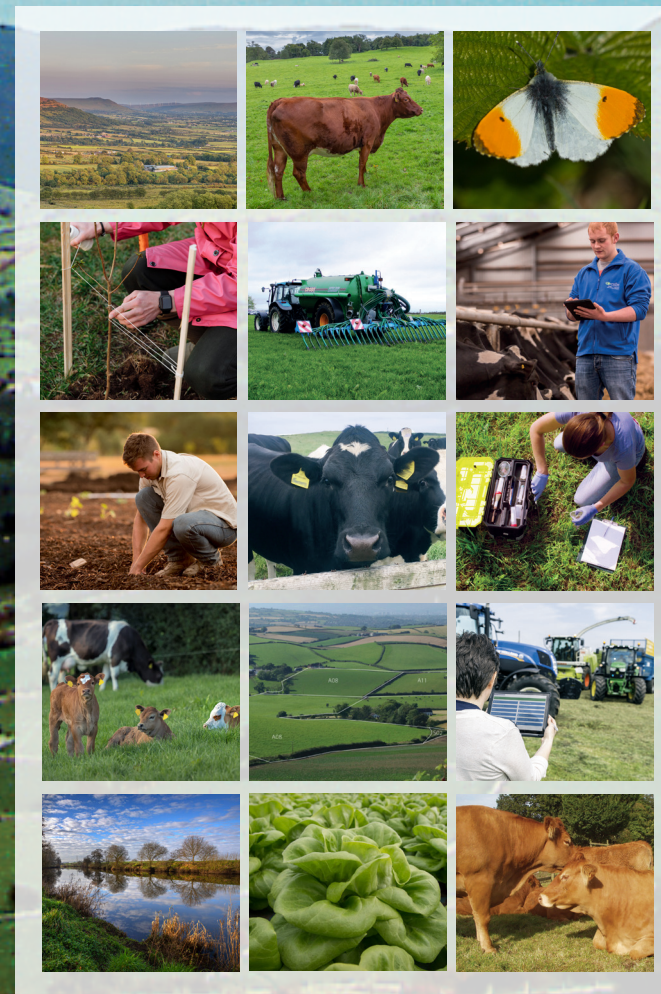


Consultation on Future Agricultural Policy Proposals for Northern Ireland

High Level Overview of Responses



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FUTURE AGRICULTURAL POLICY PROPOSALS FOR NORTHERN IRELAND
HIGH LEVEL OVERVIEW OF CONSULTATION RESPONSES

| RESILIENCE MEASURE | | | |
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| 1. The proposal is that payment will continue to be area based, use entitlements and that funding will be directed to active commercial farm businesses | | | |
| No | Question | Outcome | Key Themes Raised |
| Q 1(i) | Do you agree that income support is needed in the form of a Resilience Payment set at an appropriate level? | 272 responses to this question, 92% agreed and 8% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Must be set at an appropriate level to give protection, but not an incentive for inactivity. • Farm businesses unsustainable without payment - low incomes/volatility/rising input costs/cheaper imports. • Clear timeframe setting out a defined transition period needed. • Farmers are not receiving a fair price for food. • Protects environmental and animal health standards. • Ensures the supply of affordable quality food. • Resilience Payment should be linked to inflation. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Farmers should be encouraged to transition to running a financially sustainable business. • Move straight to a 3 year transition to divert funds from this to other support measures. • Area based entitlements are flawed. • Instead of subsidies farmers should receive a fair price for the produce they produce. • Move away from subsidies to a system of public money for public goods. • Resilience budget must be increased and ring fenced. |

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| Q 1 (ii) | Do you agree that farm businesses that solely produced grass/grass silage for sale during a historic reference period should not be eligible to claim the Resilience Payment? | 259 responses to this question, 47% agreed and 53% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Grass growers/sellers are not active farmers. Only livestock or crop producers should get payment. • Grass growing/selling is low risk. • Resilience Payment should be targeted at those at greatest need. • Farm businesses that solely produced grass/grass silage for sale are reliant on greater fertiliser and slurry use. • Growing grass for anaerobic digestion should not be funded. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Grass/silage production underpins NI agriculture. • No different than potato or cereal producers receiving support. • Allowed as part of last CAP funding. • Could exclude farms delivering environmental benefits (peatland restoration/managing priority grassland). • Will exclude genuine farm businesses. • Production of grass for anaerobic digestion should be promoted. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Need for more clarity around the active farmer criteria. |
| Q 1 (iii) | Do you agree that businesses that maintained land in a state suitable for grazing or cultivation but undertook no further agricultural activity during a historic reference period should not be eligible to claim the Resilience Payment? | 255 responses to this question, 52% agreed and 48% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Not active farmers. • No tangible output therefore not a commercial business. • Not incurring the same costs as livestock farmers. • Not contributing to the agricultural economy. • Not the type of activity that will move the agricultural industry forward. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Will exclude farms delivering environmental benefits (peatland restoration/managing priority grassland). • Resilience payment needed by all farmers to survive. • Could lead to land abandonment. |

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| | | | <ul style="list-style-type: none"> • Previous policies encouraged farmers to keep land in good agricultural and environmental condition (GAEC). • Could have an effect on opportunities for generational renewal. |
| Q 1 (iv) | To give effect to the proposals relating to grass selling businesses and those maintaining land in GAEC, do you agree that an historic year or years should be used to restrict the allocation of entitlements for Resilience Payment to farm businesses which met the following criteria: (i) had cattle or sheep registered on APHIS; and/or (ii) had at least 3 ha of an arable or horticultural crop during the reference period in an historic year or years? | 255 responses to this question, 45% agreed and 55% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • No perfect system but is an attempt to rule out extreme cases. • Effective way to prove active use of land and help protect small holders who produce food. • Means payments will go to farmers only. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Previous policies encouraged farmers to scale back animal numbers and arable production so unfair to exclude them now. • A three year historic reference period would be fairer. • Does not allow for new entrants or farmers who have recently scaled up production. • Ill health of farmer could have affected production in reference year. • Unfair to outdoor pig and poultry enterprises. • Evidence of crop sales/trading activity should be used as evidence of activity. • Not all sheep keepers register sheep on APHIS. • Stop looking at historic activity. If farmers meeting the qualifying criteria now they should be eligible. • Farms of all sizes should be eligible for resilience payment. • 3 ha minimum too large for some specialist or small scale horticulture growers. |
| 2. The proposed conditionalities outlined to be eligible to claim the Resilience Payment are aimed at environmental improvement. | | | |
| 2 (i) | Participation in soil testing, including Light Detection and Ranging (LiDAR) – do you agree with this being a condition to claim the Resilience Payment? | 258 responses to this question, 66% agreed and 34% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Soil sampling makes environmental and economic sense. • In favour if no additional cost to farmer/as long as these measures are affordable. |

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| | | | <ul style="list-style-type: none"> • Try not to increase paperwork burden. • Various frequencies suggested (up to 5 years). • Soil testing frequently mentioned, LiDAR not. • Province wide LiDAR survey an invaluable asset. • A graduated roll-out should be considered. • Education needed. • Could not support if results used in DAERA 'enforcement programme'. • Results must remain confidential. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Too burdensome on smaller farmers. • Alienates hill and LFA farmer, also older farmers. • Coercion, red tape. |
| 2 (ii) | Preparing a Nutrient Management Plan (NMP) based on the soil testing and LiDAR information – do you agree with this being a condition to claim the Resilience Payment? | 254 responses to this question, 54% agreed and 46% disagreed | <p><i>Good Agreement:</i></p> <ul style="list-style-type: none"> • Not difficult. • Makes you more efficient. • Each farmer will require a mentor. • If a farmer does not act on results, no more payments. • Due to importance of this measure, other farmers not eligible for resilience but eligible for other measure should also have this as a condition. • Nutrient management calculator on DAERA site a great tool. • This should be a focus for the proposed Knowledge Transfer Workstream (training for farmers). • Better for environment and water quality. • Not convinced by the LiDAR role. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Soil testing maybe but LiDAR not. • Try not to increase paperwork burden... you are just increasing costs to farmers. • Will encourage intensive farming. • Farmer knows land better than anyone. • This would cripple rural upland farms. • Too complicated for many farmers (av. age around 58), need grace period. |

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| | | | <ul style="list-style-type: none"> • Generally regarded as 'paper exercise'. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Farmers must be supported to understand, rather than punished for not having an NMP based on this |
| 2 (iii) | Recording of sire data on APHIS/NIFAIS for all calves born on both dairy and beef herds - do you agree with this being a condition to claim the Resilience Payment? | 248 responses to this question, 60% agreed and 40% disagreed | <p><i>Good agreement:</i></p> <ul style="list-style-type: none"> • Excellent measure to improve suckler herd genetics • Improve quality of stock... reaching a sustainable profitable business without support. • Enables better management. • Already doing it. • Not much hassle to click a button. • Only if no penalties applied for error/when bulls changed over. <p><i>No agreement:</i></p> <ul style="list-style-type: none"> • Wouldn't make a difference. • Too much bureaucracy. • It will not be done accurately. • Argument that planned genetics is going to influence environmental sustainability is far-fetched. • Only necessary for pure breeds. • Difficult to identify sire data if a cow is purchased that is already in-calf. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Mixed semen used in AI was noted as a complication – it may not always be clear which is the sire. |

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

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| 3 (i) | Do you agree with the proposal that progressive capping of the Resilience Payment will apply above £60,000? | 260 responses to this question, 73% agreed and 27% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Fair/more level playing field. • £60,000 more than sufficient safety net – businesses requiring more income support are not viable. • Small farms require more support. • Will discourage intensive farming. • Progressive capping will allow time to adapt. • Same capping rate should apply to Farming for Nature and Farming for Carbon measures. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Will dis-incentivise growth. • £60,000 is still too high. • Not enough analysis presented to justify reducing the cap. • Larger farms can incur higher running costs and need higher payments to make them resilient. • May result in splitting of farm businesses. • Discourage farms expanding beyond a certain size. • Cap should begin at average payment in NI to incentivise larger farms towards Farming for Nature and carbon measures. • Penalises larger farmers who support rural areas and employs multiple people. |
| 3 (ii) | Do you agree with the proposal to increase the minimum claim size threshold to 10 ha? | 293 responses to this question, 8% agreed and 92% disagreed | <p><i>Agreement</i></p> <ul style="list-style-type: none"> • Mostly part-time farmers (hobby). • Levels of production or risk and effort taken by those sized farms is minimal and are risk averse. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Discrimination against small farms. • 10 ha is too high. • Difficult for new entrants/young farmers to obtain land. • Smaller farms have less carbon footprint/more High Nature Value (HNV) areas. |

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| | | | <ul style="list-style-type: none"> • Small holders can be most innovative producers/niche sectors. • Unfair to pig, poultry and horticultural businesses. • Negative impact on rural communities. • Support for all active farmers who are productive. • Should be more support for small farmers not less. • Not all small farmers have other sources of income. • Will put many small farms out of business. • Can support it for grassland/livestock farms but not for the horticulture sector. <p><i>Additional comments</i></p> <ul style="list-style-type: none"> • Should be set at 5 ha (10 responses). |
| 4. The proposal is that there will be a new crisis framework that will enable the Department to assess potential risks and determine the most appropriate intervention for a specific crisis. | | | |
| 4 (i) | Do you agree with the principles proposed in the development of a Crisis Framework? | 230 responses to this question, 70% agreed and 30% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Uncertainty in agriculture. • Risk Management is important/farmers need to build resilience into their business. • Crisis should be assessed individually. • Only for catastrophic events/exceptional circumstances. • There should be industry involvement to agree thresholds/targeted sectors. • Quick decisions are required in crisis situations/policy must ensure that, in a crisis, payments are responsive, easily accessible with minimal bureaucracy. • Insurance schemes (some support for private insurance while others prefer an insurance scheme funded by small % reduction in Resilience Payment). • Public intervention/Private Storage Aid not adequate. • Interest free loan is an option that should be explored. • Support through Knowledge Measure is vital. • Yes but budget should not come from top slicing existing funding. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • More information is required. |

HEADAGE SUSTAINABILITY PACKAGE

| No | Question | Outcome | Key Themes Raised |
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| 5 | Do you agree that payments under the Headage Sustainability Package will be made only to businesses in receipt of payments under the Resilience Measure? | 225 responses to this question, 48% agreed, 52% disagreed. | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Ensures those in receipt of Headage Payment adhere to Resilience Measures conditions. • Those who meet Resilience criteria more likely to support improvement through genetics. • Concerns raised about the minimum claim size under the Resilience Measure was too high and could exclude small farms <p><i>No agreement</i></p> <ul style="list-style-type: none"> • If farm is sustainable, it should be eligible for headage payment irrespective of size. • Proposal excludes small scale beef and sheep farms. • Disagree with Headage as a Measure – viewed as a regressive step. • Concerns on the impact of a Headage Measure in uplands and high nature value farms |

Suckler Cow Measure

6. The proposals and conditions outlined for any Headage Sustainability Measure for suckler cows are aimed at driving productivity to make the sector more efficient and environmentally sustainable.

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| 6 (i) | Reducing age of first calving – do you agree with this measure and the pace of phased implementation proposed? | 228 responses to this question, 37% agreed , 63% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Appropriate training and knowledge interventions will need to be provided. • Efficiency measure that should help reduce costs and decrease emissions. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Some breeds including native breeds are not sufficiently mature to meet targets. • 27 months is too young for first calving. • Animal welfare concerns if heifer is put into calf too early. • Risk of intensification of the sector. • Difficult for hill farmers to meet targets. • Risk of reducing genetic diversity. • Pace of implementation too fast. |
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| | | | <ul style="list-style-type: none"> • Hard to get heifer back in calf if she has first calf too young. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Further engagement and consideration needed for native breeds that graze in upland areas. • Discussion on the timeframe. |
| 6 (ii) | Reducing the calving interval - do you agree with this measure and the pace of phased implementation proposed? | 224 responses to this question, 41% agreed, 59% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Efficiency measure that should help reduce costs and decrease emissions. • Can lead to better economic outturn and environmental benefits but might require contingency arrangements. • Appropriate training and knowledge interventions will need to be provided <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Practical reality will be very challenging for many farmers. • Timescales are too tight – more time needed. • Animal health and welfare concerns need to be considered. • Need to have contingency measures. • Will lead to unnecessary culling of important blood lines; and young cows. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Consider extending timeframe over six years with annual review |
| 6 (iii) | Do you agree payment should be made only to qualifying suckler cows where live calves are registered with DAERA? | 222 responses to this question, 59% agreed, 41% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Traceability an important aspect of support and calves should be properly registered. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Many reasons for calves born dead which are outside of good management practices. • Dead calves should be registered (and BVD tissue sampled) to qualify for support. |

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| | | | <ul style="list-style-type: none"> • May lead to healthy animals being culled if they lose a calf. • Should be a level of flexibility for herds. • Loss of a calf is a direct loss to the farmer. |
| 6 (iv) | Do you agree that payment quotas will apply to the suckler cow measure and be calculated on an individual farm basis based on historic reference data? | 216 responses to this question, 51% agreed, 49% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Reference year will ensure that farmers cannot artificially increase herd numbers. • Any system will need to accommodate new entrants / those adjusting their enterprises/those facing exceptional circumstances. • Should prevent overstocking. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Concern reference year maintains status quo rather than encourage change. • Should not limit farmer expansion. • Concern could lead to an increase in headage numbers or have negative environmental impacts. • Insufficient detail on reference year. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • More details are needed |
| 6 (v) | Do you agree that the payment quota may be traded and usage rules will apply? | 214 responses to this question, 58% agreed, 42% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Need to be able to trade to facilitate farmers entering / leaving the industry. • Usage rules are unclear in the consultation document but trading needs to be controlled and reviewed. • Should not lead to overstocking of land. • Trading in quota is an administrative necessity but should not have any financial value. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Incentivises manipulation. • Individuals should not be able to buy quota off smaller farms. • Should be no unintended consequences. |

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| | | | <ul style="list-style-type: none"> Trading in quotas is artificial and leads to market distortion. <p><i>More work needed</i></p> <ul style="list-style-type: none"> More details needed on quota trading and usage rules |
| 6 (vi) | Do you agree that there should be a retention period of at least 6 months? | 205 responses to this question, 64% agreed, 36% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> Allows for better control and promotes good practice. Ensures the farmer that has incurred most costs gets paid. Helps reduce unnecessary movements of animals and prevents disease spread. Need some flexibility in specific circumstances. <p><i>No agreement</i></p> <ul style="list-style-type: none"> Recognise principle but more detail is needed. Should be a shorter period. Need to consider replacement animals. Some flexibility needed <p><i>More work needed</i></p> <ul style="list-style-type: none"> More details on retention periods needed |
| 6 (vii) | Do you agree that in the future, claimants under this measure will be required to provide data [to be determined] to support a genetics programme? | 215 responses to this question, 48% agreed, 52% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> Fundamental management tool to help drive improvements in productivity and better environmental performance. NI needs a much better developed livestock database. Proposal incentivises farmers to participate in a genetics programme. Needs to be simple for farmers to record data/participate. <p><i>No agreement</i></p> <ul style="list-style-type: none"> Insufficient details. Too much paperwork for farmers. <p><i>More work needed</i></p> <ul style="list-style-type: none"> More details on genetics programme needed. |

| Beef Transformation Measure | | | |
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| 7 | Do you agree on the proposal to slaughter clean beef animals at 24 months to make the sector more productive and environmentally sustainable? | 218 responses to this question, 44% agreed, 56% disagreed | <p>This was a Y/N question. Some comments were received and included:</p> <ul style="list-style-type: none"> • Some consideration needs to be given to the type of production system. • Many upland and hill farms are farming in a sustainable and environmentally friendly way. • Farmers will need appropriate training and knowledge transfer. • Concern that native / slower maturing breeds will not be able to meet the proposed targets. • Concern that move to slaughter at a younger age will result in increased feed / meal being used. |
| 8 | Do you agree that only animals born and bred in Northern Ireland should be eligible for support under the Beef Transformation Measure? | 217 responses to this question, 63% agreed, 37% disagreed | <p>This was a Y/N question.</p> <ul style="list-style-type: none"> • Very few comments received and generally supported the principle that support should be limited to NI producers. • One organisation did not support and indicated a potential to disrupt trade from ROI and undermine longstanding trade patterns. |
| 9 | Do you agree with the proposed pace of phased implementation to reduce the age of slaughter to 24 months? | 215 responses to this question, 39% agreed, 61% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Allows time for farmers to adjust particularly for slow maturing breeds • Finishing cattle early should not have negative environmental consequences. • Appropriate training and knowledge interventions will need to be provided. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Potential disruption to supply chain re supply / demand and carcass conformation • Proposed targets difficult to achieve for native breeds which mature more slowly • Risk of increasing emissions if concentrate replaces grass |

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| | | | <ul style="list-style-type: none"> • Pace of implementation too fast – longer implementation period needed • Concerns around animal welfare. • Options needed for native / slow maturing breeds and those farming the uplands and marginal land. • Need significant improvement in herd health and genetic improvement to achieve targets. • Will result in intensification and impact on NI's 'green' food image. • Need for regular review. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Consider a more appropriate timeframe. |
| 10 | Do you agree a single minimum slaughter age of 12 months for all cattle? | 211 responses to this question, 64% agreed, 36% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Some high performing breeds/those with genetic potential are ready for slaughter before 12 months. • Concern on welfare grounds if there is no minimum <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Below 12 months is known as veal and not widely accepted as beef, needs further discussion with meat sector/retail; • Could upset the veal market; • Minimum slaughter weight might be more appropriate; • Need to permit in certain circumstances, such as on welfare grounds; • 12 months too young unless for welfare reasons. • Minimum age of 12 months could result in inefficiencies. |
| 11 | What are your views on a single maximum slaughter age of 24 months for all cattle – should there be different maximum slaughter ages for bulls, steers and heifers? | 209 responses to this question, 54% agreed , 46% disagreed | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Better to have a single slaughter age for simplicity. • Bulls finish quicker than steers/heifers. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Timeframe is too tight. • Flexibility needed for different classes of animal. • Too inflexible for slower maturing / native breeds. • Difficult for those involved with more extensive beef production to meet 24 month target. |

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| | | | <ul style="list-style-type: none"> • 24 months too young to slaughter particularly for some breeds. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Need further analysis of the current slaughter patterns by breed /category. • Different maximum ages of slaughter are necessary, given that a 24 month minimum age on young bulls is meaningless and would not be in line with market specifications. This aspect of the policy needs further work. |
| 12 | Have you any other specific suggestions to provide support for other parts of the beef sector? Explain your answer. | 81 responses were received | <p><i>Specific suggestions included:</i></p> <ul style="list-style-type: none"> • Consideration should be given to schemes to improve efficiency and environmental sustainability such as those in Ireland and Scotland. • Incentivise pasture based/organic sectors. • Consider support for farmers in the hills/uplands similar to Less Favoured Areas/Area of Natural Constraint Schemes. • Support to improve the genetic merit of herds. • Potential incentives for native /traditional breeds that use extensive grazing systems. • Support animal health /welfare initiatives. |
| 13 | Do you have any specific suggestions for incentivising productivity in breeding ewes? Explain your answer. | 84 responses were received | <p><i>Specific suggestions included:</i></p> <ul style="list-style-type: none"> • Sheep sector provides a range of public goods which needs to be recognised. • Sheep play an important environmental and conservation role particularly in the uplands which needs to be maintained. • Support for improving the health and welfare of sheep such as the Irish Sheep Welfare Scheme; • Support to ensure that sheep are raised to the highest welfare and environmental standards • Support to improve the genetics and overall quality of the NI sheep flock. • Lack of support has the potential to distort the market and balance between cattle and sheep. • Lack of support could have negative consequences for the NI Wool Sector. |

| FARMING FOR NATURE PACKAGE | | | |
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| No | Question | Outcome | Key Themes Raised |
| 14 | What are your views on the suggested policy proposals and environmental principles to be incorporated within the Farming for Nature Package? | 132 responses to this question | <p>Broad agreement for the introduction of a Farming for Nature Package, and that the proposals represent a good starting point for future scheme design.</p> <p><i>Some concerns around:</i></p> <ul style="list-style-type: none"> • Transition of funding from Resilience to Farming for Nature, payment levels, timing of implementation. • Recognition of previous improvements under agri-environment schemes, habitats already on farm. • Level of financial incentives. • UFU proposed its own 'Farming with Nature' as an alternative scheme. This alternative scheme includes proposals on some elements of the resilience and farming for carbon measures, in addition to Farming for Nature proposals. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Co-design with a range of stakeholders to develop details |
| 15 | What are your views on proposals to prioritise actions through environmental improvements to reverse the trends in nature decline by creating and restoring habitats that are important for species diversity? | 123 responses to this question. | <p><i>Views expressed included:</i></p> <ul style="list-style-type: none"> • <i>Various aspects of scheme design</i> – not to be approached in a silo fashion, should include integration of mixed farming landscapes, flexible and site specific habitat restoration plans, and landscape-scale habitat creation. • <i>Sufficient finance available</i> – creation of new habitats and maintenance of existing habitats should be financially rewarded. Bridging the financial gap between those who farm in a sustainable manner and those who don't. Ensuring subsidies are paid to small farmers (<10 ha) to stay on the land and promote nature and a sustainable environment. • <i>Eligibility</i> – Active and non-active farmers should be included. Some concerns about the perceived hierarchical nature of the proposal and its relevance to selective farms. • <i>Habitat connectivity</i> – the creation of a long forest connecting sites of high biodiversity value across NI. The creation of a more coherent and resilient ecological network. Reverse the trends in nature decline through native trees |

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| | | | and hedgerows, riparian buffer strips, and tree plantations around livestock yards. |
| 16 | Do you agree with the proposed eligibility criteria and minimum claim size proposals? | 194 responses to this question, 33% agreed, 67% disagreed and 113 made specific comments Note – the majority of those NOT in agreement were individuals or individual farmers. | <i>Specific comments included:</i> <ul style="list-style-type: none"> • A minimum land area should not be introduced. • Smaller farms should not be excluded. <i>More work needed</i> Given the lack of consensus on the minimum claim size, further work needs to be done on this, including examining the potential administrative burden/cost on scheme delivery |
| 17 | Do you agree with focusing on the habitat management actions listed as an initial mechanism to kick start improved awareness and capacity to manage environmental assets? | 174 responses to this question, 72% agreed, 28% disagreed | <i>Specific comments included:</i> <ul style="list-style-type: none"> • <i>Flexibility of habitat management actions</i> – allowing change over time. The proposals provide options available to all types of farming enterprise. Whilst the management actions are appropriate as an initial step, they should not be prescriptive and flexibility to allow local solutions. • <i>Training requirements</i> – Suitable training and guidance should be given to farmers to allow for habitat identification. This will allow farmers to draw up their own management plans. Specific training for farmers on hedgerow management. There is a long learning curve. |
| 18 | Do you have specific suggestions for other quick win management actions? | 107 responses to this question, 69% had suggestions, 31% had no suggestions | <i>Specific comments included:</i> <ul style="list-style-type: none"> • <i>Support for hedgerows</i> – grants needed for more hedge planting. Removal of hedgerows needs to stop. No penalties for farmers who have thick hedges. Hedgerows can easily be accommodated (on the farm) with little loss in productivity. • <i>Support for tree planting and woodland</i> – pay farmers to grow trees in hedgerows and not to reclaim land. We need trees and these areas should qualify under environmental payments. Better management of existing ancient woodlands. • <i>Training requirements</i> – regenerative agricultural courses should be taught at CAFRE. Clear actions with specific short webinars. Ensure communication is in place to highlight examples of best practice. On-farm training. |

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| | | | <ul style="list-style-type: none"> • <i>Focus on ensuring clean water</i> – Subsidise farmers under 10 ha to promote sustainable clean water and nature friendly habitat. Look at times of year for spraying slurry. Reed bed filtration systems or tree planting around slurry stores. |
| 19 | What are your views on proposals to introduce 'Test and Learn' pilots? | 119 responses to this question, 75% were in favour of 'Test and Learn' pilots, 10% were against and 15% were unsure | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Design: <ul style="list-style-type: none"> - Piloting new approaches of farm support ensures they are practical to deliver and capable of delivering environmental outcomes. - Ensuring the financial and advisory rewards from participation will attract interest from farmers and support farmer to farmer learning. • Collaboration: <ul style="list-style-type: none"> - Opportunity to listen to those on the ground with experience in their particular area. - Welcome the opportunity to support DAERA with Test and Learn pilots. • Education: <ul style="list-style-type: none"> - Habitat management becomes second nature to farmers. - Need to start fostering the will for farmers to collaborate early. <p><i>No agreement or unsure</i></p> <ul style="list-style-type: none"> • Unnecessary delays: <ul style="list-style-type: none"> - Having protracted pilots must not be seen as a delaying tactic. - Knowledge is already available and lessons should not needlessly be relearned. • Design concerns. • Age profile (barrier to change). <p><i>More work ed needed</i></p> <ul style="list-style-type: none"> • Test and learn outcomes. • Transition from current EFS, having processes in place to prevent gaps in funding. |

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| 20 | Have you specific suggestions for other components that could be incorporated into 'Test and Learn' pilots? | 99 responses to this question, 48% made suggestions, 52% had no further suggestions | <p><i>Themes and suggestions</i></p> <p>Facilitators:</p> <ul style="list-style-type: none"> • Key aspect of scheme includes facilitators that farmers can respect and work with. • Defining the role of facilitators and farm advisers in delivering outcomes. • Must have good facilitators or demonstrations in place which are realistic and achievable. • Facilitators and trainers need to be experienced in delivery and monitoring of the schemes. <p>Education:</p> <ul style="list-style-type: none"> • CAFRE training to help individual farmers carry out a survey of the current state of a particular habitat on their farm. • Educating next generation on importance of environment. • Integrating environmental and farm business advice in order to deliver environmental and farm business outcomes. <p>Plans and assessments:</p> <ul style="list-style-type: none"> • Environmental land management plans to target the delivery of environmental outcomes. • Effective farmer-based assessments to measure the delivery of environmental improvements. <p>Trials and pilots</p> <ul style="list-style-type: none"> • Hedge cutting trials and pesticide free farm trials, topping weeds rather than spraying. • Testing the efficiency and effectiveness of the inspection regime. • The relationships with land occupation arrangements. • Pilots on cover crops. |
| 21 | What needs to be in place to support delivery of an outcome-focused approach? Explain your answer. | 81 responses to this question | <p><i>A wide range of suggestions were made and the most frequently suggested were:</i></p> <ul style="list-style-type: none"> • Advice and guidance, education and knowledge transfer. • Advisors/facilitators/peer support. • Sufficient financial incentives. • Monitoring to assess progress and success. • Clearly defined outcomes. |

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| 22 | Have you specific suggestions for partnership delivery models that will encourage collaborative working? | 110 responses to this question, 65 respondents made suggestions | <p><i>Key themes</i></p> <p>Establishment of Business Development Groups or similar</p> <ul style="list-style-type: none"> • Farmers will think about the package and collaborating. • Include a fee for attendance. • A mentoring partnership between two or more farmers. <p>Group approach</p> <ul style="list-style-type: none"> • Opportunities for groups of farmers to work together to collectively implement environmental improvement measures. • Areas of habitat could be connected if farmers in between established wildlife corridors. <p>Look to other successes</p> <ul style="list-style-type: none"> • Farmer cluster model. • EIPs including BRIDE model. • Heart of the Glens initiative. <p>Concern raised over lack of inclusion of access to the countryside</p> <ul style="list-style-type: none"> • No mention of how the Northern Ireland public are to be treated as perhaps the key stakeholder • Use of countryside for recreation is a visible connection that public have with agriculture and an easy route to showcasing value. • A missed opportunity that consultation does not include any measures to support landowners to provide high quality outdoor recreational experiences |
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FARMING FOR CARBON MEASURES

| No | Question | Outcome | Key Themes Raised |
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| 23 | Do you agree on the proposals identified for low carbon emission farming practices? | 181 responses to this question, 68% agreed and 32% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Use of genomics should be promoted to encourage breeding superior animals and minimise non-productive animals in a herd. • Breeding crops with increased yield and disease resistance just as important as breeding improved livestock. • Soil testing, nutrient management and lime is key to reducing use of fertiliser. • Nature based solutions should receive higher priority than technological ones. • Low carbon farming plans could be implemented through farms choosing from a menu of options specific to their farm. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • They do not go far enough. • The farming industry needs to change its product mix. • While reducing non-productive livestock is sensible first step, an overall planned reduction in livestock will be necessary. • The opportunity to reduce GHG emissions by shifting from livestock to crop production has been ignored. • Concerns raised around biomethane/hydrogen and its inclusion within a future support model. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Quantify effectiveness and cost-benefit of each measure. |
| 24 | Do you agree with the principle of encouraging the Farming of Carbon as a business enterprise? | 178 responses to this question, 71% agreed and 29% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Peatland restoration should be rapidly prioritised, but funded from outside the agriculture budget. • Farmers should start to use simple carbon calculators as soon as possible. • Establishment of appropriate measuring, reporting and valuation mechanisms is essential. • Incentives needed for more, taller and thicker hedges with more hedgerow trees. |

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| | | | <ul style="list-style-type: none">• Agroforestry proposals should be elaborated and progressed.• Farmers need considerable training on the benefits of carbon farming, and on the pitfalls of carbon trading. <p><i>No agreement</i></p> <ul style="list-style-type: none">• Farming is producing food, you cannot eat carbon.• The planting of trees on productive high-grade land must be economically and ethically questionable.• There is a concern that farmers may be taken advantage of by others regarding carbon credits. <p><i>More work needed</i></p> <ul style="list-style-type: none">• Modelling of options, taking into account carbon footprints and the implications for biodiversity should be put out for consultation. |
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| INVESTMENT MEASURE | | | |
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| No | Question | Outcome | Key Themes Raised |
| 25 | Do you agree the guidelines when considering future capital support? | 150 responses to this question, 64% agreed, 36% disagreed. | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Agree it is important to avoid overcapitalisation. • Support for investments that are cutting edge or innovative. • Collaboration should be supported. • Investment support for environmental improvements, carbon reduction and other public goods. • Recognition that capital may not be the most efficient means of securing objectives. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Cut the red tape, too complicated, need to simplify. • Need to support small farms. • Doesn't offer better terms for under-represented groups (young farmers, women up to 60) and does not support generational renewal. • Collaboration can be difficult to achieve / maintain <p><i>More work needed</i></p> <p>Comments received will be used in considering next stages e.g.:</p> <ul style="list-style-type: none"> • Scheme design - take account of future cost inflation and the percentage of grant support available. • Consider leasing and pre-owned equipment, with maintenance contracts. • Support for contractors. |
| 26 | Do you agree the draft design principles when considering future capital support? | 141 responses to this question, 57% agreed, 43% disagreed. | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Broad agreement that the design principles are appropriate. • Targeted/specific schemes to achieve policy objectives. • Deliver environmental outcomes. • Support for collaboration. • Contributes to the delivery of wider policy objectives. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Need more wide ranging principles that would lead to better outcomes for nature and the rural community. |

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| | | | <ul style="list-style-type: none"> • What these mean in practice is important e.g. in terms of smaller investments • A targeted and well-funded scheme for Horticulture. <p><i>More work needed:</i> Comments received will be used in considering next stages e.g.:</p> <ul style="list-style-type: none"> • Scheme design – consider potential for small/minor enterprises to lose out. • Scheme design – input from agriculture / horticulture sectors. |
| 27 | Have you any suggestions on the capital assistance that might support the agriculture and horticulture sectors? Explain your answer. | <ul style="list-style-type: none"> • 81 substantive comments received | <p><i>Comments included:</i></p> <ul style="list-style-type: none"> • Range of suggestions for assistance relating to precision technology, innovation, renewable energy, automation, storage, health and safety, and animal health and welfare. • Some responses suggested that business capital assistance should be determined by the usual lending houses and on the basis of the sustainability of the farm business. Others suggested low interest loans. • There was support for collaborative working, including machinery rings and farmers/growers groups but recognition that it is difficult to administer and to sustain ongoing agreement between partners. • Suggested that there should be support for environmental and carbon reduction projects. • Suggested that there should be support for modernisation of farm buildings. • Suggested that there should be support for horticulture, with a range of suggestions. |

| KNOWLEDGE MEASURES | | | |
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| No | Question | Outcome | Key Themes Raised |
| 28 | What are your views on the approach to Knowledge Transfer and Innovation programmes for land managers, farmers and workers set out in this document? | 102 responded to this question. | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • General agreement on the approach proposed. • Everybody can learn something new. • Education and knowledge transfer are going to be critical to achieve the policy outcomes. • Expand to engage those experts who engage with farmers. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Reasons for limited uptake of Business Development Groups by the Horticulture industry. |
| 29 | Have you specific views on how best to encourage the participation of land managers, farmers and workers in Knowledge Transfer and Innovation programmes? | 90 responded to this question | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Peer learning should be a good focus in delivery. • Provide a financial incentive / payment for participation. • Provide free training. • Provide locally. • Deliver online / recorded and in the evenings. • Important for participants to see benefit. • Extend existing model to get more farmers involved. |
| 30 | Have you specific views on how best to encourage the adoption of innovation by land managers, farmers and workers? | 88 responded to this question | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Demonstrate the benefits, use case studies. • Establish knowledge transfer hub, database. • Support for early adopters / risk takers. • Use online delivery. • Provide reward for adoption. • Provide local delivery. |
| 31 | Are there gaps in the current provision Knowledge Transfer and Innovation programmes that need to be addressed? | 96 responded to this question; 80% agreed and 12% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Knowledge on environmental challenges, carbon, water catchments and bio-diversity. • Soil management, benefits of soil testing and LiDAR. <p><i>Other gaps identified:</i></p> <ul style="list-style-type: none"> • Animal health, sustainable use of antibiotics. • Education streams for the intensive sector. |

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| | | | <ul style="list-style-type: none">• Specific programmes required for Soft Fruit and Top Fruit sectors.• Need to develop training for women and training in transferable skills.• Training for those where English is not their first language. <p><i>More work needed</i></p> <ul style="list-style-type: none">• Impact of vegetable production on such areas as, carbon sequestration, biodiversity, the ability to improve farm resilience through the introduction of a horticulture enterprise, vertical horticultural production and the support of a circular economy. |
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GENERATIONAL RENEWAL

| No | Question | Outcome | Key Themes Raised |
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| 32 | Do you agree that there is a need to encourage longer-term planning for farm businesses? | 160 responded to this question, 90% agreed, 10% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • This will encourage younger entrants to the industry. • Planning is essential. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • This is a family matter and shouldn't have intervention. • Generations should be allowed to run their own course. |
| 33 | What are your views on a Generational Renewal Programme and the proposed three phase approach? | 84 responded to this question | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • The proposed three phased approach. • The importance placed within the proposal on the outgoing/retiring farmer. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Too simplistic to cover the many different farm situations. • A personal / family matter and government shouldn't interfere. • Should not be linked to a level 3 qualification. |
| 34 | Do you agree with the inclusion of knowledge and skills development within the Generational Renewal Programme? | 143 responded to this question, 83% agreed, 17% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Vitally important. • Very important but not just academic development – important for successors to have as many relevant and transferrable skills as possible. • Support successors and give them training. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Concerns expressed that some would find it hard to complete a qualification. • Should be comparable with any other industry. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • More clarity needed around level 3 qualification |
| 35 | Do you agree that incentives should be provided to those | 141 responded to this question, 85% agreed, 15% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Any incentive will encourage participation. • Important that incentive offered to next generation. |

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| | <p>participating on the Generational Renewal programme on achievement of specific objectives or on progress made?</p> | | <ul style="list-style-type: none"> • Opinions varied on whether incentives should be linked to achievement of objectives or progress made. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • It is in the participants' interest and so shouldn't need incentives. • Should not need taxpayers money to do what is normal business practice. • No government department should intrude on such personal decisions. <p><i>More work needed</i> Loans/New Entrants Scheme to enable successors to develop new enterprises.</p> |
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| SUPPLY CHAIN MEASURES | | | |
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| No | Question | Key Themes Raised | Outcome |
| 36 | What are your views on the scope and effectiveness of existing supply chain measures (market transparency/information, education and knowledge transfer programmes, incentivisation schemes and regulation) to help deliver a more efficient, competitive supply chain? | 77 responses to this question. | <p><i>There was strong agreement that more needs to be done to create effective functioning supply chains. The views expressed by respondents have been grouped together.</i></p> <ul style="list-style-type: none"> • Transparency and fairness around pricing, grading and traceability throughout the supply chain - use of technology such as blockchain. • Buy-local, marketing and promotion of local produce. • Encouragement of more widespread producer collaboration. |
| 37 | Do you agree with the three proposed policy areas when considering future supply chain measures? | 115 responses to this question, 73% agreed, 27% disagreed. | <p><i>There was strong endorsement for the three proposed policy areas with additional comments grouped below:</i></p> <p><i>Good Agreement:</i></p> <ul style="list-style-type: none"> • Need to focus on entire supply chain. • Need to focus on local produce/shorter supply chains. • Encourage formation of Producer Groups/Organisations. • Need to focus on market intelligence/skills/professional assistance. • Need for strong policy coherence between supply chain and Food Framework, especially through buy-local/procurement. <p><i>More work needed:</i></p> <ul style="list-style-type: none"> • Need more information/clarity on proposals. |
| 38 | Are there specific gaps in the approach that you feel need to be addressed? | 96 responses to this question. | <p><i>There was a wide range of suggestions provided which have been grouped below:</i></p> <ul style="list-style-type: none"> • Development of 'local food' and short-supply chain infrastructure (e.g. food hubs, farm shops, encouraging public sector food procurement etc). |

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| | | | <ul style="list-style-type: none"> • Development of incentive schemes/pilots to encourage supply chain co-operation. • Improved producer access to and awareness of market intelligence. |
| 39 | Are there specific early actions that you would like the Department to take to support supply chain development in the agriculture and horticulture sectors? | 98 responses to this question. | <p><i>There was a wide range of suggestions provided which have been grouped below:</i></p> <ul style="list-style-type: none"> • Need to focus on the whole supply chain. • Significant opportunity in local food public procurement. • Need to develop tailored schemes to encourage supply chain co-operation, including Producer Organisations. • Need to improve transparency and quality of feedback information (pricing and performance data) to farmers – using for example blockchain technology. |

| SOIL TESTING AND LiDAR | | | |
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| No | Question | Outcome | Key Themes Raised |
| 40 | What are your views on the proposed uses for data provided via the proposed Soil Nutrient Health Scheme? | 109 responses 90 % of Stakeholders agreed that the proposed uses of data provided via the Soil Nutrient Health Scheme is needed to establish a soil nutrient and carbon baseline across NI and agreed that the use of LiDAR maps is important for making informed management decisions. The baseline is important for informing and directing future policy. 10% of Stakeholders disagreed. | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Support for the proposed uses of data provided via the Soil Nutrient Health Scheme which will establish baseline data on soil nutrient status and soil carbon modelling across all Northern Ireland farms. • The use of LiDAR data to make informed decisions by farmers through the provision of a Soil Lidar Map was also well received. . • Some concerns raised about the appropriateness of sharing soil data with landlords. <p><i>No Agreement</i></p> <ul style="list-style-type: none"> • The Scheme as over onerous and expensive on small farmers / stick to beat us with. • Issues with breach of privacy and data sharing. • Not suitable to farmers in hill areas where soil is of poor quality. • It will put small farms and hill farms at a disadvantage from the low land farms. <p><i>More Work needed</i></p> <ul style="list-style-type: none"> • Need for appropriate use of data sharing. • Useful if soil pesticide levels could be included, so problem pesticide fields could be identified and action then taken to prevent this from entering watercourses. • The Scheme should apply to all farms not just those receiving Resilience payment to establish a full baseline. |
| 41 | Do you agree that in order to maximise future support payments, applicants should have to demonstrate that they have a current, (updated regularly) Nutrient Management Plan? | 150 responses, 79% agreed, 21% disagreed. | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Good agreement that the NMP should be linked to support payments. • Measure was viewed as a key pillar of efficient and sustainable farming. • NMP linked to support payments is a means of addressing the major environmental challenge associated with agricultural nutrient run-off. |

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| | | | <ul style="list-style-type: none"> • NMPs essential for good overall farm management and potential profitability. Plans should be straightforward and support provided for farmers to complete. <p><i>No Agreement</i></p> <ul style="list-style-type: none"> • NMP should not be needed in order to maximise future support payments as this can become just a tick a box exercise. • There must be Knowledge Transfer programme to help educate and understand a NMP so that farmers and land managers become willing to complete them as a useful tool. • General view not needed and only adds to the admin burden on farmers. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • DAERA to consider formal guidance around management practices and independent advisory services alongside the SHNS to ensure farmers understand their soils and the ecosystem services they can provide alongside increases in productivity. |
| 42 | Have you further specific suggestions for how the data provided by the Soil Nutrient Health Scheme could be used or promoted by government? | 94 responses to this questions and 56 suggestions. | <p><i>Suggestions on uses of the data included the following:</i></p> <ul style="list-style-type: none"> • Data must not be used to regulate the industry, otherwise farmers may choose to withdraw from the scheme. • Keep ongoing publicity of the benefits of the scheme to farm profit and the environment. • Information may be useful for the industry to back up sustainability credentials to customers at an NI level. • Could be used to enhance the 'green' image of farming, to make consumers aware that NI fruit is produced to energy and nutrient efficient standards with minimal environmental impact. • Allow government to focus Knowledge Transfer and advisory efforts in specific geographic areas, and to consider support measures such as, for example, lime spreading subsidy, or other approved soil conditioners. |

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| | | | <ul style="list-style-type: none"> • The data will provide a valuable benchmark against which to assess progress. • Results should be published to demonstrate what areas and what intensity of farming is causing the most damage to the environment and the soil. • Data should be shared with partner organisations, in order to help achieve mutual objectives. • Soil and LIDAR survey results should be publicly available. • Repeat carbon surveys will provide insight into sequestration rates and studies on the link with management will help drive future policy. • The national baseline could be used to develop a 'scorecard' that will allow farmers to benchmark their performance against regional or national averages • Related education should not focus just on nutrient applications and timing but also look at the bigger picture of natural soil regeneration • Used as part of a risk assessment process to understand where intensive advice led enforcement action should be undertaken to reduce diffuse pollution within particular catchments. • Scheme should be repeated every 5 years, using the same methodology and the same geolocations • Farmers within specific catchment areas could work together to reduce nutrient runoff at a landscape scale thereby improving the quality of rivers rather than at a farm by farm level. • Lidar could be used to identify areas where flood waters could be allowed to gather thereby reducing flood risk further downstream. • It should be able to assess agricultural progress towards Zero-Carbon requirement by 2050. • Used as a basis for implementing carbon budgeting at individual farm level. • It would be important to see what all sectors of agriculture are currently contributing to GHG emissions and also what each land type is contributing be it SDA, DA or lowland. |
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| | | | <ul style="list-style-type: none"> • Rewards should be directed to those who are contributing least to these emissions and to those who are prepared to carry out measures to bring about reductions in these emissions. • Tools used for nutrient calculation and recommendations should reflect all relevant production systems. • There should be an annual independent report on how the scheme is working and if improvements are being obtained. This should go out to all farms. • Soil nutrient health and LIDAR survey results should be open source. • An education program should be developed which showcases the various methods by which soil health can be improved. • Include what is learned about NI soils as news shared regularly so that everybody learns more about the soil. • Farms that are low in phosphorous should be directed to AD operators as a cheaper way of securing and creating an economic circle for digestate and reducing chemical phosphorous through fertiliser. • Provides an opportunity to reward farmers for protecting and regenerating soils, including improving soil structure, main benefits of which are: <ul style="list-style-type: none"> • Better root support, access to air and water, nutrient uptake for most efficient cropping. • Percolating and purifying farm run-off. • Carbon storage. • Supporting biodiversity. |
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LIVESTOCK GENETICS AND DATA

| No | Question | Outcome | Key Themes Raised |
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| 43 | Do you agree that the Department should pump prime the initiation of an industry led Livestock Genetics and Data Programme? | 163 responses to this question 65% agreed, 35 % disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Government must make necessary investment to develop a relevant and targeted livestock genetics and data programme. • Increasing genetic gain will bring about several benefits to the livestock sector including increased productivity and reduced GHG emissions. |
| 44 | Do you agree that farmers should be required to provide data for the Livestock Genetics and Data Programme as an eligibility condition of future support payments? | 160 responses to this part of the question 55% agreed ,45% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Farmers should be required to provide data in order to facilitate improvements in the National herd. • Challenge is engagement of farmers. Therefore supportive of this approach. • This would vastly improve the rate of knowledge and potential improvements with such a data base. • Must be part of wider essential data collection measures which will improve baselines for biodiversity, greenhouse gas emissions, and other environmental metrics which have been well studied and can more effectively help deliver environmental outcomes and improve economic efficiency and resilience. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Concerns expressed that this may be too onerous for some farmers. • This should not be compulsory. |
| 45 | Do you agree with the proposal to develop knowledge transfer programmes to support farmers to adopt genetic improvement technologies? | 162 responses to this part of the question 73% agreed,27% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Very strong agreement with the proposals. • It will be important that farmers are in a position to understand reports and use the data for decision making. • There is a considerable level of training to impart this knowledge to all farmers and to train and influence their breeding decisions. • Sharing of information between peers tends to be well received as per the BDG principle. Peer-peer uptake of new technologies is successful. |

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| | | | <ul style="list-style-type: none">• Genetic progress in the beef and sheep sectors has been slow compared to other sectors and therefore support to adopt new technologies will be required initially.• Genetics might more readily capture the imagination of many livestock farmers than some other desirable initiatives.• Such programmes are vital to ensure that farmers recognise the need for careful breeding and have the knowledge and skills to deliver on that programme. |
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CONTROLS AND ASSURANCE

| No | Question | Outcome | Key Themes Raised |
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| 46 | Do you agree with the proposal to replace the current Cross Compliance system with the simplified 'Farm Sustainability Standards'(FSS)? | There were 142 responses to this question, 80% agreed, 20% disagreed. | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • FSS simplified compared to Cross Compliance. • Training / education focus to ensure compliance with FSS. • Improved guidance and balance between sanction and guidance/advice at inspection. • Protection of habitats and biodiversity, landscape and heritage (including archaeological features) and habitats <2 ha. • Pro-active communications. • New approach to penalties – e.g. fixed penalty notices and overall system with sufficient deterrent but proportionate. <p><i>No agreement</i></p> <ul style="list-style-type: none"> • Nothing substantive. A couple of comments on methodology used for removing certain requirements from FSS based on non-compliance data. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Penalty system – negligent vs intentional definitions; link to training of farmers; potential for farmers to automatically face an intentional breach if they have been on a training course; and potential use of civil sanction. • On farm training – potential for third party to deliver e.g. FQAS visits. • Role of earned recognition in the controls process e.g. NIBL FQAS. • Resource requirements e.g. for training and education in FSS. • How baseline legislation for those SMRs that are not included in the FSS will be enforced and the resources that will be required in doing so. • 'Guidance Hub' idea put forward. |

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| | | | There were also a number of lower level comments made which were relevant to the underpinning FSS requirements. |
| 47 | Have you specific suggestions for how compliance with the proposed Farm Sustainability Standards should be controlled? Explain your answer. | 54 of the 307 respondents offered comments and/or suggestions to this question. | <p><i>Main suggestions were with regard to:</i></p> <ul style="list-style-type: none"> • A confidential hotline to report potential breaches. • Improved guidance and advice e.g. one to one advice and guidance in respect of TB. • Online training programmes in FSS as part of scheme entry requirements. • Yearly farm audits, including goals to achieve on-farm. • Spot checks on farms with no notice given. • Water monitoring downstream of farms on river catchments. • Consideration of lessons learned from controls in other jurisdictions. <p>There were also a number of comments made which were relevant to the underpinning FSS requirements.</p> |
| 48 | Do you agree with the proposal that the current land eligibility rules should be revised to make all agricultural land (except hard features) eligible for direct payment under future area based schemes? | There was 151 responses to this question, 88% agreed, 12% disagreed. | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Sensible and logical change to policy. • Simplification of rules. • Administrative efficiency and simpler for farmers. • Positive environmental benefits. <p><i>No Agreement</i></p> <ul style="list-style-type: none"> • Nothing substantive. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Potential problem with land abandonment. • Dense rush, scrub and bracken – management requirements. • What will be the definition of agricultural land? • What is the definition of a ‘hard feature’? |

METRICS, MONITORING AND EVALUATION

| No | Question | Outcome | Key Themes Raised |
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| 49 | Do you agree with the principles against which metrics should be developed? | 105 responses to this question, 67% agreed, 33% disagreed. | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Twice the amount of respondents agreed than disagreed |
| 50 | What are your views on the high level overarching metrics proposed? | There were 83 responses to this question. | <p><i>Summary of views included:</i></p> <ul style="list-style-type: none"> • Important for accountability and transparency. • Important to measure success and for benchmarking against other countries. • Simplicity urged. |
| 51 | What suggestions do you have for additional high level overarching metrics that need to be adopted or developed? | There were 72 responses to this question. | <p><i>Summary of suggestions included:</i></p> <ul style="list-style-type: none"> • Consider including other nature/environment metrics. • Consider including social impact indicators. • Quantify positive economic impact of local production versus imports. • Metrics should be tailored to different farm types/sectors. |
| 52 | What other metrics do you suggest are included in the suite of metrics but that would sit below or play a supporting role to the high level overarching metrics? | There were 77 responses to this question. | <p><i>Summary of suggestions included:</i></p> <ul style="list-style-type: none"> • Consider measuring employment including direct and indirect employment along the supply chain, supply of labour and uptake of vacancies. • Ecological indicators – water, soil, habitats. • Simplicity no “gold-plating”. |

| HORTICULTURE | | | |
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| No | Question | Outcome | Key Themes Raised |
| 53 | What are your views on the proposed outcomes regarding the Northern Ireland production horticulture sector? | 50 responses to this question, 98% agreed, 2% disagreed. | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Expansion & growth of horticulture sector. • Importance of leadership collaborating & partnering. • Importance of integrated Supply Chain. • Need for sound market data & supply chain information. • Knowledge driven. • Importance of supply chain data. • Group learning. • Reducing environmental impact. <p><i>No Agreement</i></p> <ul style="list-style-type: none"> • Should not exclude small scale and social production horticulture. <p><i>More Work Needed</i></p> <ul style="list-style-type: none"> • Unrealistic ambition for top fruit to double in 5-7 years given crop lifecycle. |
| 54 | Do you agree with the policy proposals, regarding production horticulture? | 78 Responses to this question 75% agreed, 25% disagreed | <p><i>Good agreement</i></p> <ul style="list-style-type: none"> • Production focus and scale of increased production. • Collective process/stakeholder engagement/ partnership working with industry. • Supply chain collaboration and co-operation. • Access to cutting edge knowledge transfer & innovation. • Importance of production & supply chain data. • Effective knowledge transfer needed. • Collaborative partnerships to access R&D from elsewhere. • Facilitating learning from others. • Optimising data for decision making. <p><i>More Work Needed</i></p> <ul style="list-style-type: none"> • Limited vision. • Environmental agenda within proposals. • Encouraging new entrants. |

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| 55 | Do you agree with the design principles regarding production horticulture? | 79 responses to this question. 71% agreed, 29% disagreed. | <p><i>Good Agreement</i></p> <ul style="list-style-type: none"> • Focus on environment and low carbon. <p><i>More Work Needed</i></p> <ul style="list-style-type: none"> • Focus on opportunity and not just on market failure. • Principles limited and conservative - could be stronger and more optimistic e.g. NI food self-sufficiency? Healthy diets – a clear link to health? • Ensure a just transition to low carbon. |
| 56 | Have you specific suggestions for how success can be measured regarding production horticulture? | 36 responses to this question | <p><i>A very wide range of measures were suggested which included the following:</i></p> <ul style="list-style-type: none"> • Overall output and value of sales. • Values of produce moving in and out of NI. • Levels of import substitution being achieved. • Numbers employed. • Sector profitability / productivity. • Area of land used for horticulture production. • Biodiversity / environmental measures. • Number of new entrants. • % NI produce share of local NI market. • % of quality assured local produce sourced by government procurement. • Levels of professional development activity ongoing within industry. • Levels of technology adoption. • Carbon balance of the “farm”. • Number of production horticulture businesses. • Use Hort Industry Forum as per ROI Model. • Use “Producer Organisations” for this. |

| IMPACT ASSESSMENTS | | | |
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| No | Question | Outcome | Key Themes Raised |
| 57 | 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. | 63 responses to this question | <p><i>Summary of comments included:</i></p> <ul style="list-style-type: none"> • Need to undertake full Rural Needs Impact Assessments for each of the Policy Proposals within this consultation document, as well as any final Policies which are developed as a result of this consultation process. • Consider role of agricultural support payments in sustaining rural communities, impact of policy on small holdings and upland areas, resilience payment for smaller farmer. • Need for detailed analysis of the potential impact on rural citizens of access to the majority of measures being contingent on a minimum holding of 10 ha. • Consider new ANC programme. • Consider the value of conacre. • Consider support to move forward protecting and enhancing carbon reserves by modifying farm practices and better managing our hedgerows and farmland trees. • Consider support for tourism, recreation activities, modernisation of farm buildings, labour market supply, sheep, mental health, social farms, fencing and drainage, females and young people in agriculture • Need for improved services in rural areas: banks, policing, mobile phone signal, broad band, electrical connection, transport, infrastructure, and education opportunities. • Consistent planning policies between council areas. • Less restrictive approach to applications for planning permission in the wake of concern over phosphates and ammonia. • Budget certainty to enable farm businesses to plan and to secure associated investment. |
| 58 | 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 | 47 responses to this question | <p><i>The views expressed were not limited to commenting on the criteria listed in Section 75 of the Northern Ireland Act-</i></p> <ul style="list-style-type: none"> • A number of responses were submitted regarding the proposal to increase the minimum claim size threshold to 10 ha concerns included discrimination against small farmers and those of different religious beliefs. |

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| | evidence and provide a copy. | | <ul style="list-style-type: none"> • Concerns about age discrimination issues (e.g. young and older farmers). • Concerns regarding mental health and quality of life. • Concerns regarding gender inequalities including encouraging more women to enter the profession. • Discrimination against small farmer/part-time farmer. • Concerns that policy does not consider workers: pay and conditions, trade union recognition or upskilling. • Concerns that sheep and hill farmers are not recognised. • Need to ensure that all have access to future schemes. • Request for improved and enhanced off road access network. |
| 59 | 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. | 21 responses to this question | <p><i>Summary of comments included:</i></p> <ul style="list-style-type: none"> • Policy to be less onerous on farm businesses, user friendly to older generation, with proportionate bureaucracy not limiting farmer's ability to respond to future challenges. • Engender greater trust between industry and the regulator by providing access to quality advice to become compliant and allowing time to rectify breaches. • Regulatory baseline for all farm businesses, regardless of engagement with future support scheme, to ensure level playing field and attainment of minimum regulatory requirements. • Future payments related to farming and land management to be based on recipient meeting ambitious minimum regulatory standard and synchronized to ensure even spread throughout the year. • Tax law should be reviewed and planning policies less onerous. Consider the impact of farm payment changes on planning policies, review planning policies re building materials. • Consider support for introduction of a breeding ewe sheep headage payment. • Consider potential for distortion of land values with the imposition of a min 10 ha threshold. • Current proposals fail to fully account for the challenge of expanding forest cover. • Include support for potato growers. |

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| 60 | 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. | 52 responses to this question | <p><i>Consultation responses included:</i></p> <ul style="list-style-type: none"> • A high level approach was taken for Environmental Assessments and request for mitigation measures to be set out in greater detail in the Agricultural Policy HRA. • Need for continual monitoring and assessment process throughout Policy development and implementation. • Integration of the Agricultural Policy with the SEA ER and HRA, enabling it to take account of the outcomes, mitigation and monitoring. • Transition to sustainable farming should be incentivised. • Use of biomethane as a renewable energy. • What can farmers do with plastic bale covers moving forward. • Recognise carbon sequestration on farm. • Concern expressed about the environmental pollution caused by slurries, fertilisers and herbicides. • Concerns expressed regarding the Climate Change Bill and the net zero target for Northern Ireland by 2050. • Concern expressed about the results of previous policies. <p><i>More work needed</i></p> <ul style="list-style-type: none"> • Mitigation measures to be set out in greater detail in the as Policy design develops. • Regular monitoring and assessment throughout policy implementation phase. |
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