

Consultation on Future Agricultural Policy Proposals for Northern Ireland

Comments by

Northern Ireland Environment Link

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Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 66 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields. These comments have been prepared by NIEL's Sustainable Land Use Group and endorsed by our wider membership.

If you would like to discuss these comments further we would be happy to do so.

Sean Kelly, Development Manager
Northern Ireland Environment Link
89 Loopland Drive
Belfast
BT6 9DW
P: 028 9045 5770
E: Sean@nienvironmentlink.org
W: www.nienvironmentlink.org

Introductory Comments

We welcome the opportunity to respond to the DAERA Future Agricultural Policy Proposals which will set the direction for the largest agricultural transformation in Northern Ireland for 50 years. The Sustainable Land Use Group (SLUG) has recently set out its own [vision for sustainable land management](#) which aims to ensure that farmers and rural communities have a sustainable and prosperous future, providing opportunity for nature to thrive on land whilst delivering climate targets. Transforming our food and farming system in this way will also mean that everyone has access to healthy, sustainable, and affordable food. More recently SLUG has also published its [Future Agri-Environment Schemes for Northern Ireland Issues and Options](#) Paper which outlines our proposals on the design of future environmental payments in Northern Ireland. Both of these SLUG publications provide additional information relevant to the issues raised within Future Agricultural Policy consultation.

We believe that, as a result of our current unsustainable food and farming system, Northern Ireland is seeing continuing decline in wildlife and high levels of greenhouse gas emissions in agriculture. The Future Agricultural Policy urgently needs to tackle a range of these interconnected societal challenges. This will only be achieved through transforming our approach to farming and land use, one that considers both its local and global impacts.

General Comment

The Future Agriculture policy has the potential to deliver many of the vital environmental outcomes required to achieve a successful and just agricultural transition. However, these proposals fail to provide the clarity or detail regarding the timescales for implementing new measures, including how much funding will be transferred to each Scheme under each year of the transition period.

Without strong commitments, the policy runs the risk of reinforcing 'business as usual'. The environmental NGO sector would welcome the opportunity to work with other stakeholders to develop the details and direction around future measures, ensuring that commitments to biodiversity and carbon are met, and that any targets are achieved.

Response to Specific Proposals

1. Resilience Measure

We welcome the assertion that over time money will move away from a resilience payment and go towards the Farming for Nature package which should become the central plank of the agriculture policy and that farming for nature can become a core part of the profit centre on farms rather than being a side of farm concern. However, this scheme must be given a clearly defined timeframe for the proposed reduction of payments so as not to create the impression that this is an indefinite replacement for basic payments which could reinforce farm dependence on this form of payment. Therefore, we would welcome a clear timeframe setting out a defined transition for money moving from resilience to Farming for Nature with clear levels of funding for each scheme under each year of the transition. This would help farmers prepare for the prospect of phasing out resilience payment with Farming for Nature becoming the central plank.

The rationale for Farming for Nature becoming the central plank of future policy and funding is sound and is supported by research demonstrating that engaging in environmentally sustainable farming practises and entering Agri-environment schemes, can increase the economic stability of farm businesses at the same time as reducing the negative impacts of farming on the environment. Agri-environment schemes may help to reduce the effects of environmental hazards, such as climate shocks as well as providing a higher and more stable provision of natural pest control, through the adoption of practises to benefit the environment and biodiversity. Finally, investment in land management through agri-environment schemes helps to provide an income that is independent of market volatility, thereby building resilience against external shocks. Investing in environmentally sustainable farming practises can also contribute to improving farm productivity, through the restoration of functional biodiversity such as pollinators and soil biota.

Phasing out of resilience payments must set the direction of travel for the agricultural transition by encouraging and rewarding farmers and land managers for early uptake of other environmentally sustainable measures such as Farming for Nature. During this transition phase, whilst resilience payments should be reducing, payments should be contingent on the recipient meeting ambitious minimum regulatory standards and a need for added conditionality based on sound principles of not only resilience but of ensuring no harm to the environment. Furthermore, conditions could be orientated towards preparing farmers for life after 'basic payments'. For example, a condition of setting aside 5% of land for nature, rising to 10% by the end of the transition period, would prepare farmers for entry to the farming for nature scheme.

We would recommend that for short-term resilience payments, more emphasis is placed on delivering environmental outcomes. We understand that farms in marginal areas, such as the uplands where profit margins are tight, may require a basic safety net through the agricultural transition. However, we welcome the recognition that this could “mask technical inefficiency reducing drive to innovate and delaying structural adjustment” and could result in farms caught in financial dependency as seen under CAP. Balance must be struck between provision of a safety net and managing risk more proactively. This can be achieved by ensuring that robust conditionality measures are adhered to, and that the simplification of cross compliance will not adversely impact environmental outcomes, focusing resilience payments around positive environmental management on as much land as possible. Such conditionalities focussed on environmental actions will in turn ensure that any temporary payment measures provide a better use of public expenditure through the delivery of ecosystem services and profitable, resilient farms.

Although there are many positive aspects of the measure's eligibility criteria, such as the removal of ineligible acreage which will free up previously excluded High Nature Value areas like bogs, and scrub for payments. There are still some remaining concerns around minimum claim size. A move to a 10ha minimum claim size would see 20% of farm businesses in Northern Ireland no longer eligible for resilience payment¹, which could exclude many small farms that do the most for nature. We encourage these conditionality measures are also available under Farming for Nature so as to encourage good practice at all scales.

¹ [Background Evidence Paper V2.pdf \(daera-ni.gov.uk\)](#)

2. Headage Sustainability Measure

With declining numbers of beef cattle in previous Less Favourable Areas (LFA), there remains a need to support the beef sector, not least for farm businesses through the agricultural transition but specifically in areas where livestock are necessary for grazing High Nature Value systems. While we understand the intention to try and support struggling sectors through a headage sustainability measure, we remain unconvinced that this is the best way to deliver resilient, sustainable farm businesses.

We have concerns about the implementation of such proposals, for example in some areas such as the uplands, there is potential for unintended consequences. Headage is another form of coupled support that is directly tied to agricultural production, which could lead to overstocking in marginal areas. This goes against the less is more approach of nature friendly farming, having significantly negative impacts on the upland and marginal high nature value farms. Although, there are plans in place to ensure there is no increase in total heads, the historic reference point could see maximum numbers maintained in these areas. This appears to be a contradiction, as maintaining old numbers reinforces the status quo. Clarity is needed on where this historic reference point will be set.

We believe that payments would be better targeted to the “right stock in right place” under the Farming for Nature package. Encouraging uptake of traditional breeds in marginal and upland areas which do more for nature, rather than disincentivising farmers to keep them and instead uptake intensification under the Beef Transformation Scheme. Other forms of support, such as those proposed under the Farming for Nature Package should do more for those low input-low output systems where inefficiencies in farm business remain, for example, working towards Maximum Sustainable Output.²

There remains doubt on the Headage Sustainability Measure’s effectiveness to alleviate the economic difficulties faced by the beef sector. In recognition of these inherent flaws, the Common Agricultural Policy has gradually removed (decoupled) the link between the receipt of income support payments and the production of specific products. This is to avoid overproduction and make sure that farmers are responding to genuine market demand.

DAERA also consulted widely on the Policy Options arising from the Reform of Common Agricultural Policy (Pillar I Direct Payments) during late 2013/early 2014, which included coupled support. At that time, it was decided not to introduce coupled support on the basis that:

- i) There had been, to date, no long-term pattern of substantial decline in suckler cow numbers (or production levels in other sectors) since the introduction of decoupling in 2005;
- ii) The impact of a coupled support payment on production (given the restricted budget available) was likely to be limited;
- iii) To the extent that coupled support had any effect on production, the consequential **impact on incomes would be negative** as a result of lower producer prices; and
- iv) Most responses to the consultation opposed coupled support.

² [Hill farm profitability report - FINAL agreed 15 Nov 19.pdf \(wildlifetrusts.org\)](#)

In 2016, Northern Ireland chose not to develop a Voluntary Coupled Support (VCS) scheme during this CAP cycle following a consultation with stakeholders. VCS schemes are often targeted at sectors in marginal areas such as the hills that face difficulties in terms of access to market, altitude, and climate. These circumstances make it increasingly difficult to turn a profit, and as a result many farm businesses rely heavily on public support for their survival. For many, the perceived solution to these problems has been to increase production in order to generate greater returns.

However, the background evidence paper upon which the consultation document is based gives limited detail of its choice for coupled support. This scheme may end up supporting productivity over profitability. [Analysis](#) done by AFBI shows that the introduction of voluntary coupled support in 2016 would result in a downward pressure on prices and farm incomes. The Headage Sustainability Measure is based on maintaining farm incomes, however there are risks that it could have the opposite effect. There is little evidence to show that Areas of Natural Constraint payments are a primary determinant of business viability. Subsidies paid on the area farmed are associated with a relatively large decrease in the stability of farm income³.

Coupled support provides a direct incentive to farmers to maintain and even increase production and is classified as trade-distorting under the WTO Agreement on Agriculture. Support of this kind is classified as Amber under WTO rules, meaning that there are strict limits as to how much of this support can be allocated as part of a country's agricultural budget⁴. The Agriculture Act⁵ has specific powers to ensure that future agricultural support within the UK complies with WTO state aid rules. Due to the scale of the measure taking up a sixth of the total agricultural, any implementation should be kept under close review and underpinned by the precautionary principle.

This type of support could represent a backwards step in the transition towards a sustainable land use policy in NI. Rather than tying funding to production, which often masks the unprofitable nature of numerous businesses, support in marginal areas should be tied to the delivery of environmental outcomes. Particularly in upland areas where HNV farming can yield better value for money by providing ecosystems services rather than productivity. While no specific modelling on the impact of re-introducing a coupled payment for the sheep sector has been carried out it would be expected to exhibit a broadly similar outcome to that for the beef sector, i.e. the number of breeding ewes would increase slightly, prompting a lower price and a resulting overall decrease in producer returns. Therefore, the conclusions on the effectiveness of coupled support in the beef sector also apply to the sheep sector.

3. Farming for Nature

Recent research reveals that NI ranks as the 12th-worst performing country for biodiversity loss out of 240 countries⁶. We have lost more wildlife than anywhere in the UK, with 97% wildflower

³ Harkness C et al. 2021 Stability of farm income: The role of agricultural diversity and agri-environment scheme payments

⁴ https://www.wto.org/english/tratop_e/agric_e/agboxes_e.htm

⁵ <https://services.parliament.uk/bills/2019-20/agriculture.html>

⁶ <https://community.rspb.org.uk/getinvolved/b/steppingupnorthernireland/posts/the-prime-ministers-30-30-pledge>;
<https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/new-report-shows-the-uk-is-the-least-effective-g7-member-at-protecting-nature/>

meadows gone, 11% species at risk from extinction from the island of Ireland⁷, and just 1 of 21 lakes in good quality⁸.

Future agricultural policy must ensure area-based schemes deliver public goods for public money whilst ensuring there is recognition that inclusion within the 30% protected for nature and the wider Nature Recovery Network (NRN), will not necessarily preclude farmland from being actively farmed.

Future policy can seize the opportunity to recognise and reward ‘non-market’ outputs provided by sustainable agricultural systems and High Nature Value (HNV) farming, such as carbon storage, clean water and soil conservation, as well as maintaining many landscapes that underpin rural tourism, economies and communities. A robust monitoring and evaluation framework must ensure these schemes deliver for nature’s recovery as well as value for money.

We therefore, strongly support the Farming for Nature Package as it will see the transition of farm payments move from resilience to delivery of environmental outcomes over time, committing to a large upscaling of agri-environment schemes. However, the timeline for the transition is not clearly defined, with very little detail on how these proposed measures will connect to existing EFS and build upon current payment mechanisms.

We also support the proposed incentive to encourage 10% of farmland to be managed for biodiversity. This is a good first step which all farmers can take to spare land for nature in the transition toward nature friendly farming practices, however SLUG believes that more ambitious targets should be set as 10% on many farms is already the bare minimum that farms must achieve to adhere to cross-compliance. A whole farm approach to farming would see such practices integrated into even the most intensive farming systems, for example:

- Incorporating multi-species networks of hedgerows, small woodlands, and scrub with rotationally trimmed hedges
- Limiting inputs to farmyard manure, and/or low emission slurry spreading techniques
- Species-rich grassland and no/minimum tillage
- Introducing flowering and seed-rich habitats for wildlife
- Multi-species swards and leguminous-herbal grassland to improve soil quality, water and nutrient retention.

Broader/widespread and targeted schemes

To restore our natural environment, new schemes operating under a future agri-environment framework will need to be able to effectively tackle both **widespread** environmental issues such as declines of farmland biodiversity, diffuse air and water pollution and **highly targeted issues**, such as the restoration of priority habitats or recovery of a range of restricted species.

⁷ <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

⁸ <https://www.daera-ni.gov.uk/articles/water-framework-directive-statistics>

Widespread environmental objectives	Targeted environmental objectives
<ul style="list-style-type: none"> • Recovery and maintenance of widespread species and communities • Protection and recovery of soils • Nature based solutions to support both mitigation and adaptation to climate change • Improvements to and maintenance of water quality and use • Opportunities for recreation, access and connection to nature (e.g. connected permissive paths and signage, open farm days and educational visits) 	<ul style="list-style-type: none"> • Management and enhancement of protected sites including Areas of Special Scientific Interest, and the European Protected sites Network • Management, restoration and recreation of priority habitat (peatland, native woodland) to enhance biodiversity and deliver flow benefits to society • Recovery of rare, threatened and range restricted species • Strategic natural flood risk management (including catchment wide management)

Considering the variety of environmental interventions needed, we broadly favour a future policy and funding structure which includes payments for both broad/comprehensive interventions and more complex and targeted ones. We recognise that DAERA has adopted this approach under the Environmental Farming Scheme, with a Wider scheme focused on delivering widespread environmental objectives and a Higher scheme focused on priority species, habitats and protected sites. This provides a good foundation to build upon as part of a future policy framework.

Outcome Based

Results-based approaches have the potential to improve the efficacy of sustainable land management schemes. Results based, and actions-based approaches should not be seen as mutually exclusive but different tools which can be used together to ensure schemes deliver environmental outcomes and provide the right balance of flexibility and certainty for farmers/land managers and Government.

On balance we feel it is possible to combine the benefits of a results based and an actions-based approach. Many of the results-based payments trials to date have taken a hybrid approach, with **one payment linked to management actions and a further payment for securing the target agreed result(s)**. This approach helps reduce contractual risk. Over time the balance between the two payments approaches could shift, with an increased emphasis on results-based payments as the evidence base improves and the associated risks reduce.

Types of environmental payment system

Scheme type	Payment basis	Payment verification
Pure results-based - No management actions are either specified or required	Solely based on results, measured using one or more environmental indicators	The observation of the extent to which results have been achieved
Hybrid results-based - Management actions or restrictions form part of the scheme	Partly based on results, measured using one or more environmental indicators.	Observation of results and/or whether management actions have been carried out.
Management-based - Management actions form the basis of scheme design	Wholly based on having carried out specific management actions	Observation of whether management actions have been carried out.

Landscape Scale

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

For more details on SLUG's position on agri-environment schemes, see our Future Agri-Environment Schemes in Northern Ireland paper.

The ['Making Space for Nature'](#) Report identified the pressing need to create a more coherent and resilient ecological network by focusing on more, bigger, better, and joined up habitats in order to create more connected landscapes. Reforming agricultural policy provides a clear opportunity to achieve these landscape scale outcomes and the 'step change' identified as necessary by Professor Lawton. We therefore welcome the similar language used within the consultation and recommend that there is direct reference to the Lawton principles as using these as core principles will ensure we meet many of the government plans and strategies outlined in section 1.4 of the consultation.

Quick Wins

We support and encourage plans to take action on the "quick wins" for nature, as well as maintaining the good that has been achieved from existing EFS options. However, we would welcome commitments to maintaining and strengthening the management of all existing habitats and species and also propose some further inclusions for consideration:

- The introduction of restoration and maintenance for peatland and heathland. Although much large-scale restoration will need to be funded separately, on-farm actions such as peat dam installation should still be incentivised under this Farming for Nature package.
- The continuation of peatland management is essential to ensure larger-scale restoration is maintained.
- Wild bird cover as a separate option to winter stubble, as well as the incentivising spring cereals plantation
- Hedgerow "restoration" as well as management
- Reed bed management

Incentivising Collaboration

The multiple benefits of sustainable agricultural land management have been demonstrated through projects such as the Heart of the Glens Landscape Partnership's Farm and Farmland Sustainability Project. The Woodland Trust worked in partnership with 13 landowners in the Antrim Glens to develop farm plans that identified and delivered new green infrastructure in the area. This included the planting of new native farm woodland, hedgerows and riparian woodland

to improve drainage, provide shelter for livestock and deliver an extended habitat for wildlife including priority species red squirrel and pine marten.

DAERA's Biodiversity Strategy and commitments to targets such as 30x30 and halting and reversing biodiversity loss to become nature positive by 2030 must be fully integrate into Future Agricultural policy, setting out the delivery mechanisms the agricultural sector will build in.

30x30 Target

In Northern Ireland, on 25th May 2021, Edwin Poots, Department for Agriculture, Environment and Rural Affairs (DAERA) Minister, publicly endorsed the 30x30 target. As announced by the minister in November 2021, 30x30 is an action in the draft Environment Strategy.

In order to contribute towards a 30% target, protected areas need to meet three criteria:

1. They are protected for nature in perpetuity: the entirety of the 30% should be afforded long-term protection for nature and long-term protection against damage such as pollution, overexploitation, invasive non-native species, habitat destruction and development.
2. They are well managed and in good or recovering condition: land that counts towards the 30% should be well-managed for nature, with strategic management plans that are adaptable to changing ecological circumstances that creates demonstrable improvement of feature condition. Management may vary from highly species-specific and interventionist approaches such as long-term agri-environment systems to much more hands-off approaches.
3. They are regularly monitored: land that counts towards the 30% must be regularly monitored at appropriate intervals as part of the programme of active management and investment. Robust monitoring should show clear evidence both of good management for nature and that the features are either in good condition, or are showing demonstrable signs of ecological recovery. Monitoring data should be publicly available to facilitate good management for nature.

Please see our briefings [30 x 30: Land for Nature's Recovery in Northern Ireland](#) for full detail of our current thinking on how 30x30 should be achieved in Northern Ireland.

Test and Learn

We welcome the inclusion of the Test and Learn proposals. These proposals are in step with our views on the piloting of new approaches as outlined in our [Farming for the Future A Vision for Sustainable Land Management](#) document. We believe there is a need to pilot new approaches of farm support to ensure that they are practical to deliver, capable of delivering environmental outcomes, can secure buy in from farmers and provide adequate reward for the delivery of results-based environmental outcomes. Northern Ireland has the potential to be a test bed for new ideas. Funding from the Basic Payment Scheme should be used now to pilot new approaches to delivering environmental land management. These should be co-designed and trialled with farmers and other relevant organisations within the farming and land use sector. Knowledge measures need to be key to this, as old schemes have been based around telling farmers what to

do. This will ensure that by the end of the transition period, payment schemes focused on public goods delivery are effective and ready to be rolled out across the country.

We would welcome the acknowledgement of a hybrid approach to results-based payments and would request further details on the proposed pilots.

Environmental Principles

The Environmental principles proposed within this section should underpin the entire agricultural policy and should not be limited to the farming for nature only. It is not enough that they guide the pilots and future Farming for Nature schemes but must guide the decisions made at all levels of the programme, including the simplification of the GAEC and SMRs within cross compliance. Caution must be taken to ensure that these changes are not being made at the expense of water and soil quality but will display genuine non-regression and efficiency in monitoring.

Issues requiring further information

- Countryside Access – while earlier consultation documents included proposals for possible payments in support of new or enhanced facilities that provide access to land or water, these proposals are absent from this latest consultation document. We would therefore welcome clarification around Departmental plans to develop and support greater access to the countryside.
- Landscape - We believe there should be greater recognition within the consultation of the role land managers play as stewards of wider rural assets such as the character of the our landscape, heritage and rural tourism. We therefore would like to see proposals as to how these opportunities are to be taken forward.
- Air Quality – while acknowledging the references to reducing ammonia emissions in order to improve air quality, we believe proposals to reduce other sources of air pollution such as the burning of habitat, agricultural waste etc should also be addressed.

4. Farming for Carbon

Achieving ambitious GHG reductions from agriculture remains a significant challenge, but one that must be overcome; ‘business as usual’ is not an option. It will take ingenuity, innovation and, ultimately, a transformational change in how we farm and manage our land. Critically, a carbon at all costs approach must be avoided and the pursuit of increased carbon storage through land management must be balanced with other objectives, for example, protection of biodiversity.

Peer reviewed evidence on climate change and biodiversity shows that the nature and climate emergencies are inextricably linked and must be addressed collectively. The Intergovernmental Panel on Climate Change (IPCC) and the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) are united in their view that climate change and biodiversity interconnected and that neither can be addressed without effectively addressing the other[3]. Addressing the synergies between mitigating biodiversity loss and climate change, while considering their social impacts, offers the opportunity to maximise benefits and meet global Sustainable Development Goals. A report just published by the joint UK governments, ‘Nature Positive 2030’ states: ‘we need to go high nature and low carbon, tackling the twin crises

of biodiversity loss and climate change together. The crises of biodiversity loss and climate change share many of the same causes and solutions. We need to tackle both crises or we will tackle neither’.

NI must play its part in delivering the recommendations within the UK Committee on Climate Change’s recommendations in the 6th Carbon Budget:

- Increase forest restoration rates - including natural regeneration - up to 30,000 ha per annum by 2025 rising to 50,000 ha per annum by 2035
- Achieve full restoration of upland peatlands by 2045 (or stabilisation if degradation is too severe to restore) and re-wetting and sustainable management of 60% of lowland peatlands by 2050
- End peat extraction and the sale of peat for horticulture by 2023
- Develop agro-forestry standards and extend the length of hedgerows by 40% by 2050, as well as improving both woodland and hedgerow management.

Any proposed afforestation or land use change must be implemented using the principles of sustainable land use and the “right tree, right place” approach which will require NI-specific data. This can be achieved under the establishment of the Land Use Strategy for NI, which has been recommended by the Independent Strategic Review of NI Agri-food⁹.

Under the Farming for Carbon scheme, it is vital that there is a balance between investment in technological and nature-based solutions. Focussing on agri-technologies alone, risks distracting from making systemic changes to enable us to produce food whilst recovering nature and combatting climate change. For example, highlighting the issues around tech-solutions, ie methane reduction feedstock additives, could halt emissions but not address the wider impact of cattle numbers on the natural environment. Therefore agri-technology should be regulated in a way that guarantees that they will only be used for the public good and not further exacerbate wider ecological or welfare problems

Biomethane and Anaerobic Digestion

The UK currently generates vast quantities of manure and slurries, with considerable environmental impact. Whilst using manures and slurries as Anaerobic Digester (AD) feedstocks to generate biomethane mitigates some of these emissions effectively, it results in significantly lower emissions mitigation than dietary shifts to more plant-based diets. Even if almost all of the UK’s manure was sent to AD (which is unlikely to be economically feasible), it would only bring down UK agriculture emissions by a maximum of [27 per cent](#). In contrast, halving UK beef, lamb and dairy consumption, and planting trees on the spared grassland, could reduce the UK’s domestic agricultural emissions by [156 per cent](#). Government funding and regulation should therefore focus on means of incentivising and accelerating a just transition to more plant-based diets.

Extreme care must be taken to ensure subsidies are not set high enough to perpetuate or even expand the livestock industry. Highly subsidised AD has been used in Northern Ireland to

⁹ [Independent Strategic Review of NI Agri-Food | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](#)

[facilitate](#) the explosive growth in the intensive livestock industry, through lowering waste disposal costs and helping factory farms to gain planning permission and bypass nitrate regulations. There are already [examples](#) of AD plants helping intensive factory farms expand in the rest of UK. The government should instead incentivise AD as a last-resort waste disposal option primarily through introducing taxes on methane and nitrate emissions and bringing forward the ban on open manure storage. This will increase the gate fees AD plants can charge for manures and slurries, making them more financially viable without the need for high government subsidies, whilst avoiding perverse outcomes via the growth of the intensive livestock industry.

The focus on slurry infused grassland as another area of sequestration is something we would be cautious of as its shallow nature can be unstable and bring volatility in its ability to store carbon long-term.

Allocating the majority of agricultural funding towards the delivery of sustainable land management and public goods should enable farming for carbon to become a core element of the farm business.

Whilst reducing emissions poses a significant challenge to the agriculture sector, it is a timely moment to scale up climate and nature friendly farming because of the opportunity we have to develop new agriculture policy and re-purpose farm support. Cross-sectoral policies which fully embed the inseparability of climate, biodiversity and human quality of life will be the only way to achieve sustainable, positive outcomes.

Nature Based Solutions

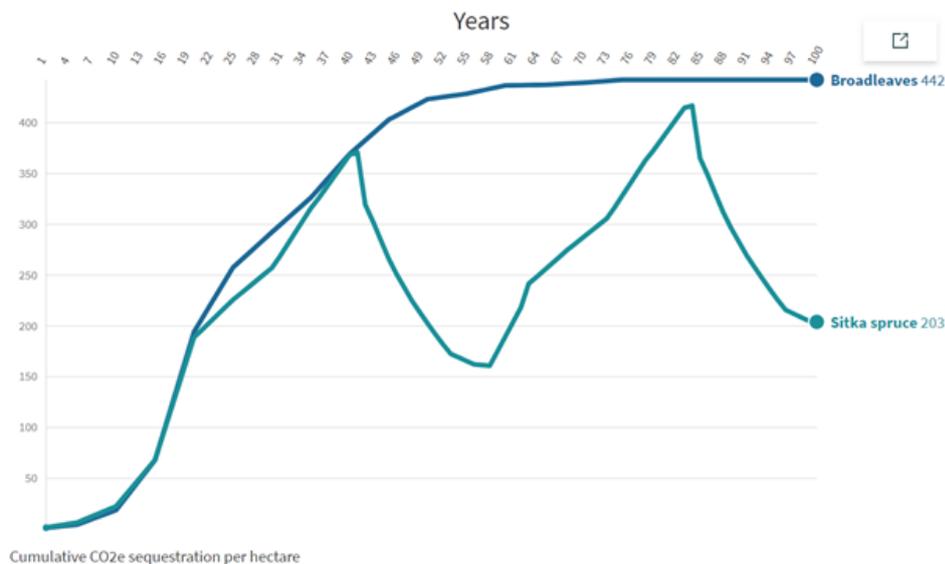
Nature Based Solutions can be one of our greatest allies in addressing the joint nature and climate emergency. If we are going to have any chance of achieving net-zero by any of the suggested dates, we need to rethink the way we use our land. If *done well*, nature-based solutions in the land sector can both help reduce our carbon emissions AND lead to a host of co-benefits for biodiversity, soil health, air quality, public health, wellbeing and much more. Therefore, we would like to see the policy proposals commit to a comprehensive programme of on-farm nature-based solutions, to enable farmers to protect, enhance and create natural habitats on their farms as a top priority. These habitats form vital carbon stores and stimulate a host of benefits for nature and ecosystems. Actions include:

- (i) **Protection and appropriate management of existing carbon rich habitats** including flower rich grasslands, floodplains, wet grassland, wood pastures, salt marsh, and heathlands.
- (ii) **Restoration of wet peat and blanket bog**, [e.g. Garron Plateau](#)
- (iii) **Establishment of trees and shrubs**, using native trees in suitable habitats
- (iv) **Increase grass and margins** for pollinators, natural pest control and carbon sequestration
- (v) **Creation of buffer zones along waterways** with suitable vegetation, sequestering carbon, safeguarding water quality, and connecting habitats.
- (vi) **Expanding hedgerows** and cutting on a three-year rotation
- (vii) **Agroforestry**, for example the introduction of fruit trees into crops to increase environmental and economic resilience

Reference to on-farm nature-based solutions is currently absent from the farming for carbon policy proposals. As it stands, the proposals suggest that peatland restoration will be progressed through the peatland strategy, woodland creation will be progressed through *forests for our future* and there is minimal detail around agro-forestry. Therefore, the only farming for carbon interventions being proposed under this package are largely technologically focussed.

Afforestation

We are concerned that table 5 relating to carbon sequestration values is somewhat misleading in terms of the stated superior carbon sequestration potential of conifers versus broadleaf. Such flawed assertions have the potential to lead to poorly designed policy outcomes. The table is over-simplistic and appears to fail to take account of yield class or long-term use of harvested wood products¹⁰. [RSPB \(2021\) woodland carbon storymaps](#) and supporting research (Field et al. 2020)¹¹ show that mixed broadleaf woodlands managed for conservation can store more carbon over 100 years than Sitka spruce plantations under standard productive management. The large drops in sequestration in Sitka spruce plantations are due to carbon released in rotational harvesting. Carbon stored in harvested wood products is included in our comparison, but these often have short lifespans compared to long-term carbon stores in woodland.



Therefore, to maximise benefits for carbon and nature, it is essential that a majority of new woodland is native, and appropriately sited to drive nature recovery and benefit from superior long-term carbon reduction benefits. It is critical to note that, past tree-planting activities in the wrong places (such as on peatland, or adjacent to designated open habitat) has harmed important

¹⁰ Bradfer-Lawrence, T., Finch, T., Bradbury, R. B., Buchanan, G. M., Midgley, A. & Field, R. H. 2021. The potential contribution of terrestrial nature-based solutions to a national 'net zero' climate target. *Journal of Applied Ecology*, 10.1111/1365-2664.14003. <https://besjournals.onlinelibrary.wiley.com/doi/10.1111/1365-2664.14003#:~:text=Overall%2C%20the%20contribution%20of%20these,UK%20emissions%20at%20current%20levels.>

¹¹ R.H. Field, G.M. Buchanan, A. Hughes, P. Smith, R.B. Bradbury (2020) The value of habitats of conservation importance to climate change mitigation in the UK. *Journal of Biological Conservation* 248.

habitats and species and undermined effective climate action. The Woodland Trust Emergency Tree Plan rightly recognises that the nature and climate emergency must be addressed in tandem and a careless 'dash for carbon' approach to tree planting risks unintended negative consequences. Agriculture policy must ensure that woodland expansion is undertaken in a way that ensures the right tree is planted in the right place and that delivers for biodiversity, as well as climate adaptation and mitigation and other objectives.

Peatland

Of the 242,000 thousand hectares of peatlands in NI, approximately 86% is not intact, and as little as 1% has been restored in some way over the last 30 years. Degraded peatlands are therefore contributing 6-8% to NI' Greenhouse gas Inventory. To meaningfully harness the power of nature to tackle climate change, we must restore our peatlands as an urgent priority. Given that much of our peatland exists on farmed land, agricultural policy has a key role to play in both protecting, managing and restoring peatland habitat. We are very supportive of the developing peatland strategy and the need to undertake a large-scale programme of peatland restoration across Northern Ireland.

While a peatland restoration fund could exist outside of agriculture policy to deliver large-scale restoration projects, such as complex tree removal and rewetting projects, there is scope for agriculture policy and funding to facilitate smaller-scale less complex interventions at individual farm level. Furthermore, there is no guarantee that the required size of fund will be put in place. Therefore, it would be a missed opportunity if agriculture funding did not make provision for peatland restoration activities. In addition, creating this separation reinforces the dichotomy between agriculture and the environment at a time when we need to establish more integrated approaches to sustainable land management and nature restoration. Making provision for peatland restoration within the agriculture policy funding envelope, would create more ownership of peatland restoration within the farming community and empower landowners to take a hands on role in tackling the nature and climate crisis.

Agriculture policy will be essential to transition away from 'business as usual' and reward farmers for delivery of public goods which, for example, will require grazing at appropriate densities, in line with the carrying capacity of the land.

Farming and land use must help address the climate emergency. Land needs to be managed in ways that contribute to broader climate change mitigation and adaptation. Farmers are supported to transition to practices that benefit both nature and climate. The funding to help this transition should be provided on the basis of 'public money for public goods'.

5. Investment Measures

We support this measure as it encourages the adoption of green technology and refers to carbon/peatland and potential investment in related capital equipment. We support concept of co-operative and shared measures to reduce overcapitalisation of farms.

We would like to see investment be cross-cutting within the measures, allowing for funding to be used for pilots, capital works and the facilitation of farmer-to-farmer networks which can strengthen ambition, innovation community, and knowledge bases.

6. Knowledge Measures

We strongly support this measure. Through the aforementioned successes of the EFS Groups, CAFRE BDG's and the EIP model in the RoI we believe that the strengthening and establishment of more farmer-to-farmer networks is essential in helping bridge the gaps within the sector, whilst producing an effective model for future delivery of policy proposals.

We also promote increased cooperation between delivery agencies (e.g. SLUG and CAFRE) and the knowledge gap that currently exists on environmental matters.

7. Generational Renewal

We support this measure and recognize the need for succession and generational renewal to create long-term, sustainable farm businesses. We support the requirement for skills and training and a focus on incentivising the successor rather than paying off the retiree. However, we believe greater ambition is needed to allow farmers to strive for higher levels of education.

We identify opportunities of a fresh approach but risks of loss of traditional and sympathetic land management skills. This will identify the role of the retiree in helping with the knowledge transfer of nature and traditional management.

8. Livestock Genetics and Data

Having a scheme to encourage development of breeding genetics is only part of the picture, these animals then need very high input feed to sustain them with a high carbon footprint. Having a scheme which incentivised traditional breeds would encourage farmers to keep this type of livestock which would better deliver sustainable outcomes.

9. Metrics Monitoring and Evaluation

A hybrid approach is needed to the evaluation of potential results-based payments for Farming for Nature. The current proposals are potentially focusing on key species which could adversely affect existing habitat if not implemented accurately. This could also see land managers lose out on payment if their habitats do not avail of the priority species.

The use of existing national monitoring procedures is encouraged so as to make the most effective use of these schemes and not duplicate work.

SLUG calls for regular, long-term, landscape-scale monitoring and a targeted approach for species in order to determine what approach is most effective.

Metrics pose a new opportunity to set baselines for biodiversity and climate. We also believe carbon audits should be offered to all farms, to help establish a baseline per industry.