacceptable to cause environmental harm.

However, we have to recognise the past mistakes of previous agri-food strategies and their contributions towards some of the environmental issues facing Northern Ireland today. Farmers cannot be punished for adopting unsustainable farming practises led by poorly designed policy. This is particularly relevant considering the problems created by 'Going for Growth' strategy in terms of ammonia emissions. A future regulatory system can help farmers to reduce future emissions and should be the goal of a new policy, but in many instances the costs of cleaning up past mistakes should be in the hands of government and the agri-food industry which developed it in the first place.

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

As stated above, we feel that an area based payment does not represent the most effective means to building the long term economic, social and environmental resilience of the agriculture sector here. However, if resilient payments are to comprise part of the farm support system, a cap will be necessary, especially if implemented as part of an area basis. For example, under the current area based system in the UK, larger landowners reap the biggest rewards, with 64% of direct payments going to just 20% of farmers and farm businesses³³. This represents an inequitable system, in which those with the most land benefit primarily on the basis of the size of their farm³⁴. In a future system we have to ensure fairness between small and large landowners whilst delivering value for money to the taxpayer. Checks and

³³ DG AGRI, (2016), Report on the Distribution of Direct Aids to Agricultural Producers (Financial Year 2015). Brussels: European Commission Directorate-General for Agriculture and Rural Development

³⁴ Helm, D. (2017) Agriculture After Brexit, Oxford Review of Economic Policy pp124-133

balances will need to be developed to ensure that the majority of resilience support is not unfairly directed to a relatively concentrated number of recipients

When considering the role of environmental land management schemes in the future a cap on maximum payments is also important. At present, there is a cap on payments for environmental land management within the current Environmental Farming Scheme. For example, the maximum any farm business can claim within the scheme is £20000 over the course of five years³⁵. This has already caused a number of problems at present for farmers who have invested significantly in environmental management on large areas of land during previous schemes. This may result in farmers removing valuable conservation options which have been in place for a number of years as a new scheme has developed a lower cap on payments. This ultimately undermines attempts to meet environmental outcomes whilst also potentially discouraging farmers from entering into agreements again in the future. Similarly, the current EFS has created a four-option rule for participating farmers, meaning that they are limited to the number of conservation interventions they can undertake on their land. Again, this may serve to undermine attempts at meeting environmental objectives, as good work undertaken in previous years has to be undone to fit the new requirements of a scheme.

In terms of eligibility, the current minimum threshold for entry into schemes (3ha) may impact upon their ability to meet environmental objectives. For example, numerous small holdings in a landscape may support a large total area of environmentally valuable land. Failing to recognise this and support these small-scale farmers from managing it correctly, may result in a loss of habitat of value or a missed opportunity to support such farmers to provide added environmental benefit. As such, we would encourage a landscape scale approach towards environmental land management, particularly in areas of high environmental value.

Ultimately, funding based on the scale of environmental need should help to mitigate these problems, allowing schemes to be developed with the intention of meeting outcomes, with appropriate funding allocated alongside.

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

The insurance models used in North America are also administratively complicated and expensive for Governments^{36,37} bureaucratic for applicants and potentially interventionist from a market perspective. They require significant amounts of data; which NI does not currently hold³⁸. It is also important to recognise that the tax system in the UK already provides significant reliefs for agriculture, which will presumably continue to play a significant role in enabling farmers to manage risk.

Specifically, the introduction of five-year income tax averaging for farmers from 2016/17 will help to manage volatility. This comes in addition to existing capital allowances, that can be used to manage risk, and significant expenditure associated with Agricultural Property Relief and exemptions from Business Rates. Whilst these do not explicitly provide a risk management function, will help to insulate farmers from risk in a similar way to direct payments. There may be scope to better use the tax expenditure associated with these reliefs

³⁵ <https://www.daera-ni.gov.uk/topics/rural-development/environmental-farming-scheme-efs>

³⁶ Office of Inspector General (2016), Federal Crop Insurance Corporation/Risk Management Agency's Financial Statements for Fiscal Years 2016 and 2015. United States Department of Agriculture.

³⁷ 92 OECD (2007), The Implementation Costs of Agricultural Policies

³⁸ <https://blogs.worldbank.org/psd/files/agricultural-insurance-data-15sept2015.pdf>

to help farmers manage volatility in the future. Risk management tools such as crop insurance also have some significant drawbacks, such as moral hazard. This refers to cases where farmers may adopt higher risk behaviour, knowing that their losses will be covered. This can lead to environmentally damaging behaviour, such as locating high risk crops in areas that are vulnerable to soil erosion, which risks undermining the effectiveness and coherence of broader public policy. Commodity specific insurance can also encourage specialisation, which may in turn lead to negative environmental impacts, and increase exposure to climate and market volatility and risk³⁹.

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

See question Q23.

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

No comment

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

No comment

³⁹ Soil Association (2017) Soil Association Policy Briefing: Lessons to learn from Crop Insurance programmes worldwide

Environmental sustainability

Key points

1. To ensure that farming is productive, profitable and resilient in the long term a future framework must have environmental enhancement at its core
2. The Framework must fully recognise the pivotal role that a healthy environment has in supporting a productive, profitable, resilient agriculture sector
3. We need to shift emphasis from 'what farming can do for the environment, to what the environment can do for farming'
4. It is important that existing levels of funding associated with the CAP are maintained and repurposed in order to meet environmental outcomes
5. Funding to support farmers and land managers to provide environmental public goods needs to be allocated on the scale needed to meet environmental outcomes.
6. Outlining the benefits of environmental land management towards the farm business will be central to ensuring the long-term sustainability of the sector.
7. Trusted advice will play a fundamental role, securing farmer buy in and delivering value for money
8. A collaborative approach to the development of new policy interventions is necessary, this must encompass a wide range of stakeholders with skills, knowledge and expertise in farming and environmental land management.
9. Sustainable approaches to agriculture must be embedded throughout all stages in education and professional development
10. We support outcomes based approaches to payments in some cases, however action based payments will remain important in many scenarios
11. It is essential to create environmental payments which are attractive to farmers and land managers, whilst also providing clear value for money to the public. A practical approach towards moving beyond costs-incurred income-foregone can help to achieve this.
12. Examples of well-designed agri-environment schemes provide a proof of concept on which future delivery models can build on.
13. Future schemes must be targeted, based on evidence, provide dedicated expert advice, secure farmer buy and make sound business sense to fully realise the benefits.
14. We recommend that more regard is taken of the historic rural landscape. We recommend that DAERA consult with the Department for Communities to review how measures can be put in place to ensure the protection and enhancement of the historic environment.

We welcome the focus of the future agriculture policy framework for NI having a significant focus on the environment and the engagement with DAERA colleagues to date. It is broadly recognised that farming can significantly impact upon the environment, both positively and negatively. Since the 1950s and the advent of the CAP in Europe, intensive farming practises have resulted in widespread biodiversity loss, the degradation of habitats and a decline in soil, water and air quality. NI has experienced significant environmental degradation, largely because of the intensive agricultural practises encouraged by badly designed policy. This is

evidenced by the 2016 State of Nature Report which highlights the perilous state of the environment in NI⁴⁰.

Despite this, there are numerous examples in which farmers and land managers have worked to provide a range of environmental public goods, helping to restore species and habitats, providing clean air and water and to improve soil quality. These examples demonstrate that farming and the environment are inextricably linked and that there are ways to farm effectively with nature whilst maintaining or enhancing productivity and profitability⁴².

For farming to be productive and resilient in the long term, sustainable management of the environment is essential. We need to move away from the flawed view that environmental restoration is a restriction upon farming, and instead recognise that positive environmental management is integral to delivering a productive, resilient agriculture sector.

We welcome the Policy Framework's objective to create an agricultural sector that is environmentally sustainable. This represents a significant shift from policies of the past, where moves to achieve environmental sustainability played a peripheral role. The environment is farming's biggest asset, supporting food production, farmer livelihoods and contributing to food security. We must ensure that we have a healthy natural environment to support agriculture here for the long term. Whilst it's important to recognise the impact of farming on the environment, it is of equal importance to recognise the immense opportunities that positive environmental management can have towards meeting objectives of farming⁴³.

The Framework's principles focus primarily on the negative environmental impact of conventional farming practises. Although this is important, we need to fully recognise positive environmental management as an asset, rather than a burden or a cost. **More emphasis needs to be made on the role of positive environmental management in supporting a profitable, resilient agriculture sector.** By adopting this as the key principle, we can seek to adopt new innovative methods of farming that aim to work with, rather than against nature in the production of food and other marketable goods. Such an approach has been witnessed in the Sustainable Land Management Strategy for Northern Ireland, which sets the scene in addressing some of our biggest environmental and agricultural problems in a coordinated, collaborative manner.

Numerous examples exist to demonstrate the important role that positive environmental management can have upon farm businesses. From positive soil management benefitting agricultural production and breeding waders in upland systems^{44 4546}, the adoption of herbal leys which improve the structure and nutrient content of soil, benefit stock health and

⁴⁰ https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2017_2.PDF

⁴¹ https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/state-of-nature/210-2470-15-16_stateofnature2016_northernireland.pdf

⁴² <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/16.17.079b%20Sustainable%20Land%20Management%20Strategy%20%28Summary%29%20final%20amended.PDF>

⁴³ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/16.17.079b%20Sustainable%20Land%20Management%20Strategy%20%28Summary%29%20final%20amended.PDF>

⁴⁴ https://www.researchgate.net/publication/280488687_Soil_pH_and_organic_matter_content_add_explanatory_power_to_Northern_Lapwing_Vanellus_vanellus_distribution_models_and_suggest_soil_amendment_as_a_conservation_measure_on_upland_farmland

⁴⁵ https://www.sruc.ac.uk/news/article/1385/improving_farmland_soil_is_good_for_grazing_and_good_for_birds

⁴⁶ https://www.researchgate.net/publication/297892133_A_role_for_liming_as_a_conservation_intervention_Earth_worm_abundance_is_associated_with_higher_soil_pH_and_foraging_activity_of_a_threatened_shorebird_in_upland_grasslands

pollinating insects⁴⁷, to the multiple benefits provided by agri-environment options on arable farmland, which can serve to maintain and enhance yields⁴⁸, reduce costs and minimise pests and disease⁴⁹. Additionally, research has demonstrated that when the emphasis is changed from what farming can do for the environment, but what the environment can do for farming, there can be a significant uptake in the adoption of positive environmental practises by farm businesses⁵⁰.

To ensure that farming is productive and resilient in the long-term **A future framework for NI must have the provision of environmental public goods at its core.** The future of farming is reliant upon a healthy, productive countryside. The only way to achieve this is to support farming practises that work with nature, to provide food and other private goods in a way that helps to protect and restore our environment.

Recognising and rewarding the provision of public goods

We welcome the paper's principle to use environmental payments for the provision of public goods to ensure that a farming policy for NI meets its objective of being environmentally sustainable. It is important to note however, that within the framework there is no definition of a public good. The concept of 'public goods' in the context of agriculture policy is well established. In general, work to date has identified public goods from agriculture and land management as those things that farming and land management can provide, but which the market does not deliver⁵¹. **We call for this definition of public goods to be clearly specified and used within future policy.**

A recent report by Wildlife and Countryside Link provides high level analysis based on the strength of the case for using public money to secure any given outcome. Within this, the strongest case for using public money to secure outcomes was for the delivery of environmental public goods, as defined above.

When focusing on payments for the delivery of specified environmental outcomes it is important to consider exactly what they are, and the level of financial resource needed to meet them. As such we welcome the move to define our long term environmental outcomes within the framework. However, we are concerned that the outcomes identified within the framework are not linked to relevant commitments present in existing legislation. **As such, we call for environmental outcomes to be targeted to achieve national and international environmental commitments as set out in existing legislation and be agile enough to align with future legislation.**

In NI, there is currently an absence of a long-term plan for the environment. Recent moves by Defra to create a 25-year environment plan have set out ambitions to hand over our planet to the next generation in a better condition than we inherited it. With this comes a long-term vision of how land will be managed and for what ends. This begins setting the environmental outcomes which land management will aim to meet and has had a key role in shaping the direction of England's agriculture policy. **We need a long-term vision for our environment in Northern Ireland and the Republic.** This could take the form of a wholistic 25-year all-

⁴⁷ <https://www.agricology.co.uk/resources/herbal-leys>

⁴⁸ <http://rspb.royalsocietypublishing.org/content/282/1816/20151740>

⁴⁹ <https://www.sciencedirect.com/science/article/pii/S0167880912001570>

⁵⁰ <http://www.heartoftheglens.org/cms/wp-content/uploads/2018/01/Glens-of-Antrim-Resilient-Farm-Project-Report.pdf>

⁵¹ Cooper, T., Hart, K. and Baldock, D. (2009) The Provision of Public Goods Through Agriculture in the European Union, Report for DG Agriculture and Rural Development, Contract No 30-CE-0233091/00-28, Institute for European Environmental Policy: London.

island environment plan, outlining what we want to achieve and the ways in which we want to get there. This will help better guide the environmental outcomes of which a new agriculture policy is aiming to deliver.

Funding needs

To meet our environmental objectives, NI government must allocate more resources in the management and restoration of habitats, landscape features and the historic environment, and to support land management practises that maintain and enhance soil and water resources and contribute towards the mitigation of climate change.

A recent report *Assessing the Costs of Environmental Land Management in the UK*⁵² estimates that In Northern Ireland, the level of **funding needed to achieve our environmental objectives requires an eight-fold increase based on current costs**. These costs are focused on land management interventions, and do not reflect the total costs associated with a future agricultural policy.

To ensure sufficient investment towards achieving our environmental goals, existing levels of funding associated with the CAP should be maintained, particularly for an initial 10-year period⁵³. Within this, the proportion of **funding associated with environmental farming and land management policies should be significantly increased**. A transition towards a public goods payment system provides the strongest rationale for long term public investment, and the best chance for a stable and certain policy post Brexit.

Achieving positive behavioural change

We strongly agree that achieving positive behavioural change will be central to ensuring the long-term sustainability of the agriculture sector. The provision of accurate information and **access to trusted advice will play a fundamental role** within this, helping to secure farmer buy in, whilst ensuring that interventions deliver value for money for the taxpayer through public good delivery.

When well designed and supported by advice, agri-environment schemes have been shown to be highly effective in providing a range of environmental outcomes, as well as being popular with many in the farming community. This has been witnessed across Northern Ireland in numerous projects where trusted advisors have worked consistently with farmers to generate big wins for the environment^{54 55 56 57}. Advice will be central to achieving this positive behavioural change and to build on past successes and must be significantly invested in within a future policy. It is imperative that the newly formed DAERA single knowledge advisory service is prepared for this significant shift in policy and has the resources available to deliver high quality advice where it is most needed.

⁵² <https://www.nationaltrust.org.uk/documents/assessing-the-costs-of-environmental-land-management-in-the-uk-final-report-dec-2017.pdf>

⁵³ https://ww2.rspb.org.uk/Images/Assessing%20the%20costs%20of%20Environmental%20Land%20Management%20in%20the%20UK%20Policy%20Briefing_tcm9-449500.pdf

⁵⁴ <https://www.tandfonline.com/doi/full/10.1080/00063657.2017.1415296>

⁵⁵ <http://www.heartoftheglens.org/cms/wp-content/uploads/2018/01/Glens-of-Antrim-Resilient-Farm-Project-Report.pdf>

⁵⁶ <https://www.rspb.org.uk/our-work/conservation/projects/halting-environmental-loss-project/>

⁵⁷ <http://www.agriland.ie/farming-news/ni-college-farm-shows-how-to-balance-productive-farming-and-the-environment/>

Investment in monitoring and evaluation will also play a key role in supporting positive behavioural change within the agriculture and land management sector. Effective monitoring and evaluation will enable an understanding on the effectiveness of any policy intervention, helping to drive constant improvements in design and delivery.

A collaborative approach

We strongly agree that a more collaborative approach to the development of future policy interventions is necessary. This will include working with a range of stakeholders with skills, knowledge and expertise in farming and environmental management, who have succeeded to deliver measurable environmental benefits in the past. This will ensure that what is developed is practical and deliverable for farmers and land managers on the ground. However, it must be **recognised that future policy is based on robust science to ensure that what is delivered provides the public benefits that tax payers are expecting**. Again, effective monitoring and evaluation is central when trialling novel approaches to environmental land management. This will help to determine what works, what doesn't and what can be improved in the delivery and design of new policy interventions. The adoption of pilot schemes during the transition period from the previous system provides an opportunity to develop new schemes which are practical for farmers and fit for purpose for the environment

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

There needs to be significant investment in research and education to develop opportunities for positive environmental management in agriculture. Transitioning to a new approach of profitable, resilient farming based upon environmental protection and restoration, will require a significant shift in perception, and a greater level of knowledge and understanding for all involved. To get there, research and education will be key.

Sustainable approaches to agriculture must be embedded throughout all stages in education and professional development. We need to move away from our current siloed approach, where positive environmental management is viewed as an option, and in many cases a restriction, rather than an essential part of a thriving business. At present, Cafre's highest agricultural qualification⁵⁸ reflects this traditional approach with a small number of standalone modules based on environmental sustainability and sustainable agriculture. And yet, the need is pressing and urgent to incorporate positive environmental management throughout all aspects of agricultural production. Educational providers should reflect this, embedding sustainability throughout all of their programmes. This will help change the narrative around farming and the environment, with the win-win benefits of positive environmental management being acknowledged, accepted and most importantly implemented as part of best practise.

A similar move is being witnessed in France which in 2014 enacted the "Law for the Future of Agriculture, Food and the Forest" which is the first step in shifting the objectives of French agriculture to give environmental and social goals as much weight as economic ones. The law actively encourages agroecological approaches⁵⁹ to farming and sets a target of implementing

⁵⁸ <https://www.cafre.ac.uk/courses/bsc-ag-tech/>

⁵⁹ Agroecology is the science of applying ecological concepts and principles to the design, development, and management of sustainable agricultural systems. Agroecology is the science of sustainable agriculture; the methods of agroecology have as their goal achieving sustainability of agricultural systems balanced in all spheres. This includes the socio-economic and the ecological or environmental.

these on the majority of French farms by 2025. It has also added agroecology to the curriculum of agricultural colleges across the country under the slogan of “let us produce in other ways.” In 2014 the French government also employed over 200 new researchers and tutors to teach agroecology across the country as a core part of the national agricultural education programme.

Similarly, research needs to focus on identifying innovative sustainable models for agriculture here. More needs to be done to identify and maximise the opportunities to incorporate positive environmental management into all farm businesses. Research findings need to be widely communicated to relevant audiences in order to make informed environmental and business decisions moving forward. As such **we welcome the Department’s intention to incorporate environmental research and knowledge transfer as a key component of their policy framework.**

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

We support a new policy which focuses on the delivery of environmental outcomes. As stated above, we call for environmental outcomes to be targeted to achieve national and international environmental commitments as set out in existing legislation and be agile enough to align with future legislation. Funding should be allocated based on the scale needed to meet these specific outcomes.

It is important to note the subtle difference between the delivery of outcomes and payments that are related to the outcome being delivered. It is our view that a range of mechanisms should be used to deliver specific environmental outcomes. These include both action based payments and payments related directly to the results achieved.

We support outcomes based (or results based) approaches to payments in some cases, however action based payments will remain important, particularly to achieve high-level uptake. The potential benefits of results based over actions based payment can include: reduced bureaucracy, increased flexibility, more empowered land managers and better environmental outcomes. However, in some cases we do have concerns that results based payments can permit management measures that are not supported by a robust evidence base, which at best may not be a good use of public money and at worst could lead to environmentally damaging practises. Ensuring adequate safeguards against this in any future outcomes-based payments will therefore be essential.

Natural England have been piloting ‘Results Based Agri-environment Schemes’ since 2016, whilst The Department of Agriculture Fisheries and Marine has been implementing the outcome based Burren Programme since 2010. These pilots have demonstrated improvements in the delivery of environmental outcomes, but further investment is required to unlock the full potential of outcomes based approaches. However, we recognise that in some cases payments for outcomes or results may not represent the most practical option for delivery. Results are not always in the control of the farmer and could present a higher risk to them. Similarly, there are numerous examples demonstrating that when practically designed, well-resourced and supplemented with high quality advice action based payments can deliver impressive results⁶⁰. **As such, we believe that actions based payments should remain a crucial component of future payment schemes, especially if we are to secure the degree of uptake envisaged in a future policy.**

⁶⁰ <https://www.tandfonline.com/doi/full/10.1080/00063657.2017.1415296>

In terms of co-design, there is significant scope to work with farmers and land managers to develop and design effective agri-environment schemes can play a crucial role in securing better uptake and delivering success. Many farmers have been delivering agri-environment schemes for years, generally by undertaking a range of specified management techniques at specified times of the year. However, for many the restrictive nature of these prescriptive schemes can be off putting and can result in a lower than optimal uptake. In the future it is essential to work closely with farmers to develop something that works well within their management of the farm, but also delivers the desired results for the environment. By working together, we can deliver options which do this. A key here will be to move towards a more flexible system, in which management can be tailored to suit the particular circumstances of a farm or landscape.

This could be agreed through a process of advisory and consultation with each individual farmer partaking in a scheme. This will help contribute towards the delivery of environmental outcomes rather than simply following prescriptions. If carefully managed a process of co-design will help give farmers greater ownership over environmental land management, as well as developing a greater insight and knowledge of the techniques involved in achieving the required results. Additionally, farmer knowledge will be effectively harnessed to deliver simple, practical and effective scheme options which suit those that are entering them

Q30. What are your views on the need for future schemes to move beyond the costs incurred income forgone approach to incentivise changes in farming practise to enhance environmental sustainability?

The direct link between expenditure and an action or result is the best way of securing value for money, and creating transparency about what public money is paying for. Importantly, it also fits with the principles that the more someone does to provide public benefits, the more they should receive in return. This has been the approach adopted through current agri-environment schemes which work upon the basis of income-forgone and costs-incurred, which is a more effective way of achieving environmental outcomes than other currently available options (area based payments with associated conditions).

However, using income-forgone and costs-incurred does present some issues. Creating enough of an incentive to secure sufficient uptake, or uptake in the right areas can be problematic, especially in sectors of agriculture that are potentially highly profitable. At the other end of the scale, where income from farming is low or non-existent, payments can be very low, even if the environmental benefits are significant.

It is necessary to create environmental payments which are attractive to farmers and land managers, whilst also providing clear value for money to the public. To further understand how this can be achieved, we encourage to **DAERA to explore three areas**

1. **Whole farm costs.** It should be possible to treat the costs of running a farm business as a cost associated with securing an environmental action or outcome, where that far, system is essential in securing environmental public goods⁶¹. This would refer particularly to economically marginal but environmentally important High Nature Value farming systems such as the uplands of the Antrim Hills or the wet grassland systems of Lough Beg.
2. **Transaction costs.** Environmental land management may often incur significant transactional costs beyond those associated with a specific intervention. This will often

⁶¹ Barnes A.P., et al (2011), Alternative approaches for non-economic farming systems delivering environmental public goods. Report for the Land Use Policy Group.

be the case with regards to landscape scale cooperation, or where significant training and advice is required.

3. **Costs associated with long-term land use change.** Creating climate change resilience while helping to deliver the government's obligations under the Paris Agreement should underline the attitude to land use change. Government should accept the principle that it is rural areas and rural dwellers who will largely deliver on Climate Change obligations for example in delivering renewable energy and reducing gaseous emissions. **This recognition should be accompanied by additional payments.** Certain land management interventions, such as habitat creation, will incur costs that extend beyond five or ten-year management contracts. In conjunction with other policy mechanisms, there may be scope for higher upfront payments to recognise these long-term costs, on the condition that the land use change in question is maintained in perpetuity.

As an alternative to these approaches some have suggested making payments based on the nominal value of ecosystem services provided. We believe that this approach would be flawed for the following reasons.

1. Farmers and land managers do not 'own' the full value of ecosystem services flowing through their land. For example, the value of clean water may be considerable. It is not reasonable though to expect downstream beneficiaries to pay the full value of this for two reasons-
 - a. Firstly, it is an offence to cause or knowingly permit pollution. Much of the value of clean water is not something that should be paid for therefore, but something that society can reasonably expect to be provided through compliance with legislation, or societal norms.
 - b. Secondly, allowing land managers to levy a fee for services based on the nominal value of ecosystem services, when they often have a monopoly over supply of that service, would not be acceptable, and is not tolerated in any other sector.
2. Valuing ecosystem services is difficult and contested, with no reliable or accepted means of doing so at a finite spatial scale, such as an individual farm. Monetising those values, where they are possible to define, is an additional complex task. More research needs to be undertaken before this approach can be broadly accepted

Monetising outcomes from land management interventions is useful in understanding what the benefits of these for society, and therefore the case for public investment. At this stage however, it does not – for the reasons described above, present a sound basis for calculating payments to farmers and land managers. Consideration should be given to more detailed analysis as to how this approach could be developed in the longer term

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

Creating a fair and transparent supply chain, that encourages and rewards positive environmental land management will be a significant tool towards developing a truly sustainable farming sector for NI. With well targeted support, innovation and will, we can create a premium sustainable brand for NI food based on food of the highest quality, with high welfare standards and sound environmental management. This could take the form of accreditation schemes, which can ensure that food produced to high environmental standards is properly recognised and rewarded by the market. For example, beef or lamb produced in breeding wader hotspots could be recognised for the valuable contribution that they make towards saving these species. Or, livestock used to manage species rich grassland could generate a better price because of their unique and rich flavour and health benefits that they

produce⁶². Such moves are already being witnessed in NI, where farmers producing high quality, high welfare, environmentally sound products are succeeding within the market place.⁶³ Government could support programmes to build and develop these brands and products, with the product being the character and health of the landscape as much as the food itself. Improved branding and support in accessing markets can help to create a sustainable food image that genuinely lives up to its reputation, generating better market return, sustaining farmer livelihoods and restoring the environment.

Such a move is being championed within Exmoor National Park which has been developed by a range of stakeholders with an interest in the area.⁶⁵ This approach, entitled Exmoor's Ambition outlines a path to build economic and environmental resilience under a public money for public goods programme. Within this, the development a top-quality brand based on the environmental integrity of the food produced in the landscape plays a key role.

In the Netherlands significant work has been undertaken to improve the environmental sustainability of the dairy industry. Working in collaboration, Friesland Campina, Radobank and the World Wildlife Fund are developing innovative measures to help farmers in the restoration and conservation of the environment⁶⁶. Working with farmers they will map out the measures taken by the dairy farming sector in order to protect biodiversity. These include measures to improve functional agrobiodiversity, the diversity of the landscape, the diversity of species and regional biodiversity. A new Biodiversity monitor has been developed to facilitate and evaluate this, demonstrating the performance of dairy farmers in respect to environmental sustainability. The intention is, that dairy farmers who are performing well will receive recognition through the supply chain for this valuable work, through for example favourable interest rates at the bank or a premium price for their product. Similar moves could be adopted in many key landscapes and industries within Northern Ireland, helping to sustain farmers commercially as well as the environment physically.

Customers have an important role to play within this process, as they ultimately be the ones who purchase and consume many of these products. Branding and marketing will be important, as will a greater awareness of their roles in supporting the food system. Developing a greater recognition and awareness of positive environmental management in farming can help do this. For example, improved public awareness of agri-environment schemes would allow the public to understand better the link between their tax money, their spending on food and the management of the countryside.

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

Numerous examples of well-designed agri-environment schemes provide a proof of concept on which to build upon. The evidence suggests that well designed and implemented schemes, supported by an effective regulatory baseline, can provide significant benefits for farmers, land managers and the environment. Positive results have been achieved in a number of areas, including the uplands of Glenwherry and the wet grasslands of Lough Beg and Lough Erne where farmers have helped reverse local declines in breeding waders, to County Down, where agri-environment options are providing widespread benefits for priority seedeaters.

⁶² <https://www.pastureforlife.org/media/2016/01/pfl-it-can-be-done-jan2016.pdf>

⁶³ <http://www.glenarmshorthornbeef.co.uk/>

⁶⁴ <https://www.broughgammon.com/>

⁶⁵ http://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0010/1112869/ExmoorsAmbition_Web.pdf

⁶⁶ http://biodiversiteitsmonitormelkveehouderij.nl/docs/Biodiversiteitsmonitor_engels.pdf

The best examples of these schemes provide a starting point for an expanded and more ambitious future environmental land management system, delivered at a landscape scale. These examples highlight the need for any future environmental payment system to include.

- a. A **degree of targeting**, to ensure that management interventions are at the right scale, and in the right place for a given objective. This will be crucial in delivering value for money.
- b. Investment in **expert, trusted advice**, central to securing value for money and the buy in of the farming and land management community.
- c. A **strong evidence base** as to the effectiveness of different management interventions, and the scale at which they need to be deployed.
- d. Investment in **monitoring and evaluation** in order to understand the effectiveness of any policy intervention, and to drive constant improvements in design and delivery. To achieve this, a degree of national oversight and scrutiny will be needed.
- e. **Farmer buy-in** as a prerequisite to success, that can drive uptake even where the management interventions are challenging and ambitious.

The above points will help to achieve this in providing the confidence that a given intervention will deliver the target outcome, as well as processes for managing applications and contracts that are fit for purpose.

A prime example of a project which embodied these core features is evident within the mixed and arable farmland of East County Down. Here, a range of farmers have effectively used well placed agri-environment options and access to expert ecological advice to significantly increase populations of threatened seed eating species on their farms.

This project epitomised these core principles, being targeted to the right landscape, with dedicated expert advice being administered to ensure that options were located in the right place and that the farmer was managing them correctly. Monitoring and evaluation was carried out throughout to assess and measure progress, whilst farmer buy in was achieved because of the relationships built between themselves and the advisors. Because of these features, this project provided huge wins for wildlife, with population increases of 79%⁶⁷ for the red listed species Yellowhammer on farms which received the most dedicated advice. These increases took place in the face of wider declines throughout the rest of the countryside.

One of the key aspects towards increasing uptake in future land management schemes, will be the role that the Department plays in promoting and advertising them. Farmers need to be made fully aware of schemes, when they open and the benefits that they can bring to their farm business. This needs to be communicated by staff in the department when working with farmers, through the newly formed Knowledge Advisory Service and through a range of communication channels.

In the future, we need to be aware of poor scheme design, inadequate systems and processes, the presence of low value for money options and poor targeting. To varying degrees, these have all reduced the effectiveness of schemes in the past. Additionally, previous budgets have never met the scale of need.

The case for investing in a more ambitious environmental land management through public policy is solid. The future system must be well designed and properly funded to achieve our environmental obligations (see question 30).

⁶⁷ <https://www.tandfonline.com/doi/full/10.1080/00063657.2017.1415296>

Supply chains

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

Post Brexit, market transparency will be vital to ensure NI produce is the first pick when it comes to marketing NI produce to both the local and international consumer.

Presently, an asymmetry exists in the supply chain between a large number of farmers and a small number of powerful processors and retailers⁶⁸. Given this, there is a clear role for government to be proactive in providing primary producers with a business environment that enables them to secure a fair return from the market, and a fair share of the profit that exists in the supply chain.

With supermarkets dominating the retail market and dictating prices to producers, it is becoming increasingly difficult to make a decent livelihood from farming. Farmers are often running at a loss, so that supermarkets can make greater profits, by paying below the cost of production. Farmers often only stay in business through subsidies from the taxpayer.

From the point of view of food security and carbon emissions we have to try and shift the balance more towards local food production and consumption. Encouragement should be given for quality assurance and local promotion initiatives so as to strive for a shorter supply chains where possible, with producers benefiting from fair price for product and society benefiting from a reduction in emissions and a pull towards sustainable outcomes.

As we have outlined above, a shift to public money for public goods is essential, but part of that shift must allow for farmers to get a better income from the market. As mentioned before, public education in this regard is vitally important

DAERA should support fairer purchasing practises in the agri-food supply chain through the development of a statutory code of conduct. This code should support fair purchasing in all agricultural sectors and apply to all stages in the supply chain and would be properly enforced and ensure fair treatment for suppliers regardless of where they are, and which sector they work in.

Q34. What are your views on CPD extending to encompass supply chain awareness for farmers, including increased emphasis in farmer training on business planning, benchmarking and risk management?

It is vitally important that supply chain awareness is built into continued professional development so farmers can respond to the pull factors of the supply chain that could drive sustainability upwards.

We consider it important that farmers have access to and are encouraged to utilise training on business planning which should focus on the profitability and sustainability of their operations. By focusing on profitability and sustainability farmers can often reduce inputs which can deliver cost savings and better environmental outcomes. CPD could provide a mechanism for this but it is important that any such training is independent and supports the farmers to think about new future approaches beyond the current status quo to ensure we transition to an agriculture sector which meets future challenges for people and nature.

⁶⁸ http://www.foodcoalition.scot/uploads/6/2/6/8/62689573/plenty_complete.pdf

Q35. What are your views on the need for, and nature of, government action to achieve greater collaboration within and better functioning of the agri-supply chain?

As mentioned above we feel there is a clear need for government action to achieve greater collaboration within the supply chain, especially through a difficult time of uncertainty and transition out of the EU.

A number of examples exist elsewhere where governments have intervened to support the agri-food industry in a journey towards sustainability. Origin Green⁶⁹ has begun to achieve this through the self-described 'semi-state' organisation Board Bia which is responsible for marketing and promotion of Irish food, implementing quality assurance and sustainability programmes and market and consumer insight. Such a body should be considered in NI as we move forward into highly competitive global markets. Another example is that of Dutch based ZuivelINL which was established by the Dutch Federation of Agriculture and Horticulture and the Dutch Dairy Organisation⁷⁰. The mission of the organisation is to strengthen the Dutch dairy supply chain in a way that respects the environment and the supply chain. This has been taken a step further and developed the 'Biodiversity monitor for the dairy farming sector'⁷¹ which, in partnership with eNGOs seeks to provide a new tool for standard quantification of biodiversity enhancing performance in the dairy sector. Given the public goods approach mentioned above, acting as a step change in agriculture and land management policy (push), it is vital that the market and supply chain can act as a pull factor in improving the sustainability of agriculture and land management in NI.

Nature Matters NI supports industry calls for an Origin Geern[er] which could and should outcompete with the sustainability of produce from Rol.

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⁶⁹ <https://www.origingreen.ie/what-is-origin-green/>

⁷⁰ www.zuivelnl.org/zuivelnl-organisation-of-the-dutch-dairy-supply-chain/

⁷¹ http://biodiversiteitsmonitormelkveehouderij.nl/docs/Biodiversiteitsmonitor_engels.pdf