



Northern Ireland Future Agricultural Policy Framework

Comments by

Sustainable Northern Ireland

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Sustainable Northern Ireland (SNI) is a networking and forum body for statutory and non-statutory organisations concerned with the pursuit of sustainable development in Northern Ireland. We work closely with councils to promote and deliver sustainable development policy and practice at a local level. Our work programmes encourage organisations to integrate the principles of sustainable development throughout their operations and business planning functions, and deliver bold and innovative projects to promote economic, social and environmental wellbeing. Sustainable NI, its Board of Directors and wider public sector membership brings together a range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation in the field of sustainable development.

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Introduction

SNI welcomes the opportunity to respond to the government's proposals on Northern Ireland's Future Agricultural Framework.

To develop a truly sustainable food and farming system, where farmers work with nature to produce high quality nutritious food, we need to move out of our current siloed approach and recognise numerous inter-related problems that need to be addressed. These include volatility in farm gate prices, public health crises, poor diets, food poverty, food waste and environmental degradation. These issues cannot be solved purely through the reform of any one policy, but instead rely on coherence across different areas, including health, environment, public procurement, agriculture, welfare and education.

Key asks

- DAERA must continue to engage with stakeholders to ensure to ensure farmers and land managers have a clear picture of changes to agriculture policy resulting from Brexit.
- For a future agriculture policy to be sustainable in the long term, efforts to drive innovation and productivity must be coherent with those aimed at protecting, restoring and enhancing the natural environment.
- There needs to be a stronger recognition that effective environmental land management can lead to increases in productivity. Science innovation and research based upon maximising productivity must seek to identify opportunities for these win-win scenarios
- Payments for positive environmental management can provide a stable reliable income source independent of market volatility whilst providing societal benefits. This represents a better use of public expenditure to manage risk and build resilience, as well as delivering beneficial outcomes.
- We call on DAERA to adopt a broader view of vulnerability and risk management to develop a wider concept of resilience
- Rather than being viewed as areas of disadvantage, economically marginal systems should be recognised for their high potential to offer significant public benefits
- To ensure that farming is productive, profitable and resilient in the long term a future framework must have environmental enhancement at its core
- We need to shift emphasis from 'what farming can do for the environment, to what the environment can do for farming'
- It is important that existing levels of funding associated with the CAP are maintained and repurposed in order to meet environmental outcomes
- Funding to support farmers and land managers to provide environmental public goods needs to be allocated on the scale needed to meet environmental outcomes
- There needs to be some recognition that the rural landscape is an important and distinctive element of Northern Ireland, and there should be reference to the importance of protecting the rural historic environment and distinctive landscape features.

Productivity

Key points

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

Improved Resilience

Key points

1. Payments for positive environmental management can provide a stable reliable income source independent of market volatility whilst providing societal benefits. This represents a better use of public expenditure to manage risk and build resilience, as well as delivering beneficial outcomes.
2. We call on DAERA to adopt a broader view of vulnerability and risk management to develop a wider concept of resilience
3. Positive environmental management builds the long resilience of the sector. For example, moves to increase soil health will better equip our farming systems to safeguard themselves against the negative impacts of climate change and disease, whilst positive environmental land management in upland areas will safeguard against fire and erosion, whilst benefitting lowland systems in reducing flood risk
4. Rather than being viewed as areas of disadvantage, economically marginal systems should be recognised for their high potential to offer significant public benefits
5. Any future payments related to farming and land management must be based on the recipient meeting ambitious minimum regulatory standards. This not only applies to proposed payments for resilience, but for any public payments moving forward

6. The design of cross compliance and its enforcement is ineffective and bureaucratic and in need of reform
7. Future regulation should be based on knowledgeable enforcement with visits and monitoring undertaken by qualified inspectors
8. A proportionate approach to penalties is required, potentially adopting a similar approach to Scotland's general binding rules where farmers are given up to three opportunities to rectify regulatory non-compliance
9. A future regulatory system must be underpinned by the principle of polluter pays provider gets to ensure a fair and level playing field for farmers and value for money for the taxpayer

Environmental Sustainability

Key points

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

14. We recommend that more regard is taken of the historic rural landscape. We recommend the Daera consult with the Department for Communities to review how measures can be put in place to ensure the protection and enhancement of the historic environment.

Conclusion

SNI recognises that this is a real opportunity to improve the future of agriculture in Northern Ireland.

Key changes in policy that can be adapted to a range of stakeholders must to be adopted. It should not lie within an agricultural bubble but encourage partnerships with other public and private bodies to ensure sustainability. Local and central government and other public agencies can all contribute and support a successful agricultural sector within their own plans and strategies.

Investment in education and Continual Professional Development with environmental land management central to any future educational and training programmes. This requires investment in our education system, appropriately skilled and trained educators, availability and affordability of courses for farmers to pursue and opportunity to share good practice. Positive environmental management will build long term resilience within the agricultural sector.

Investment must also be made in research and innovation to develop the skills and knowledge of those on the front line. Farmers should be supported technically and financially to develop ideas and business cases in order to move the sector forward.

In achieving a positive behavioural change towards the natural environment farmers and their partners can ensure long-term sustainability.

This short submission serves only to offer some limited comments on the plethora of issues to be considered in depth as part of any review of agricultural policy in Northern Ireland.

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