

Northern Ireland Future Agricultural Policy Framework Stakeholder Engagement

Summary of responses

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Executive Summary

In August 2018 DAERA launched a stakeholder engagement exercise to seek views on a possible future agricultural policy framework for Northern Ireland. In total, 1,277 responses were received when the exercise closed in October. A brief synopsis of the responses to the key themes is as follows:

Transition

- The majority of respondents supported all proposals with the exception of greening where there was an even split in the responses received, with half supporting the continuation of greening and half not.

Productivity

- General support for a Productivity Grand Challenge and the proposals in the document relating to encouraging agricultural education, knowledge exchange, Continuing Professional Development (CPD), investment in innovation and new technology, and alternatives to capital grants.
- Mixed views about linking educational attainment to other policy interventions.

Resilience

- Strong support for a resilience payment.
- Broad support for targeting resilience support payments to take account of natural disadvantage.
- Even split of stakeholders who supported tiering or capping payment and those who did not.
- Slightly more supported insurance type measures than those who did not.
- Good support for fiscal measures and having a crisis response framework.

Environmental Sustainability

- Good support for the suggested environmental principles.
- Over 50% supported the need for investment in research and education.
- Good support for outcome-based measures; co-design with farmers and land managers; and a move from costs incurred approach to incentivise changes.

Supply Chain

- Good support for the Government playing a role in ensuring transparency.
- Good support for supply chain awareness training, but mixed views on delivery and use of qualifications.

Impacts

- A few comments about equality issues if a qualification requirement for grants was introduced.
- Several comments on poor rural broadband and poor transport links.
- Calls for regulations and inspections to be proportionate and flexible.
- Some comments on the relationship between productive farming and the environment and the pivotal role of farmers in the past and in the future.

Other Comments

- Many comments were provided, the majority repeated previous responses such as supporting the environmental measures and public money for public goods.
- Some respondents saw Brexit as an opportunity to re-shape and re-focus the industry, but they also called for a clear direction of travel.
- Other responses included suggestions for joined-up approaches to the many inter-related issues; importance of food supply and security; forestry and horticulture; focus on the environment; rural heritage; recreation and tourism.
- Several responses were critical of what they viewed as a lack of ambition in the document.

Introduction

In August 2018 DAERA published a stakeholder engagement document seeking views from a broad range of stakeholders across farming, food and environmental sectors on a proposed future agricultural policy framework for Northern Ireland. This was because the United Kingdom (UK)'s exit from the EU would mean that the Common Agricultural Policy (CAP) would no longer apply in Northern Ireland. Agricultural policy is devolved, and its future direction will largely be determined by the devolved administrations.

Under the draft Withdrawal Agreement between the UK and the EU, it was anticipated that existing Regulations under the CAP in relation to direct payments would continue to apply in 2019 and there would be no scope to change these. Direct support from 2020 would operate under domestic legislation.

The stakeholder engagement paper built on the previous DAERA Minister's letter to the Secretary of State for Environment, Food and Rural Affairs (Defra) on 2 March 2017. This described the following key desired outcomes and long-term vision for Northern Ireland's agricultural industry as:

1. Increased productivity in international terms;
2. Improved resilience to external shocks;
3. An agriculture industry that is environmentally sustainable; and
4. An industry which operates within an integrated, efficient, sustainable, competitive and responsive supply chain.

The stakeholder engagement document therefore sought stakeholder views on two time periods:

1. 2020-2021 when CAP would no longer apply and support is funded by the UK Government (UKG). This could be a transitional period which provides some certainty in relation to support arrangements, but may also provide some scope for simplification; and
2. 2022 and beyond, which looks towards a longer-term agricultural policy.

A list of the questions posed is attached in Annex A. The purpose of this document is to provide a synopsis of the responses and views submitted by stakeholders. During this exercise, DAERA's guiding principle is that this stakeholder engagement process does not, and will not, in any way prejudge or constrain the ability of an incoming Minister, NI Executive and NI Assembly to decide what is appropriate for Northern Ireland's agri-food sector.

Response to the stakeholder engagement

DAERA launched the stakeholder engagement on 1 August 2018 and it ran until 10 October 2018. The engagement exercise was widely advertised in the farming press, on DAERA's website and issued via e-mail to a wide range of stakeholders. This provided stakeholders the opportunity to respond with their views on a possible high-level framework for agricultural policy in Northern Ireland following the UK's exit from the EU.

In total there were 1,277 responses, of which 66 were from organisations/representative groups (hereafter referred to as organisations) and 1,211 from individuals.

Of the individual responses received, 1,190 were submitted on one of two template response forms which, for the purpose of this summary, are numbered 1 and 2. Responses were received on Template 1 from 1,136 people and responses were received on Template 2 from 54 people.

A list of respondents is provided in Annex B.

The following sections of this document summarise the comments made by stakeholders to each question. Some stakeholders did not answer each individual question or provide individual responses to any question. In the latter case, comments have been summarised under the most relevant questions.

Summary of responses

Transition

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

Fifty-nine responses included comments about this question. Forty-two were from organisations, almost half of which were farming focussed, and 17 were from individuals.

Fifty-six responses, 39 organisations (over half of which were farming focussed) and 17 individuals, were supportive of the proposal. One environment focussed organisation was not supportive and the remaining two organisations did not specifically address the question. In addition, 54 responses on Template 2 supported the retention of entitlements as the basis of direct support until, and beyond, the new Agricultural Policy Framework.

Fifteen responses from those supportive of the proposal (nine organisations and six individuals) cited a range of benefits. Of these:

- Five organisations and two individuals suggested that retaining the current system would provide a degree of stability and certainty for the sector during transition;
- One organisation and one individual suggested that the proposal would provide some “planning headroom” for farmers whilst negotiating future sustainable income support;
- One organisation and two individuals commented on the importance of continued support to the industry in the period immediately post departure from the CAP; and
- Two organisations and one individual said that maintaining the current system would avoid confusion and reduce administrative costs associated with change.

Four organisations, three of which were farming focussed, supported the retention of the current entitlements system because it helped ensure that support was directed towards active farmers. However, two farming organisations suggested that farm payments should be targeted towards the primary producer.

Fourteen responses, from 11 organisations and three individuals, provided views on the timeframe for the retention of entitlements. The eleven organisations (of which four were farming focussed and two environment focussed) and two individuals suggested that entitlements should be retained until 2021. One individual suggested that entitlements should be retained until at least 2022 and until at least a new policy framework with related financing had been implemented and not just agreed. This individual went on to say that DAERA should follow a similar course to England and Wales, which had set their transition to end in 2027.

One environment focussed organisation called for a guaranteed transition period with a clear definition as to how the old system would change to the new.

One individual said that the transition away from support payments must be done at a considered and reasonable pace, or it could force lots of farmers out of business.

Seven responses from six organisations, half of which were farming focussed, and one individual, supported the development and trialling of new approaches. Suggestions included:

- Coupled pilot exercises in areas such as environmental efficiency, calf welfare and genetics;
- Fast tracking of the cattle EID initiative; and
- The development and trialling of an ambitious new agricultural policy focussed on delivering outcomes.

Six responses from four organisations, the majority of which were environment focussed, and two individuals, noted the absence of a Minister and the Northern Ireland Executive and the implications for progressing the detail of the new policy. Another organisation stated that no new system should be introduced until there is a Minister and Assembly in place to scrutinise proposals.

One organisation and one individual suggested that entitlements should be extended to all land used including forestry. The organisation also suggested that new forestry should be eligible for direct payments to enable land managers to diversify.

Other comments/suggestions

- One farming focussed organisation favoured the retention of entitlements in the short term, but in the longer term the system must not impede new entrants or systemic growth of existing commercial enterprises.
- Another farming focussed organisation felt that transition by 2021 would be a very tight timeframe in an arable context equating to only two harvests, which is not a normal crop rotation.
- One environment focussed organisation said that the rest of the UK was moving ahead with future plans, and DAERA needed to be aware of the implications for Northern Ireland.
- A different farming focussed organisation said that retention of entitlements in the short term would be essential for vegetable, potato and apple growers.
- Another environment focussed organisation said that in the short term the current system should be retained to avoid environmental damage resulting from any forced rapid structural change of farms. However, in the longer term an area-based payment system would not be appropriate.
- One individual said that entitlements should be retained as an area-based payment and not linked to headage or production for 10 years post Brexit.
- One individual stated that entitlements had no link to a sustainable, balanced, productive and profitable use of farmland, and their continued use could only be justified by the expense and administrative waste needed to create an alternative arrangement in the short term.
- One environment focussed organisation said that Pillar 1 payments should be phased out and replaced with a system that rewarded farmers for delivering public goods for public money through a sustainable land use model.

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?

Fifty-one responses included comments about this question. Thirty-five were from organisations, nearly half of which were farming focussed, and 16 were from individuals.

A total of 25 responses (16 organisations and nine individuals) were supportive of the proposal to abolish the three greening requirements. Of the 16 organisations, seven were farming focussed and one was environment focussed.

A total of 20 responses (15 organisations and five individuals) favoured the retention of the three greening requirements. Of the 15 organisations, nine were farming focussed and three were environment focussed.

A further six responses (four organisations and two individuals) suggested that some of the greening measures should be retained. Of the four organisations, three were environment focussed and one was farming focussed. The three environment focussed organisations suggested that there could be some justification for retaining the arable measures given the decline in arable land in recent years towards silage and fodder which provided little resource in terms of biodiversity value. The farming focussed organisation advocated the abolition of the crop-diversification requirements as they generated an unnecessary burden without any significant productivity or environmental benefit, and were ill-suited to Northern Ireland due to the absence of large arable enterprises and lack of rotational crop options. This organisation also supported the ability to remove the ecological focus area requirement if only to provide a level of flexibility in any future policy which was not possible with the measure in place but would allow its reinstatement if a suitable alternative cannot be found. Of the two individuals, one was content to retain all of the greening requirements apart from the three-crop diversification requirement, and the other suggested the abolition of the crop diversification requirements in full.

Reasons for abolishing the greening requirements

Nine responses (five organisations and four individuals) suggested that greening requirements were inappropriate for Northern Ireland. Eight responses (seven organisations and one individual) criticised the level of administration involved and three responses (one organisation and two individuals) commented on the cost of implementation. Five responses (four organisations, three of which were farming focussed, and one individual) questioned the benefits and effectiveness of greening. One of the farming focussed organisations suggested the requirements could continue to be regulated under cross compliance.

Reasons for retaining the greening requirements

Four responses from three organisations (two farming focussed and one environment focussed) and one individual, said that greening demonstrated a positive approach and recognised farmers' contribution to public goods and environmental stewardship. The environment focussed organisation felt that greening was a starting point for developing more ambitious approaches to public good from agriculture.

One farming focussed organisation said that retention would avoid confusion and reduce the administrative cost associated with change, and one individual suggested that the benefits from greening outweighed the administrative burden of managing the scheme.

One organisation suggested that greening should be retaining to maximise the protection of water quality, and one individual said that arable farmers needed to demonstrate a more positive approach to environmental management noting the high amount of chemicals used by such farmers.

Suggestions

Three responses (two environment focussed organisations and one individual) suggested re-directing a proportion of the greening funds to pilot projects. Two of these suggested pilots with a public goods approach, and the one suggested pilots to test an outcome-based system of agri-environment support.

Three organisations (of which two were farming focussed) called for in depth discussions post 2021 to develop a workable and sustainable environmental policy, and one individual said that the greening requirements should be retained until there was an alternative delivery mechanism for environmental objectives.

Two environment focussed organisations recommended reviewing the effectiveness of the greening measures with a view to replacing them with environmental measures that would add value. One emphasised that environmental delivery should not be neglected by removing greening without providing alternative delivery mechanisms, and the other said that any financial gains from abolishing greening must be put into environmental measures and not incorporated into the value of the Basic Payment.

One organisation suggested implementing specific schemes with clear environmental and productivity benefits like "The Sustainable Land Management Strategy".

One organisation in favour of abolishing the greening requirements emphasised that the incorporation of greening requirements into the Basic Payment should continue to require a robust standard of environmental stewardship and the public good of countryside management.

One organisation suggested that crop diversification could be achieved by support initiatives to stimulate direct grower processor contracts which encouraged adoption of added value or niche crops as this would provide both crop biodiversity and enterprise diversity.

One individual suggested that greening requirements should be integral to all land uses and appropriate to the specific biodiversity priorities of the region.

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?

Fifty-one responses included comments about this question. Thirty-five were from organisations, nearly half of which were farming focussed, and 16 were from individuals.

Forty-three responses from 30 organisations (of which 12 were farming focussed and seven environment focussed) and 13 individuals, were supportive of the retention of the current ploughing ban on environmentally sensitive permanent grassland. Five responses (three farming focussed organisations and two individuals) were not supportive, and a further three responses did not express a clear preference.

Suggestions for administering the ban

Fifteen responses from 11 organisations, (half of which were farming focussed) and four individuals, expressed a view on the means of administering the ban.

Four responses from three organisations (of which two were farming focussed) and one individual, supported retention as a condition of the Basic Payment. One farming focussed organisation and one individual suggested that the Environmental Impact Assessment (EIA) Regulations were the most suitable vehicle for protecting these areas. Two organisations (including one farming focussed organisation) suggested protection through either the EIA Regulations or as a condition of receiving the Basic Payment.

One organisation and one individual suggested that the ban should be expanded to include any form of mass soil disturbance, included in a strengthened EIA Regulation as well as being a condition of receipt of farm payments including “agri payments”.

Two organisations, one of which was farming focussed, suggested the ban could be regulated under cross-compliance.

One environment focussed organisation suggested the ban should be retained by means of a “change of use” application policy for permanent grassland. One farming focussed organisation suggested the ban could remain provided financial recompense was provided as part of an environmental management plan. One individual suggested the ban should be retained as part of any new greening requirement post transition.

Other comments/suggestions

Eight responses referred to the need for additional financial compensation for not ploughing these areas. Of these, three organisations (two of which were farming focussed) suggested that a higher tier rate of payment should be made available through the environmental funding stream. Two farming focussed organisations said that regard must be given to the producer who farmed the land as the inability to improve production could be considered income forgone. One organisation indicated it would welcome schemes that would support these areas and that these schemes should have parity to interventions in areas with lowlands.

Seven responses from five organisations (of which four were farming focussed) and two individuals, emphasised that the ban should only apply to the designated areas within a field and not the entire field.

One farming focussed organisation supported the ability to remove the ban if only to provide a level of flexibility in any future policy which would not be possible with the measure in place but would allow for its reinstatement in the event that a suitable alternative cannot be found.

One environment focussed organisation suggested that while sensitive grasslands required protection under regulation, this must not prevent ploughing where reasonable alternative use was proposed and habitat loss could be mitigated. One farming focussed organisation suggested that each individual case should be considered on its merits.

One organisation noted the high levels of CO₂ emissions associated with ploughing and said that the ban should be retained with appropriate compliance measures considered alongside the review of agricultural policy post 2022. It highlighted the need to be mindful of changes in cultivation practices brought about by technological advances and other events such as the banning of glyphosate when considering future policy.

One environment focussed organisation suggested a need for enforcement of the protection of undesignated sensitive grasslands. It highlighted deficiencies in the data for both designated and undesignated sensitive grassland, and urged DAERA to use the transition period to resource a mapping system capable of responding to landscape needs. A further two environment focussed organisations highlighted the sustained loss of semi-natural grasslands in the wider landscape, and referenced Scotland's approach which signposted farmers to contact their local office for further advice about restrictions that may apply to unimproved semi-natural grassland. One individual also acknowledged the need to support farmers to check which types of grassland could/could not be ploughed.

One environment focussed organisation suggested that permanent pasture which was semi-improved, and outwith designated sites, could be ploughed and reseeded with native species as part of ecological restoration.

One individual said that all future support arrangements should incentivise minimum tillage and soil conservation, particularly in environmentally sensitive areas, and suggested that the principles contained within the United Kingdom Forestry Standard 2017 and associated Guidelines should be used as a basis for the development of similar standards in agriculture and future financial support.

One farming focussed organisation noted that the outcome delivered by the ban was unknown and may well be unnecessary regulation that could be removed.

One individual suggested that the impacts of ploughing in sensitive areas should be fully considered as there may be instances where ploughing and sympathetic use of drainage could better support the retention of such landscapes.

One organisation felt that removal of the ban could result in an increase in soil erosion run off from fields which would detrimentally affect water quality.

One individual stated that disturbing protected areas was an offence and those breaking the law should be prosecuted and expect heavy penalties.

One organisation highlighted the presence of thousands of archaeological sites within such and other grasslands and their vulnerability to ploughing.

One individual felt that farmers should be able to plough any land that they want.

One individual said that 'green desert' soil improvement should be permitted, and this included the ability to plough and introduce more crop rotations and the reseeded of grassland. This approach would diversify agriculture and in the future would support the management of DAERA's objectives around nitrogen, and support increasing productivity (e.g. arable area could be expanded).

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?

Forty-nine responses included comments about this question, 34 were from organisations and 15 were from individuals.

A total of 44 responses, 32 organisations (of which 18 were farming focussed) and 12 individuals, supported the proposal. One individual was not supportive and four responses (two organisations and two individuals) did not directly address the question. In addition, 54 responses on Template 2 recognised the importance of the YFP, and suggested that this payment should continue for as long as the participants were eligible (five years) from a direct fund rather than a reserve.

Thirteen responses from nine organisations (seven of which were farming focussed) and four individuals, emphasised the need for continuity and the importance of honouring commitments already made to those accepted into the scheme. Two farming focussed organisations stated that maintaining the status quo would avoid confusion and reduce the administrative cost associated with change.

Six responses from five organisations and one individual, highlighted the need to continue to support young farmers in order to maintain the future sustainability and growth of the industry. Two of these responses, plus the afore-mentioned 54 template responses, suggested that payment should be made from a direct fund rather than a reserve and that the future framework should identify additional funding for this initiative for a five-year period post Brexit.

One individual favoured retaining the current support arrangement in the short term as it could give some momentum for generational change.

Other comments/suggestions

- One farming focussed organisation suggested that while some changes may be required, support for young farmers must continue in some form.
- One organisation in favour of providing some form of financial support to young farmers suggested that, instead of cash payments, financial support could be used to subsidise participation in educational and skill-based programmes.
- One individual felt that the scheme was open to abuse and suggested that beneficiaries should not automatically receive entitlements at the regional average rate on entry to the scheme. The rate should start low and increase with experience.
- One individual suggested that the five-year cap should be removed and payment should be continued until the farmer was at least 40 years of age.
- One individual suggested that the age profile within agriculture did not reflect the wider population and younger land managers of all rural land uses should continue to be encouraged.
- One environment focussed organisation stressed the importance of encouraging young new entrants to take a pro-active approach to environmental sustainability within their forward business planning.
- One organisation emphasised the importance of implementing controls to ensure that those who were accepted into the scheme were active and involved in

productive agriculture, and another organisation identified a risk that including 2019 will lead to a spike in applications.

- The individual not supportive of the proposal was not convinced that the scheme had been efficient at preventing the gradual ageing of the farm workforce as a whole and felt there was “a degree of nepotism” which was inappropriate in the use of public funds”.

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

Forty-seven responses included comments about this question, 33 were from organisations and 14 were from individuals.

A total of 26 responses from 19 organisations (just over half of which were farming focussed) and seven individuals, favoured allowing applications post 2019.

Thirteen responses from eight organisations (more than half of which were farming focussed) and five individuals, were not supportive. Eight responses, from six organisations and two individuals, provided comments but did not directly address the question. In addition, 54 responses on Template 2 suggested that this scheme should continue for new participants into the future post Brexit for a period of five years.

Twelve responses from seven organisations (almost half of which were farming focussed) and five individuals, indicated that continued support during the transition period would be necessary to encourage young farmers to enter and or remain in the industry.

Two farming focussed organisations felt there was no justification for discontinuing the schemes and one environment focussed organisation questioned why the schemes would not be continued post 2019 given that the "Confidence and Supply Deal" guaranteed payments until 2022. Two responses stated that maintaining the *status quo* would avoid confusion and reduce the administrative cost associated with change. Two responses, from one organisation and one individual, plus the afore-mentioned 54 template responses, highlighted the need to continue to incentivise young farmers in order to maintain the future sustainability and growth of the industry. They suggested that payment should be made from a direct fund rather than a reserve and that the future Framework should identify additional funding for this initiative for a five-year period post Brexit.

Two responses, from one farming focussed organisation and one individual, were content for the scheme to continue during the transition period but suggested a review should be undertaken in advance of 2021 to inform development of an alternative programme of support. Ten responses, from eight organisations and two individuals, identified a need for DAERA to consider measures to facilitate generational renewal/succession planning. The majority of these were not supportive of continuing applications to the YFP and the Regional Reserve post 2019. Of the 10 responses, two organisations suggested the need for a targeted outcomes-based approach to generational renewal and another organisation emphasised the importance of generational renewal to securing primary production. They indicated a desire for further consultation on this agenda to arrive at an evidence-informed, targeted means of encouraging young people into the career.

One environment focussed organisation supported the concept of the YFP going forward given the challenge of succession planning, especially in less intensively managed areas. Two farming focussed organisations suggested DAERA should build on the start made by Land Mobility.

Comments / suggestions

Three farming focussed organisations were of the view that the current age criterion should be removed. One felt that age should not be the sole determinant for preferential access to payments and suggested that qualification and/or proven competence are equally relevant.

Two organisations not in favour of carrying forward the current arrangements suggested the need for bespoke schemes tailored to the specific circumstances prevailing in Northern Ireland. One stated a preference for a scheme which targeted productive farmers and provided young farmers with access to land.

One organisation suggested the need to encourage young people to enter horticulture and urged DAERA to consider scholarships, and one individual suggested that younger land managers of all rural land uses should continue to be encouraged.

One farming focussed organisation suggested that up to 2021 any young farmer seeking to establish their business should continue to receive a top-up payment; however, going forward from 2021, new entrants should have a Level 3 qualification commencing between 2021 and 2025.

One individual suggested payment should be capped to the first 50 hectares and trading of entitlements should not be allowed.

One farming focussed organisation noted that young farmers received support for a relatively short time period in relation to a lifetime in the industry and suggested that if farms were profitable in their own right young people would be attracted to enter the industry.

One organisation advised DAERA to consider the experience of the Cornish Fresh Start, which pointed to ways in which loans to new entrants could usefully meet a practical need.

One farming focussed organisation felt that the YFP incentivised artificial changes in farm ownership.

One individual felt that the YFP had not really addressed the issue of an ageing workforce and they stated a preference for investment in improving the sustainability of farming and expansion of efficient farms.

One organisation, which favoured discontinuing Regional Reserve top-up payments to the Basic Payment, was concerned that this would deter new entrants in the absence of alternative measures that would encourage them to enter the industry. It urged DAERA to prioritise the development of a strategy for generational renewal.

One environment focussed organisation highlighted the need for a road map for future agricultural support to assist new entrants with business decisions and that this should set out the support that would be available for environmental public good provision.

One individual suggested that future policy should address the serious issue of an ageing workforce by incentivising new entrants, providing capital investment and addressing scale of operation and security of tenure, adding that in the future it would become more important for farm businesses to spread their costs over a larger area and potentially increase output by increasing the average holding size.

One organisation suggested that if the schemes were to be removed, alternative methods of support should be examined and these should be related to taxable income to ensure real benefit.

Another organisation suggested that if the schemes were to be continued, eligibility should be extended to forestry.

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

Forty-seven responses included comments about this question, 32 were from organisations and 15 were from individuals.

Fifteen responses, 10 organisations (the majority of which were farming focussed) and five individuals, highlighted the need for farm businesses to be profitable. Fourteen responses, from 11 organisations (the majority of which were farming focussed) and three individuals, stressed the importance of securing access to land on longer tenure.

Twelve responses, from 10 organisations and two individuals, identified tax incentives as an effective lever for encouraging landowners to either sell land or to let land under longer-term lease. Two farming focussed organisations suggested that if the introduction of tax incentives was not possible, DAERA should consider how its policies could be flexed to incentivise longer leases.

The importance of agricultural property relief was noted by one organisation, and another suggested that there should be no capital gains tax or inheritance penalties for those under the age of 40 if agreements were entered into.

One individual called on DAERA to work with the relevant professions to improve farmer knowledge of the tax regime, particularly inheritance tax.

One organisation suggested that taxation policies should be examined to ensure that no perverse incentives had been set up that would encourage older farmers to continue their businesses simply to gain the benefits of favourable tax treatment.

Sixteen responses offered views on measures to encourage the exit of older farmers. The suggestions were as follows:-

- Ten responses (eight organisations and two individuals) suggested a retirement scheme.
- Two responses (one organisation and one individual) suggested providing farmers with a mentor on succession planning and signposting professional advice.
- One organisation suggested that an early retirement payment could be offered to older farmers who engaged in a joint venture with a younger farmer.
- One farming focussed organisation suggested some form of “succession payment” as many farmers were reliant on the state pension and rarely considered retirement.
- One individual suggested direct engagement with all farmers over 55 years of age to develop a business plan for generational renewal.
- One individual suggested a match funding voucher to engage legal and accountancy professionals to plan for succession.
- One organisation suggested relaxation of planning laws and promotion of social housing in rural areas to enable older farmers to obtain alternative accommodation in the locality upon retiring.
- One organisation suggested a Farmers’ Welfare Scheme based on profit generated and not on assets owned or turnover.

Eight responses offered views on potential schemes. The suggestions were as follows:

- Three organisations suggested top-up grant rates of 10% for young farmers and those farming in the Severely Disadvantaged Areas.
- Three organisations, one of which was farming focussed, advocated measures that would encourage and develop farms where two generations are working together. One of these suggested a Joint Ventures and Matching Service to encourage older farmers to partner with younger farmers in a mutually beneficial farming arrangement.
- One farming focussed organisation suggested the retention of the Young Farmers' Scheme and Regional Reserve flexed to encourage productivity, professionalism and succession planning.
- One organisation suggested an outcomes-based approach with educational activities/programmes to support practical understanding of farm business management.
- One environment focussed organisation said that "a one size fits all" approach would not work and suggested consideration of specific localised farmer-led schemes which addressed the issues within an area.
- One organisation suggested continued support to young farmers and new entrants in order to get them established in the business, which would include financial, educational and health and safety measures.

Six responses, from five organisations (the majority of which were farming focussed) and one individual, offered views on possible financial instruments. Suggestions included: the use of loans; loan guarantee schemes; loan investment schemes; interest rate subsidies; capital allowances; capital grants; and capital investments. One organisation suggested tax incentives for working in adjacent industries (e.g. food processing) or widening agricultural restriction clauses for residing in rural dwellings.

Six responses, from five organisations (four farming focussed and one environment focussed) and one individual, suggested that the age restriction that currently applied to new entrants may work against generational renewal and should be reconsidered. The environment focussed organisation said that the real concern was to see more farmland in the hands of proficient people, adding that the engagement paper's thinking that access to schemes might be skewed towards those with training might promote this.

Three responses, from two organisations (one of which was environment focussed) and one individual, made reference to education and training. One organisation said that higher level training for farm business managers could facilitate generational renewal, and the environment focussed organisation said that DAERA should consider whether raising the qualification level to Level 3 would have a positive or negative effect on generational renewal and indirectly on rural communities within certain types of enterprise. The individual pointed to evidence in the Republic of Ireland that showed productivity and efficiency gains when farm businesses were under the control of educated farmers.

Four organisations, two of which were farming focussed, identified a range of other commercial arrangements designed to minimise capital investment for new entrant farmers. These included: farming partnerships; share farming; contract rearing; cow

leasing and producer groups. Six responses, from five organisations (the majority of which were farming focussed) and one individual, highlighted the importance of the Land Mobility Scheme to assist generational renewal. One farming focussed organisation suggested that the Scheme would presumably benefit from incentives to increase participation.

Two responses, from one farming focussed organisation and one individual, made reference to the importance of business scale to securing sustainable, viable enterprises. The individual suggested the need for a mechanism to facilitate the merger of small farms into more viable sized units.

One organisation referred to the need to support forestry new entrants. They noted that under the current rules a young farmer could qualify for a higher level payment provided they had agricultural training or qualifications and suggested this should be amended to ensure “a level playing field” for new entrant investors who purchased land to create woodland. One individual suggested that a land management policy which integrated all land management uses would encourage new entrants into land based industry.

Two organisations, one farming focussed and one environment focussed, identified the need for an evidence base for generational renewal and the need to apply effective indicators for measuring the success of interventions. One suggested the need for an immediate survey of succession intentions across the production sector.

Other suggestions

- One organisation suggested that a more innovative outreach programme should be considered, noting successful models introduced in the Republic of Ireland and Scandinavia.
- One organisation and one individual thought it would be important to facilitate/fund succession planning.
- One individual suggested that approaches to achieve generational renewal needed to be developed in conjunction with farmers themselves and by broader engagement with the younger generations.
- One farming focussed organisation suggested that young farmers should be encouraged to engage in pension schemes to assist generational renewal in their lifetime.
- One individual suggested using a proportion of direct funding to improve the economic and environmental sustainability of farm enterprises, subject to proper procedures and conditions.
- One individual felt that fewer unworkable rules from DAERA would facilitate generational renewal.
- One organisation said that the Framework should set prices and marginal profits for producers, and one individual highlighted the need for a stable market in order to provide an adequate income for a farming family.
- One farming focussed organisation said that the presence of an anaerobic digester in an area was skewing conacre prices for farmland that could otherwise be used for direct primary production. A review of support should be undertaken to ensure that this sector was not being double subsidised through a combination of Renewable Obligation Certificates and direct agricultural support.

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?

Forty-eight responses included comments about this question, 36 were from organisations and 12 were from individuals.

The vast majority were supportive of retaining the requirements with the potential for amendments as detailed in Section 2.7 of the engagement paper. Where comments/suggestions have been made, these are summarised below.

Active farmer

Thirty-five responses provided comments on this issue, 26 were from organisations (the vast majority of which were farming focussed) and nine were from individuals. Of these, one individual favoured abolition of the requirement.

Two organisations said they were content for the current active farmer definition to remain until 2021 to provide stability, but suggested that alternative arrangements should be explored to target “genuine active farmers” post 2021.

Five responses, three organisations and two individuals, suggested the need for a minimum stocking density requirement.

Two organisations suggested the focus should be on the active management of land, and another organisation felt that an active farmer should be one who is “actually engaged in production”. One individual suggested that the viability of an enterprise should be a consideration.

Two organisations felt that the current assessment of active farmer status is subjective and inconsistent. A further two responses (one organisation and one individual) emphasised the need to continue to review and remove support from non-active farmers.

One individual said that the active farmer provision is a double-edged sword. While the aim is to provide support directly to the farmer, the landowner must recoup his loss of entitlement payment resulting in higher land rental prices.

One organisation emphasised that the term “active farmer” does not in any way link to farm output and suggested that direct payments should be directed towards full-time farmers whose sole income is from the farm. It also advocated a move from an area payment to a production linked payment.

One individual suggested that just acknowledging the existence of agricultural activity as a condition of payment seems counterproductive to the notions of sustainability and resilience and stated a preference for an outcomes-based payment based on the NI vision for agriculture.

Land eligibility

Thirty-five responses provided comments on this issue, 27 were from organisations (just over half of which were farming focussed) and eight were from individuals. Of these, one individual favoured abolition of the requirement.

Two responses cited negative consequences of the current eligibility rules and noted the opportunity to review the rules to ensure they delivered appropriate outcomes for the environment and biodiversity.

Three organisations suggested that areas deemed ineligible should be specifically detailed on an actual map for the farmer.

One organisation said that the “managed for agricultural activity test” had diminished the public good value of some land for questionable productivity and noted that different metrics would be required to determine land eligibility for a public goods payment. One individual noted that the definition of eligible land as land managed for agricultural activity drives a desire to maximise eligible hectares to the detriment of sustainable farm businesses and a resilient countryside. They suggested that eligible land must be land that contributed to the desired outcomes of the NI vision.

One organisation suggested that where a minimum stocking density appropriate to land type (e.g. severely disadvantaged area) could be met then all of the area should be considered eligible.

One organisation suggested the rules should be reviewed to show that eligible land was productive land.

One organisation highlighted the fact that many archaeological sites were located on farmland and would welcome discussion as to what “active management” entailed and whether it would threaten these sites.

One organisation suggested that if rush covered land could be considered eligible for payment, the incentive to spray MCPA would be removed and water quality improved. One individual suggested that land eligibility should only be for land which could support a viable farm and should reflect land quality and area.

Cross compliance

Thirty responses provided comments on this issue, 24 were from organisations (just over half of which were farming focussed) and six individuals.

Six responses, from five organisations and one individual, favoured a warning system before consideration of a penalty with four of these advocating greater use of the “yellow card” in cross compliance.

Two responses, from one organisation and one individual, said that cross compliance had held in check a huge amount of environmental damage and must be retained to encourage compliance and allow for the effective sanctioning of damaging practice.

One organisation called for a review of the cross compliance penalty matrix, which they believe to be unfair.

One organisation suggested the removal of the dates for spreading organic and inorganic fertilisers and replacing them with a more science-based approach as outlined in the Sustainable Land Use Strategy.

As regards any review to ensure that measures were appropriate to Northern Ireland, one organisation emphasised that there should be no downgrading of requirements relating to animal health, animal welfare, public health and food safety, and another organisation said it would be important to continue to make payment conditional on compliance with certain food safety/quality, environmental, animal welfare and occupational safety standards.

One organisation said that recipients of support should continue to be bound by cross compliance obligations as these required compliance with existing legal obligations. One organisation suggested that the removal of cross compliance would represent a grave threat to the historic environment.

One individual suggested that cross compliance could be very useful post-Brexit if environmental governance was undermined more generally. They also said that there was a lack of clarity as to what was being proposed by DAERA as different stances appeared to be taken across the engagement paper.

Key dates

Twenty-four responses provided comments on this issue, 19 were from organisations (the majority of which were farming focussed) and five were from individuals.

Two responses, from one organisation and one individual, identified a need to minimise the impact on those farmers going through inspection. They both suggested that a proportion of the payment should be made to the farmer in advance of the processing of the inspection findings. One suggested that 50% of the payment should be paid as normal and the balance paid following the processing of the inspection results.

One organisation saw no reason to change current dates for direct land-based payments. However, they would welcome more flexible start dates for agri-environment agreements.

One organisation said that the application process and date of payment were well established and should be retained, and another organisation said that continuing to maintain the current arrangements would provide clarity and certainty over cash flows for businesses.

One organisation suggested that key dates for submission of the Single Application Form and payment should be retained, with 100% of payments being issued from mid-October.

Penalty regime

Thirty-one responses provided comments on this issue, 26 were from organisations (just over half of which were farming focussed) and five were from individuals.

Nine responses, from eight organisations and one individual, suggested the use of a warning system before consideration of a penalty with four advocating the use of the "yellow card" approach.

Two organisations suggested the need to review the limits on maximum penalties to ensure they were proportionate but yet acted as a deterrent.

One organisation felt that a percentage system for fines should not be used as it discriminated against larger farms.

One organisation suggested that during transition, when many farmers would have difficult business decisions to encounter, a more supportive system should be considered other than penalties which were often disproportionate and untimely, often going back up to eight years.

One organisation stated a preference for a system that would incentivise good practice as opposed to a penalty based system.

One organisation expressed support for the “polluter pays” principle for environmental damage.

One organisation suggested using the transition period to pilot new approaches, including simplification of the penalty regime and revision of penalties as well as inspection rates and methodology.

One organisation suggested that any future penalty regime should reflect the finite nature of the historic environment.

As regards a review of the penalty regime, one individual said that it would be essential to reflect on what the objectives were and what made a proportionate penalty.

One organisation felt that there was little justification for change in the timeframe available.

Retrospective penalties

Twenty-two responses provided comments on this issue, 17 were from organisations (the majority of which were farming focussed) and five were from individuals.

Three responses, from two organisations and one individual, said they were opposed to retrospective recoveries.

Two organisations agreed that the principle of retrospective recoveries required re-examination to ensure they were proportionate and equitable to all parties. One emphasised that there must be recognition of the principle of proportionate effort in the recovery of small sums.

One organisation said that a more supportive system other than penalties should be considered as penalties were often disproportionate and untimely, often going back up to eight years.

One organisation felt there was little justification for change in the timeframe available.

Inspection regime

Twenty-nine responses provided comments on this issue, 22 from organisations and seven were from individuals.

Three responses commented on the use of technologies. One environment focussed organisation noted that accurate inspection to accompany payments would be essential in the future and digital technology advances, particularly remote sensing, offered cost-effective solutions. It noted that the technology would need to meet the user requirements of both DAERA staff and farmers, and the expansion of NI broadband and 5G capabilities would need to accompany the process. One organisation said new technologies such as smartphone apps, drones etc. should be leveraged to create a robust system at modest cost. One individual said the use of technology and a “traffic light system” could reduce the burden of inspections whilst incentivising good practice.

One farming focussed organisation stressed the need for more workable notification for remote-sensing inspection, and one individual said they would like to see more reliance on remote rapid field visits and an assessment of the actual area of ineligible land within a field rather than the whole field being declared as ineligible.

Two farming focussed organisations were concerned that subjectivity in the inspection process led to inconsistency in interpretation. They said that inspections pending or awaiting results should never impede the issuing of an advance payment to all businesses at the same time and they suggested that retention of 30% of payment should be sufficient to cover any if not all penalty situations with the option of recoveries as at present.

One farming focussed organisation emphasised the need for a more efficient and effective risk-based inspection system that took account of “earned recognition”.

One farming focussed organisation suggested that following a negative finding at inspection, the first stage should be advisory followed by enforcement if advice was ignored, and one individual suggested that farmers should receive a report which allowed for remedial action to be completed.

One farming focussed organisation suggested using the transition period to pilot new approaches including simplification of the penalty regime and revision of penalties as well as inspection rates and methodology.

One farming focussed organisation suggested that Defra's Stacey Review may be pertinent.

One individual said the inspection regime “must be beefed up”.

Another individual questioned the benefit of an annual review if the proposed transition period was 2020/2021, and one organisation highlighted the need to signal any changes in a timely manner.

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

Twenty-four responses included comments about this question, 18 were from organisations and six were from individuals.

One organisation said that in carrying forward the present regime on a temporary basis, the rules were likely to remain largely similar and that policy effort was better spent on designing the post 2021 regime.

With regard to being recognised as an active farmer, one individual suggested a need for greater flexibility in the sale of crops off-farm such as grass and arable crops in bulk.

One farming focussed organisation said that future direct payment schemes should take a common-sense approach with a more structured penalty system, and an appeal system which was fair and time bound.

One farming focussed organisation suggested that the “use or lose” rule for payment entitlements could be removed as it was an extra source of confusion, especially if the regional reserve was being removed.

One individual suggested that payment to new entrant young farmers should be capped at 50 hectares to prevent opportunistic activity to attract subsidy.

One farming focussed organisation expressed a preference to freeze the value of entitlements at the end of 2019 and abandon any further move towards a flat rate payment.

One farming focussed organisation suggested that stability for the short-term transition period was important. The opportunity should be taken to pilot new approaches during this interim period including simplification of the penalty regime, revision of penalties as well as the inspection rates and methodology.

One organisation suggested that a requirement for a stocking density reduction or improved land management practices within drinking water catchments could have a beneficial impact on run-off water, and therefore raw water quality, at abstraction points.

One organisation said that if rush covered land was considered eligible for payment this could remove the incentive to spray MCPA.

One individual suggested that the limits on hedge width and height needed to be revisited and the closed season for hedge cutting needed to be extended to end August to halt interference with later nesting birds. The whole issue of hedge cutting needed to be re-examined in order to increase the services provided by hedges in terms of crop and stock protection and provision of pollinators and natural insect pest control.

One farming focussed organisation said that care should be taken on introducing change given the challenges and difficulties associated with implementation.

One farming focussed organisation suggested that all areas that had generated refusals and penalties which may be perceived to be disproportionate should be examined.

One environment focussed organisation suggested that all payments made on a per hectares basis should be equal.

Productivity

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

Fifty-nine responses included comments on this question. Forty-four were from organisations (19 were farming focussed and nine environment focussed) and 15 were from individuals.

Twenty-six responses from 19 organisations (10 farming focussed and three environment focussed) and seven individuals were supportive of the proposal for a “Productivity Grand Challenge” approach to deliver a step change in the rate of advance in science and innovation and three were not. Eight responses, from five organisations and three individuals, expressed reservations, citing the small-scale farm system in Northern Ireland; the potential of damage to the environment at the expense of productivity; and an adverse impact on prices.

Sixteen responses from 13 organisations (two farming focussed and seven environment focussed) and three individuals said that environmental issues needed to be considered. Eighteen responses from 12 organisations (six farming focussed and six environment focussed) and four individuals wanted consideration of profitability to be included. Three organisations suggested that economic performance needed to be understood, and one farming focussed organisation suggested that economic sustainability would be a more important driver. Two organisations and one individual suggested that international competitiveness was important. Six responses from five organisations (two farming focussed and three environment focussed) and one individual linked productivity with players across the whole supply chain. Two farming focussed organisations asked what part of the food chain would most benefit in financial terms from increased production, asking if there would be any price commitment or guarantee of margins for producers to sustain productivity.

Three organisations (of which two were farming focussed) and one individual said that funding should come from the Departmental agricultural budget, and two farming organisations said that it should not come out of the existing agricultural budget.

Ten organisations (five farming focussed and three environment focussed) and one individual supported the integration of science, knowledge exchange and education. Six (mostly farming focussed) organisations and one individual supported the multi-actor approach. Six (also mostly farming focussed) organisations and one individual supported a long-term approach, and one of those farming focussed organisations suggested that the proposed 5-year limit on research programmes was insufficient to research in a serious manner.

Nine organisations (three farming focussed and three environment focussed) and one individual expressed views about the importance of application and adoption of results and advances by farmers. For example, the involvement of farmers in setting the direction of research and new delivery approaches to encourage greater innovation. Three environment focussed organisations suggested that appropriate soil management had benefits for productivity and two organisations (one farming focussed and one environment focussed) included soil sampling and analysis in

suggestions for a coordinated learning and research approach. Two individuals pointed to the need to understand local levels of soil fertility and one environment focussed organisation was concerned about the risk of soil erosion.

Six organisations (two farming focussed and three environment focussed) and one individual acknowledged the importance of animal health and welfare to productivity. In contrast, one individual suggested that animal welfare was being given a higher priority than soil studies to the detriment of making progress.

Four responses from two organisations (of which one was farming focussed) and two individuals suggested support for other sectors including horticulture, poultry, beef and lamb production, the arable sector and all rural land uses including forestry.

Three organisations (of which one was farming focussed and one environment focussed) called for Government support to improve broadband coverage.

Examples of other approaches

Four responses suggested that the Department should look closely and learn from other approaches including the ABP Better Farm Programme / Better Farm Challenge; Ireland's Bord Bia; the Irish Cattle Breeders Federation database; and linking to Northern Ireland draft Industrial Strategy, 'Innovation Strategy and Smart Specialisation Framework'.

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?

Fifty-eight responses included comments about this proposal. Forty-two were from organisations (of which 18 were farming focussed and seven environment focussed) and 16 were from individuals.

Fifty-three responses from 40 organisations (16 were farming focussed and seven environment focussed) and 13 individuals supported the proposal. Two individuals were not supportive of the proposal – one said that there was enough emphasis on education already and suggested instead more free soil testing, and blood, forage and silage analysis. Another individual suggested that unless there were changes in the wider agricultural enterprise, education was not sufficient to bring about change. Fifty-four responses on Template 2 also welcomed this approach of industry engagement with formal training initiatives.

Comments supporting the proposal

Eight responses from seven organisations (three farming focussed and two environment focussed) and one individual suggested that it made the sector more efficient, competitive and profitable. One organisation suggested that better educated farmers run more productive and innovative farming enterprises. Another organisation suggested that there were significantly greater gains in land moving into the hands of the trained than in moving it out of the hands of older farmers.

Five organisations (two were farming focussed and three environment focussed) suggested that education could play a key role in delivering environmental benefits. One environment focussed organisation and one individual suggested that a relatively small investment in research and knowledge transfer in the area of public goods would produce a relatively big change in the profitability of many farms once payment for public goods outcomes commenced.

Two farming focussed organisations noted that acquisition of expertise determined the viability of agriculture. One organisation and one individual suggested that there were gaps in many farmers' knowledge and saw education as the way to improve environmental knowledge and understanding of the factors that underpinned their business such as soil science, nutrient cycles, and plant and animal health.

Another organisation suggested that Knowledge Exchange needed to have a high priority, especially for those subjects without local education or research provision. Another individual suggested that a high proportion of farmers were stuck in the past and had no desire to learn or adopt new innovation or efficiency.

Observations and suggestions

Five responses (three of which were from farming focussed organisations) opposed making education and knowledge transfer compulsory or a condition of schemes.

One organisation suggested that it should be relevant and be of benefit to the participants. One organisation suggested that life-time experience also needed to be taken into account and one individual stressed that there should be no emphasis on

formal qualifications as there were many extremely knowledgeable and capable farmers who could not complete an academic course.

Another three farming focussed organisations said that education was always to be encouraged but should not be essential, and went on to suggest that Level 2 should be sufficient for anyone entering the industry. Another organisation and an individual also viewed Level 2 attainment as a recognisable and acceptable level for maintaining the farm/producer standards.

In contrast, a different farming focussed organisation suggested that from 2021, a Level 3 qualification should be required to become the head of a business. It went on to say that it hoped that CAFRE would be able to deliver these courses to a high standard.

One farming focussed organisation stressed that it was through enhanced knowledge and the adoption of technologies on farms that change would happen and positive outcomes would be delivered.

One individual suggested that Northern Ireland farms must be able to avail of reliable research and analysis of current best practice.

One organisation and one individual suggested a forestry skills study, similar to that undertaken in England and Wales, citing significant opportunities for a more integrated rural labour market, because of many transferable skills between farming, forestry and other land management industries including planning, soil management and machinery operation.

One farming focussed organisation said that to supplement the provision of training, Government could play a major role in facilitating the further development of industry-wide benchmarking systems. Another farming focussed organisation suggested that in this digital age, Government needed to ensure that infrastructure as well as skills were in place.

One individual promoted the work of the Agriculture and Horticulture Development Board (AHDB) as an example of what could be done.

One farming focussed organisation urged DAERA and Queen's University to consider reinstating an agricultural science degree as a matter of urgency because of the challenge facing the NI ruminant livestock sector in its ability to recruit and retain livestock scientists.

Approach

Four organisations and one individual suggested that incentives should be offered to encourage farmer engagement. Suggestions included cash, grants, farm and land transfer tax breaks or incentives, and stamp duty. Two organisations and one individual supported online delivery and another individual suggested that knowledge transfer could be further improved by having more information available online.

Three farming focussed organisations and one environment focussed organisation commented on the nature and source of training providers. Two farming organisations

suggested that the present administrative capabilities and training capacity should be examined as it would be more cost effective to supplement their present numbers than to train others who then work for outsourced administration to deliver projects. The environment focussed organisation also suggested giving consideration as to the nature of the education and where it was obtained. The other farming focussed organisation said that involvement of the veterinary profession would be integral to converting knowledge into action and thus achieving animal health, animal welfare, environmental and productivity gains.

One organisation and one individual suggested that an indicative budget should be included in the Framework for this work.

One organisation stated that it was disappointed that Business Development Groups had ceased. One individual said that many farmers would be happy to go to Business Development Groups, but the cash incentives would need to be re-established again. One individual said that education and knowledge transfer should be available to all land use managers but wasn't in the current Business Development Groups, which did not reflect land uses other than the principal agricultural sectors in NI.

One organisation suggested CPD with flexible delivery, and another said that programmes should be tailored in terms of content and flexibility to meet the needs of the farming community.

One organisation suggested that the design and delivery of educational initiatives must take account of the low levels of literacy and numeracy skills amongst some older farmers.

One organisation suggested that improving economic prosperity required total engagement along the entire supply chain starting with education and going right through to the consumer.

One individual suggested that investment in education and knowledge exchange must be coupled with policies to ensure the supply chain returned a fair price for agricultural produce.

Content

A number of responses included suggestions about the content of education programmes. Four organisations, two of which were environment focussed, suggested the requirement to identify and communicate tried and tested scenarios in which positive environmental land management has provided significant benefits to farming systems including productivity benefits.

Two environment focussed organisations suggested that by linking with science, innovation and research, the key role of positive environmental management could be recognised and communicated to all within the industry. Their responses each gave the example of management practices like soil testing to facilitate reduced fertiliser applications, reducing costs and thereby helping productivity and profitability.

One environment focussed organisation called for sustainable, resilient farming and land management methods that delivered holistic benefits for the environment, society

and economy. Another environment focussed organisation suggested conservation of biodiversity, ecosystem services and actions for climate change. One organisation and one individual suggested public goods provision.

One organisation suggested a wider range of degree courses - for example, pure agriculture and agriculture with added disciplines like economics or the environment. Another organisation suggested understanding of managing business costs and financial planning as well as technical knowledge

One organisation called for best practice when using pesticides and the principles of protecting water quality and avoiding pollution.

One organisation suggested that farm safety needed to play an important part of the education process.

Challenges

One farming focussed organisation suggested that there was a challenge in reaching those on whom knowledge transfer initiatives have so far had little impact

Another organisation and one individual pointed to the challenge of peripheral areas, small farms and areas of disadvantage.

One organisation suggested that the transition from education into the work place was daunting and often challenging for individuals. It went on to suggest that creative schemes such as sponsored internships and apprenticeships could ease the situation and should be extended across all sectors of the NI agri-food industry.

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?

Fifty-three responses included comments on this question. Thirty-nine were from organisations, of those 19 were farming focussed and five environment focussed, and 15 were from individuals.

Twenty responses from 15 organisations (of which five were farming focussed and two were environment focussed) and five individuals were supportive of the proposal. Nineteen responses from 12 organisations (of which 10 were farming focussed) and seven individuals were not supportive. Fourteen responses from 10 organisations (of which four were farming focussed and three were environment focussed) and four individuals expressed reservations.

Supportive

One organisation and one individual suggested that the requirement should apply to a wide range of land uses including forestry and not be restricted to agricultural training.

Two environment focussed organisations said that qualifications could help to further develop a process in which research-based evidence informed decision making.

Other comments included the view that farmers should be better trained and more knowledgeable about best practice; the public adoption of educational attainment should stimulate greater interest in self-improvement and may become a driver for generational change; and educational attainment was essential to achieve efficiency and increased profitability.

Views on delivery issues

One organisation suggested the need for new support above and beyond the existing investment (funding) and a need for online delivery and the use of new technologies.

One farming organisation also emphasised the importance of good internet access to facilitate blended learning and allow farmers to undertake online training. Another organisation suggested that due to the lack of broadband, or the poor quality and speeds attainable in rural areas, online delivery would not currently be feasible.

One environment focussed organisation urged a review of educational providers to ensure capacity to manage future formal training initiatives, especially those regarding sustainable agriculture.

One individual advocated a modular system to provide sufficient time for farmers to reach the required standards.

Proposed content / focus

Six organisations (five of which were environment focussed) suggested that environmental matters should be included. One organisation suggested business management should be included, and another highlighted the poor Health and Safety record in Northern Ireland and suggested that this might be a priority area.

Views on the minimum level of qualification

Eleven organisations (six were farming focussed) and three individuals expressed their opinions on an appropriate level of training. Five organisations (three were farming focussed) and one individual suggested that a Level 2 qualification in agriculture should be sufficient with the individual specifying that it should not be compulsory.

One farming focussed organisation suggested that education and training should focus on continual development rather than attainment of academic qualifications, and another organisation called for training pitched at an appropriate technical level, not overly academic and delivered by those who had practical experience in the sector.

One farming organisation was supportive of the idea that from 2021 a Level 3 qualification should be required to become the head of a business. However, another farming focussed organisation agreed that while a Level 3 qualification was a valid aspiration for an education strategy, it was too blunt an instrument to be used in isolation as a determinant for funding/access to services, pointing out that many existing farmers and leaders in their sector were not qualified above the College Certificate (Level 2) and older farmers would not have had the opportunity to study to Level 3. One organisation suggested that it could be prohibitive to demand a Level 3 qualification and that support needed to be provided to those individuals with learning difficulties and other basic skills deficits to access Level 2 and 3 qualifications.

In contrast, one individual suggested that a sliding scale could be used with Level 4 the aspired baseline. Another organisation suggested that subsidising CPD courses or higher qualifications (Level 4 and above) would allow for further career progression on a 'life-wide learning' basis.

One organisation expressed a preference for subsidised short but topic-focused courses which brought together small groups of farmers as opposed to formal individual training; and one individual suggested that it could be a siphon of money towards training providers delivering "bums on seats" qualifications.

Reservations

Nine responses from six organisations (five were farming focussed) and three individuals cautioned against making education levels a mandatory requirement.

Four of those organisations and two individuals felt that it could be perceived as discriminatory or seeking to penalise non-participants and those without formal qualifications. Two farming focussed organisations did not wish ever to set up multi-tier farming where some believed they were inferior to others due to education attainment. Neither did they wish to have a "licence to farm".

One farming organisation strongly supported the proposal that a reduced risk rating for official inspections should be attained through earned recognition for a history of previous compliance rather than on educational attainment. However, another farming focussed organisation said that attempts to use measures of earned recognition to reduce inspections offered less relief than might be thought.

Two organisations suggested that experience and knowledge should be recognised and another suggested that relevant qualifications did not guarantee the success of a farm business. Two environment focussed organisations suggested that to be worthwhile, formal training initiatives needed to provide clear benefits to farmers and land managers, otherwise formal training initiatives would be viewed as a burden on time and resource.

One organisation said that the approach would not work in the short term for horticulture, as those already in horticulture at all levels had such a wide variety of educational backgrounds.

One individual asserted that the farmer with no qualifications but a wealth of experience was far smarter than a person with a load of diplomas and not one ounce of common sense. One farming focussed organisation and one individual suggested that farmers who did not meet minimum education levels could be assessed from a competency perspective. The organisation suggested that enterprise performance and benchmarking figures could be an effective indicator of competence.

Several responses suggested that individual farmers could have their own difficulties in attending courses or training. One organisation pointed to issues such as social isolation, or anxiety from older farmers with regards to attending an educational course for the first time, maybe being impediments to some farmers' participation. One individual suggested that given the current financial state of the industry farmers would not have the time to attain qualifications. Another said that many farmers did not really like the classroom. The response went on to suggest that if they did they would probably not be farming and that formal training would be more successful in Business Development Group situations. One organisation suggested it was imperative that individuals were not alienated for not engaging with education and training schemes.

Other comments and suggestions included:

- the need for a balance to be struck to ensure there was no discrimination against equally competent farmers who didn't have/need formal training but would benefit from the support of any policy interventions;
- interventions that were incentive based rather than penalty based;
- experience, lifelong learning and CPD to be recognised as well as formal qualifications;
- employment of external experts by farmers for advice should negate the requirement to undertake training in certain areas;
- incentivising attendance by providing preferential access to schemes risks leaving behind those struggling to get training due to issues of time, confidence etc.;
- the need to pay attention to how incentives were presented in order to ensure a positive response;
- setting incentives provided there was evidence that education brought benefits;
- funding schemes that did not disproportionately benefit those who had been able to gain qualifications due to historical differences between the two communities in Northern Ireland;
- incentives for older farmers based around sharing their knowledge and experience with younger generations; and
- a need for a strategy which contributed to the future competitiveness of the UK.

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

Fifty-five responses included comments on this question. Forty-one responses were from organisations (20 of which were farming focussed and six were environment focussed) and 14 responses were from individuals.

Of the 55 responses received, all expressed strong or fairly strong support for the concept of CPD.

Three organisations (of which one was farming focussed and one environment focussed) and two individuals noted that CPD was used in other industries and therefore could/should be applied to agriculture.

One environment focussed organisation and one individual did not support the proposal to create a link between participation in CPD and access to financial support, and the individual felt that it would not support productivity and may have the opposite effect.

Two farming focussed organisations suggested that CPD should not be compulsory with one of them suggesting that such an approach could be perceived as discriminatory. Another farming organisation suggested that positive rather than coercive incentives should be used, and four responses (two organisations and two individuals) felt that finding the time for CPD would be problematic for some farmers.

Funding

Thirteen responses from 12 organisations (four of which were farming focussed and four environment focussed) and one individual provided comments on funding issues.

Four organisations (three of which were farming focussed) and one individual had concerns regarding the source of the necessary funding. Of these, three organisations (two were farming focussed) stated that direct payment funds must not be used. One farming organisation suggested that funding should come from other public sources and one individual suggested that the agriculture budget must be ring fenced. Other comments included suggestions that additional funding above the current level would be required and the cost of administering and monitoring a CPD programme must also be taken into consideration.

Four environment focussed organisations suggested the need for a clear evidence-based rationale to justify the funding of CPD from the public purse. Of these, two acknowledged that while public funding may be necessary in the short term, in the longer term CPD should be seen as a necessary part of investment by land managers themselves. One of those queried the burden on the public purse, pointing out that the taxpayer was not expected to fund CPD in any other business sector. It also suggested linking to indicators in the Programme for Government and other high-level country strategies.

One farming focussed organisation observed that public funds already provided subsidised free development, advice and education to a greater extent than most industries and questioned whether more was required. Another farming organisation said it should be funded from other public sources. One organisation said that CPD was a necessity but so too was the investment of public funds to support the sector.

Content / focus of a CPD programme

Nineteen responses from 15 organisations (of which five were farming focussed and four environment focussed) and four individuals offered views on content.

There was a strong view that CPD programmes must have a focus on environmental sustainability and delivery of public good. Six organisations (three of which were environment focussed) suggested that environmental sustainability should be incorporated into all training programmes.

Other suggestions included farm business management; productivity; profitability; efficiency; development of a farm business plan; links into an earned recognition scheme; a full appreciation of all aspects of food production and land management; animal health and welfare; antimicrobial resistance; and carbon usage.

One farming focussed organisation said that it must be targeted at genuinely active farmers, and another organisation and one individual suggested the inclusion of all land management professions including forestry.

One environment focussed organisation suggested that CPD should be underpinned by sound science, and went on to say that DAERA should ensure the quality and relevance of provision if accredited providers were used. One individual encouraged exposure to high-quality agricultural advisors and farmers, including those outside DAERA.

Delivery models / issues

Thirteen responses from 10 organisations (of which six were farming focussed and one environment focussed) and three individuals offered views on potential delivery models.

Suggestions included a credit points scheme possibly linked to peer learning; farmer collaborative vehicles to share good practice/experience; vouchers schemes; a modular delivery system; informal farmer-to-farmer discussion groups; schemes that were practical, easy to administer with minimal recording requirements; flexible delivery; sessions offered continuously throughout the year; access for those in peripheral areas, small farms and areas of disadvantage; and online delivery.

One farming focussed organisation noted that a CPD points system already operated within agriculture i.e. BASIS. However, they suggested that extending such a scheme to all areas risked creating "an administrative monster". They suggested that the

proposed credit system implied that CDP events offered by CAFRE/AFBI would in the future be charged for and this was likely to reduce, not increase, uptake.

Another farming focussed organisation suggested the need for a strategy which contributed to the future competitiveness of the UK, particularly in the areas of investing in science, research & innovation and developing skills.

Examples of other approaches

Several responses suggested other best practice examples within and outside Northern Ireland including:

- A Forestry Skills Study for England and Wales;
- The CPD points schemes operated by BASIS; and
- UU Business School undergraduate Certificate in Continuing Professional Development, which was based on accumulation of credit points.

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?

Fifty-two responses included comments on this question. Thirty-eight were from organisations (15 were farming focussed and eight were environment focussed) and 14 were from individuals.

Thirty-three responses from 25 organisations (10 of which were farming focussed and six environment focussed) and eight individuals supported targeting investment in innovation and new technology uptake and aligning it to other strategic objectives, notably environmental performance. Two individuals were not supportive.

A further nine organisations gave qualified support as follows. Three organisations (two of which were farming focussed) suggested that a better understanding of the environmental issues and the works that have been carried out over the years on farms was needed. Four organisations (two of which were farming focussed) suggested that productivity and/or profitability also needed to be a priority, one of those suggesting that it should be targeted at specific environmental issues such as ammonia levels and water quality. One said that it must be additional to existing investment (funding) and should not disadvantage rural communities based on their location, size and the nature of their farming. One farming organisation said it would only encourage this proposal when it was backed up and proven by the relevant science and affordable to the majority.

Fifteen responses from 11 organisations and four individuals expressed a range of views about the importance of productivity versus the environment. Ten organisations (four were farming focussed and two environment focussed) and three individuals stressed the importance of balancing the objectives of productivity as well as the environment, and one individual cautioned against linking food production and environmental performance too closely as it could drive up cost. Two organisations (one was a farming focussed organisation) supported addressing environmental issues but not to the exclusion of productivity and profitability. One farming organisation said that production cannot come at the expense of environmental degradation. One individual said that investment must be made to ensure such intensification does not degrade the already pressurised natural environment.

Five organisations (one farming focussed and one environment focussed) and one individual suggested green infrastructure interventions including filtration ponds and shelter for stock. One environment focussed organisation suggested slurry injection in sensitive areas and one individual said that no subsidy should be paid on land used for anaerobic digestion.

One organisation suggested a “Green Bank” or “Green Fund” where application was made for co-funding high to moderate risk projects where there was a requirement for initial capital or underpinning of cash flow.

One organisation suggested that farms in Less Favoured Areas (LFAs), might be deemed unsuitable for this targeted investment.

Two organisations suggested that investment must be targeted to infrastructure as well as environmental improvements.

Four organisations (one farming focussed and three environment focussed) and one individual suggested that soil quality needed to be optimised.

One organisation and one individual suggested that the policy needed to be flexible and another individual suggested that regimented output-based grants did not necessarily encourage development and education.

One organisation and one individual suggested that the policy should apply to all rural land uses.

One environment focussed organisation asked for more detail on how environmental performance would be measured and one farming focussed organisation suggested that an appropriate weighting needed to be given to environmental performance. One individual suggested that it could be difficult to measure fairly.

Four organisations (one farming and three environment focussed) and three individuals commented or expressed concerns about having appropriate measures - for example, according to the circumstances of each sector or even each farm and targeting the most appropriate technology. One organisation suggested that risk was an important feature of the innovation process and a higher risk threshold should be considered. One individual said that care needed to be taken to avoid perverse outcomes, and another said that it was a bad idea and would just drive up the cost of purchase.

Five responses (including three from farming focussed organisations) supported collaboration and consultation with different sectors and one organisation also included universities and colleges.

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

Forty-one responses included comments on this question. Thirty-one were from organisations (15 were farming focussed and four environment focussed) and 10 were from individuals.

Twenty-five responses from 19 organisations (eight were farming focussed and two environment focussed) and six individuals supported the provision of investment incentives other than capital grant such as loans, loan guarantees and interest rate subsidies. One farming organisation and one individual were not supportive.

Two farming organisations raised concerns about the servicing of debt when cash flow could be interrupted, and another suggested that incentives other than capital grants would need to be thoroughly scrutinised so as not to leave investors in a vulnerable position.

Five responses (three of which were from environment focussed organisations) suggested that flexibility was necessary as individual farms would need different solutions, and one organisation suggested that the incentive should be flexible to adapt to market need.

Two environment focussed organisations suggested that business advice should be open to all, and one individual suggested that specific support through CPD should be offered.

One organisation and three individuals suggested that banks and other professionals would need to be involved. Another individual said that Government should not become involved in such financial matters other than to assist in the provision of skilled help in preparing cash flow projections.

Responses from three organisations (of which two were farming focussed) and three individuals included suggestions for what to invest in. These included new machinery and technology, amalgamating farms, joint farming and co-operation such as buying new machinery to use on different farms.

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

Forty-eight responses included comments on this question. Thirty-five were from organisations (16 of which were farming focussed and five were environment focussed) and 13 were from individuals.

Twenty responses from 15 organisations (of which 11 were farming focussed) and five individuals called for long-term land leases coupled with tax incentives, some suggested following Ireland's approach. Seven responses from four organisations (three were farming focussed) and three individuals suggested other tax measures including a tax credit for on-farm R&D; tax incentives for infrastructure investment; HMRC clarification that inheritance tax would not be applied to long leases; tax allowances/discounts for supply chains that proved all parts of the chain were working closely together; and inheritance tax relief.

Eleven responses from nine organisations (of which six were farming focussed) and two individuals focussed on the issue of succession planning and generational renewal. Three organisations and one individual were supportive of land mobility schemes, two farming organisations suggested examining the barriers to exit. Another farming organisation suggested facilitating older farmers to access a decent retirement and another organisation suggested retraining grants for farmers who wished to exit the industry.

Eight responses from seven organisations (of which one was farming focussed and four were environment focussed) and one individual suggested that strategies for improving productivity should be aligned with enhancing the environment and ecosystems. Five responses from four organisations (of which one was farming focussed and three were environment focussed) and one individual suggested various forms of CPD, knowledge exchange and business and marketing advice. One individual also proposed online production and publication of farming 'research briefs' on each sector. One farming focussed organisation suggested genetics schemes as an industry-wide initiative to improve aspects such as eating quality and not just the 'production' aspects of genetics such as growth rates.

Eight responses from five organisations (of which four were farming focussed and one was environment focussed) and three individuals suggested different types of support for local producers and processors. One environment focussed organisation and one individual expressed concern about competition from cheap imports that might be produced to lower standards and cost of locally produced food.

One individual suggested insurance schemes which both Government and producers would pay into each year and which farmers could then draw down on in difficult years, and measures to encourage co-operation between farmers through land, machinery or labour sharing initiatives and development of contract and share farming. One farming organisation suggested that generous support should be provided for integration and co-operation of Producer Groups.

Five responses from four organisations (of which one was farming focussed and two were environment focussed) and one individual called for various types of grants.

Three organisations (two were environment focussed) suggested loans. One organisation and one individual said that support needed to be long term. One organisation called for support mechanisms to be considered in tandem with a review of supply chains, and one individual suggested that the Government should provide financial incentives to encourage equitable and integrated supply chains.

One individual and one organisation supported implementation of the Strategic Land Management Policy.

Resilience

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

Fifty-seven responses included comments relating to this question. Forty were from organisations (of which 15 were farming focussed and eight environment focussed) and 17 were from individuals.

Thirty-five responses from 28 organisations (of which 13 were farming focussed and four environment focussed) and seven individuals expressed support for resilience payments. Six responses from five environment focussed organisations and one individual gave qualified support. One individual said that payment without strings attached should be resisted. Three responses from one organisation and two individuals suggested that woodland and forestry should be included, and one organisation and one individual suggested horticulture.

Three farming organisations suggested that the payment should be 50% of current entitlements. One organisation suggested 75% and another suggested payments should be at a lower level so as not to mask poor performance and inefficiency. Two organisations (one of which was farming focussed) and one individual preferred area payments and two environment focussed organisations didn't.

An additional 54 responses on Template 2 recognised the challenges faced by the local industry and suggested that failure to react quickly in providing the resilience support very often led to farms collapsing. It was suggested that an indicative budget should be included in the Framework for basic farm resilience support and that would bring about assurance and confidence in the industry.

Focus of resilience payments

Nine responses from eight organisations (of which two were farming focussed and five environment focussed) and one individual said that resilience payments should be directed to delivery of public goods and seven (nearly all environment focussed) organisations and two individuals suggested environmental goals. Six organisations (of which one was farming focussed and two were environment focussed) supported payments for market volatility and dysfunctionality and one individual did not. Five organisations (of which one was farming focussed and three were environment focussed) and one individual supported a focus on soil quality and fertility; and four organisations (of which three were farming focussed) and one individual supported productivity and profitability. One organisation suggested direct payment should be fully decoupled from production.

Three organisations (of which one was farming focussed) suggested payments for active farmers, and one farming focussed organisation suggested farmers for whom farming was their sole income source. Two organisations suggested smaller farms and those at higher risk. Three environment focussed organisations suggested payments for protecting and restoring the natural capital. Three organisations suggested weather events such as storm damage and one organisation suggested capital investment - for example borehole and irrigation systems to overcome drought.

One supported tax allowances to encourage farmers to set aside profit in a good year to be available in times of need.

Reasons for supporting a resilience payment

Twelve responses from 10 organisations (five of which were environment focussed) and two individuals expressed reasons for supporting a resilience payment related to fluctuating markets. Seven of those, including the environment focussed organisations, suggested that payments for positive environmental management provided a stable, reliable income source.

Eight organisations (of which four were environment focussed) and four individuals cited climate and weather related events. Eight organisations (of which six were environment focussed) and three individuals supported positive environmental management and restoring the natural capital. Six organisations (four of which were environment focussed) and one individual referred to animal and crop disease as reasons for supporting a resilience payment.

Three organisations and three individuals were concerned about protecting food supply and food quality, and two farming focussed organisations and one individual raised concerns about EU and post-Brexit trading arrangements.

Concerns about resilience payments

Nine responses from six organisations (of which one was farming focussed and four environment focussed) and three individuals expressed concerns about the risk of perverse incentives and/or outcomes. These included distorting market prices, incentives to engage in risky behaviours and the potential to restrain innovation and productivity. Two organisations suggested that the need for a resilience payment demonstrated a weak business model. Three responses from two organisations (one of which was farming focussed) and one individual said it shouldn't be used to support inefficiency or non-viable farms. One individual said it shouldn't be the primary support for farmers, and another said it would continue the handout trend. Two environment focussed organisations suggested the need for safeguards. Two responses from one farming focussed organisation and one individual expressed concerns about how it would be triggered and administered, with another individual suggesting a flexible system that allowed for different levels of support when most needed.

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

Thirty-nine responses provided comments relating to this question. Twenty-six were from organisations (of which 11 were farming focussed and four were environment focussed) and 13 were from individuals.

Seven responses, from three environment focussed organisations and four individuals, supported environmental objectives; four responses from one organisation and three individuals supported public good; one individual supported social objectives and two responses from one environment focussed organisation and one individual wanted a fixed budget. Three individuals thought payments should be area based and five organisations didn't think they should be area based.

Seven responses from five organisations (four of which were farming focussed) and two individuals suggested that payments should be related to productivity or outcomes. One farming focussed organisation said that payment should be directed at productive farmers; another farming focussed organisation suggested full-time farmers; and one individual suggested farmers who gained a certain percentage of their annual income from farming. One organisation and two individuals suggested that smaller farms should be paid more and one organisation and one individual included forestry and woodland creation.

Four organisations (of which three were farming focussed) suggested that changes should be gradual and another suggested a phased transition such as an annual reduction of 5% per annum up to 2025. Two organisations and one individual suggested basing payment on CAP payments and another individual suggested using previous tax returns. One organisation suggested targeting the number of full-time employees or number of livestock, and another suggested that the level of support should be determined as a percentage of loss of both infrastructure and sales because of extreme conditions.

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

Fifty-one responses provided comments relating to this question. Thirty-five were from organisations (12 of which were farming focussed and nine were environment focussed) and 16 were from individuals. In addition, 54 responses on Template 2 supported reinstatement of Areas of Natural Constraint (ANC) schemes.

Thirty-five responses from 25 organisations (of which seven were farming focussed and seven were environment focussed) and 10 individuals supported targeting of a basic farm resilience support payment to take account of issues such as natural disadvantage. Four responses from one organisation and three individuals were not supportive.

Sixteen responses from 13 organisations (one of which was farming focussed and eight were environment focussed) and three individuals suggested that provision of public good or public benefit by marginal, upland and disadvantaged areas should be supported. Five of those responses described the contribution of high nature value farming systems. The reasons for supporting areas of natural disadvantage included their potential to offer significant public benefits such as enhancing biodiversity, carbon sequestration, flood risk management and drought.

Seven responses from six organisations (one of which was farming focussed and four were environment focussed) and one individual were supportive of the opportunities offered by tourism, and three individuals supported inclusion of forestry. One farming focussed organisation referred to the vulnerability of the suckler beef and sheep sectors and one individual warned that dairy can also hit poor profits.

Six responses from three farming focussed organisations and three individuals called for direct support for SDAs. Another organisation and another individual (as well as the aforementioned template responses) said that the ANC scheme should be re-introduced. One organisation and one individual said that the Less Favoured Area Compensatory Allowance scheme had an adverse impact on management decisions and distorted what the land could have been used for more productively.

One organisation and one individual suggested that payments should be decoupled from production and four organisations supported payments linked to productivity.

Two responses from one organisation and one individual suggested that payments should not be a surrogate for income support or a means of maintaining, non-viable farms. One response from farming focussed organisations warned of the risk of the resilience payment trying to meet too many objectives.

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

Thirty-nine responses provided comments relating to this question. Twenty-nine were from organisations (nine of which were farming focussed and eight were environment focussed) and 10 were from individuals.

Twenty responses from 15 organisations (three of which were farming focussed and six were environment focussed) and five individuals favoured linking resilience support with cross compliance. Three responses from two farming focussed organisations and one individual did not support a linkage. Eleven responses from eight organisations (three of which were farming focussed and two were environment focussed) and three individuals suggested tying payments to meeting certain standards or regulations.

Eight responses from six organisations (one of which was farming focussed and four were environment focussed) and two individuals saw an opportunity to link payment to driving environmental objectives. Eight organisations (three of which were farming focussed and two were environment focussed) suggested changes and improvements to inspections, enforcement and how penalties were applied.

Three organisations suggested that cross compliance was in need of reform. Three responses from two environment focussed organisations and one individual suggested that cross compliance ensured recipients were operating on a level playing field. One organisation wanted a simple framework and one individual wanted measures that were reasonable, flexible and justifiable. One organisation cautioned that if cross compliance was set at an onerous level farmers would just opt out.

Five responses from four organisations (two of which were farming focussed and one was environment focussed) and one individual were concerned about productivity. Three of those, two organisations and the individual, referred to improving productivity of the soil health and one of those suggested a liming subsidy.

One environment focussed organisation saw some merit in retaining an element of an area based payment to provide an underpinning revenue stream. Two organisations said that payments should not be unqualified income support, but linked to meeting certain requirements. One farming organisation suggested that enforcement of cross compliance requirements should not be linked to crisis support measures or income resilience payments, which may only be periodic depending on market developments.

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

Thirty-three responses provided comments on this question. Twenty-three were from organisations (nine of which were farming focussed and four were environment focussed) and 10 were from individuals.

Three responses (two organisations and one individual) were in favour of the current cross compliance/good farming practice arrangements with one of those advising that it should be revisited in order to focus on the provision of public goods in the form of environmental care and enhancement.

One farming focussed organisation was not in favour of the current cross compliance arrangements, but was in favour of good farming practice and suggested that the penalty regime currently associated with cross compliance worked against it. One individual wanted to abandon the current regime.

Three organisations (of which two were farming focussed) suggested monitoring the worth of cross compliance/good farming practice, and one organisation suggested a review to measure the success of measures in the past.

Design and implementation

Fifteen responses from eight organisations and seven individuals commented on the design and implementation of the scheme. Suggestions included taking an appropriate and proportional approach to penalties with three environment focussed organisations pointing to Scotland's General Binding Rules (GBR). The same three organisations plus four individuals thought that the scheme should encourage positive action and allow farmers a chance to take remedial action. Five organisations (one of which was farming focussed and four were environment focussed) and one individual called for flexibility in order to allow for different land types and seasonal variations. Three environment focussed organisations advised on ensuring coherence across the UK.

Other suggestions were to make the scheme less bureaucratic; simplify checks; and have eligibility conditions that were evidence/science based, realistic and achievable.

Content and focus

Fifteen of the responses from 12 organisations and three individuals made suggestions about the content and focus of a scheme. These included comments on environmental protection, soil quality, animal health and welfare, forestry, productivity, public good, amenity and recreation value, and traceability. Out of the 15 responses, six organisations (of which four were environment focussed) and one individual wanted to protect the environment; three organisations (of which two were farming focussed) and one individual suggested encouraging good soil management; and four organisations (three of which were environment focussed) suggested safeguarding animal health and welfare.

One farming focussed organisation suggested that greening should be removed, and another suggested that payments should not be made to conduct activity that is mandated in law. One organisation suggested that the cross compliance rules should

be changed to ensure rushes became eligible as that would remove any incentive to spray MCPA as it was having a detrimental impact on water quality.

Examples of other strategies and approaches

One organisation and one individual referred to the Sustainable Agricultural Land Management Strategy; another organisation and another individual suggested the UK Forestry Standard; one organisation pointed to the Clean Growth Strategy in GB; and one individual suggested a tie-in with other standards such as Farm Quality Assurance audits, Freedom Foods and Lion Eggs.

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

Thirty-seven responses provided comments to this question. Twenty-seven were from organisations (of which 10 were farming focussed and four were environment focussed) and 10 were from individuals.

Four responses from three organisations (of which two were farming focussed and one was environment focussed) and one individual were content with the current regime. Eleven responses from five organisations (of which two were farming focussed) and six individuals suggested environmental factors and four of those (three organisations and one individual) also included productivity. Five responses from three organisations (of which one was farming focussed) and two individuals suggested good farming practice.

Four organisations (of which three were environment focussed) said, "*polluter pays provider gets*" and three of those suggested helping farmers to reduce future emissions, going on to say that the costs of cleaning up past mistakes should be in the hands of Government and the agri-food industry which developed them in the first place. One individual said that the cross-compliance regime should be based on the environmental principles set out by the EU: Prevention, Precaution, Polluter/Transgressor pays, Rectification at source, and Environmental integration.

Two organisations and one individual included animal welfare and one individual included animal husbandry. One organisation and one individual suggested protecting habitats. One organisation suggested including ammonia levels, nitrates and phosphates to help meet the aim of sustainable farming and another specified nitrates and management of slurry/manure. One farming focussed organisation suggested that cross-compliance should be retained, but with more concise targets.

Ten responses made suggestions about the design and approach to a scheme and these included a proportionate approach to penalties; a constructive rather than punitive approach; a good working relationship with industry; knowledgeable enforcement; an appeal procedure; and factual, science-based measures.

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

Forty-two responses provided comments against this question. Twenty-nine were from organisations (of which 13 were farming focussed and five were environment focussed) and 13 were from individuals.

Thirteen responses from 10 organisations (of which four were farming focussed and two were environment focussed) and three individuals expressed support for tiering or capping a basic farm resilience support payment. Another 13 responses from nine organisations (of which eight were farming focussed) and four individuals were not supportive. Nine responses from six organisations (of which one was farming focussed) and three individuals expressed support for an eligibility threshold and one farming focussed organisation didn't. Two responses from one farming focussed organisation and one individual suggested a change to the eligibility threshold. One organisation said there was a case for considering a higher lower limit to the current eligibility threshold to encourage restructuring and increased industry productivity. Four organisations (of which three were farming focussed) did not favour changing the eligibility threshold.

Ten responses from six organisations (of which two were farming focussed and three were environment focussed) and four individuals referred to farm size. Their views were mixed with half of those (three organisations and two individuals) supporting capping or tiering to enable smaller and developing farms gain maximum benefit or to ensure larger farms were not over-compensated. One farming focussed organisation and one individual however pointed out that larger farms could well be producing more food, employing more labour and providing more environmental benefits so could well justify a higher level of support. Two organisations and one individual said that both large and small farms could be affected so any tiering or capping had to be proportionate and fair.

One farming organisation and one individual suggested that account needed to be taken of horticulture and other intensive production systems such as poultry and mushrooms.

Four organisations (of which two were farming focussed) and one individual suggested that funds should be targeted at viable or commercial enterprises, although one of those organisations cautioned that farms which were unsustainable in productivity terms could be vacated giving rise to rural dereliction.

Four responses (two organisations and two individuals) expressed concerns about the potential for creating disadvantages between farm businesses.

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

Forty-two responses included comment about this question. Thirty were from organisations (of which 14 were farming focussed and four were environment focussed) and 12 were from individuals.

Eight responses from five organisations (of which three were farming focussed) and three individuals were supportive of anti/cyclic insurance type measure to help address volatility. Eleven responses from nine organisations (of which five were farming focussed) and two individuals were not supportive. Four organisations (of which one was farming focussed and two were environment focussed) and one individual were supportive of tax measures.

Two organisations (of which one was farming focussed) and one individual suggested that Government would need to contribute to an insurance scheme for it to work, and another two organisations (of which one was farming focussed) and one individual said that it was not the role of Government to provide or underwrite insurance. Four responses from organisations (of which two were farming focussed) suggested that it should not be a replacement for Government support or an opportunity for Government to avoid intervention in relevant situations.

Fourteen responses from 10 organisations (of which five were farming focussed and two were environment focussed) and four individuals identified difficulties and challenges with insurance schemes. Eight responses from seven organisations (of which two were farming focussed and two were environment focussed) and one individual questioned how, or even if, an insurance model would work in Northern Ireland. Comments included references to a relatively immature UK market and concerns over whether there was sufficient scale and diversity for this to work as a financial model in Northern Ireland.

Seven responses from six organisations (of which three were farming focussed and two were environment focussed) and one individual questioned whether Northern Ireland had the large amounts of detailed data that would need to be gathered and analysed at farm level.

Four organisations (of which one was farming focussed and three were environment focussed) and one individual suggested that it could encourage risky behaviours, and another environment focussed organisation urged that these measures were examined very carefully to avoid perverse incentives for environmental damage.

Four responses (two organisations and two individuals) were concerned about the ability of farmers to pay the necessary premiums. Three organisations (of which one was farming focussed and two were environment focussed) suggested that insurance type schemes could be highly bureaucratic and carry a high administrative cost, and another suggested there could be problems accessing and triggering requirements in different sectors and locations.

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

Twenty-five responses included comments about this question. Seventeen were from organisations (of which nine were farming focussed and one was environment focussed) and eight were from individuals.

Seven responses from four organisations (two of which were farming focussed) and three individuals suggested that measures should be sector specific, although one of those individuals commented that certain events can affect all sectors and it may be simpler/more effective to support income across all sectors. Three farming focussed organisations and one individual didn't support a sector specific approach.

Six responses from four farming focussed organisations and two individuals were supportive of income protection and one farming focussed organisation wasn't, suggesting that a sector specific approach would act as a distortion in the utilisation of land. Two organisations and one individual suggested that it would be preferable to have such measures considered on a general basis.

Five organisations (three of which were farming focussed) repeated their previous responses that they were not in favour of insurance type measures.

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

Thirty-one responses included comments about this question. Twenty-three organisations (of which 13 were farming focussed and one was environment focussed) and 8 were from individuals.

Twenty-one responses from 16 organisations (of which 10 were farming focussed) and five individuals were supportive of fiscal measures and one organisation wasn't, suggesting instead that support should be provided from a national/regional fund.

Seven responses from six organisations (of which four were farming focussed) and one individual expressed varying degrees of support for a deposit scheme; five responses (four organisations and one individual) supported a more beneficial capital allowance provision, and three organisations (two of which were farming focussed) suggested that long-term land leases should be looked at.

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

Forty responses included comments about this question. Twenty-eight were from organisations (of which 13 were farming focussed and three were environment focussed) and 12 were from individuals.

Twenty-seven responses from 19 organisations (of which eight were farming focussed and two were environment focussed) and eight individuals indicated support for a crisis response framework, and two responses from one farming focussed organisation and one individual didn't.

Eight responses from five organisations (three of which were farming focussed) and three individuals said it should be on a local/regional basis; seven (six organisations and one individual) said it should be national/UK wide; and four (three organisations and one individual) suggested an all-Ireland approach.

Seven responses (five organisations and two individuals) said the response should be swift and timely, and four responses from three organisations (one of which was farming focussed) and one individual suggested that it should be flexible and able to adapt.

Two farming organisations suggested that care was needed to ensure inclusiveness and equality, and one organisation and one individual called for industry input.

One organisation and two individuals said that forestry should be included. One organisation said it would be hugely difficult for such a diverse industry as horticulture. Five responses mentioned funding: two organisations (one was a farming focussed organisation) suggested financing from UK-wide funds; two individuals called for guaranteed funding with one of those stressing that the protocol should afford discretion for those who make key decisions at the time of need; and one organisation called for national as well as regional funding.

Environmental Sustainability

Q27. What are your views on the suggested environmental principles to be incorporated within the agricultural policy framework?

Sixty-three responses provided comments relating to this question. Forty-nine were from organisations (of which 17 were farming focussed and 12 were environment focussed) and 14 were from individuals.

Thirty-one responses from 23 organisations (of which eight were farming focussed and six were environment focussed) and eight individuals expressed agreement with the suggested environmental principles to be incorporated within the agricultural policy framework. Five responses from four organisations (of which one was farming focussed and three were environment focussed) and one individual made suggestions for either strengthening or adding to them.

Two organisations suggested that a breach of principles should lead to sanctions. Nine responses from seven organisations (four of which were environment focussed) and one individual supported the concept of public money for public good. One organisation expressed grave concerns about the direction of travel towards public goods for public money.

Five organisations (three of which were environment focussed) suggested that environmental enhancement should be at the centre of a new framework, stressing the relationship between a healthy environment and productive, profitable farming. Eight responses from six organisations (of which two were farming focussed and two were environment focussed) and two individuals felt there had been a failure in the past to recognise the contribution farming had made to the environment. Ten responses from nine organisations (of which one was farming focussed and five were environment focussed) and one individual recognised the future environmental benefits that could be achieved through farming practices. Two organisations and one individual suggested the integration of agriculture, food production and environmental measures.

Six responses from four organisations (one of which was farming focussed and one was environment focussed) and two individuals suggested that the rural historic environment needed to be protected.

Seven responses from six organisations (of which one was farming focussed and four were environment focussed) and one individual called for a collaborative approach involving farmers and wider stakeholders. Five organisations (of which four were environment focussed) called for consultation with a wide range of stakeholders.

Nine responses from eight organisations (of which three were farming focussed and five were environment focussed) and one individual suggested that the right information and advice needed to be provided to farmers. Seven organisations (of which three were farming focussed and four were environment focussed) said that policy needed to be based on sound and robust science.

In addition to the above responses, 1,133 responses on Template 1 suggested that the protection and restoration of the environment should be the central focus of a new agriculture policy post-Brexit in Northern Ireland, and in order to achieve a healthy and vibrant rural economy with farming playing a central role, a new agriculture policy must have environmental protection and restoration at its core.

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

Fifty-nine responses provided comments relating to this question. Forty-four were from organisations (of which 16 were farming focussed and 10 were environment focussed) and 15 were from individuals.

Fifty-one responses from 36 organisations (of which 14 were farming focussed and nine were environment focussed) and 15 individuals supported the need for investment in research and education targeted on environmental and conservation management. Seven responses (five organisations and two individuals) expressed a range of views on funding, some calling for properly funded approaches and two farming focussed organisations suggesting separate budgets.

Three organisations (of which two were farming focussed) suggested that research should be targeted on the uplands. Another three responses from two organisations (of which one was farming focussed) and one individual suggested that understanding the challenges faced, the harm and the emissions was necessary. One of those organisations also suggested that a campaign on waste reduction could bring immediate and long-lasting results.

One farming focussed organisation and two individuals suggested that all sectors and all land uses should be included. Another organisation specified forestry, suggesting a Forestry Skills Study and preparation of a Skills Action Plan, and described significant opportunities for a more integrated rural labour market with associated benefits.

Three organisations (of which two were environment focussed) called for sustainability approaches to be embedded and another called for input and collaboration from both ecologists and agricultural professionals. Two organisations called for research and education to improve productivity and profitability, and one environment focussed organisation cautioned that a focus on technological solutions could cause Government and industry to overlook low-tech methods.

Other suggested approaches included:

- online training (two organisations);
- wide dissemination of research findings (two organisations);
- veterinary input (one organisation);
- engagement with the public (one organisation);
- embracing circular economy concepts (one organisation); and
- integrated holistic approaches (one individual).

Some responses referred to existing examples including the Resilient Farms Project, the use of Fields Labs, and the use of remote sensing and mapping. Two responses referred to how France enacted the “Law for the Future of Agriculture, Food and the Forest” in 2014, which shifted the objectives of French agriculture to give environmental and social goals as much weight as economic ones.

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

Fifty-four responses provided comments relating to this question. Thirty-nine were from organisations (of which 13 were farming focussed and 10 were environment focussed) and 15 were from individuals.

Ten responses from nine organisations (of which two were farming focussed and two were environment focussed) and one individual supported outcome based environmental measures. Seven responses from six organisations (of which three were farming focussed and one was environment focussed) and one individual supported co-design with farmers and land managers. Twenty-four responses from 19 organisations (of which six were farming focussed and seven were environment focussed) and five individuals supported both outcome based measures and co-design approaches.

Benefits

A number of benefits were identified. Five responses from four environment focussed organisations and one individual referred to better environmental results; five organisations (of which two were farming focussed and three were environment focussed) referred to increased flexibility to suit local landscapes and conditions; three organisations (two of which were farming focussed and one was environment focussed) commented on the benefits of listening to and harnessing local knowledge and wisdom; two environment focussed organisations commented on more empowered farmers and land managers, and also suggested (amongst other things) reduced bureaucracy as a consequence of results based over actions based payment. One environment focussed organisation commented, "Co-design of policy and programmes has been shown to work in other sectors, leading to a sense of 'ownership'." Another organisation called for the inclusion of outdoor recreation as a possible initiative meriting support. One individual said, "Agriculture needs more environmental schemes and measures, this idea of more cows, cattle, pigs etc. is not on, it's destroying agriculture."

Concerns

Eleven responses from eight organisations (of which three were farming focussed and two were environment focussed) and three individuals expressed concerns about the difficulty in designing a scheme and the need to be flexible, tailored and if necessary refined over time. Four organisations (of which two were environment focussed) and one individual pointed out the need for a baseline of accurate, scientific data, and two of those (one organisation and one individual) suggested that there was insufficient data at present. Six responses from five organisations (of which one was farming focussed and one was environment focussed) and one individual emphasised the need for measurement and monitoring and foresaw difficulties in identifying appropriate measures and the potential for disputes. Two organisations (one of which was farming focussed and one was environment focussed) and one individual said a scheme would be costly and complex to administer.

Six organisations (three of which were environment focussed) saw a need to continue with some action based payments, five organisations (of which two were farming focussed and three were environment focussed) pointed out that results and outcomes

were not always in the control of the farmer, and two of those environment focussed organisations suggested that results based payments could permit management measures that were not supported by a robust evidence base.

Suggestions

Eight responses from organisations (of which one was farming focussed and five were environment focussed) advised taking a landscape approach. One farming focussed organisation suggested that there were also problems for collaborative or landscape-wide schemes where some achieve but others do not. Two environment focussed organisations and one individual emphasised the need for long-term agreements.

Three organisations said that co-operation was needed between farmers and one of those suggested that the efforts of one farmer could be undone by the actions of another. Another of those organisation suggested that the Catchment Sensitive Farming scheme in England should be considered in NI to incentivise farmers to work together to improve water quality.

Several made suggestions about the comprehensiveness of a new scheme, one organisation and one individual advised integrating all land uses including forestry. One organisation promoted recreational opportunities and experiences and another suggested multi-functional policies i.e. a sustainable land use policy rather than separate policies for farming, wildlife and forestry. One organisation advised that the policy should be holistic, based on the whole farm operation including production and environmental aspects as far as possible, and another suggested that payments should be awarded on the basis of audited farm plans that included both production and environmental activities.

Other suggestions included:

- flood attenuation (two organisations);
- protecting the rural historic environment and cultural heritage (two organisations);
- improved water quality (one organisation); and
- funding for forward thinking ideas (one individual).

Examples of other approaches and programmes

Eleven responses suggested approaches taken by other organisations that would provide helpful examples to consider. These included the Glens of Antrim Resilient Farms Project; the Leader model; the UK Industrial Strategy; Ireland's High Nature Value Farmland, Burren LIFE Programme, Aran LIFE Project and the Pearl Mussel Project; the National Trust Scheme at Malham in Yorkshire; Natural England's Results Based Agri-environmental Payment Schemes; and the National Ecosystem Assessment Approach.

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 practice to enhance environmental sustainability?

Fifty-five responses provided comments relating to this question. Forty were from organisations (of which 13 were farming focussed and 10 were environment focussed) and 15 were from individuals.

The suggestion for future schemes to move beyond the costs incurred income forgone approach to incentivise changes in farming to enhance environmental sustainability was supported by 24 organisations (of which 10 were farming focussed and four were environment focussed) and six individuals.

One individual did not support the proposal. One farming focussed organisation suggested that two key goals for the farming industry were to increase production of food and agricultural goods for other uses (energy or industrial processes) and at the same time, to do it sustainably.

One farming focussed organisation and two individuals suggested that incentives shouldn't weigh too heavily on the environmental side and thereby compromise food production or other strategic outcomes. Three organisations (two of which were farming focussed) felt that the environmental work on farms to date appears to be taken for granted. Four responses (two organisations and two individuals) suggested taking into account the value of the natural capital in order to inform priorities and decision making for public spending. One individual asked why there was no desire to change farming practice with regard to soil fertility management, and one organisation suggested a Climate Change Act with sector specific targets. One environment focussed organisation recommended that DAERA introduce a suite of sustainable farming policies, the impact of which would be monitored by requiring farmers to submit an annual sustainability assessment using a framework of harmonised metrics.

In addition to the above responses, a further 1,134 responses on Template 1 suggested that the new policy must include more financial support to help protect nature and wildlife and ensure that funding enabled farmers and land managers to deliver a range of environmental benefits.

Funding

Four responses from three organisations (one of which was farming focussed and two were environment focussed) and one individual said that payment must be sufficient to incentivise farmers to take risks or take land out of production, and reward provision of public goods. Two organisations (one of which was environment focussed) and one individual suggested a mix of predictable, baseline payments and additional payments to incentivise positive environmental outcomes. Three responses (two organisations and one individual) said that payment for actions that were a legal requirement or that would happen without any intervention from the farmer could not be supported. Three responses (two organisations and one individual) referred to compliance with WTO rules.

One organisation expressed concerns that this could reduce the funding available to support other measures such as the basic resilience payment, but another called for a significant increase in funding relative to existing agri-environment schemes. One organisation suggested that consideration might be given to a reduced level of taxation in relation to environmental payments to achieve a public good. One individual suggested other models of paying for public goods, such as contributions to the cost from those that benefit directly from environmental services - for example, flood alleviation.

Design and operation of a scheme

Five responses (four environment focussed organisations and one individual) suggested that DAERA should explore the feasibility of three other models: a whole farm costs model; a transaction costs model; and a long-term land use change model.

Six responses (4 organisations and two individuals) referred to other land uses, and these included forestry, enhanced outdoor recreation opportunities and cycling. One organisation suggested targeting issues such as flood mitigation but not access for recreation. One individual suggested that it should be possible to place a value on flood mitigation, GHG reduction and pollution mitigation.

One organisation suggested targeting specific areas such as AONBs, ASSIs and Areas of Natural Constraint, and another suggested giving consideration to the application and adoption of technological advances.

One individual response suggested group schemes whereby all farmers/land users in a specific catchment area might obtain further bonuses where there was large-scale buy-in to the scheme, with increased bonuses for every individual/farm in the group that complied.

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

Fifty-one responses provided comments to this question. Thirty-seven were from organisations (of which 13 were farming focussed and nine were environment focussed) and 14 were from individuals.

Twenty-seven responses from 20 organisations (of which three were farming focussed and seven were environment focussed) and seven individuals expressed support for other actors in the supply chain having a role in driving better environmental outcomes. Six responses from four organisations (three of which were farming focussed) and two individuals didn't. Eight responses from six organisations (two of which were farming focussed and one was environment focussed) and two individuals stressed the importance of the role of farmers, and eight responses (seven organisations and one individual) said that Government should be involved. One farming focussed organisation said that there was no role for Government.

Four environment focussed organisations and two individuals suggested customers and consumers should play a role. Three responses from two organisations (one was farming focussed and one was environment focussed) and one individual suggested NGOs, and three responses from one organisation and two individuals suggested retailers. Other suggestions included the veterinary professions, country sports, caterers, processors, councils, consultants, financial institutions and universities.

Problems and concerns

Nine responses from seven organisations (six of which were farming focussed) and two individuals) identified potential problems and issues. Five of those farming organisations and one individual warned about the risk of schemes that increased costs for producers - for example, by further compliance issues - but didn't improve prices, or even reduced payments. Another farming organisation said that it was easy for those outside the supply chain to add unattainable goals through unrealistic costs, and suggested that if they required higher outcomes they must bear the cost of such measures.

Another organisation suggested that work was needed to improve the inspection regime and the way in which the NIEA and officials in general interact with farmers. One individual stressed the need to understand the whole picture and not be in it for environmental improvement alone.

Examples of other approaches

Seven responses suggested examples from other places: - three organisations referred to the approach in Exmoor National Park and the approach in the Netherlands. One organisation suggested a local food promotion organisation similar to Bord Bia, and one individual suggested following the example of Origin Green in Ireland. One organisation suggested LEAF Open Farm Sunday, and another referred to the Mourne upland path works.

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

Forty-one responses provided comments relating to this question. Twenty-nine were from organisations (of which nine were farming focussed and nine were environment focussed) and 12 were from individuals.

Requirements of a delivery model

Nine responses from eight organisations (five of which were farming focussed) and one individual said that the delivery model needed to provide a profit margin or be financially rewarding to the farmer. Eight responses from six organisations (of which four were farming focussed and one was environment focussed) and two individuals specified that it needed to be simple, practical, easy to implement and accessible. Four responses (one organisation and three individuals) wanted it to deliver for the environment as well as for farmers; three responses (one organisation and two individuals) suggested it should be integrated and joined up; and two responses from one environment focussed organisation and one individual suggested it should be flexible. Other suggestions were for an outcome driven model; appropriate objectives and clear targets; and a model that was measurable, fair and transparent.

Design of a delivery model

Many of the responses included suggestions for design of a delivery model. Nine responses from seven organisations (of which one was farming focussed and three were environment focussed) and two individuals suggested it should be targeted to ensure interventions were at the right scale and in the right place, or would select deliverables that were achievable. Seven organisations (of which one was farming focussed and three were environment focussed) referred to the importance of a strong evidence base and sound science. Six responses from five organisations (of which three were environment focussed) and one individual referred to the importance of providing expert advice. Three of those environment focussed organisations suggested using the Knowledge Advisory Service and called for a robust land use map at a resolution that was fit for purpose.

Three responses from environment focussed organisations and two individuals recommended robust monitoring and evaluation, one of those individuals also recommended effective sanctions.

Five organisations (of which one was environment focussed) supported regional, sub-regional and landscape approaches that were locally relevant.

Two organisations (one farming focussed and one environment focussed) and one individual suggested piloting or trialling new schemes, and the environment focussed organisation suggested reverse auctions.

One farming focussed organisation suggested voluntary schemes which farmers could opt in to rather than blanket regulation, and another farming organisation called for a balanced and pragmatic approach which recognises that environmental perfection is not always achievable. Two organisations (one of which was environment focussed) and two individuals called for sufficient and security of funding, and resourcing.

There were also some suggestions about how not to design a scheme: two organisations suggested that current schemes were excellent examples of how not to deliver desired environmental outcomes; three environment focussed organisations cautioned against poor design, inadequate systems, poor targeting and inadequate budgets; and two farming focussed organisations and one individual warned that environmental targets shouldn't be at the detriment of other outcomes.

Who should be involved

Suggestions regarding who should be involved included:

- farmers (five, mostly environment focussed, organisations and two individuals);
- DAERA (five, mostly environment focussed, organisations and one individual);
- the agriculture, food and drink industries including farm suppliers (two organisations and one individual);
- collaboration between statutory agencies and non-statutory bodies (one environment focussed organisation);
- ministers and civil servants taking responsibility for delivery (one organisation); and
- NGOs and local authorities (one organisation).

Examples of other projects and models

Nine responses referred to other projects and models that they considered worthy of consideration. These included the uplands of Glenwherry; wet grasslands of Lough Beg and Lough Erne; Marsh Fritillary measure within the current Environmental Farming Scheme; the Leader model; the National Trust project at Malham; the Burren Life project in Ireland; Resilient Farms projects; the Welsh Game and Wildlife Conservation Trust's 'Farmer Clusters'; research undertaken at Pontbren in the Welsh uplands; reverse auctions used by Wessex Water to reduce nitrogen pollution; the recently launched voluntary Environmental Farming Scheme; and the old Environmentally Sensitive Area Scheme.

Supply Chain

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

Thirty-nine responses included comments on this question. Twenty-nine were from organisations (of which 14 were farming focussed and three were environment focussed) and 10 were from individuals.

Twenty-three organisations (of which 10 were farming focussed and three were environment focussed) and six individuals felt that the Government should play a role in ensuring market transparency. One farming focussed organisation didn't, saying that the dairy sector was amply provided with market data. Responses from six organisations (of which one was farming focussed and three were environment focussed) and one individual identified an imbalance in the supply chain. Nine responses from eight organisations (of which five were farming focussed and one was environment focussed) and one individual said that transparency should be improved. Four organisations (three of which were farming focussed) and one individual suggested that the role of the Groceries Code Adjudicator should be considered. Two farming focussed organisations and one individual said there was mistrust between producers and processors.

Two farming focussed organisations and two individuals suggested that imported products should be identified, and three farming focussed organisations and one individual suggested that imports should be to the same standard. One organisation and two individuals suggested that food labelling should be clearer. Other suggestions included shorter supply chains, supply chain integration, code of conduct, price reporting, benchmarking production efficiency, quality assurance and local production initiatives, distributed ledger technology ('blockchain'), and support for set prices and marginal profits for producers. One organisation suggested exploring the example of Ireland's Bord Bia, and another suggested establishing an equivalent to Bord Bia.

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

Thirty-nine responses provided comments on this question. Twenty-five were from organisations (of which 10 were farming focussed and four were environment focussed) and 14 were from individuals.

Thirty-two responses from 22 organisations (of which eight were farming focussed and four were environment focussed) and 10 individuals indicated support for supply chain awareness training and four individuals didn't. Five organisations (three of which were farming focussed) suggested that it should have a separate budget. One of those suggested online delivery, but noted that rural communities have poor quality broadband. One organisation and one individual suggested including all rural land uses and land managers including forestry.

Two individuals called for greater awareness and understanding by those in the supply chain of challenges faced by each other, and a third individual suggested that groups of farmers should be encouraged to work together in the supply chain. One organisation suggested that the agri-food industry should be a more market oriented and consumer-focussed industry.

One farming organisation said that farmers should not be penalised for lack of qualifications, and one individual pointed out that tying payments to CPD would not support productivity and may have the opposite effect. Two organisations said that training should not be compulsory. Two responses from environment focussed organisations said that training on business planning should focus on profitability and sustainability. One environment focussed organisation suggested examining the approaches to benchmarking, and one individual said that benchmarking should be made anonymous.

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-food supply chain?

Thirty-nine responses contained comments relating to this question. Twenty-eight were from organisations (of which 11 were farming focussed and four environment focussed) and 11 were from individuals.

Thirty-three responses from 26 organisations (of which 10 were farming focussed and four were environment focussed) and seven individuals supported the need for Government action. One organisation and one individual did not. One individual commented that the intensive pig and poultry sectors are there already without Government interference, and one farming focussed organisation said that in the dairy industry supply chain, farmer owned and controlled cooperatives ensured the highest degree of collaboration.

Four organisations (two of which were farming focussed) promoted greater collaboration and integration throughout the supply chain. Two farming organisations emphasised greater transparency.

Three organisations wanted to ensure fair profits for producers and one of those suggested grant assistance to the processing sector.

Three responses from environment focussed organisations suggested using the supply chain to act as a pull factor in improving the sustainability of agriculture and land management, and another organisation suggested linking ventures to environmental management or sustainability. Two of those organisations suggested this would help target premium markets. One organisation suggested developing a premium brand for Northern Ireland's food products. Another organisation (farming focussed) suggested a public marketing/education programme, with the help of seed money from the Government, to promote the unique selling points of British produce (e.g. full lifetime traceability throughout the supply chain from individual animals to the shop shelf) and an industry-wide programme, similar to Origin Green.

One organisation emphasised support for local supply chains, another suggested support for niche enterprises, and one individual suggested placing emphasis on local production.

One organisation and one individual suggested that forestry should be included, and another organisation suggested including fishing. One organisation suggested encouraging local horticulture producers to cooperate and work together and suggested local marketing / promotion schemes such as a Bramley Apple Festival. Another organisation suggested investing in regional food economies connecting urban populations with rural producers and agriculture and facilitating farmers' markets.

One farming organisation and one individual wanted to avoid abusive practices, and another organisation suggested tackling unfair trading practices. Another farming organisation suggested that carcase classification using the EUROP system should continue. One individual called for a crackdown on rules imposed by meat processors,

and one individual called for appropriate infrastructure and oversight of standards in slaughter and food handling.

One individual didn't trust the Government saying that it would continue to allow the supermarkets to exploit farmers to keep food cheap. One organisation didn't feel that trust was there to build collaboration.

One farming focussed organisation cautioned against the use of written contracts as they could potentially reduce flexibility.

One organisation and one individual suggested that food purchased by the public sector should be locally sourced.

One organisation and one individual called for improvements to infrastructure and planning.

One farming organisation suggested challenging the powers of the Food Ombudsman and reviewing the responsibility and powers of the agency. Another organisation suggested that the Supermarket Ombudsman's Office needed to have more regulatory powers and a third organisation, farming focussed, suggested that the Grocery Code Adjudicator should have more power to protect integrity and fairness in the supply chain.

One individual called for standardised labelling, and another suggested the need to consider the interdependence between Northern Ireland and Ireland.

Equality, Rural, Regulatory and Environmental Impacts

Q36. Are there any equality comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

Twenty-one responses included comments about this question. Fourteen were from organisations (of which seven were farming focussed) and seven were from individuals.

The views expressed were not limited to commenting on the criteria listed in Section 75 of the Northern Ireland Act.

Two farming focussed organisations and one individual were concerned about potential equality issues and age discrimination if a qualification requirement for grants was introduced. One organisation supported age proofing of any future recommendations.

Two responses (one from a farming focussed organisation) said that farmers (in general) needed to be viewed as equal partners in the food supply chain. One organisation and one individual said that policies must apply fairly to all farm businesses. Three organisations (two of which were farming focussed) suggested that hill farmers needed to be recognised with one of those also claiming that farmers in border communities were not being represented. Another organisation said that horticulture growers should be treated equally to agricultural producers.

One organisation and one individual said that support should be proportionate to the environmental benefit produced. Other comments included a suggestion that a sub-regional/ landscape area approach would better reflect the challenges for peripheral areas, smaller farms, quality of land and disadvantage. One individual called for additional support for Areas of Natural Constraint and another drew attention to lack of broadband in many rural areas. One organisation commented that farmers no longer have easy access to DAERA officials for advice and so they are now seen as inspectors rather than advisors. One individual suggested that it wasn't necessary to print Irish on agricultural documents.

Q37. Are there any rural needs comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

Nineteen responses included comments against this question. Ten were from organisations (of which four were farming focussed) and 9 were from individuals.

Seven responses from three organisations and four individuals commented on poor rural broadband services, and six responses from three organisations and three individuals identified transport links – including public transport and maintenance of road networks – as being an issue. Three responses from two organisations and one individual mentioned access to essential services such as schools, doctors and hospitals, and a further two individuals were concerned about rural crime.

Other concerns included rural poverty, mental and physical health, health inequalities and social inclusion. Six responses from three farming focussed organisations and three individuals made links between the viability of agriculture and non-agriculture sectors and the rural economy. One individual response cautioned that urban presumptions/perspectives should not be imposed on those in the rural setting.

One organisation voiced concerns in relation to how transition, changes and support would be communicated and provided to those in rural areas and how courses would be delivered if there was to be a focus on CPD and qualifications.

One organisation suggested horticulture as a vehicle to address many rural needs, and another organisation believed that the application of the rural needs assessment would benefit from a sub-regional / landscape approach to better reflect the challenges for peripheral areas and smaller farms.

Q38. Are there any regulatory impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

Fifteen responses provided comments to this question. Ten were from organisations (of which seven were farming focussed) and 5 were from individuals.

Five of the responses (three organisations and two individuals) called for regulations and inspections to be proportionate and flexible with some latitude for mistakes and omissions.

Four responses from two farming organisations and two individuals expressed concerns about planning policy and conditions. These concerns included inconsistencies between council areas and between commercial and domestic dwellings.

Three organisations (two of which were farming focussed) suggested that there should be compensation for the destination [sic] of environmental sites for the restrictions placed upon them.

One farming focussed organisation suggested that as much forward notice of changes should be given as possible so that businesses could adapt.

One individual said that continued financial support into the future was needed as world prices were not sufficient to cover overheads. The response went on to suggest that winter was too long in this country so expenses were much higher than in a lot of other countries.

Q39. Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

Twenty-one responses provided comments on this question. Fifteen were from organisations (of which six were farming focussed and two were environment focussed) and six were from individuals.

Nine responses from eight organisations (five of which were farming focussed and one was environment focussed) and one individual identified a relationship between productive farming and the environment and the pivotal role that farmers have played in the past and could do in the future. One farming focussed organisation suggested that the value of “public goods” needs to be better recognised and rewarded.

One environment focussed organisation pointed out that the Convention for Biological Diversity targets would still apply after EU exit. Another organisation suggested that Northern Ireland was one of the least wooded places in Europe, despite having an ideal climate for growing trees. One environment focussed organisation cautioned that since the early 1970s, wild farmland bird populations, which were used as an indicator for the health of the farmed environment, had declined by up to 52%. Such declines being rapid, massive and widespread, with parallel declines in other components of farmland biodiversity, including wild plants and insects, and ecosystem services.

One individual suggested that the science behind ammonia was poor yet it was being allowed to prevent productive, efficient farming. Another individual said that farmers needed to realise that environmental impact regulations applied to them as well as everyone else. One farming organisation suggested that it would be more practical and beneficial if DAERA and NIEA performed a more advisory role than that of judge, jury and jailer.

Four responses from organisations contained suggestions for improving the environmental impact and these included:

- a sub-regional/landscape area approach that would better reflect the challenges for peripheral areas, smaller farms, quality of land and disadvantage; developing a world-class system for managing plant health biosecurity;
- retaining the principle of cross compliance;
- rewarding landowners for preserving and enhancing the amenity and recreational value of the land; and
- accelerating the adoption of new waste reducing and handling practices through short-term measurable initiatives or tax incentives.

Responses from three individuals also made suggestions for improving the environmental impact and these included:

- scrapping the slurry spreading ban;
- reviewing the hedge cutting ban dates;
- scrapping the ban on spreading phosphate for cereal farmers over index 3;
- policing the dairy industry much tighter on the nitrates directive; and
- compensating farmers who were limited by environmental regulations outside GAEC.

Other comments and evidence

Q40. Are there any other comments you wish to make or any other evidence of need that you think the Department would find helpful?

Fifty responses included comments on this question. Thirty-four were from organisations (of which 14 were farming focussed and 10 were environment focussed) and 16 were from individuals.

Many of the responses to this question repeated previous views and comments. Some provided copies or links to other reports and information. Four organisations and one individual felt that the document lacked scope and ambition, but others welcomed the opportunity to engage and comment. One farming organisation and one individual were disappointed that the pictures on the front cover appeared to emphasise grassland livestock sectors and ignore other sectors.

Sixteen responses from 13 organisations (of which three were farming focussed and six were environment focussed) and three individuals saw the current situation with Brexit as an opportunity to plan and transform agricultural policy, with four organisations commenting on problems and weaknesses with the CAP. Nine responses from eight organisations (of which three were farming focussed and three were environment focussed) and one individual noted the lack of clear direction, and two organisations and one individual commented on the lack of an operational Assembly and Executive.

Ten responses from six organisations (of which three were farming focussed and three were environment focussed) and four individuals commented on environmental matters. Nine responses from eight organisations (of which three were farming focussed and three were environment focussed) and one individual advocated landscape management and enhancement. Seven responses from six organisations (of which one was farming focussed and four were environment focussed) and one individual commented on rural heritage. Seven responses from four organisations (of which two were farming focussed and one was environment focussed) and three individuals commented on rural communities. Six responses from four organisations (of which one was farming focussed and two were environment focussed) and two individuals commented on the potential for tourism and access for recreational activity.

Five responses from two organisations and three individuals promoted forestry as a positive and important opportunity, and three organisations pointed to the benefits of the arable and horticulture sectors. One farming focussed organisation promoted Northern Ireland beef and lamb as safe, traceable and environmentally sustainable. One individual commented on the dependence of beef and sheep on subsidies. Four other responses from three organisations and one individual also stressed the need for funding support to continue.

Eight responses from seven organisations (of which two were farming focussed and three were environment focussed) and one individual called for a joined-up approach, five of those organisations suggesting that multiple government departments and agencies needed to be involved. One organisation suggested encouraging partnerships between public and private bodies to ensure sustainability; one individual

suggested that there was a disconnect between farmers and DAERA; one organisation pointed to the contribution of agriculture to other industry sectors; and one organisation called for a single agri-food marketing and promotion delivery mechanism within Government. Seven responses from six organisations (five of which were environment focussed) and one individual suggested that there were many inter-related problems to address.

Eight responses from six organisations (of which four were farming focussed and one was environment focussed) and two individuals suggested that the rules and approach to inspections and penalties needed to change.

Six responses from organisations (of which three were farming focussed and two were environment focussed) stressed the importance of food production and food security. Five environment focussed organisations supported the principle of public money for public goods.

Five responses from three organisations (of which one was farming focussed and one was environment focussed) and two individuals commented on prices for various products. Three of those, one organisation and two individuals, were about the limited ability of farmers to influence prices, and one organisation suggested that the use of area based payments had resulted in an increase in the price of land and acted as a barrier to new entrants to farming. The other organisation commented positively on the potential for the forestry industry with wood prices at record levels and demand forecast to rise.

Four responses from organisations (two were farming focussed) and one individual stressed the importance of profitability. One organisation commented on the productivity gap between Northern Ireland and elsewhere in the UK, suggesting that inter-regional comparisons of productivity may face various measurement problems. One individual pointed to the small size of agricultural holdings, the ageing profile of farmers and the short-term nature of the letting of agricultural land as some of the most important factors which are contributing to the low levels of productivity and efficiencies.

Two organisations and two individuals commented on the lack of recognition for the contribution made by farmers, often under difficult conditions.

Four farming focussed organisations suggested the need to promote and market Northern Ireland and its products, and one of those suggested that the UK marketing strategy plan should include tangible goals for the beef and sheep meat sector. Two organisations suggested that Protected Geographical Indication (PGI) status was needed for local products.

Three organisations (two farming focussed and one environment focussed) called for an improvement in broadband and digital connectivity.

Three organisations supported training and learning although one of those cautioned that training alone did not guarantee good practice.

There were many other comments including a call to recognise the importance of the veterinary profession in achieving animal health, welfare, environmental and productivity gains; support for the creation of small co-op style processors; coupled support for vulnerable sectors; agricultural property relief; longer land leases; soil optimisation; and grants for safety measures.

Annex A Questions

Transition

1. What are your views on the retention of entitlements as the basis of direct support until a new agricultural policy framework is agreed?
2. 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?
3. 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?
4. 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?
5. What are your views on whether to allow further applications to the YFP and the Regional Reserve after 2019?
6. What are your views on the most effective means of encouraging and facilitating generational renewal on farm businesses?
7. What are your views on whether the elements of the current direct payments discussed in Section 2.7 could remain in 2020 and 2021?
8. Have you any specific suggestions for simplifying other aspects of the current direct payment in 2020 and 2021 which are not mentioned here? If so, please explain your rationale for suggesting these.
9. What are your views on a “Productivity Grand Challenge” approach to delivering a step change in the rate of advance in science and innovation?

Productivity

10. 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?
11. 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?
12. What are your views on continuous professional development (CPD) as a policy intervention and the possible investment of public funds to incentivise CPD?
13. 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?
14. What are your views on the provision of investment incentives other than capital grant (such as loans, loan guarantees, interest rate subsidies etc.)?
15. What other initiatives by government and/or industry should be pursued to facilitate restructuring and investment and drive productivity?

Resilience

16. What are your views on the provision of a basic farm resilience support measure?
17. What are your views on an appropriate mechanism to establish the level of payment under a farm resilience support measure?
18. What are your views on the targeting of a basic farm resilience support payment to take account of issues such as natural disadvantage?
19. What are your views on linking a farm resilience support measure with cross compliance obligations?

20. What are your views on the content of cross compliance/good farming practice associated with this provision?
21. What issues would an appropriate cross compliance regime seek to encompass?
22. What are your views on the tiering or capping of a basic farm resilience support payment, or the establishment of an eligibility threshold?
23. What are your views on the introduction of anti-cyclical/insurance type measures to help address volatility?
24. Should anti-cyclical/insurance type measures be sector-specific or aimed more generally at income protection?
25. What are your views on the enhancement of fiscal measures as a means of addressing the issue of income volatility?
26. What are your views on a possible pre-defined and agreed crisis response framework to respond to crisis events, either locally or nationally?
27. What are your views on the suggested environmental principles to be incorporated within the agricultural policy framework?

Environmental sustainability

28. What are your views on the need for investment in research and education targeted on environmental and conservation management in the agricultural sector?
29. What are your views on a shift towards outcome based environmental measures for agriculture, including co-design with farmers and land managers?
30. What are your views on the need for future schemes to move beyond the costs incurred income forgone approach to incentivise changes in farming practice to enhance environmental sustainability?
31. What are your views on the role of other actors in the supply chain seeking to drive better environmental outcomes?
32. What are your views on the delivery models that would deliver the best uptake and outcomes?

Supply chain

33. What are your views on the role of government in ensuring market transparency?
34. What are your views on CPD extending to encompass supply chain awareness training for farmers, including increased emphasis in farmer training on business planning, benchmarking and risk management?
35. What are your views on the need for, and nature of, government action to achieve greater collaboration within and better functioning of the agri-food supply chain?

Impact assessments

36. Are there any equality comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.
37. Are there any rural needs comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.
38. Are there any regulatory impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

39. Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

Other comments and evidence

40. Are there any other comments you wish to make or any other evidence of need that you think the Department would find helpful? Please submit any evidence with your response.

Annex B Respondents to the Stakeholder Engagement

Organisations/Representative Groups

<p>Agricultural Consultants Association (ACA) (NI)</p> <p>Agricultural Law Association (ALA)</p> <p>AgriSearch</p> <p>AI Services (NI) Ltd</p> <p>Anglo Beef Processors (ABP)</p> <p>Australian Government</p> <p>Bank of Ireland, Danske, First Trust and Ulster Bank (collective response)</p> <p>Belfast City Council</p> <p>Belfast Food Network (BFN)</p> <p>Belfast Hills Farmers</p> <p>Belfast Hills Partnership (BHP)</p> <p>Border Communities Against Brexit</p> <p>British Veterinary Association (BVA) and BVA Northern Ireland Branch</p> <p>Butterfly Conservation Group</p> <p>Carn / Glenshane Focus Group</p> <p>Central Association of Agricultural Valuers (CAAV) & Northern Irish Rural Valuers Association (NIRVA) (joint response)</p> <p>Chartered Institute of Ecology and Environmental Management (CIEEM)</p> <p>Chartered Institution of Water and Environmental Management (CIWEM)</p> <p>Confederation of Forest Industries (Confor)</p> <p>Council for Nature Conservation and the Countryside (CNCC)</p> <p>Countryside Alliance Ireland and Ulster Angling Federation</p> <p>Cycling UK</p> <p>DAB Farmers' Association</p> <p>Dairy UK</p> <p>Dale Farm Cooperative Ltd</p> <p>Democratic Unionist Party (DUP)</p> <p>Department for Communities, Historic Environment Division</p> <p>Department for Infrastructure, Walking and Cycling Unit</p> <p>Farmers for Action</p> <p>Fermanagh and Omagh District Council</p> <p>Historic Monuments Council (HMC)</p> <p>Holstein NI</p>	<p>Horticulture Forum NI</p> <p>Invest NI</p> <p>Livestock and Meat Commission (LMC)</p> <p>Mid & East Antrim Borough Council</p> <p>Mountaineering Ireland</p> <p>Mourne Heritage Trust</p> <p>Moy Park</p> <p>National Sheep Association (NSA)</p> <p>National Trust, Nature Matters NI, Nature Friendly Farming Network (shared view)</p> <p>Nature Friendly Farming Network (NFFN)</p> <p>NI Greenways</p> <p>NI Water</p> <p>Northern Ireland Agricultural Producers' Association (NIAPA)</p> <p>Northern Ireland Environment Link (NIEL)</p> <p>Northern Ireland Food and Drink Association (NIFDA)</p> <p>Northern Ireland Grain Trade Association (NIGTA)</p> <p>Northern Ireland Local Government Association (NILGA)</p> <p>Northern Ireland Meat Exporters' Association (NIMEA)</p> <p>Outdoor Recreation NI</p> <p>Royal Society for the Protection of Birds (RSPB)</p> <p>Rural Support</p> <p>School & Nursery Milk Alliance</p> <p>Sinn Fein</p> <p>Sustainable Food Trust</p> <p>Sustainable NI</p> <p>Sustrans</p> <p>Ulster Angling Federation (UAF)</p> <p>Ulster Arable Society (UAS)</p> <p>Ulster Farmers' Union (UFU)</p> <p>Ulster Unionist Party (UUP)</p> <p>Ulster University Business School</p> <p>White's Speedicook Ltd</p> <p>Woodland Trust</p> <p>Young Farmers' Clubs of Ulster (YFCU)</p>
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Individual Stakeholders

Abercorn Estates Anon Benians, Mr Lindsay Best Blakiston Houston Estate Company Robin Brown Patrick Casement Allan Chambers Mary Dobbs, Viviane Gravey & Ludivine Petetin (joint response) Sheamus Greene	Alistair Henry Vincent McAlinden Gordon McKinley Ian Montgomery John Moore WRL Moore Thomas Moorhead Stewart Morrell Patrick Mullin NI Farm Forestry James Thompson
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Template 1 Stakeholders

Cormac A Donnghaile	Colin Barrett	Margaret Bohoussou
Stephen James Acheson	Gary Bartholomew	Rachel Bolt
Mary Acheson	Ian Bates	Gillian Bolton
Emma Adair	Helen Jane Baxter	L. E. June Bonar
Margaret Adamson	Richard Beadle	Sam Bonar
Helen Ruth Agnew	Shirley Beatty	Andrew John Bond
Carolyn Marie Alcorn	Lorna Beaumont	Susan Bonner
Jonathan Allen	Chris Beck	Holly Booker
Michael Allen	Louise Beggan	Robert Booth
James Victor Allister	Alan Bell	Peter Bowles
Jenny Anderson	Amy Bell	Philip Box
Jill Anderson	Denis Bell	Carol Boyd
Kenneth Anderson	John Bell	Florence Boyd
Paul Anderson	Jonathan Bell	John Boyd
Jonathan Andrews	Katy Bell	Michael Boyd
Jonathan Andrews	Laura Bell	Eoin Boylan
Lindsey Applegate	Philip Bell	Hugh Bradley
Caroline Armstrong	Kate Bellew	Patrick Joseph Bradley
Christine Armstrong	Mark Benfold	Ryan Bradley
Oscar Armstrong	Caroline Benge	Declan Bradley
Paul Armstrong	Denise Bennett	Katie Brady
Robert Armstrong	Martin Bennett	Robbie Breadon
William Armstrong	Mary Bennett	Kaye Brennan
Jackie Arrell	Andrea Bennett	Richard Briggs
Patricia Ashworth	John Bennett	Morris Brodie
Kathleen Aspin	Gary Benson	Karl Brooks
Stephen James Aston	David Bentley	Emily Ruth Brough
Martin Atkinson	Jade Berman	Bob Brown
Sophie Atkinson	Amy Berrisford	Diane Brown
Marc Audley	Catherine Bertrand	James Gordon Brown
Martin Austin	Mary Best	Kirsty Brown
David Ayres	Melissa Beveridge	Nigel Marshall Brown
Jonathon Backus	Alistair Bingham	Robin Brown
Frances Bailey	Phyllis Bingham	Susan Brown
Fiona Bailie	Jill Margaret Bird	Vanessa Brown
Claire Bain	Katie Bird	Shania Browne
Jack Baldwin	Donnell Black	Susan Bruzas
Sidonie Ball	Karen Blackman	Alan Buchanan
John Ballantine	Janet Blair	Richard Bunting
R Ballentine	Susan Blair	Rebecca Burgess
Gareth Bareham	Stuart Blair-Monger	Julia Burns
Victoria Barlow	Christopher James Blake	Seamus Burns
Claire Barnett	Louise Bleakley	John Burrell
Roisin Barr	Wendy Blythe	Estelle Burrows
Roisin Barr	Wendy Blythe	Michael Burton
Elsbeth Barraclough	Kenneth Bodles	Conor Bush
Aine Barrett	Luke Bogue	Heien Butterfield
Clare Barrett	Reverie Boheme	

Michael Byrne	Kathryn Cochrane	Susan Crowe
Henry Stuart Cahoon	Chris Coleman	Norman Cubitt
Judith Calderwood	Chris Coleman	Mark Cully
Pat Calvert	Elaine Colhoun	Ruairi Cumiskey
Orla Calvey	Kendrew Colhoun	Catherine Cummings
Brian Campbell	John Niall Collen	Emma Cunningham
David Campbell	Ciara Collins	Joe Cunningham
James Campbell	Darryl Collins	Jean Curran
Naomh Campbell	Annette Comerford	Emma Curtis
Fil Campbell	Susan Compton	Olivia Daly
Scott Campbell	Desima Connolly	Patricia Kay Dalzell
Shona Campbell	James Denis Rentoul	Tom Dalzell
Lesley Cannon	Connolly	Natalie Darnell
Odette Carden-Fleet	Tracey Connolly	Susan Darragh
Catherine Cardwell	Josef Connolly	Philomena Davidson
David John Carson	Billy Conway	Ray Davies
Philip Carson	Malachy Conway	Nicholas Davis
Ronald Michael Carson	Rachael Conway	Angela Davison
Denise Carson	Sally Cook	John Dawson
Anthony Frederick Carver	Sophie Cooper	Graham Day
Anne Casement	Sophie Cooper	Olivia Day
Jennifer Cassells	Katherine Corrigan	Gerard Daye
Lynn Cassells	Chris Corrigan	Jennifer De Maria
Oliver Cassidy	Roger Corry	Cherith Deacon
Collette Cassin	Barry Costello	Brian Dean
Carole Castles	Ade Couper	Patricia Deeney
Simeon Cathcart	Diane Cowan	Patricia Deens
Sharon Caughey	Colm Coyle	Sara-Jayne Deens
Elizabeth Caulfield	Aislinn Coyle-Little	Rebecca Denley
Clare Cavanagh	Ashley Craig	Chris Denton
Freda Cave	Diane Craig	Audrey Derby
Vickie Chambers	Hugh Craig	Venkat Deshpande
William Chambers	John Craig	John Devenney
Peter Chapman	Tara Craig	Alan Dew
John Childs	David Craig	Donna Dillon
Linda Margaret Childs	Brigid Craven	Amy Dixon
James Christie	Thomas Craven	Elaine Doey
Peter Christie	John Crawford	Anne Doherty
Sue Christie	Lesley Crawford	Richard Donaghey
Irene Clarke	Maura Creelman	Damian Donnelly
Michael Clarke	Ášna Cregan	Gary Donnelly
Raphael Clarke	Patrick Cregg	Linda Margaret Donnelly
Jonathan Clarke	Al Creighton	Craig Donoghue
Jonathan Clarke	Rachel Creighton	Oliver Doone
Raymond Clements	Diane Crookes	Niall Doran
Mark Clendinning	Sharon Croome	Clare Dorman
Brid Coady Weekes	Peter Crossett	Mary Dorman
Dorothy Coates	David Crowe	Brian Douglas
Kaye Coates	Emma Crowe	Neil Douglas

Alain Douglas	Carolyn Faith	Patrick Geary
Joe Dowdall	Rebekah Miriam Farmer	Alan George
Frances Dowds	Rebekah Miriam Farmer	Jean Gerrard
Meghan Dowds Roddy	Susan Mary Farmer	Carmel Gibbons
Susan Downs	Emma Farnan	Mandy Gibbons
Aoife Doyle	David Farrell	Sandra Gibbons
Brian Doyle	Gary Feeley	David Gibson
Caren Draper	Jenny Ferguson	Muriel Gillespie
Laurence Drummond	Margaret Ferguson	Muriel Gillespie
Stephen Dunbar	Mark George Thomas	Helen Gilmour
Janyne Duncan	Ferguson	Rebecca Gindin-Clarke
Neil Duncan	Neil Ferguson	Robert Henry Givan
David Dunlop	Claire Ferry	Rosemary Glendinning
David Dunlop	Raymond Finn	Liz Glenn
Jane Dunlop	Malcolm Finney	Terry Goldsmith
Jean Dunlop	Stephen Fiorentini	Claire Golemboski-Byrne
Paris Louise Dunlop	Patrick Fitzsymons	Steven Golemboski-Byrne
Sandra Dunlop	Caroline Fitzpatrick	Rosi Gomes
Fiona Dunn	Heather Fleck	Iain Alasdair Gordon
Jen Dunster	Alexander Kennedy	Stephen Gorman
Emma Durant	Fleming	Paul Gosling
Joy Dyson	Hilary Flett	Kileane Goubert
Richard Eakin	Pat Flowerday	Lucy Gough
Simon Easton	Susan Fontanes	Colin Graham
Andrew George Edgar	Margaret Ford	Emma Graham
Emma Edgar	Wes Forsythe	Harry Graham
Toby Edwards	Linda Margaret Foster	Ruth Graham
Vanessa Ehrhardt	Michael Foster	Lisa Grant
Kate Eighteen	Robert Foster	Antonia Gray
Ann Elkin	Patrick Fox	David Joseph Gray
A Elliott	Ian Frazer	Simon Gray
Gemma Elliott	Margaret Fulford	Simon Gray
Gemma Elliott	Denis Fullerton	Ryan Green
Nikki Elliott	Jim Fullerton	Ian Greenaway
Noel Elliott	Gregor Fulton	Diane Greenwood
Paul Elliott	Marella Fyffe	David Greer
Geraint Ellis	Steven Fyffe	Louise Greer
Andrea Ellis	Jenny Galbraith	Clodagh Griffiths
Jonas Ellwood	Emma Gallagher	Roisin Grimes
Krystyna England	Karen Gallagher	Roisin Grimes
Kelsie Erskine	Noreen Gallagher	Norma Grindle
Victor Ervine	Jennifer Gallanders	Alice Groom
Alison Esler	Rod Galway	Colleen Groves
Austen Espeut	Robert John Gantley	Dorothy Groves
Arlene Evans	Mary Gardiner	Anne Guichard
Rhys Evans	Amanda Garvey	Irene Gunning
Andrew George Ewing	Enda Gates	Mervyn Guthrie
Lucille Ewing	Noel Gates	Susanne Guthrie
Lucille Ewing	Robert Gault	Janet Haddock

<p> Charmaine Halliday Fiona Halliday Carrie Hamill Kirsty Hamill Linda Hamilton Chris Hancock Paul Hanlon Kelley Hann Stephen Hanna Mark Hanvey Becky Harcourt Gemma Harkin Anne Harper Martin Harper Anna Hart Dee-Ann Harvey William Hassard Kate Hathaway Martin Haughey Will Hawkins Eileen Hearst Anne Heasley Nick Heath Jenni Hedges Jenna Hegarty Brian Hegarty Carol Henderson Rebecca Jane Hendrick James Hennessey Alistair Henry Keith Henry Lorna Henry Nichola Henry Shelagh Henry Sean Heron Margaret Patricia Herron Jill Hessin Stephen James Hewitt Stephen Hey Emma Hilditch Emma Rose Hilditch Emma Hill Lois Hill Michelle Hill Ruth Hill Joanne Hinchliffe Dawn Hind Lindsay Hodges Richard Hollis </p>	<p> Clare Hollywood Gary Holmes Linda Hopkins Suzanne Hopkins Suzanne Hossick Neill House Alan George Houston Anthony Houston Diana Houston Gary Houston William Andrew Darren Houston Brian Howard J Hughes Neil Hughes Gillian Humphreys James Humphreys Ernest Hunter Rebecca Hunter Emily Hunter Avril Hutchinson Kathleen Ingleston Kathleen Ingleston Lesa Ingleston Michael Ingleston Aisling Irvine Rhona Irvine Jane Irving Conor Jameson Diane Jameson Sharon Jamieson Alexey Janes William Wallis Jefferson Meg Jenkins Kate Jennings Martha Elizabeth Jess Eva John Faith Johnson Andrew Johnston David Johnston Emily Margaret Johnston Gwen Johnstone Jacqui Johnstone Rhys Jones Susan Jones Terry Jones G Kane Leona Kane Rosemary Kane </p>	<p> Melissa Kealey-Bennett Adam Kearney Mandy Keery Jan Keeyes Nicole Keizer John Kelly Pat Kelly Sean Kelly Nicola Kelso Julie Kempthorne Gordon Kendall Alison Kennedy Claire Kernohan Keren Kerr David Kershaw Grainne Ketelaar Emer Kier Richard Kilgore Nichola Kinnear Raymond Kirke Matt Kirkham Colin Kirkpatrick Lisa Kirkwood Joy Kitson Rowena Knight Merlynne Knott Joanne Knowles Susan Kula Peter Laird Norma Laming Daniel Larkin Elaine Latimer Barbara Lavelle Michael Laverick Linda Laverty Yvonne Lavery Richard Lawrence David Leckey Rosemary Lee Evelyn Leiper Emily Lemaire Pauline Lemon Titus Leskov Jacqueline Ley Ashlinn Leyden William Andrew Liggett Greg Lilley Benjamin Lindsay Ruth Sarah Linton </p>
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David Littlejohns	Lucy Mason	Ruth McClurg
Judy Logan	Patrick Edward Mason	John McCluskie
Claire Lorimer	E Masterson	Elaine McConaghie
Russell Lough	E Masterson	Caroline McConkey
Mark Loughran	Irene Matchett	Julie McConnell
Susan Lovatt	Grainne Mathews	Keith McConnell
Caryl Love	Alison Matthews	Sarah McConville
Kris Lowenstein	Rebecca Mattingley	Bryony McCormick
Nicola Lowry	Sean Maxwell	David McCormick
Nicola Lowry	Sean Maxwell	Evelyn McCormick
Jane Lutton	Sophie Maxwell	Conor McCoy
Drew Lyness	Les Mayers	Cornelia McCreery
Mandy Lyness	Barbara Mayne	Tina McCrory
Susan Lynn	Geraldine McAdam	Wendy McCulla
Ally Lyons	Joanne McAlinden	Noel Daniel McCullough
Sheila Lyons	Vincent McAlinden	Pamela McCullough
Sarah Lyttle	Philip McAlister	Ruth McCullough
Ruairi Mac Leanachain	Kathleen Ellen McAllister	Avril McCune
Barra Mac Seain	Peter McAllister	Caroline McCusker
David Macauley	Dara McAnulty	Deirdre McCusker
Kathy Mackenzie	Margaret McAnulty	Amanda McDermott
Kathy Mackenzie	Roisin McAnulty	Sean McDermott
David Mackey	Roisin McAnulty	Anne-Marie McDevitt
Ellen MacMahon	Ben McAteer	Val McDonagh
Paul Magee	Christopher McAteer	Paul McDonald
Stuart Maginnis	Siobhain McAteer	James McDowell
Mark Magreehan	Fiona McAuliffe	James Leslie McDowell
Victoria Magreehan	Walter H C McBride	Robert McDowell
Ann Maguire	Charlotte McBrien	Marie McDowell
Colin Magwood	Anthony McCabe	Ciara McElroy
Emma Mahon	Stephen McCabe	John McElroy
Evin Mahoney	Stephen McCabe	Geoffrey McElwaine
Abigail Maiden	Sarah McCaffrey	Michael McErlean
Krysten Maier	Jillian McCahon	Philip McErlean
Claire Mallon	Malgorzata McCallum	Shannen McEwen
Cormac Manning	Stephen McCann	Steven McFarland
Adam Mantell	Tim McCann	Gary McFarlane
Petty Marron	Daphne McCartney	Niall McFerran
C Marshall	Sharon McCartney	Keelin McGartland
Christopher Marshall	Ann McCaskie	Amy McGinn
Robbie Marshall	Sheena McCaugherty	Deborah McGivern
Gillian Martin	Caroline McCavana	Patrick McGlinchey
John Martin	Crystal McClean	Gordon McGlone
Kyle Martin	Penny McClean	Claire Mcgonigle
Michael Martin	Ross McClean	Helen McGorman
Owain Martin	Colin McClelland	Emer McGourty
Robert Martin	Peter McCloskey	James McGovern
Stephen James Martin	Doris McClung	Kate McGrath
CM Martin	Michael McClure	

Fiona McGrath	Francis Medlicott	John Mulholland
Nichola McGrenra	Alexandra Mehaffy	Maria Mulholland
Patrick McGrogan	Michael Meharg	Brendan Mullan
Patrick McGrogan	Clive Mellon	Annemarie Mullan
Craig McGuicken	Ciara Mellon-Kane	Judith Mullen
Conor McGuinness	Kerry Melville	Anne Murphy
Hilary McGuire	Jane Mercer	Denise Murphy
Trevor McIlwain	Nigel Mercer-Smith	Andrea Murray
Robert Colin McIlwaine	Lauren Meredith	Derek Murray
Nathan McIlwrath	Kerry Metcalfe	Marie Colette Murray
Daitha McKay	Rehannah Mian	Jack Muskett
Elizabeth Ann McKee	Kate Middleton	Roger Neal
Jenifer McKee	Auleen Millar	Áireann Neeson
Clare McKenna	Rebecca Millar	Ciaran Neeson
Paul McKenna	Jamie Miller	Deirdre Neill
Roger McKenna	Jonathan Miller	Lpos Neill
Erin McKeown	Averil Milligan	Olivia Neill
Gerard McKerr	Jane Minty	Heather Neilly
Derek McKillop	Russell Mirfin	Karine Nellins
Gillian McKillop	Dawn Miskelly	Jennifer Nelson
Conor McKinney	Claire Mitchell	Elaine Nelson
Conor McKinney	Jonathan Mitchell	Honor Nicholl
David McKnight	Brona Moffett	Tracy Nicholls
Heather McLachlan	Anne Montgomery	Cheryl Nicholson
Claire McLaughlin	Ian Montgomery	Glynis Nicholson
Orlagh McLaughlin	Emma Montgomery	Mark Noble
Connor Michael McLean	Sinead Moodie	Edward Nolan
Rebecca McLean	Philip Mooney	Chris Norman
Patricia Mclean	Suzanne Mooney	Ben Norwood
Jari McLeod	Deirdre Moore	Catherine O Boyle
Derek McLoughlin	Graham Moore	Kerry O Donnell
Shannon McLoughlin	John Gibson Moore	Fiacre O'Donnell
Deirdre McManus	Peter Moore	Sinead O'Flaherty
Paul McMeekin	Richard Moore	Melanie O'Halloran-
Gary Mcmillan	Brian Moran	Gomes
Jill McMonagle	Yvonne Morley-Chisholm	Mal O'Hara
Matthew McMullan	Campbell Morris	Pauline O'Hare
Sandra McMullan	Ian Morris	Aideen O'Kane
Andrew McMurray	Andy Morrison	John O'Kane
Christopher McNally	Jim Morrow	Joanne Oliver
Sarah McNamee	Sharon Morrow	Rachel O'Loan
Chris McNulty	Osborne & Ann Morton	Elaine O'Mahony
Helena McNulty	Phoebe Morton	Katie O'Mahony
Margaret Louise McQuaid	David Mudd	Rachel O'Malley
Paula McQuillan	Neil Muir	Anna O'Neill
Melissa McQuitty	Kelly Muldoon	Marie O'Neill
Laura McVeigh	David Mulholland	Roisin O'Neill
Joanna McVey	David Mulholland	Sonja Orderley
Peter McWilliams	Jo Mulholland	Genevieve O'Reilly

Julian Orford	Marie Rice	Megan Shepherd
Stephanie Elaine Orford	Shanna Rice	Joanne Sherwood
Nuala Orton	Aine Rice McCaldin	James Shiels
Rachel Osborne	Suzi Richards	Danielle Shortall
Olwen Owens	Joanna Ridgway	Brian Shortt
Mark Page	Jackie Ritchie	Jean Shortt
Julie Parsons	Jane Robb	A Sides
Dawn Patterson	Carolyn Robertson	David Simpson
Ron Patton	Hans Robinson	David Smith
Ashley Peel	James Robinson	Lisa Smith
Yvonne Penpraze	Noelle Robinson	Richard Smith
Susan Peoples	Rin Roche	Susan Smith
Christopher Perry	Lauren Rodgers	Ben Smith
Dorothy Perry	Luke Rodgers	William Smiton
Dorothy Perry	Mark Rodgers	Desmond Smyth
Sophie Pheasant	Kayleigh Roebuck	Eilish Smyth
Mark Phillips	Catherine Rogers	John Smyth
Andrew Phillipson	Felicity Roos	Matthew Smyth
Darren John Pinkerton	Stephen Roulston	Nigel Snell
Gala Podgornik	Helen Rountree	Josie Snow
Mary Polizzi	Anne Rowe	Richard Sobey MBE
Derek Polley	Myrddin Ruddock	Craig Somerville
Jonathan Pollock	Alastair Ruffell	Agnes Spence
Hazel Porter	Trevor Rutherford	Jonathan Spence
Liz Porter	Valerie Rutledge	Celia Spouncer
Adele Pound	Ciara Ryan	Kevin Statham
Murray Power	Denise Salters	Michael Stephenson
Alexandra Praschberger	David Sandford	Jake Stevens
Kenneth Pressagh	Michael Savage	Rebecca Stevenson
Ronald Price	Allen Sayers	Angus Stevenson
Susan Price	Nina Schonberg	Linda Stewart
Dan Pringle	Stephen W Scilley	Tom Stewart
Stephanie Pruzina	Anne Scott	Michael Stinson
Eamon Quinn	Audrey Scott	Conor Stirk
Kevin Quinn	Barry Scott	Patricia Stirling
Rhiannon Quinn Nixon	David Scott	David Stott
Kathleen Rafferty	Margaret Scott	Joanna Strantzali
Brian Rainey	Matthew Scott	Martin Sturm
Donna Rainey	Ruth Scott	Carolyn Summers
James Rainey	Sophie Scott	Jenny Summerville
Alan Rea	Pauline Isobel Service	Amber Surgenor
Henrietta Reade	Gary Seymour	Brian Sutton
Richard Redford	Geraldine Seymour	Wilfred Swain
Pauline Reed	Dagmara Shannon	Mairaed Sweeney
Sarah Boyd Reeve	Mark Shannon	Mohammad Tariq
Holly Reid	Jon Sharkey	Sairah Tariq
Dennis Reynolds	Julie Shaw	Anna Taylor
Darren John Rice	Alison Shearer	Beth Taylor
Fionnuala Rice	Karen Sheil	Christina Taylor

Emily Taylor	Heather Walker	Norman Whiteside
Norah Taylor	Vivienne Walker	Jonny Whyte
June Teacy	Dave Wall	Neville Wiggins
Alex Tennant	Cheryl Wallace	Paul Wilby
Irene Theochari	Paul Walls	Justine Wilde
Sarah Thomas	Loren Walsh	Phil Wilkinson
Anna Thomason	Richard Walters	Christine Williams
Harold Anthony	Christine Walters	Debra Williams
Thomlinson	Mhairi Walton	Elliot Williams
Pamela Thomlinson	John Wann	Lynda Willis
David Arnold Thompson	Arthur Ward	Adam Wilson
Kate Thompson	Barry Ward	Bridget Wilson
Marian Thompson	Kay Ward	Davena Wilson
Meredith Thompson	Michele Waring	Dorothy Wilson
Rachel Thompson	Richard Warner	Etta Wilson
Ren Thompson	Richard Boyden Warner	Maud Wilson
Astrid Thomson	Neal Warnock	Robert Wilson
Kate Titford	Vicki Warnock	Robert Wilson
Andrea Todd	Penny Warrell	Ruby Wilson
Patricia Jane Tomkins	Vanessa Warrington	Ruth Wilson
Gerard Tomlin	Angela Watson	Julie Jane Wilson
Cherry Townsend	Hazel Watson	Valerie Wilson
Edel Trainor	Robert Price Murray Watt	Jon Winterbourn
Edel Trainor	Rachel Louise Watterson	John Witchell
Aoibhinn Treanor	Michael Watts	Mark Withers
Jill Truesdale	Christine Watts	Robert Gary Withers
John Tu	Karley Wauchope	Simon Wood
Benjamin Tucker	Jane Waugh	Bronagh Woods
Andrew Tuddenham	Victoria Waugh	Joan Woods
W Tully	Angela Webb	Sean Woods
Andrew Turner	John Weir	Roger Woodward
Liam Turner	Sheila Weir	George Woolsey
Sharon Turner	Sophie Wells	Sacha Workman
Kenneth Tyndall	Lesley Wertheimer	Gobnait Wright
Andrew Upton	Nicola Wheeler	Janet Wright
Nika Vuletic	Karen Whelan	Arnold Wylie
Michael Wadsworth	Brenda White	Eve Young
AJ Walker	Marc White	Irene Younge
Alena Walker	Simon White	
Alena Walker	Denis White	

Template 2 Stakeholders

Bernie Bogue Barry Boyle Gerry Boyle J Boyle John Boyle Martin Boyle Damian Curran Deirdre Curran Gerard Curran Padraig Curran Ronan Curran Damien Foy Andrew Greene Julia Greene Rory Greene Siobhan Greene Austin Johnston Brian Johnston	J B Johnston Paul Johnston Christine Maguire John Maguire Tom Maguire Eoin McCarney John McCarney James McConnell Maureen McDonagh Noel McDonagh Cathal McDonnell John McDonnell Bernadette McKenna Emer McKenna Gerry McKenna Paul McManus Noreen McMaster James McQuaid	Gerard & Darragh Moane James O'Boyle Thomas O'Hara Conor O'Harte Mary O'Harte Natalie Rennie James Rooney Helen Smyth Norah Smyth Paul Smyth Eugene Toye Vera Toye Rosemary Treacey Anne Treacy John Treacy Mary Treacy Philip Treacy Sean Treacy
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