

Consultation on Future Agricultural Policy Proposals for Northern Ireland

Summary of Responses



Sustainability at the heart of a living, working, active landscape valued by everyone.



Department of
**Agriculture, Environment
and Rural Affairs**

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Contents

1. Executive Summary	2
2. Introduction	5
3. Responses to the Consultation	6
4. Summary of responses	7
RESILIENCE	7
HEADAGE SUSTAINABILITY PACKAGE	27
FARMING FOR NATURE	52
FARMING FOR CARBON MEASURES	69
INVESTMENT MEASURE	74
KNOWLEDGE MEASURES	80
GENERATIONAL RENEWAL.....	90
SUPPLY CHAIN MEASURES	98
SOIL TESTING AND LIDAR.....	102
LIVESTOCK GENETICS AND DATA	105
CONTROLS AND ASSURANCE	109
METRICS, MONITORING AND EVALUATION.....	115
HORTICULTURE	119
IMPACT ASSESSMENTS	128
5. Way forward	133
Annex A List of Consultation Questions.....	134
Annex B Number of Responses to Questions	139
Annex C Respondents to Consultation: Organisations/Representative Groups and Individuals	140
Annex D – Questionnaire and Non-questionnaire responses (see attached)	

1. Executive Summary

In December 2021 The Department of Agriculture, Environment and Rural Affairs launched a public consultation to seek views on future agricultural policy proposals for Northern Ireland. In total 339 responses were received when the consultation closed in February.

Across the majority of respondents, there was a sense of opportunity for NI to redefine its agricultural policy for the first time in almost 50 years and develop a future agricultural policy better suited to local needs in order to underpin long term sustainability within the industry. Overall, respondents welcomed the opportunity to comment on the future agricultural policy proposals and looked forward to playing an effective role in the future development of a sustainable agricultural industry.

Responses indicated a strong endorsement for a number of the future agricultural policy proposals for Northern Ireland. Key findings are outlined below:

Resilience Measure

- The need for continuation of income support 'safety net' Resilience payments was welcomed across all stakeholder groups, although some respondents sought clarity on when the proposed Resilience payments would end. There was broad agreement on the proposal for progressive capping of the Resilience Payment above £60,000 however the majority of respondents disagreed with the proposal to increase the minimum claim size to 10 ha. There was a mixed response to the conditionalities proposed, with respondents recognising the benefits the conditions would bring while also identifying training and knowledge as a potential barrier and some concerns about the added burden for farmers.
- The proposed approach to crisis framework was viewed as positive.

Headage Sustainability Package

- There were mixed responses on the Headage Sustainability Proposals. The majority of respondent raised concerns re the conditionalities of age at first calving and calving interval of the Suckler Cow measure and the age at slaughter in the Beef Transformation Measure. A number of respondents asked for more information and raised concerns about the ability of native breeds to meet the conditions proposed.

Farming for Nature

- There was broad agreement for the introduction of a Farming for Nature Package and to focussing on the habitat management actions listed in the consultation documents as an initial mechanism to kick start improved awareness and capacity to manage environmental assets. A number of specific suggestions were received for other quick win management actions. Concerns were raised around the proposed eligibility criteria and the minimum claim size proposals. There was broad support for Test and Learn pilots to be introduced.

Farming for Carbon

- The need for low carbon emission farming practices was broadly supported. Some respondents felt that the proposals did not go far enough and that the farming industry needed to change its product mix, including a planned reduction in livestock numbers. The principle of encouraging the Farming of Carbon as a business enterprise received broad support.

Investment Measure

- There was broad support for the guidelines proposed for future capital support and to the draft design principles.

Knowledge Measures

- The proposed approach to future Knowledge and Innovation received good support, with many identifying that peer learning should be a focus of delivery moving forward. Gaps in current provision around environmental challenges, carbon, water catchments, biodiversity and soil management were identified.

Generational Renewal

- There was strong support for encouraging a longer term planning approach for farm businesses, with respondents stating that this would encourage younger entrants into the industry. There was good agreement with the proposed three phase approach to a Generational Renewal Programme, with respondents agreeing that the inclusion of knowledge and skills development was vitally important within any new programme.

Supply Chain Measures

- Stakeholders indicated strong agreement that more needed to be done to create effective function supply chains.

Soil Testing and LiDAR

- The majority of respondents agreed that the data from the Soil Nutrient Health Scheme was vital in establishing a baseline across Northern Ireland. There was good agreement that the requirement to have a nutrient management plan should be linked to support payments.

Livestock Genetics and Data

- Respondents supported the proposal that Government must make the necessary investment to develop a relevant and targeted livestock genetic and data programme and that the development of knowledge transfer programmes to support farmers adopt genetic improvement technologies was necessary.

Controls and Assurance

- There was strong support for simplifying the current cross compliance system and for the redefinition of land eligibility. Some concerns were raised around land abandonment.

Metrics, Monitoring and Evaluation

- Respondents showed broad support for the principles around which metrics would be developed.

Horticulture

- There was strong support for the Horticulture proposals, with a number of responses indicating that there was significant potential to expand and grow this sector.

Impact Assessments

- A number of responses were received across all the impact assessments, with the main theme being the need to undertake further assessments as the policy proposals continued to be developed.

General comments

- Common across all responder groups, the view was expressed that many of the proposals needed more detail. In particular the timescale of transition and estimated payment levels for schemes needed to be defined to gain support from and provide security for participants.
- The challenges of future implementation were highlighted, including the importance of being cognisant of other established and developing government policies.

2. Introduction

- 2.1. The Department of Agriculture, Environment and Rural Affairs (DAERA) launched a consultation on 21 December 2021 seeking views on its future agricultural policy proposals for Northern Ireland emerging from the Future Agricultural Policy Framework Portfolio published in August 2021. Based on the four key outcomes of increased productivity, environmental sustainability, improved resilience and an effective functioning supply chain the framework charts the way forward for a future agricultural policy which better meets Northern Ireland's needs. Future policy will be judged in terms of its ability to contribute to the achievement of the Framework's outcomes.
- 2.2. The consultation encompassed the policy proposals of 14 component workstreams of future agricultural policy. These included 8 main primary components, 5 cross cutting elements and 1 sectoral measure.
- 2.3. The consultation ran until 15 February 2022 on the DAERA website, with NI Direct's Citizen Space platform providing the online survey facilities. A wide range of statutory consultees and relevant stakeholders across Northern Ireland were contacted directly via email, with details of the consultation and its supporting documents, including web links to the consultation's website page which contained further information on how to respond. During its eight week term, the consultation was widely and regularly publicised through DAERA media platforms, including DAERA twitter and Facebook accounts and the farming press. A total of 186 external attendees joined four online information sessions. The Department wishes to thank all stakeholders and members of the public who took the time to respond to the consultation.
- 2.4. The consultation document can be viewed on the DAERA website by clicking on the following link: <https://www.daera-ni.gov.uk/consultations/consultation-future-agricultural-policy-proposals-northern-ireland>

3. Responses to the Consultation

- 3.1. The consultation closed on 15 February 2022 with a total of 339 responses received from a range of organisations, and individuals. As with any Northern Ireland Civil Service public consultation, responses were received from a self-selecting range of respondents. Of the 339 responses received for the consultation, 55 were from organisations/representative groups (hereafter referred to as organisations) and 284 from individuals (of which 39 were anonymous). Respondent organisations were grouped based on their focus in relation to farming, environment or 'other' aspects. The latter category included for example; councils, unions, outdoor/recreation and rural organisations. A list of respondent organisations and individuals is provided at Annex C.
- 3.2. The consultation questionnaire provided respondents with the opportunity to answer questions based on the proposals (see list of questions at Annex A). For some questions there was the opportunity to respond, either in favour of the proposals or against. Respondents were also provided with the facility to comment on the proposals. It was not compulsory for respondents to answer all questions. As such not all respondents indicated if they agreed or disagreed with each question and not all respondents to each question provided comments. The number of responses to each question is summarised in Annex B.
- 3.3. Of the responses received, 286 were received via the online Citizen Space questionnaire. A further 21 responses to the questions were received by email/hard copy and these were uploaded to the Citizen Space platform (see Annex D: questionnaire responses). Additionally 32 'non-questionnaire' email responses were received that provided views /feedback on aspects of the consultation document. The latter ranged from short emails to more detailed feedback (see Annex D: non-questionnaire responses). All comments have been considered in the analysis of responses.
- 3.4. The quantitative reporting function on Citizen Space was used to produce a high level overview of responses to the questionnaire. This is available on the Department's website at: [Summary of Responses: Consultation on Future Agricultural Policy Proposals for Northern Ireland | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](#).
- 3.5. Further analysis of responses was undertaken and the following sections of this document present a more comprehensive summary of the responses made by stakeholders to the 60 questions included in the consultation. The analysis included both quantitative and qualitative assessment of responses detailing the number of respondents, the number for and against the proposal (where relevant), and provides a summary of responses in relation to the key themes identified. Note minor updates to some of the figures presented in the High Level Overview as a result of further analysis.

4. Summary of responses

RESILIENCE

Q1 (i) Do you agree that income support is needed in the form of a Resilience Payment set at an appropriate level? Explain your answer.

Two hundred and seventy-two responses were received to this question. Thirty-five were from organisations (of which 22 were farming focused and 6 environment focused), 236 were from individuals and 1 was from a political party/representative.

Thirty-one responses from organisations (of which 21 were farming focused and 5 environment focused), 218 individuals and 1 political party/representative expressed support for a resilience payment.

Twenty-two responses, from 4 organisations (1 farming focused organisation and 1 environment focused organisation) and 18 individuals, were not in support of a resilience payment.

In agreement with the proposal

Five organisations (3 farming focused and 2 environment focused) supported payments due to the risk of volatility in agriculture.

Five organisations (4 farming focused) and 6 individuals believed that a resilience payment was vital for our food security and 8 individuals believed support was needed until farmers received a fair price for what they produced.

Five farming focused organisations and 6 individuals believed that without some form of meaningful support payment there could be a reduction in domestic production due to rising input costs, leading to a greater reliance upon imported food.

One farming focused organisation stated that as subsidies provided 83% of total farming income in Northern Ireland it was essential that there was some level of area-based payment.

Responses received from individuals indicating strong support raised key themes such as farming would be unsustainable without subsidies due to rising input costs, cheaper imports and increasing market and climate volatility.

Focus of a Resilience Payment

Three farming focused organisations suggested that the payment should be simple, based on efficient production and targeted toward genuine active farmers.

One farming focused organisation suggested that the resilience payment should be set at approximately 75% of current Basic Payment Scheme (BPS) payments for farmers and potentially reduced to no less than 50% of total current BPS payments.

One political party/representative believed that resilience payments should reflect inflation and did not agree that they should be lower than the current BPS level.

Four environment focused organisations supported environmental conditions as a requirement to claim a resilience payment.

Not in agreement with the proposal

One farming focused organisation believed that the proposed payment would be an obstacle to improving resilience in the sector and that farmers should be encouraged to run a financially sustainable business.

One environment focused organisation suggested that funding should be diverted to Farming for Nature Packages, focused on achieving a balance, between production, climate mitigation and nature's restoration and adopting a different approach to farm business management, in which the emphasis shifted from output to profit margin. Three individuals expressed concern that small farmers were being treated unfairly and that payments should be equal throughout.

Responses from two individuals believed that area based entitlements were flawed and did not take into account the type of farming and environmental impact, rewarding larger land holdings.

Other comments/suggestions

Five organisations (of which 4 were environment focused and 1 farming focused) agreed with the proposal for a resilience payment but believed that there should be a clearly defined transition period to move funding into the Farming for Nature package.

One political party/representative commented that a resilience payment must ensure viable and sustainable food production and that they would like to see more information on the level at which the payment would be set.

Q1 (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? Explain your answer.

Two hundred and fifty nine responses were received to this question. Twenty seven were from organisations (of which 17 were farming focused and 6 environment focused), 230 were from individuals and 2 were from political parties/representatives.

Thirteen responses from organisations (of which 8 were farming focused and 5 environment focused), 109 individuals and 1 political party/representative expressed support for businesses solely producing grass/grass silage for sale during a historic reference period not being eligible to claim the resilience payment. Fourteen responses from organisations (of which 9 were farming focused and 1 environment focused), 121 individuals and 1 political party/representative did not support the proposal.

In agreement with the proposal

Four responses from organisations (of which 2 were farming focused and 2 environment focused) and 21 individuals expressed the view that businesses solely producing grass/grass silage did not constitute active farm businesses.

Six responses from organisations (of which 4 were farming focused and 1 environment focused) and 11 individuals said that the resilience payment should be for farm businesses actively involved in food production or incurring the expense/risk of keeping animals or growing crops.

Two responses from farming focused organisations and 2 individuals said that businesses selling grass to anaerobic digesters should not receive the Resilience Payment with one of the organisations stating that experience suggested that this sector operated without additional assistance.

An environment focused organisation stated that it was essential that resilience funds were targeted to the areas of greatest need, supporting the delivery of greatest public benefit.

Not in agreement with the proposal

Six responses from organisations (of which 4 were farming focused and 1 environment focused) and 10 individuals felt that some genuine farm businesses produced grass silage and that grass silage producers provided an important service for other farmers.

Three responses from farming focused organisations and 9 individuals questioned why grass producers should be treated differently to cereal or potato growers.

Three responses from organisations (of which 1 was farming focused and 1 environment focused) and 5 individuals felt that as this type of activity was considered eligible to receive payments in the past it would be unfair to exclude it now.

Three responses from organisations (of which 2 were environment focused) and 4 individuals highlighted the environmental benefits this type of activity created.

Three responses from individuals highlighted that particular reasons, such as the ill health of the farmer, may have led a business to decide to undertake grass production.

Responses from 1 farming focused organisation and 4 individuals indicated that businesses selling grass to anaerobic digesters should receive the resilience payment with one respondent saying that with gas prices rising it was in the national interest to produce biomethane and that anaerobic digestion was not economically viable if fuelled by slurry alone so silage was needed.

Other comments/suggestions

Three farming focused organisations stated that more thought was needed in relation to this proposal as there could be unexpected consequences if it was introduced highlighting the issue of farmers that may be part of a shared farming agreement.

One farming focused organisation stated that the proposal was going to be extremely difficult to administer questioning where hay/haylage would fit and potential reliance on imports from Ireland and GB for the equine sector.

One farming focused organisation felt that all businesses should not come under the one umbrella e.g. grass produced for calves on a B & B basis should be allowed but those growing grass for subsidised anaerobic digestion plants should not.

Q1(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? Explain your answer.

Two hundred and fifty five responses were received to this question. Twenty nine were from organisations (of which 18 were farming focused and 6 environment focused), 224 were from individuals and 2 were from political parties/representatives.

Twenty two responses from organisations (of which 15 were farming focused and 5 environment focused), 110 individuals and 1 political party/representative expressed support for businesses that maintained land in a state suitable for grazing or cultivation but undertook no further agricultural activity during a historic reference period not being eligible to claim the resilience payment. Seven responses from organisations (of which 3 were farming focused and 1 environment focused), 114 individuals and 1 political party/representative did not support the proposal.

In agreement with the proposal

Two farming focused organisations and 1 individual said that if a business was not producing a tangible output, then it was not a commercial farm business and did not justify support.

Three farming focused organisations indicated that the Resilience Payment should be targeted towards those producing food.

One farming focused organisation, 2 environment focused organisations and 16 individuals felt that the Resilience Payment should only go to businesses that were actively farming.

Five farming focused organisations, 1 environment focused organisation and 9 individuals said the Resilience Payment should be targeted at businesses that incurred the costs and accepted the risks associated with grazing and/or cultivation.

One environment focused organisation felt that the Resilience Payment should be targeted at areas of greatest need, supporting the delivery of greatest public benefit.

One individual indicated that solely keeping land in a state suitable for grazing or cultivation was not the type of activity that would move the agricultural industry forward.

Not in agreement with the proposal

One environment focused organisation, 2 'other' organisations and 9 individuals warned that the proposal would exclude businesses delivering significant environmental benefits and potentially discourage participation in future land management interventions.

Two individuals felt that the Resilience Payment was needed by all farm businesses to survive.

Three individuals warned that the proposal could lead to land abandonment and encourage bad behaviours such as fly tipping.

One 'other' organisation and 5 individuals felt that as this type of activity was considered eligible to receive payments in the past it would be unfair to exclude it now. One suggested that if this proposal was adopted those undertaking this activity must be given the opportunity to diversify.

Eight individuals felt it would be unfair to exclude farmers that had put a lot of money into fencing, cutting hedges, drainage etc.

Two responses from individuals highlighted that particular reasons, such as the ill health of the farmer, may have led a business to decide to maintain its land in a state suitable for grazing or cultivation and not undertake any further agricultural activity.

Other comments/suggestions

One environment focused organisation and 1 individual highlighted the need to address the issue of new entrants as being important in terms of facilitating the restructuring of the agriculture industry for the future.

One environment focused organisation felt that those that kept land in a state suitable for grazing or cultivation should retain the right to apply for agri-environment schemes.

Two individuals indicated that taking land out of agricultural use had a negative effect on the agricultural industry.

Q1 (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? Explain your answer.

Two hundred and fifty five responses were received to this question. Twenty seven were from organisations (of which 16 were farming focused and 6 environment focused), 227 were from individuals and 1 was from a political party/representative.

Seventeen responses from organisations (of which 11 were farming focused and 4 environment focused) and 98 individuals expressed support for businesses that maintained land in a state suitable for grazing or cultivation but undertook no further agricultural activity during a historic reference period not being eligible to claim the Resilience Payment. Ten responses from organisations (of which 5 were farming focused and 2 environment focused), 129 individuals and 1 political party/representative did not support the proposal.

In agreement with the proposal

Five farming focused organisations, 1 environment focused organisation and 8 individuals expressed the view that the proposal would help ensure that the Resilience Payment went to genuine farmers only.

One farming focused organisation and 6 individuals agreed with the proposal and suggested that the historical reference period should be based on a 3 year period given that a number of factors, some of which would be outside the control of the business, could influence output in a particular year.

One farming focused organisation suggested that the only meaningful way to prove that a business had been active during a historic reference period was to show animals present on APHIS or provide evidence of crop/straw sales for arable farms.

Two farming focused organisations suggested that stocking rates should be in line with the acreage owned or farmed, not simply a matter of having an operational herd or flock number for the sake of it. On a similar note, 1 individual felt that businesses should have proof from previous years that they were working the land to its fullest and not just keeping a couple of calves to keep grass at bay.

One individual felt that the proposal was not perfect but recognised that it was an attempt to rule out extreme cases.

Not in agreement with the proposal

Eight responses from individuals felt it was unfair to discriminate against grass growers/sellers because they were active farmers and were vital to the agricultural industry.

Seven responses from individuals stated that each case should be dealt with on its own merits as illness or succession issues may have affected production in the reference period.

Four responses from individuals felt that businesses who were following the eligibility rules in place during the reference period should not be penalised now.

Six responses from individuals suggested that the proposal did not take account of new farmers, young farmers or businesses that have started to keep livestock after the reference period.

Three responses from individuals stated that farms of all sizes should be eligible for the Resilience Payment.

Six responses from individuals felt that the new scheme should start with a clean slate and that a historic reference period should not be used to determine eligibility. One response from a political party/representative indicated that DAERA must future-base any decisions made on the use of historic reference year.

One environment focused organisation, 1 other organisation and 3 individuals expressed the view that the proposal disregarded environmental improvement as an outcome of the Resilience Payment and could cause smaller, but significant, parcels of land to fall below the minimum standard leading to harm.

One farming focused organisation felt that the proposal for a reference period was all about maintaining the status quo rather than encouraging necessary change.

One farming focused organisation and 1 individual felt that 3 hectares was too large for small scale, start up or specialist horticulture growers.

Other comments/suggestions

Two farming focused organisations and 1 other organisation stated that pig and poultry enterprises should also be included within the active farmer definition.

One other organisation expressed the view that it should be made clear at an early stage that the historic reference period was in the past in order to deter farmers from increasing livestock numbers in order to obtain a larger entitlement to the Resilience Payment.

One farming focused organisation felt that the 3 hectare minimum would be a very low bar to set and that less than ten acres of agricultural land would not involve any considerable effort or inputs. Therefore the minimum threshold should be raised to 10 hectares to reduce the number of applicants eligible for the same pot of funding.

One political party/representative stated there was a lack of detail from the Department on the use of the historic year or years to restrict the allocation of entitlements for a Resilience Payment.

One response from an individual suggested it would be better to exclude from receiving the Resilience Payment those who have committed pollution offences, breached veterinary or animal welfare rules or been responsible for the destruction of environmental or archaeological sites.

Q2 (i) Participation in soil testing, including Light Detection and Ranging (LiDAR) – do you agree with this being a condition to claim the Resilience Payment? Explain your answer.

Two hundred and fifty eight responses were received to this question. Twenty nine were from organisations (of which 15 were farming focused and 7 environment focused), 1 political party/representative and 228 individuals.

Twenty-eight responses from organisations (of which 15 were farming focused and 7 environment focused), 1 political party/representative and 140 individuals were in support of this condition.

One organisation and 88 individuals did not support this condition.

In agreement with proposal

Thirteen responses were received from organisations (of which 6 were farming focused and 7 environment focused) and 39 from individuals, indicated strong levels of support for soil testing, citing its environmental and economic benefits, and its relevance as a useful tool for farmers to manage and improve their land. Benefits highlighted included reduced use of fertiliser, addressing climate change and establishing baselines, boosting productivity and saving farmers money through reducing costs of artificial fertiliser and appropriate use of manure and slurry.

One farming focused organisation felt that any competent farmer should already be doing so, and that knowledge transfer should be considered.

One environment focused organisation and 2 individuals highlighted the importance of LiDAR to understand impacts across the countryside.

Education, knowledge transfer and/or professional assistance were raised by 2 farming focused organisations, 2 environment focused organisations and 2 individuals.

One farming focused organisation raised a specific question about the cost of organic matter/carbon analysis being higher than nutrient analysis, and that if this testing was required, this cost should be reflected in payments and adjusted. Seven individuals' support was conditional on the cost being met by government.

Two farming focused organisations and 2 individuals suggested that farmers already tested their soils, and that non-DAERA schemes should be recognised to meet the condition. Although they did not provide a response, this view was shared by 1 political party/representative.

Three environment focused organisations supported this condition on a temporary basis, with the money to move into Farming for Nature support more quickly.

Frequency of testing was raised by 1 farming focused organisation, 1 environment focused organisation and 4 individuals, with suggested time periods ranging from annual up to four or five years.

One individual felt that farmers should be excluded from payments if they did not act on results, while 2 more thought that any actions required after testing should be covered by further grant aid.

Two individuals and 1 organisation suggested a need for a grace period to allow farmers to transition without financial impact.

Not in agreement with proposal

Eight individuals felt soil testing was not relevant to all farms, with Severely Disadvantaged Areas and hill farms being mentioned specifically.

One farming focused organisation and 5 individuals questioned the cost, cost burden and/or value of soil testing and LiDAR.

Four individuals and 1 farming focused organisation raised concerns about LiDAR's efficacy, cost and accessibility.

Nine individuals raised concerns about bureaucracy and administrative difficulties for smaller farms. Three individuals suggested it should be a guideline rather than condition, with an emphasis on encouragement.

Two individuals suggested costs would disproportionately affect smaller farms.

One individual felt that this condition excluded older or less modern farmers.

Other comments/suggestions

One individual thought that it could encourage intensive farming and that aid for 'rest periods' should be considered as an alternative scheme.

Two individuals felt that soil testing did not go far enough, and that further data such as earthworm counts and infiltration rates should be monitored for true soil health.

Three farming focused organisations, said they could not support this condition if it was to be used in an enforcement programme.

One political party/representative requested that all results and analysis would be confidential. One farming focused organisation also highlighted a cohort of farmers who may not want DAERA to access their results, and to consider how they could be included.

One environment focused organisation felt the condition would help establish a baseline for biodiversity through targeted data collection, and should extend to the Farming for Nature Package, to provide continuity as resilience was phased out.

One farming focused organisation suggested the payment design be recast so that it was expressly intended to achieve land management improvements, rather than be a condition for income support.

Q2 (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? Explain your answer.

Two hundred and fifty four responses were received to this question. Twenty nine were from organisations (of which 15 were farming focused and 7 environment focused), 1 political party/representative and 224 individuals.

Twenty-five organisations (of which 12 farming were focused and 7 environment focused), 1 political party/ representative and 111 individuals were in support of the condition.

Four organisations (of which 3 were farming focused) and 113 individuals were not in support of the condition.

In agreement with the proposal

Eleven organisations (of which 4 were farming focused and 7 environment focused) and 43 individuals expressed strong support, describing NMPs as a sign of good practice, necessary for improvement in productivity and efficiency, and with attendant improvements in the environment, biodiversity, water quality and carbon footprint.

One farming focused organisation, 1 political party/representative and 5 individuals commented that support and knowledge transfer would be required.

One political party/representative suggested a phased rollout should be considered, while 1 farming organisation thought that payments should be given as a default, then only removed if a farmer did not submit an NMP within a defined period of time.

Four individuals supported the condition if it came at no additional cost to farmers, or if templates were provided. Two individuals felt that the details required in the plan must be reflective of farm size to encourage farmers to participate.

One environment focused organisation felt an NMP was meaningless without an action plan, and that the NMP should also include buffer zones, interception for water runoff and protection of peat soils.

One farming focused organisation and 1 individual were also of the opinion that the plan needed to be put into action, either by incentivisation (farming organisation) or removal of payments (individual).

One environment focused organisation was supportive as long as it would not lead to fertilisers being added to semi-natural grasslands, and recognised different areas, such as upland/lowland areas.

Not in agreement with proposal

One farming focused organisation thought an NMP should be a goal but not a condition for hill farmers.

Thirteen individuals commented on red tape and administrative burdens especially for small farms.

Three individuals felt that producing an NMP would be too complicated for older farmers.

Nine individuals commented about differing requirements for different geographical regions or quality, with one claiming it would cripple farmers in areas such as west of the Bann.

Two farming focused organisations and 3 individuals referred to NMPs as a paper exercise, not reflective of reality and/or with no benefits. One farming focused organisation suggested other farmers would need to understand what soil testing and LiDAR could provide first, before expecting an NMP from them.

Other comments/suggestions

One political party/representative thought that many farmers already produce a NMP and should continue, but that farmers should be supported to gain an understanding of soil testing and LiDAR rather than penalised for not having an NMP based on this information.

One political party/representative commented that while supportive in principle, they were concerned the measure could force small farmers out of business, and that it needed to be carefully managed to be fair.

One farming focused organisation was supportive of NMPs being encouraged as a management tool, but not if it was used to regulate farmers on nutrient application. They also commented that farmers would need to understand what soil testing and LiDAR provides before expecting an NMP from them.

One environment focused organisation thought that NMPs should not be paid for long term, as the benefits outweighed the cost of implementation.

One farming focused organisation suggested that the payment design be recast so that it was expressly intended to achieve land management improvements, rather than be a condition for income support.

Q2 (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? Explain your answer.

Two hundred and forty eight responses were received to this question. Twenty eight were from organisations, 1 political party/representative and 219 individuals.

Twenty-three organisations (of which 15 were farming focused and 5 environment focused), 1 political representative and 124 individuals were in support of the condition.

Five organisations (of which 2 were farming focused and 1 environment focused) and 95 individuals were not in support of the condition.

In agreement with proposal

Four farming focused organisations, 2 environment focused organisations and 5 individuals commented on the value of this genetic data and its role in improving sustainability, productivity and the national herd. Five farming focused organisations described improvements to efficiency, reductions in Green House Gases and benefits to the environment.

Sixteen individuals, as well as 1 farming focused organisation and 1 environment focused organisation, said it encouraged good management and breeding practices.

Six individuals commented they were already recording sire data, with 2 mentioning a breed society programme.

One farming focused organisation, 2 environment focused organisations and 5 individuals referred to accurate data in traceability.

One individual asked for it to be simple, not DNA testing. However another individual commented that without DNA the sire recording data would be very weak.

One organisation and 1 political party/representative emphasised it must not be an onerous system for farmers.

One farming focused organisation suggested there were wider opportunities to improve resilience such as the need to prioritise preventative health measures as a risk mitigation strategy.

Not in agreement with proposal

Five individuals were not convinced recording sire data was relevant, and 4 individuals commented that farmers would need education and/or promotion of the benefits.

Three individuals could not see any benefit for commercial farmers, only those with pedigree herds.

Four individuals raised a concern about buying a heifer in calf which would make accurately recording the sire data difficult.

Nine individuals made comments on bureaucracy and administration burdens.

One individual thought suggestions of making environmental improvements through recording genetic data was far-fetched.

Other comments/suggestions

One environment focused organisation thought the measure had no implication for nature.

Seven organisations (including six farming focused), 2 political parties/representatives and 4 individuals raised the issue of farmers using multiple bulls in their herds, and/or mixed semen in Ai programmes, which could make recording sire data complicated or inaccurate. Both political parties/representatives recommended that DAERA gave further thought to making this a practical proposal. Three farming focused organisations and 2 individuals requested no penalties if errors were made or bulls changed over.

Q3 (i) Do you agree with the proposal that progressive capping of the Resilience Payment will apply above £60,000? Explain your answer.

Two hundred and sixty responses were received to this question. Twenty-eight were from organisations (of which 18 were farming focused and 6 environment focused), 230 were from individuals and 2 were from political parties/representatives.

Seventeen responses from organisations (of which 9 were farming focused and 6 environment focused), 172 individuals and 2 political parties/representatives agreed with the proposal that progressive capping of the resilience payment will apply above £60,000.

Eleven responses from organisations (of which 9 were farming focused) and 58 individuals disagreed with the proposal that progressive capping of the resilience payment will apply above £60,000.

In agreement with the proposal

One farming focused organisation suggested as the resilience payment was to be viewed as a “basic safety net” there would be very few farm businesses who would or should require more than £60,000 to continue as a going concern. If a business was unable to survive without an injection of more than £60,000 per annum then it should not be viewed as a viable or sustainable business. Two farming focused organisations believed that the proposal would ensure a fairer distribution of support given the limited budget available.

Responses from individuals in agreement with the proposals raised common themes, citing that farm businesses currently receiving in excess of £60,000 were likely to be sustainable farms that could operate without support. Some individuals felt that the system benefitted larger farm businesses who were already more capable of dealing with market risks.

Two political parties/representatives welcomed progressive capping of the resilience payment as they felt this would provide more support to smaller farms which were a vital part of the rural economy.

Two environment focused organisations felt that progressive capping of resilience payments could assist in the phasing out of such measures towards Farming for Nature payments.

Not in agreement with the proposal

Three farming focused organisations were opposed to the proposal as they felt that larger farms incurred higher running costs associated with larger scale operations and these needed to be recognised and compensated for.

Two responses from farming focused organisations expressed concerns that a cap of the resilience payment could act as an incentive for farm businesses splitting, increase the amount of conacre arrangements, and could be counterproductive to driving efficiency and productivity in NI agriculture.

Two individuals suggested that larger farms should not be paid less for producing more and that the proposed capping would dis-incentivise growth.

Other comments/suggestions

Two farming focused organisations in favour of the proposal and two farming focused organisations opposed to the proposal felt that the cap should be much lower. One farming organisation and one individual suggested that the level of £60,000 was overly generous given the size of farm businesses within NI and rather than introduce progressive capping over £60,000, the maximum payment should be capped at £50,000.

Q3 (ii) Do you agree with the proposal to increase the minimum claim size threshold to 10 ha? Explain your answer.

Two hundred and ninety-three responses were received to this question. Thirty-six were from organisations (of which 21 were farming focused and 7 environment focused), 252 were from individuals and 5 were from political parties/representatives.

Thirty-one responses from organisations (of which 17 were farming focused and 6 environment focused), 233 individuals and 5 political parties/representatives did not agree with the proposal to increase the minimum claim size threshold to 10ha.

Five responses from organisations (of which 4 were farming focused and 1 environment focused) and 19 individuals agreed with the proposal.

In agreement with the proposal

Three responses from farming focused organisations agreed with the proposal as they believed that resilience payments should be targeted towards those farming enterprises that were farming as a full time business.

One farming focused organisation believed that anything below 10ha could not be considered an active farm, the levels of production or risk and effort taken by those sized farms was minimal and they were risk averse. They contributed little to the local economy and were often a restriction on local progressive farmers being able to get access to land to develop their businesses.

One environment focused organisation suggested that funds freed up from implementing this minimum threshold should be allocated directly into the Farming for Nature package and used to increase the scale of the Environmental Farming Scheme.

Nineteen responses from individuals raised common themes indicating levels of support for this proposal, citing that farms under 10 hectares were not viable and that owners were mainly hobby farmers who would have additional sources of income.

Not in agreement with the proposal

Five environment focused organisations highlighted the environmental benefits of smaller farms, such as protecting vital natural habitats.

Two political parties/representatives suggested that many of these farms which would be affected were naturally sequestering carbon in peatland areas as well as through hedgerows and boundary vegetation as a result of their small size. They should be fully valued for their environmental asset and should be compensated for that.

Twelve responses from 4 farming focused organisations and 8 individuals disagreed with the proposal as they believed this would impact on new entrants joining the industry. Many young farmers start with small land areas and build their business from that and need support. Also, farmers with high value crops could be missed out if a higher land area was applied.

Responses from individuals raised key themes indicating strong disagreement for this proposal, citing that it discriminated against smaller farms who contributed to rural communities and the environment, potentially resulting in many going out of business. Many small farms tend to have a smaller carbon footprint than their industrial-sized counterparts.

Five responses from political parties/representatives suggested that the proposal to increase the minimum claim size threshold to 10 hectares would be significantly unfair to smaller scale farms. One political party/representative believed that the imposition of a minimum 10 hectare threshold would mean the sequential damage by way of distortion of land values. Land values would be massively over-inflated due to competition that would result from a few acres of land which would become available and would allow neighbouring holdings to reach the area threshold.

Other comments/suggestions

Four organisations (of which 2 were farming focused and 1 environment focused) and 6 individuals supported a 5 hectare limit, and 2 farming focused organisations suggested that those existing farms between 3 and 5 hectares should not lose their Farm Business Number. These farms, although small, provided a lifeline in local farming communities for local employment and were often a first point of entry for young farmers.

Three farming focused organisations and 6 individuals expressed concerns with regards to the impact on horticulture businesses. One farming focused organisation suggested careful analysis was needed not to exclude horticulture high value crops and/or high-grade seed potatoes.

Q4 (i) Do you agree with the principles proposed in the development of a Crisis Framework? Explain your answer.

Two hundred and thirty responses were received to this question. Thirty were from organisations (of which 20 were farming focused and 6 environment focused), 199 were from individuals and 1 from a political party/representative.

Twenty-nine responses from organisations (of which 19 were farming focused and 6 environment focused), 132 individuals and 1 political representatives agreed with the principles proposed in the development of a crisis framework.

One farming focused organisation and 67 individuals disagreed with the principles proposed in the development of a crisis framework.

In agreement with the proposal

Responses from five organisations (of which 3 were farming focused and 2 environment focused) agreed with the principles and supported DAERA's objective to encourage farm businesses to better manage risk within their own businesses.

Responses from two farming focused organisations believed that the principles should provide a better alternative to the current situation but suggested resilience could be further improved through improvements in how farmers approached animal health and welfare. One farming focused organisation suggested that Public Intervention/Private Storage Aid were no longer suitable measures and welcomed the introduction of the concept of trigger price/incomes being used to determine the operation of a crisis framework, providing the trigger points were subject to annual review.

One political party/representative supported the development of a crisis framework given that climate change was already impacting agriculture and believed that crisis events should trigger a simple payment scheme. Four responses from individuals highlighted the impact of climate change and the increase of extreme weather events in the requirement for a crisis framework.

One individual stressed the need to assess every crisis differently and apply the correct remedies as and when required, no two years were the same. One individual response suggested there should not be resilience payments with the budget only being used to fund crisis measures if and when required.

Not in agreement with the proposal

One farming focused organisation suggested that crisis should be covered by farms own crisis insurance which should be a prerequisite for resilience payments. They believed it was contradictory to provide a safety net and then prepare a crisis fund as well.

Eight responses from individuals did not agree with the proposals as they felt more information was required on the thresholds/trigger points.

Other comments/suggestions

Two environment focused organisations suggested that engaging in environmentally sustainable farming practices, and participation in agri-environment schemes could improve the economic stability of farm businesses, for example minimising the effects of flooding and other climate shocks.

Three farming focused organisations, 1 'other' organisation and 3 individuals believed that any future crisis fund must not come from the resilience payment budget. There could be instances where one sector did not wish to support another sector as they may view it as unviable or not worth funding so there could be divisiveness among sectors.

One farming focused organisation suggested that government made interest free loans available in times of crisis while 2 farming focused organisations suggested a model similar to the USA's Margin Protection Programme.

Three organisations (of which 2 were farming focused and 1 environment focused) and 2 individuals suggested that any crisis framework needed to be easy to administer so payments were not delayed.

HEADAGE SUSTAINABILITY PACKAGE

Q5. Do you agree that payments under the Headage Sustainability Measure will be made only to businesses in receipt of payments under the Resilience Measure? Explain your answer.

Two hundred and twenty five responses were received for this question. Twenty seven were from organisations, (of which 17 were farming focused and 7 environment focused), 196 were from individuals and 2 from political parties.

Seventeen organisations (of which 14 were farming focused and 2 environment focused), 97 individuals and 2 political parties/representatives were supportive of this proposal.

Ten organisations (of which 3 were farming focused and 5 environment focused) and 106 individuals were not supportive.

In agreement with the proposal

Ten farming focused organisations and 2 political parties/representatives agreed with the proposed linkage to Resilience Measure as it would encourage commitment to the measure from the farmer, an adherence to scheme rules, and would be advantageous in helping to deliver more benefits and drive changes such as improved productivity and profitability.

Six individuals agreed with the question as they expressed the opinion that it should be paid to those who were receiving the basic “active farmer” resilience payment.

Not in agreement with the proposal

One farming focused organisation and 14 individuals disagreed with the question and also noted that they believed that the 10 hectare minimum claim threshold under the Resilience Measure was too high, as it would exclude small farms and therefore it should be reduced.

Five organisations (of which 2 were farming focused and 3 were environment focused) and 3 individuals did not agree with the measure or had various concerns with respect to the measure, the impact of the scheme on tenants over landowners and the impact that this might have on domestic beef production.

Two environment focused organisations and 1 individual were concerned that the introduction of a Headage payment might result in negative impact on habitats / high nature value land.

Eight individuals considered that payment should be given to all farmers keeping livestock regardless of whether they were eligible for Resilience payment.

Two individuals noted that the scheme would discourage farmers by being too complicated and a further 2 disagreed with coupled support as a measure at all.

One environmental organisation noted that while they believed that there should be a co-ordinated approach between the schemes they did not consider that Headage payment was in line with the aims of the overall scheme to deliver environmental and public benefits.

Other comments/ suggestions

Three organisations (2 environment focused) and one individual noted that it would be more beneficial to target support at delivering the right level of stock (often very low) in marginal /

less favoured areas. Additionally that the schemes should support the use of traditional breeds in marginal areas. There was concern that Headage payment was another form of coupled support that was directly tied to agricultural production, which could lead to overstocking in marginal areas.

Two farming focused organisations and one individual, despite agreeing with the suggested link between Headage and Resilience payments, noted that that they were dismayed that sheep were not covered in the sustainability package.

Q6. 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.

Q6 (i) Reducing age of first calving - do you agree with this measure and the pace of phased implementation proposed? Explain your answer.

Two hundred and twenty seven responses were received for this question. Thirty were from organisations, (of which 18 were farming focused and 8 environment focused), 195 individuals and 2 political parties/representatives.

Twelve organisations (of which 7 were farming focused and 3 environment focused) and 72 individuals supported reducing the age at first calving measure and its pace of implementation.

Eighteen organisation (of which 11 were farming focused and 5 environment focused), 123 individuals and 2 political parties/representatives were not supportive of the proposal.

In agreement with the proposal

Five organisations (of which 3 were farming focused and 2 environment focused) and 7 individuals noted the main benefits of reducing the age at first calving and its pace of implementation where environmental and productivity improvements could be achieved. Respondents stated that the measure could deliver desirable outcomes and environmental benefits, and that efficiencies from the measure benefitted the farm business and the environment through reduced costs and decreased emissions. Responses also noted that the measure was a logical approach in line with overall desire to increase productivity and reduce the environmental impact of the suckler industry.

One environmental organisation and 2 individuals noted the benefits of financial gain from the measure and stated that there was no value in keeping unproductive animals.

One response from an individual highlighted the progress from the measure and that people needed to move forward with new practices, methods and technologies.

Not in agreement with the proposal

Nine organisations (of which 7 were farming focused and 2 environment focused), 9 individuals and 2 political parties/representatives said the measure should not be a blanket policy across a number of areas. Responses stated that it needed to be applied with common sense, as not all animals were sufficiently mature to be put in calf at 18 months. There was general agreement that one size did not fit all across different breeds, including native breeds, and maturity was reached at different rates. Responses also highlighted that there could be difficulty for pedigree breeds, that production systems were not all the same and that consideration needed to be given to problems such as an infertile bull and disease outbreaks.

Three organisations (of which 2 were farming focused), 20 individuals and 1 political party/representative indicated concerns with animal welfare. They cited the risk from animals calving at a younger age and potential reduction in life span if first calved too young. Responses also noted that heifers should calve at the right weight and size to avoid problems during calving. Some of those who did not agree noted the environmental benefits to reducing the age at first calving but highlighted potential welfare consequences for livestock on the hill.

One organisation and 7 individuals expressed their views on the risk of intensification and increasing productivity and, or production through the measure which went against the move towards more natural farming and more consideration for the environment. Other responses considered that the measure seemed to move further towards intensification of the sector, which linked to a negative impact on animal welfare and could undermine Northern Ireland's 'green' food image. Responses also noted the increased risk of intensifying production to increased stocking levels and more use of concentrated feeds.

Ten organisations (of which 8 were farming focused and 1 environment focused) 2 individuals and 2 political parties/representatives, all raised concerns with the age at first calving measure and its pace of implementation for native breeds. Respondents noted concerns about the potential loss of genetic diversity and the commercial pressure pushing NI farmers towards a smaller number of cattle breeds. Respondents were also concerned that some native breeds would not achieve the required mature weight until they were well over 30 months.

Five organisations (of which 4 were farming focused and 1 environment focused) and 3 individuals had concerns with reducing the age at first calving and its pace of implementation for hill farmers. They indicated that it wasn't suitable in hill areas and it did not support hill grazers and favoured farmers in better lowland areas.

One response from an individual said that the measure discriminated against small farmers.

Three organisations (of which 1 was farming focused and 2 environment focused) and 1 individual noted unintended consequences for the environment, including biodiversity as some breeds were later to mature for conservation grazing. Responses also noted that it could result in overstocking in marginal areas, with negative impacts on upland and marginal high value farms.

Other comments / suggestions

One political party/representative that disagreed with the proposal suggested native breeds should be given some sort of exemption and further suggested the proposed transition should be longer. One farming focused organisation suggested it should be over 6 years instead of the proposed 4.

Two farming focused organisations who agreed with the measure highlighted the need for knowledge intervention. They said very careful management of these phases and more understanding, through appropriate knowledge intervention measures would help farmers with heifer management and achieving the targets. It was also noted that there needed to be heavy focus from advisory services on supporting the measure.

One individual highlighted concern for farmers who don't raise calves through to cow and buy cows in calf or with calf, being disadvantaged as they would be at the mercy of others.

One farming focused organisation suggested in the first year to set the age at first calving high enough to draw in as many cattle farmers as possible.

Q6 (ii) Reducing the calving interval - do you agree with this measure and the pace of phased implementation proposed? Explain your answer.

Two hundred and twenty four responses were received for this question. Twenty eight were from organisations, (of which 17 were farming focused and 7 environment focused), 194 individuals and 2 political parties/representatives.

Fifteen organisations (of which 11 were farming focused and 3 environment focused), 76 individuals and 1 political party/representative supported reducing the age at first calving measure and its pace of implementation.

Eighteen organisation (of which 11 were farming focused and 5 environment focused), 123 individuals and 2 political parties/representatives were not supportive of the proposal.

In agreement with the proposal

Five organisations (of which 3 were farming focused and 2 environment focused) and 15 individuals agreed it would improve efficiencies from environmental, productivity and financial perspectives. Responses noted that reducing the calving interval would minimise the number of days a cow must be maintained, citing better economic return from a feed efficiency point of view and the number of calves produced over a cow's lifetime. Improved efficiency, productivity and benefits to the environment were stated as positive outcomes from the measure.

One organisation ('other') also noted the positive intent around carbon reductions in reducing the carbon interval but was concerned regarding a blanket approach. Responses further noted that the measure was important for the sustainability and image of the industry to be efficient, carrying no passengers that unnecessarily contributed to greenhouse gases. Further responses noted that the measure could allow for stock numbers to be reduced, contributing to sustainable limits of methane, ammonia and CO₂ and also meet NI's CO₂ goals.

One organisation ('other') suggested DAERA should engage with the veterinary profession to develop the proposal to ensure animal health and welfare were fully considered.

One individual said that the calving interval proposal was best farming practice and should already be practiced.

Some individuals, while they supported the measure, raised concerns on the potential to rule out the use of native breeds and the environmental benefits associated with them as well as the difficulties hill farmers would face with the measure. Concerns were also raised regarding animal welfare, difficulty to meet the measure and perverse consequences on genetics.

Not in agreement with the proposal

Four organisations (of which 1 was environment focused) and 14 individuals raised concerns with reducing the calving interval and its pace of implementation with regard to animal welfare. They said it would put the cow and calf under stress and strain, that a cow needed time to recuperate and calving outside was much healthier. Two individuals thought the measure was unethical and inhumane for the animals. It was also noted that the measure would have a negative impact on animal welfare, undermining NI's 'green' food image.

Four organisations (of which 3 were farming focused), 14 individuals and one political party/representative said time scales for the measure were too tight or hard to meet.

Responses noted that farming systems had varying time scales and should not be penalised and that some cows, depending on recovery and condition after calving could come into heat at different intervals. Respondents also said heifers took longer to come back into cycle second time around and it was more difficult for heifers that had had a caesarean to come into calf again and highlighted that the vast majority of farmers knew the importance of fertility and in real life there was slippage.

Three farming focused organisations and 2 individuals raised concerns around impacts on the native breeds and potential loss of genetic diversification and that it could lead to unnecessary culling of genetically important blood lines. Responses noted that the proposal didn't support the traditional hill grazers and that native breeds were natural and sustainable, and in higher altitudes needed more time to grow and recover.

Two individuals had concerns for hill farmers and said the measure was narrow, non-inclusive and detrimental to farms in upland areas.

One organisation ('other') and 3 individuals cited intensification and concern over increasing animal numbers if the measure was introduced.

Other comments / suggestions

Three organisations (of which two were farming focused), one individual and one political party/representative noted the need for mitigating circumstance in a number of areas. Responses highlighted the need to take account of problems suckler farms face such as an infertile bull slipping calf because of TB testing, heat stress and poor reception rates from Artificial Insemination. Responses also highlighted other mitigating circumstances such as in the event of disease outbreak or where rare breeds were needed in the management of high nature value areas.

One environment focused organisation was concerned of unintended consequences of farmers acquiring marginal land and increasing/using unsuitable stock on the land resulting in habitat damage or increased use of fertiliser.

In relation to the time scale for the measure, one organisation ('other') suggested a fixed maximum calving interval of 400 days with no phased reductions. Another suggested 380 day by year 4 and a further suggestion of extending the measure to 6 years with annual review.

One individual highlighted that farmers needed to calve cows in spring in order to reduce concentrates and antibiotic use.

One farming focused organisation noted there must be a heavy focus from advisory services on supporting the measure.

Q6 (iii) Do you agree payment should be made only to qualifying suckler cows where live calves are registered with DAERA? Explain your answer.

Two hundred and twenty two responses were received for this question. Twenty four were from organisations, (of which 15 were farming focused and 6 environment focused), 194 were from individuals and 2 from political parties/representatives.

Twelve organisations (of which 6 were farming focused and 3 environment focused) 37 individuals and 2 political parties/representatives were supportive of this proposal.

Fourteen organisations (of which 9 were from farming focused and 3 environment focused) 75 individuals and 2 from political parties/representatives were not supportive of the proposal.

In agreement with the proposal

One environment focused organisation and 8 individuals agreed with the proposal noting that this measure should help ensure better traceability, lead to better oversight of the suckler industry and ensure the transparency and accountability of the programme helping prevent fraud or abuse.

One environment focused organisation and 3 individuals supported the proposal noting that this could have a positive effect on stock quality and encourage good husbandry. Additionally it was noted that this should improve livestock data collection.

One organisation ('other') and 4 individuals agreed with the proposal but felt that there needed to be mitigating factors within this rule – suggesting that there should be some flexibility in the case of animal disease / health breakdowns in a herd. Respondents also suggested that flexibility could be provided by allowing the requirement for a live calf to apply to 80/90% of the herd, as they noted that all suckler herds lost a number of calves each year, regardless of animal husbandry.

Three individuals agreed with the proposals but were concerned that there should not be an additional financial penalty to the farmer for the loss of a calf, as long as the dead animal was recorded properly.

Not in agreement with the proposal

Eight organisations (of which 7 were farming focused and 1 environment focused), 23 individuals and 2 political parties/representatives disagreed with the proposal, noting that the loss of a calf through death was already a significant cost to the farmer. It represented the farmer's whole year's work in getting the cow in calf and ready to calve, so to further penalise the farmer by not paying a penalty would be unfair. One political party/representative and 2 individuals suggested that payment should be dependent on a calf tagged and registered (dead or alive).

Two farming focused organisations suggested that registering and sampling a dead calf for BVD should be sufficient to qualify for payment.

Four individuals suggested that payment should be made on the in calf suckler cow, not the calf.

Other comments/ suggestions

Two political parties/representatives and one farming focused organisation stated that the Department had not provided enough information on the historic reference data for them to comment at this time.

Two individuals suggested that more specialised breeds should also be given mitigations in respect of this measure.

An individual suggested that a farmer in the case of a dead calf should be able to substitute a dairy calf or other calf and receive payment for this calf.

One individual suggested that producers should be encouraged to use easier calving genetics to avoid dystocia.

Q6 (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? Explain your answer.

Two hundred and sixteen responses were received for this question. Twenty four were from organisations, (of which 14 were farming focused and 6 environment focused), and 187 were from individuals.

Fifteen organisations (of which 10 were farming focused and 3 environment focused) and 93 individuals were supportive of this proposal.

Nine organisations (of which 4 were farming focused and 3 environment focused) and 97 individuals were not supportive of this proposal.

In agreement with the proposal

Two farming focused organisations and 12 individuals agreed with the proposal that the reference period should include a historic reference year as they noted that it would help regulate numbers, avoid future overstocking of herds and to avoid artificial / speculative increase of cattle numbers by farmers in order to receive subsidy. One environment focused organisation suggested that stocking rates should also be calculated in line with appropriate sustainability stocking levels for the specific grazing area of eligible animals / herds.

Three organisations (of which 2 were farming focused and 1 environment focused) and 3 individuals noted that new entrants would need further consideration to allow them a fair entry into the system and that additionally farmers who wished to develop their farms would have a method to increase their quota. This could be based on a system of eligibility assessments and consideration of sustainable stocking levels.

Not in agreement with the proposal

Two organisations (1 farming focused) and 28 individuals expressed concern in respect of the historic reference period that it would limit farmer expansion or growth limit diversification, not take account of rises and falls in herd numbers or could restrict new entrants from beginning a suckler herd.

One organisation ('other') and one individual specifically mentioned their concern for new entrants to the scheme under this proposal.

One organisation (farming focused) expressed concern in respect of the use of reference periods which aim to maintain status quo rather than encouraging necessary change and noted that payment systems should be based on promoting the public interest not preserving private interests.

One organisation (farming focused) was concerned that this would be a regression to past bureaucracy from before 2005 which would restrict farmers from being able to adapt flexibly to change.

One organisation (environment focused) was concerned about the potential consequences for biodiversity and whether this policy could have a negative impact in respect of this.

Other comments/ suggestions

One organisation (farming focused) suggested that there should be an allowance for heifers >30 months to be included within the head count as farmers may have been bringing animals into herd for business reasons.

A further suggestion was that the reference period should be considered over 5-7 years to allow for natural fluctuation within a business.

**Q6 (v) Do you agree that the payment quota may be traded and usage rules will apply?
Explain your answer.**

Two hundred and fourteen responses were received to this question. Twenty five were from organisations (of which 15 were farming focused and 6 environment focused), 187 were from individuals and 2 from political parties/representatives.

Sixteen organisations (of which 12 were farming focused and 2 environment focused) 107 individuals and 1 political party were supportive of this proposal.

Seven organisations (of which 3 were farming focused and 4 environment focused) and 80 individuals were not supportive of this proposal.

In agreement with the proposal

Two farming focused organisations and 7 individuals agreed with the proposal and noted that it would allow some flexibility, facilitate new entrants and enterprise changes, as well as allowing farmers to exit the industry.

Five farming focused organisations agreed that there needed to be a system of transfer for quota but noted that the process would need to be controlled and reviewed. Two farming focused organisations suggested that the quota should be calculated on a Livestock Unit equivalent basis.

One environment focused organisation and 1 individual noted that there would need to be controls in place to ensure that an overstocking scenario could not occur, particularly ensuring that the National Herd was not increased.

One farming focused organisation and 1 individual were concerned that the smaller farmer might trade their quota to larger farmers but still keep their own cattle which could lead to increased cattle numbers and subsequent negative environmental effects.

Not in agreement with the proposal

Two organisations (of which 1 was farming focused) and 4 individuals specifically noted that they disagreed with any trading of quota.

Two organisations (of which 1 was farming focused and 1 environment focused) and 4 individuals expressed concerns that an ability to trade quota was giving value to an artificial commodity and may have unintended if not perverse consequences.

Two organisations (of which 1 was environment focused) and 2 individuals expressed concerns that this measure could have negative environmental effects.

Four individuals noted that they did not see any need to have a system to trade quotas if farmers were paid for their current cow numbers, or a payment made retrospectively on the previous year.

Other comments/ suggestions

One farming focused organisation, 1 political party/representative and 2 individuals both for and against the proposal noted that the ability to trade would need to be very carefully considered, that usage and scheme rules would need to be reviewed regularly and clear guidance / training would need to be provided.

There were some concerns that the introduction of quota trading would drive up costs.

A number of responses indicated that the rules pertaining to this would need to be developed further before respondents could comment fully on the proposal.

**Q6 (vi) Do you agree that there should be a retention period of at least 6 months?
Explain your answer.**

Two hundred and five responses were received to this question. Twenty one were from organisations (of which 13 were farming focused and 5 environment focused), 183 were from individuals and 2 from political parties/representatives.

Eleven organisations (of which 7 were farming focused and 3 environment focused) and 119 individuals were supportive of this proposal.

Nine organisations (of which 5 were farming focused and 2 environment focused), 63 individuals and 2 political parties/representatives were not supportive of this proposal.

In agreement with the proposal

Two organisations (of which 1 was farming focused) and 14 individuals agreed with this proposal on the basis that this would be a beneficial measure to help to reduce fraudulent activity, manipulation of the scheme, or the perverse use of the support measures. Respondents considered that the retention period allowed for better control and promoted good practice.

One organisation ('other') and 2 individuals noted that this proposal might help welfare standards and stop unnecessary movements of cattle.

Not in agreement with the proposal

Four organisations (of which 2 were farming focused) and 3 individuals noted that they felt that the retention period should be shorter than six months as this would allow the farmer more flexibility, suggesting that having to hold on to an animal to qualify for payment could encourage inefficiency.

One individual suggested that this could have not only a negative impact on business efficiency and but could also affect the ability of a business to meet carbon reduction targets.

Other comments/ suggestions

An individual suggested that the number of calves that needed to meet the retention period should be averaged out so that not 100% of the calves would need to remain on farm for six months which would allow some flexibility to cover situations such as calf mortality.

Five organisations (of which 4 were farming focused and 1 environment focused) and 1 political party/representative commented that more details on retention periods would be needed to fully understand the implications of this measure.

Q6 (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? Explain your answer

Two hundred and fifteen responses were received to this question. Twenty seven were from organisations (of which 16 were farming focused and 6 environment focused) and 188 were from individuals.

Seventeen organisations (of which 10 were farming focused and 4 environment focused) and 87 individuals were supportive of this proposal.

Ten organisations (of which 6 were farming focused and 2 environment focused) and 98 individuals were not supportive of this proposal.

In agreement with the proposal

One organisation ('other') and 2 individuals noted that improving the genetic performance or standards of cattle could drive enterprise efficiency and help to meet carbon reduction targets.

Three organisations (of which 2 were farming focused and 1 environment focused) were in favour of this as they saw genetic programmes as an essential tool in improving sought after genetic characteristics, particularly in respect of native or traditional breeds and light hill breeds. Respondents were concerned that a focus on heavy, high yielding continental breeds would reduce the number of animals suitable for hill and marginal grazing as these animals provide a valuable role in managing semi-natural vegetation on high nature value farmland.

One farming focused organisation and 1 individual proposed that it should be a condition of anyone receiving public payments that they be required to provide information that may be of public benefit.

One farming focused organisation noted that this information could help NI develop a livestock database similar to the ICBF in ROI and noted that that a database using the breeding indexes would make it much easier for breeders and farmers to select bulls, record their progeny and plan future breeding programmes. They also noted that the breeding of more efficient animals would be crucial in terms of meeting CHG emission levels as animals with lower emissions could be monitored and bred from, reducing their contribution to methane levels and preventing any further reductions within the National Herd.

Six individuals agreed with the proposal as they saw benefits in the provision of this data to aid efficiency, herd health and profits

Not in agreement with the proposal

Three organisations (of which 2 were farming focused) and 6 individuals noted that they could not agree to this measure at this time as they did not have enough details of the scheme, or the rationale for this proposal.

Twelve individuals noted that they did not agree with the proposal as it would add to the farmer's administrative load and was an unnecessary bureaucracy. They noted that the farmer had too much paperwork already, and that it was getting over complicated particularly for less technically advanced farmers.

One farming focused organisation noted that it was concerned that this requirement must be introduced in a format that was simple and straightforward to understand and complete for the farmer.

Other comments/ suggestions

One farming focused organisation suggested that they would support an annually funded veterinary visit for each farmer at which data would be collected and shared centrally.

Q7. Do you agree on the proposal to slaughter clean beef animals at 24 months to make the sector more productive and environmentally sustainable?

Two hundred and eighteen responses were received to this question. Twenty four were from organisations (of which 15 were farming focused and 5 environment focused), 193 were from individuals and 1 was from a political party/representative.

Twelve organisations (8 of which were farming focused), 76 individuals and 7 anonymous respondents were supportive of this proposal.

Twelve organisations (7 of which were farming focused and 2 environment focused), 110 individuals and 1 political party/representative did not support the proposal.

In agreement with the proposal

Three farming focused organisations cited the main benefit to slaughtering clean beef animals at 24 months was that it would make the sector more productive and environmentally sustainable. Responses stated that while the goal was desirable in principle, there would need to be investment in advisory services to ensure farmers had the technical knowledge to make this change. Respondents also noted concerns around the variation in farm systems and types and noted how hill farms in particular could farm sustainably and produce beef animals at an older age than 24 months.

Not in agreement with the proposal

Two farming focused organisations who were against the proposal noted concerns around slower maturing breeds, native breeds and dairy bred animals. Responses considered there was consumer demand for slower grown beef for its depth of flavour and the pace of growth within these breeds was not sufficient to meet the demands of the proposal. Respondents raised concern that producing animals to be slaughtered at 24 months would lead to increased costs, intensification of farming practices, increased ammonia levels, increased use of feeding from unsustainable sources and potentially increase animal welfare issues.

Other comments / suggestions

One organisation ('other') that did not specifically note whether they were for or against the proposal noted concerns of the risk of unintended environmental consequences in the pursuit of faster maturity to a maximum carcass weight and noted that improved genetics and effective use of inputs would go some way to offsetting this risk. The response also raised the question of how active compliance to the measure would be monitored and what would constitute a failure, and what the consequences of this would be.

Q8. Do you agree that only animals born and bred in Northern Ireland should be eligible for support under the Beef Transformation Measure?

Two hundred and sixteen responses were received for this question. Twenty four were from organisations (of which 15 were farming focused and 5 environment focused) and 192 were from individuals.

Eighteen responses from organisations (of which 12 were farming focused and 2 environment focused) and 118 individuals expressed support for the proposal that only animals born and bred in Northern Ireland should be eligible for support under the Beef Transformation Measure.

Six responses from organisations (of which 3 were farming focused and 3 environment focused) and 74 individuals did not support the proposal.

In agreement with the proposal

One farming focused organisation expressed the view that it was only fair and appropriate that the support was allocated to animals that were Northern Ireland born and bred, partly due to the reason that Northern Ireland farmers could not avail of government support in any other country.

One farming focused organisation stated they supported this proposal as it would maintain the reputation of the current system, but noted this was subject to consideration around any genetics issues.

Not in agreement with the proposal

Three organisations (of which 2 were farming focused) expressed concerns that this proposal would have an impact on many businesses which imported animals from ROI and that there was the potential to disrupt the trade in cattle onto farms and direct slaughter from ROI. They questioned the benefits of this proposal to Northern Ireland agriculture and the environment.

One organisation ('other') expressed concerns that if animals imported from ROI were not eligible for the suckler payment, this could have an impact on the quality of the suckler herd in Northern Ireland. The response noted that this proposal could have all-island impacts on the cattle and sheep trade.

One farming focused organisation stated that given the likelihood of an under 24 month slaughter premium in ROI, the combination of both policies could undermine all-island trade in cattle for slaughter and further production.

Q9. Do you agree with the proposed pace of phased implementation to reduce the age of slaughter to 24 months?

Two hundred and seventeen responses were received to this question. Twenty four were from organisations (of which 15 were farming focused and 6 environment focused), 190 were from individuals and 2 were from political parties / representatives.

Eight organisations (of which 5 were farming focused and 2 environment focused) and 77 individuals expressed support for the proposed pace of phased implantation to reduce the age of slaughter to 24 months.

Seventeen organisations (of which 11 were farming focused and 4 environment focused), 113 individuals and 2 political parties / representatives did not support the proposal.

In agreement with the proposal

Three farming focused organisations expressed support for the proposal but with the caveat that the necessary support and knowledge sharing was offered to farmers in order to achieve these targets. Concern was expressed that farmers be allowed time to adapt to the new policy, particularly in respect of slower maturing breeds.

Two environment focused organisations expressed support for the measure but noted that these may not be achievable for slower maturing animals, traditional breeds and those used to graze marginal or high nature value farming in upland areas.

One organisation ('other') expressed the view that while they were supportive of the proposal, a level of flexibility should be applied that would be linked to consumer demand.

Five individuals expressed the view that the proposed pace of implementation would give farmers time to adapt and improve and in turn reduce the carbon footprint of their farms. Respondents also expressed concern that it might be difficult for traditional and specialised breeds to meet the target and this might lead to an increase in concentrate feeding.

Not in agreement with the proposal

Nine responses from organisations (of which 8 were farming focused), 1 political party/ representative and 14 individuals expressed concern around the impact the proposal would have on slower maturing breeds and native and traditional breeds or those who practised conservation grazing on high nature value habitats or upland farms. Respondents stated that they felt the time frame was too tight a 'one size fits all' policy would not work and should be assessed by breed type.

Two organisations (of which 1 was farming focused) and 1 individual expressed concerns around animal welfare if the proposal was to be introduced and stated that animals with forced high growth rates may suffer from serious health conditions including lameness and reproductive disorders.

Two farming focused organisations noted concerns of potential market disturbances and a potential glut of cattle coming to market in spring if all farmers were forced to finish at 24 months.

Responses from individuals also noted concerns around potential disruption to the supply chain in reference to supply and demand and carcass conformation.

One organisation ('other') and 12 individuals noted that this proposal would move the sector towards more intensive farming methods and feeding systems, which in turn would

discourage farming friendly farming practices and increase emissions. Respondents stated that the proposal would encourage force feeding and a heavy use of concentrates, moving towards a more factory farming approach. And that this could potentially damage Northern Ireland's 'green' food image.

One farming focused organisation stated that farmers would need advice, training and encouragement to make changes to their breeding policies and also the possibility of demonstration farms where farmers could see trials and results of what could be achieved.

Other comments / suggestions

One environment focused organisation noted a concern that rapid change may lead to negative genes coming through in the breeding programme.

One farming focused organisation suggested six years as a more appropriate timeframe with an annual review to allow the sector to adapt and not create any natural market disturbances.

Q10. Do you agree a single minimum slaughter age of 12 months for all cattle?

Two hundred and eleven responses were received to this question. Twenty six were from organisations (of which 16 were farming focused and 6 environment focused), 183 were from individuals and 2 were from political parties/representatives.

Seventeen responses from organisations (of which 11 were farming focused and 4 environment focused), 115 individuals and 1 political party/representative expressed support for a single minimum slaughter age for all cattle. Nine responses from organisations (of which 5 were farming focused and 2 environment focused), 68 individuals and 1 political party/representative did not support the proposal.

In agreement with the proposal

Three responses from farming focused organisations and 3 individuals expressed the view that anything younger than 12 months would and should be considered a specialist product, such as veal for a specific market. One farming focused organisation noted that this market had particular specifications and the majority of retailers did not accept beef in the category 8 months or less as part of their retail / customer specification. Three individuals noted that they could not see the rationale for slaughter below the age of twelve months unless considering the veal market, which should be considered separately.

Two environment focused organisations and two individuals expressed support for the proposal by noting that only in exceptional circumstances should slaughter take place before this age.

Two organisations (of which 1 was environment focused) and 3 individuals commented that not having a minimum slaughter age could lead to animal welfare issues, and reduce the risk of malpractices to increase carcass weight by force feeding or unethical measures. One environment focused organisation stated that reducing the minimum age below this, would lead to more intensive feeding and consequently a higher carbon footprint. One political party/representative was supportive of the proposal, as it would help to increase efficiency and reduce greenhouse gas emissions.

Two individuals noted that a minimum age would allow stock numbers to be reduced and lead to reduced greenhouse gas emissions and improvement in quality of breeds reared.

Two responses from individuals commented that some systems could have an animal well grown and be viable for slaughter at twelve months, and this might help reduce costs for a smaller farmer, but noted that any younger and they were unlikely to have reached their full potential.

Not in agreement with the proposal

Two farming focused organisations and 4 individuals noted that some high performing producers were able to finish cattle at a younger age, and that some continental bulls were fit for slaughter under 12 months and flexibility should be applied. One organisation ('other') stated that this flexibility should be linked to consumer demand.

Responses from 3 farming focused organisations and 3 individuals noted that slaughter age should be based on other factors, such as breed, and a minimum slaughter weight might be more appropriate. Respondents noted that different breeds as well as heifers and bullocks gained weight at different rates, so a minimum slaughter age may not be appropriate. One individual noted that a minimum age was not required and an animal should be slaughtered when it was not profitable to keep.

Three responses from organisations (of which 2 were farming focused) and 6 individuals did not support a minimum slaughter age as this would have an adverse impact on the veal industry with its particular potential to add value to dairying. One farming focused organisation noted how this proposal would also upset the supply of dairy calves for export to other countries, that it would be unfair to penalise those farmers supplying the veal industry and that they should also be offered support.

Six responses from individuals felt that a minimum age of 12 months for slaughter was still too young, unless in exceptional circumstances or if welfare was an issue. Respondents noted that an animal would not be fully grown at twelve months and one individual suggested this should be set at 15 to 20 months to allow animals to mature naturally and to avoid industrial production.

Other comments/suggestions

One farming focused organisation commented that there would need to be further consultation with the meat industry and the retailer sector if this proposal was to be amended going forward.

One political party/representative noted that the proposal appeared too rigid.

Q11. 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?

Two hundred and eight responses were received to this question. Twenty three were from organisations (of which 14 were farming focused and 6 environment focused), 184 were from individuals and 1 was from a political party/representative.

Six responses from organisations (of which 3 were farming focused and 2 environment focused) and 107 individuals expressed support for a single maximum slaughter age of 24 months for all cattle.

Seventeen responses from organisations (of which 11 were farming focused and 4 environment focused) and 77 individuals did not support the proposal.

One political party/representative did not answer whether they agreed or disagreed with the proposal.

In agreement with the proposal

Four responses from organisations (of which 2 were farming focused and 1 environment focused) and 23 individuals supported the proposal but noted that bulls, steers and heifers matured at different ages and expressed support for different maximum ages for each type of animal.

One response from an environment focused organisation said that native breeds were slower to mature but were valuable in grazing species-rich habitats and suggested there could be flexibility for different breeds.

Three individuals also noted support should be given to grass fed beef.

Not in agreement with the proposal

Eight responses from organisations (of which 6 were farming focused and 2 environment focused) and 2 individuals expressed the view that the timeframe was too tight or unachievable for native breeds, especially in upland areas where cattle tended to grow slower and mature later.

Two farming focused organisations focused and 6 individuals felt the maximum slaughter age of 24 months was too young and suggested the limit should be set at 30 months.

Two farming focused organisations focused expressed the view that the proposal was too inflexible.

Other comments/suggestions

Two farming focused organisations focused and 1 political party/representative suggested hill farmers could be exempted from a single maximum slaughter age requirement.

Two farming focused organisations focused and 1 political party/representative expressed support for a review of the average age at slaughter across breeds for steers, bulls and heifers.

One farming focused organisation suggested a revised timeframe of six years with an annual review would be more appropriate.

Q12. Have you any other specific suggestions to provide support for other parts of the beef sector?

Seventy nine responses were received to this question. Twenty two were from organisations (of which 13 were farming focused and 4 environment focused), 55 were from individuals and 2 were from political parties/representatives.

Comments/Suggestions

Two farming focused organisations focused and 1 political party/representative suggested consideration should be given to providing similar support to Department of Agriculture, Food and Marine schemes that supported the beef sector. The schemes referred to in either or both responses included:

- Beef Environmental Efficiency Programme (BEEP)
- Beef Data and Genomics Programme (BDGP)
- Suckler Carbon Efficiency Programme (SCEP)
- Green, Low-Carbon, Agri Environment Scheme (GLAS)

Two farming focused organisations expressed support for a beef calf scheme similar to the Scottish Suckler Beef Support Scheme (SSBSS) which helped maintain beef suckler herds at a level that sustained the commercial beef industry in Scotland.

One response from a farming focused organisation expressed a preference for suckler beef and sheep support similar to the Scottish Less Favoured Area Support Scheme (LFASS) which provided essential income support to farming businesses in remote and constrained rural areas and was similar to the DAERA Areas of Natural Constraints Scheme (ANC).

A key theme from groups and individuals made reference to encouraging the improvement in genetics of the beef herd through the provision of support.

An emerging theme was the importance of rare breeds which mature slower and it was suggested support could be provided through the Funding for Nature package. It was noted that headage support could have an unintended consequence of impacting numbers of native breeds as they would be less profitable.

Five responses from one organisation ('other') and four individuals, highlighted the lack of support for the organic sector in the proposal and two of the individuals further suggested support was also needed for the pasture-based sector.

A number of responses (one farming focused organisation, 1 political party/representative and 3 individuals) suggested consideration should be given to support to hill/upland farmers similar to previous Less Favoured Areas and Areas of Natural Constraint payments.

Other emerging themes included the need to review cattle grading, transparent reporting of slaughtered cattle prices to encourage fair prices, more emphasis on animal health and welfare initiatives and improved brand marketing.

Q13. Do you have any specific suggestions for incentivising productivity in breeding ewes? Explain your answer.

Eighty four responses were received for this question. Twenty two were from organisations (of which 13 were farming focused and 4 environment focused), 60 were from individuals and 2 were from political parties/representatives.

Key themes raised

Eighty one responses received stated that some form of support should be offered to the sheep farming sector while 3 responses from individuals stated that no support or intervention was necessary as sheep farming was already well incentivised and that the sector was already operating as fast as possible.

Twenty five responses (of which 3 were from environment focused organisations and 1 political party/representative) suggested that the sector needed a headage based payment for breeding ewes, similar to that offered to the suckler cow sector. Respondents noted that the lack of proposals on the sheep sector was a serious omission in the consultation and that a sheep transformation programme should be introduced. Respondents also noted that the sheep sector currently provided a wide range of public goods and should be getting recognition for this. There was concern that this imbalance of support between the two sectors, would lead to a preference in farming in one sector and this could have environmental and market implications and further unintended consequences.

One environment focused organisation expressed the view that a headage based scheme should not be offered and that a land based payment offered a greater degree of sustainability and resilience for farm businesses. They noted that in the past, headage based payments caused considerable environmental damage as an unintended consequence.

A common theme raised from organisations (five farming focused, 1 'other' and 1 political party/representative) was that of the need to introduce a similar scheme in Northern Ireland to that of the Sheep Welfare Scheme in the Republic of Ireland. These organisations considered that the introduction of such a scheme would improve animal health and welfare in the sheep sector as it would include improvements in lameness control, mineral supplementation for ewe's post mating and lambs post weaning, scanning pregnant ewes, meal feeding lambs post weaning, parasite control and flystrike control. Respondents also suggested the potential for two schemes, one for lowland flocks and another for upland/hill flocks. It was noted that targeted support would increase productivity and reduce the carbon footprint of the sector.

One political party/representative expressed the view that there should be an all-island approach to sheep sector support as the sector provides many environmental, economic and social benefits. It also highlighted the potential for unintended consequences of distorting the market and the balance between cattle and sheep farming, and that it was important to sustain the viability of both sectors.

One farming focused organisation commented that consideration should be given to a first step similar to that offered in England of the funding of one annual diagnostic visit by a vet for the flocks disease status with the data then being recorded and reported. It expressed the view that this would improve herd health and the productivity of the animals.

A common theme raised across four farming focused organisations and individuals was the need to look at the current low process offered for wool and investigate the reasons behind

this and the implications it was having on the sheep farming sector. These organisations highlighted the importance of wool to the Northern Ireland sheep sector, and the potential loss of jobs and income if support was not offered.

Three farming focused organisations referenced the Livestock Marketing Commission / Andersons Centre report which suggested a payment of £12 per ewe.

Comments from seven organisations (of which 4 were farming focused and 2 environment focused) raised the issue of the importance of sheep grazing for upland habitats and the critical role that sheep played in managing upland environments and habitats. There was concern that if favour shifted to cattle, some areas of land would suffer degradation from either cattle grazing or abandonment, greater wildfires due to greater fuel loads, lack of species diversity and encroachment of unwanted vegetation and a general lack of land management. Respondents also noted that sheep and cattle grazing rotationally ensures good paddock clean out levels, reduces anthelmintic inputs and worm burdens.

A further key theme raised across farming focused organisations and individuals, was the need to incentivise payments to breeders who recorded and reported data to permit evaluation of breeding and hereditary traits. It was noted that targeted support may encourage more sheep farmers to engage in performance monitoring and genetic advancement, as historically this had been lacking. Respondents also considered that commercial sheep producers should be incentivised for using rams of a higher genetic merit and some respondents expressed the view that a genetic improvement programme was essential for progress in production efficiency and to reduce the environmental footprint of the sheep sector. One environment focused organisation noted concerns that a lack of targeted support might lead to a reduction in the sheep gene pool.

FARMING FOR NATURE

Q14. What are your views on the suggested policy proposals and environmental principles to be incorporated within the Farming for Nature Package?

One hundred and thirty four responses were received to this question. Forty two were from organisations (of which 23 were farming focused and 9 environment focused), 90 were from individuals and 2 from political parties/representatives.

Responses from 35 organisations (of which 19 were farming focused and 8 environment focused), 62 individuals and 2 political party/representatives were broadly supportive of the proposals. Responses from 6 organisations (of which 3 were farming focused and 1 environment focused) and 13 individuals did not support the proposals.

Key themes raised

Landscape scale

Five environment focused organisations supported the proposal that schemes should be capable of delivering at a landscape scale. One individual said that the emphasis on landscape scale could disadvantage farmers compared to corporate landowners. Two farming focused organisations and 2 individuals supported the inclusion of all land types.

Eligibility

Four farming focused organisations said that eligibility should be confined to active farmers. One farming focused organisation and 2 environment focused organisations supported the eligibility criteria.

Minimum land area

One farming focused organisation and 1 individual did not support the minimum land area proposal. Six individuals said that smaller farms needed to be included in future schemes.

One farming focused organisation supported the minimum land area proposal.

One farming focused organisation suggested that the minimum land area under a Farming for Nature Package and a Resilience Payment should be standardised.

Financial incentives

Responses from 6 organisations (of which 3 were farming focused and 2 environment focused) and 2 individuals said that financial incentives needed to be of a sufficient level to enable participants to make an economic return on the environmental assets that they managed.

Responses from 6 organisations (of which 1 was farming focused and 5 environment focused) supported the principle that farmers and land managers should be rewarded for the public goods they provide.

One environment focused organisation agreed that a cap should not be imposed.

One farming focused organisation, 1 'other' organisation, 1 individual, and 1 political party/representative said that an individual business cap on the level of payment available under the Farming for Nature Package should be imposed.

One farming focused organisation and 1 'other' organisation expressed concern that the balance of funding could move away from active farmers to other landowners.

One farming focused organisation and 1 individual stated that payment should be made for the management of existing environmental assets.

Outcome based

Responses from 4 organisations (of which 2 were farming focused and 2 environment focused) and 1 individual agreed with an outcome based approach. One farming focused organisation said that an activity based approach should be adopted.

Time horizon

One farming focused organisation and 1 individual said that a long term approach was required.

Collaborative participation

Responses from 8 organisations (of which 6 were farming focused and 2 environment focused) and 1 individual supported collaborative participation.

Monitoring and evaluation

Four responses from organisations (of which 1 was farming focused and 3 environment focused) and one from an individual supported the implementation of robust monitoring and evaluation of schemes/overall Package.

10% land managed under biodiversity measures

Responses from 3 environment focused organisations welcomed the proposal that scheme participants would be incentivised to work towards managing at least 10% of their land under biodiversity measures, and 2 of these suggested that the target could be more ambitious.

Implementation/transition

Two environment focused organisations said that the timescale of transition and estimated payment levels for schemes under a Farming for Nature Package needed to be defined to gain support from and provide security for, participants of current agri-environment schemes.

One environment focused organisation said the timeline for the transition of payments to a Farming for Nature Package from a Resilience Payment should be defined.

Support/engagement

Responses from 5 organisations (of which 2 were farming focused and 3 environment focused) and 1 individual said that support for engagement with participants was important.

Responses from 10 organisations (of which 3 were farming focused and 6 environment focused) and 13 individuals said that the provision of, and access to, appropriate advice and guidance would be important for future schemes.

Two farming focused organisations said that working with farmers and providing advice should come before enforcement.

Three farming focused and 2 environment focused organisations suggested that a co-design approach should be used.

Other comments/suggestions

Three organisations ('other') and 1 individual expressed disappointed that proposals to address access to land for recreation were not included. One organisation ('other') expressed concern that the proposals did not consider heritage, the historic environment or landscape character. One farming focused organisation was concerned that farmed and kept biodiversity was not included in the proposals.

Two individuals suggested that measures under previous agri-environment schemes should be re-introduced.

Responses from 5 organisations (of which 4 were farming focused and 1 environment focused) highlighted that flexibility was important.

Responses from 1 farming focused organisation and 1 individual suggested a whole-farm approach.

A response from 1 organisation ('other') said that water should be included in the proposals. Responses from 4 individuals said that the proposals were limited, and 2 further individuals said that measures to address ammonia should be included.

A response from 1 environment focused organisation said that consideration needed to be given to common land and that dual use should be permitted.

One farming focused organisation provided an alternative proposal to Farming for Nature.

One farming focused organisation suggested that the focus should be on lower input farming systems.

One environment focused organisation said that sustainable development was incorrectly listed as 1 of the 5 principles within the Environment Act (2021) and questioned the omission of the principle of integration.

Two environment focused organisations said that the principles of the Environment Act (2021) should be applied to all future agricultural policy.

One farming focused organisation said that the Northern Ireland Farm Welfare Bill needed to be in place to ensure farm sustainability.

Q15. 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?

One hundred and twenty three responses were received for this question. Thirty-two were from organisations (of which 18 were farming focused and 8 environment focused), 90 from individuals and 1 from a political party/representative.

Responses from 29 organisations (of which 16 were farming focused and 8 environment focused), 81 from individuals and 1 from a political party/representative were supportive of the proposals. Three organisations (of which 2 were farming focused) and 9 individuals were less supportive.

Key themes raised

Scheme design

Responses from 12 organisations (of which 7 were farming focused and 3 environment focused), 16 individuals and 1 political party/representative discussed scheme design. One individual expressed concerns that actions would be approached in a silo fashion. Responses from 2 individuals supported the integration of mixed farming landscapes, and a further 2 individuals supported flexible and site specific habitat restoration plans, and landscape-scale habitat creation.

Financial incentives

Nine responses from organisations (of which 6 were farming focused and 2 environment focused) and 10 responses from individuals made suggestions in relation to the level of financial incentives that would be required to implement measures.

Three responses from individuals suggested that the creation of new habitats and the maintenance of existing habitats should be financially rewarded. Two responses from individuals also suggested that subsidies should be paid to small farmers (with less than 10 ha of land) to enable them to stay on the land and promote nature and a sustainable environment.

Habitat connectivity

Responses from 5 organisations (of which 4 were environment focused) and 2 individuals supported measures to improve habitat connectivity.

One environment-focused organisation commented on the need for the creation of a more coherent and resilient ecological network. Another environment focused organisation agreed on the need to reverse the trends in nature decline through native trees and hedgerows, riparian buffer strips, and tree plantations around livestock yards.

Proposed actions

Responses from 1 farming focused organisation and 3 individuals raised some concerns in relation to perceived limitations of proposed actions.

One farming focused organisation responded that it was a mine field that needs careful consideration, with a further farming organisation raising concerns that the suggestions could create a hierarchy which would discriminate against farms with certain habitats on their land.

Two individuals raised concerns about working within very strict measures and more red tape.

Other comments/suggestions

Responses from 4 individuals included comments regarding the transition from existing schemes to a new scheme. One individual suggested that the agreements under a future scheme should be for longer periods of time and not start/stop in nature.

One individual suggested prioritising actions to ensure rural communities and the agriculture industry were not negatively impacted by changing long-established agricultural processes.

Q16. Do you agree with the proposed eligibility criteria and minimum claim size proposals? Explain your answer.

One hundred and ninety four responses were received to this question. Thirty seven were from organisations (of which 22 were farming focused and 8 environment focused), 156 were from individuals and 1 was from a political party/representative.

Responses from 19 organisations (12 of which were farming focused and 6 environment focused) and 45 individuals supported the proposals. Responses from 18 organisations (10 farming focused and 2 environment focused organisations), 111 individuals and 1 political party/representative did not support the proposals.

In agreement with the proposal

Seven responses from organisations (of which 2 were farming focused and 5 environment focused) and 2 individuals agreed with the eligibility criteria.

Ten responses from organisations (of which 7 were farming focused and 3 environment focused) and 6 individuals agreed with the minimum claim size proposal.

Not in agreement with the proposal

Eight responses from organisations (of which 7 were farming focused) were not in agreement with the eligibility criteria and said that eligibility should be restricted to active farmers.

Ten responses from organisations (of which 4 were farming focused and 1 environment focused) and 35 individuals did not agree with the minimum claim size proposal and said that smaller farms should not be excluded and/or that all areas were important for biodiversity.

Other comments/suggestions

One farming focused organisation commented that clarification was required in relation to land in conacre.

One farming focused organisation suggested that, in the case of land in conacre, priority should be given to the business that was farming the land rather than the landowner.

One farming focused organisation, 1 environment focused organisation and 3 individuals suggested that the minimum claim size for the Farming for Nature Package and the Resilience Payment should be standardised.

Q17. 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? Explain your answer.

One hundred and seventy four responses were received to this question. Thirty were from organisations (of which 16 were farming focused and 8 environment focused), and 144 responses were from individuals.

In agreement with the proposal

Twenty seven responses from organisations (of which 14 were farming focused and 8 environment focused) and 98 responses from individuals agreed with focusing on the habitat management actions listed.

Not in agreement with the proposal

Responses from 3 organisations (of which 2 were farming focused) and 46 individuals did not agree with focusing on the habitat management actions listed.

Key themes raised

Habitat management actions

Responses from 4 organisations (of which 3 were farming focused and 1 environment focused) and three individuals suggested flexibility within habitat management actions and allowing change over time.

One individual responded that the previous Environmental Farming Scheme was not flexible enough.

One individual responded that the proposals provide options available to all types of farming enterprise, and that support should be given to farmers and landowners wishing to undertake even more ambitious schemes.

One individual responded that whilst the management actions were appropriate as an initial step, they should not be prescriptive and there should be flexibility to allow local solutions.

Three farming focused organisations said that, by suggesting the need to 'kick start' improved awareness and capacity to manage environmental assets, DAERA failed to recognise the significant environmental work already carried out by farmers.

Two environment focused organisations and one individual suggested that some elements of peatland restoration should be included in the list of management actions.

Training requirements

Responses from one farming focused organisation, 1 environment focused organisation and 2 individuals made suggestions in relation to training requirements.

One farming focused organisation commented that there would be a long learning curve as those who could be involved became more familiar with what was required.

One environment focused organisation commented that there should be specific training for farmers on hedgerow management, with penalties for frequently cut hedgerows.

One organisation ('other') said that training and funding should be part of a support programme.

One individual suggested that suitable training and guidance should be given to farmers to allow for habitat identification and the drawing up of management plans, with another individual suggesting that people must be trained.

Q18. Do you have specific suggestions for other quick win management actions?

One hundred and seven responses were received to this question. Seventy four provided specific suggestions, of which 29 were from organisations (of which 14 were from farming focused and 8 environment focused organisations), 44 from individuals and 1 from a political party/representative.

Key themes raised

Hedgerow management

Two organisations (of which 1 was environment focused) and 9 individuals supported proposals for hedgerows maintenance, restoration and creation. Four individuals suggested that more grants were needed for hedge planting. One individual said that the removal of hedgerows needed to stop, with a further individual suggesting that there should be no penalties for farmers who had thick hedges. One individual stated that hedgerows could easily be accommodated (on the farm) with little loss in productivity.

Tree planting and woodland management

One environment focused organisation and 8 individuals supported tree planting and woodland management actions. One individual suggested that farmers should be paid to grow trees in hedgerows and not to reclaim land. Another individual stated that trees were needed and that these areas should qualify under environmental payments. One individual suggested that better management of existing ancient woodlands was needed, with the associated immediate benefit to wildlife. One individual suggested the incentivising of tree nurseries in the same way as the current protein scheme.

Training requirements

Two farming focused organisations and 6 individuals made suggestions around training requirements. One farming focused organisation suggested the use of specific short webinars as a training resource. One farming focused organisation suggested the need for good communication to highlight examples of good practice. Two individuals responded with a suggestion for better hedge cutting training. Two individuals said that farmer education should be ongoing and that on-farm training should be provided. One individual suggested that regenerative agricultural courses should be taught at CAFRE's Greenmount Campus. Another individual suggested clear actions with specific short webinars, with another individual suggesting that communication should be in place to highlight examples of best practice.

Water management actions

Responses from 2 organisations (of which 1 was farming focused) and 3 individuals related to the provision of clean water.

One farming focused organisation requested support for measures such as reed bed filtration systems or planting trees around slurry stores. One other organisation expressed concern that management actions should be carefully considered to ensure that unintended consequences did not occur.

One individual suggested subsidising small farmers (with under 10 ha of land) to promote sustainable clean water and nature-friendly habitat. One individual suggested strongly reducing the spraying of slurry to once per year. One individual called for the strict policing and enforcement of restrictions on slurry spreading and the use of chemical fertilisers and pesticides.

Other comments/suggestions

Responses from 2 farming focused organisations gave suggestions for the development of a baseline on farms and for the measurements of habitat features already present.

One farming focused organisation suggested the creation of ponds on every farm.

One farming focused organisation suggested the implementation of riparian buffer strips as the most straightforward way of securing a quick win.

Responses from 4 individuals made suggestions in relation to rewilding and letting nature do its own thing.

Q19. What are your views on proposals to introduce 'Test and Learn' pilots?

One hundred and twenty responses were received for this question. Thirty six were from organisations (of which 20 were farming focused and 9 environment focused), 82 were from individuals and 2 were from political parties/representatives.

Responses from 35 organisations (of which 17 were farming focused and 9 were environment focused) 54 individuals and 1 political party/representative made positive comments on the proposals. Six farming focused organisations, 1 environment focused organisation, and 30 individuals voiced support for the proposal without including further comment.

One organisation and 10 individuals were less supportive responses of the proposals.

Key themes raised

Scheme design

Twenty two responses, including 15 organisations (of which 8 were farming focused and 4 environment focused) and 7 individuals commented on aspects of scheme design.

Responses from 7 organisations (of which 2 were farming focused and 4 environment focused) and 4 individuals said that 'Test and Learn' pilots would provide opportunities to encourage participation, and pilot new approaches to farm support and peer to peer learning.

Collaboration

Four responses from organisations (of which 2 were farming focused and 1 environment focused) and 2 responses from individuals made suggestions relating to collaboration.

One response from a farming focused organisation voiced some concern over the involvement of eNGOs in delivery of a pilot.

One environment focused organisation welcomed the possible opportunity to collaborate with DAERA on future pilots.

One individual commented that farmers were happy to learn from others and it was important to identify potential problems before scaling up.

Education

Five responses made reference to previous learning and future learning opportunities. One response was from a farming focused organisation and 4 responses were from individuals. One individual said that learning was not necessary given the amount of information already held by the Department.

Other comments/suggestions

Four individuals expressed concerns that a pilot scheme would cause unnecessary delays.

One individual commented that any sites established under 'Test and Learn' pilots should reflect all farming types, land classifications and geographical areas.

One environment focused organisation commented that a pilot should be co-designed and trialled with farmers and other relevant organisations within the farming and land use sector.

Q20. Have you specific suggestions for other components that could be incorporated into 'Test and Learn' pilots?

Ninety nine responses were received for this question. Twenty four were from organisations (of which 15 were farming focused and 6 environment focused) 74 were from individuals, and 1 response from a political party/representative.

Responses from 26 organisations (of which 13 were farming focused and 7 environment focused) and 22 individuals made specific suggestions for components that could be incorporated into 'Test and Learn' pilots.

One individual did not agree with the proposed 'Test and Learn' pilots and one individual responded that more information was needed.

Key themes raised

Facilitators/collaboration

One farming focused organisation responded on the need to have facilitators that farmers could respect and work with.

One farming focused organisation commented that facilitators needed to be experienced in the delivery and monitoring of any schemes being proposed.

One individual mentioned the need to define the role of facilitators and farm advisors.

Eight organisations (of which 6 were farming focused and 2 environment focused) and 4 individuals commented on the need for collaboration.

Two farming focused organisations and 2 individuals commented on the need for DAERA to listen to and liaise with farmers and environmental groups.

Education

Two organisations (of which 1 was farming focused) and 3 individuals said that sufficient levels of training would be required.

One individual suggested mandatory classroom learning to qualify for an environmental payment. One individual responded that there was a need to educate the next generation on the importance of the environment. One individual proposed training to help farmers carry out a survey of the current state of a particular habitat on their farm. One environment organisation suggested that environmental and farm business advice should be integrated in order to deliver outcomes.

Plans and assessments

One environment focused organisation suggested testing the effectiveness of farmer-based assessments in measuring the delivery of environmental improvements or outcomes.

One environment focused organisation proposed the use of scorecards as a simple and verifiable way of delivering results based schemes.

Trials and pilots

One individual suggested pesticide-free farm trials which would include topping weeds rather than spraying.

One farming focused organisation proposed a trial using mixed vegetation riparian strips to capture nutrient run off, which could later be harvested and composted.

One farming focused organisation outlined a trial to assess the grazing impacts of native breeds on habitats and landscapes.

**Q21. What needs to be in place to support delivery of an outcome-focused approach?
Explain your answer.**

Eighty one responses were received to this question. Thirty three were from organisations (of which 20 were farming focused and 7 were environment focused), 47 from individuals and 1 from a political party/representative.

Key themes raised

Advice and guidance

Responses from 10 organisations (of which 3 were farming focused and 6 environment focused) and 13 individuals said that the provision of, and access to appropriate advice and guidance would be important for future schemes.

Education/training and knowledge transfer

Eleven organisations (of which 6 were farming focused and 5 environment focused) and 10 individuals said that education, training and/or knowledge transfer should be made available to Farming for Nature participants to ensure delivery of outcomes.

Advisors/Facilitators

Nine responses from organisations (of which 4 were farming focused and 4 environment focused) and 12 individuals highlighted the need for advisors to be available to participants. Three organisations (1 farming focused and 1 environment focused) and 1 individual stated a preference that a DAERA advisor should be used. Two farming focused organisations and 1 'other' organisation suggested that farmers could be used as advisors. Two farming focused organisations suggested that a network of facilitators would be required.

Peer support/mentors

Four organisations (of which 3 farming focused and 1 environment focused) and 2 individuals suggested that peer support and/or mentors could support delivery of an outcome-focused approach. Five organisations (of which 2 were farming focused and 2 environment focused) suggested that this could be achieved through the use of groups such as environmental Business Development Groups.

Outcomes and monitoring

Nine organisations (of which 3 were farming focused and 3 environment focused) and 2 individuals stated that clearly defined outcomes were important.

Six responses from organisations (of which 1 was farming focused and 4 environment focused) and 7 individuals said that a robust monitoring system would be required.

Financial incentives

Six responses from organisations (of which 4 were farming focused and 2 environment focused) and 11 responses from individuals highlighted the need for sufficient financial support and appropriate level of incentives.

Two farming focused organisations and 2 individuals responded that financial incentives needed to be long-term in nature.

Participant assessment of outcomes

Responses from 4 organisations (of which 1 was farming focused and 2 environment focused) and 2 individuals suggested that farmers could be involved in assessment of outcomes.

Flexibility

Responses from 8 organisations (of which 5 were farming focused and 3 environment focused) and 1 individual suggested that flexibility was required, including in the range of measures available, in scheme implementation and the payments system used.

Co-design

Responses from 5 organisations (of which 2 were farming focused and 2 environment focused) and 2 individuals supported the co-design of future schemes under the Farming for Nature Package.

On-line tools / remote technologies

One farming focused organisation and 1 environment focused organisation highlighted that on-line tools, smart phone applications, photograph geotagging and satellite imaging would have a key role in providing advice and guidance, and for monitoring and assessing outcomes.

One farming focused organisation said that LIDAR screening could be used to give baseline information on existing habitats.

Other comments/suggestions

Two farming focused organisations said that payments should not be made to consultants and that a future scheme should not become a profit centre for consultants and environmental NGOs.

Two responses from individuals stated that there should be less bureaucracy.

One organisation ('other') and 2 individuals responded that an independent environmental protection authority should be set up.

Responses from 1 organisation ('other') and 2 individuals said that 'real-world' examples rather than those from test plots or college farms should be used to demonstrate what was required from scheme participants.

Responses from 1 organisation ('other') and 1 individual suggested that a 'green scheme' could be introduced for commodities that met verifiable environmental standards, and 1 farming focused organisation suggested that a Northern Ireland bespoke version of an organic system could be introduced, based, for example, on the 'Pasture for Life' standard.

Q22. Have you specific suggestions for partnership delivery models that will encourage collaborative working?

One hundred and ten responses were received for this question. Thirty three were from organisations (of which 18 were farming focused and 8 environment focused), 76 were from individuals, and 1 response from a political party/representative.

Responses from 29 organisations (15 farming focused and 8 environment focused), 35 individuals, and 1 political party/representative made specific suggestions related to partnership delivery models.

One environment focused organisation expressed concerns that the consultation did not include any measures to support landowners to provide high quality outdoor recreational experiences. They also said that there was no mention of how the Northern Ireland public were to be treated as a key stakeholder.

Key themes raised

Partnerships/collaboration

Nine organisations (of which 5 were farming focused and 3 environment focused) and 2 individuals gave views on the proposed use of partnerships.

One farming focused organisation proposed the adoption of a partnership model similar to farmer cluster initiatives in England. One environment focused organisation and 1 individual suggested that the BRIDE project in Ireland was a good example of a partnership model, particularly for dairy farms. One individual gave further examples of partnership working such as the Heart of the Glens model and the farmer-led European Innovation Partnership projects.

One individual suggested that a partnership approach would not work as farmers were mostly independent individuals.

One individual suggested that there should be opportunities for groups of farmers to work together to collectively implement environmental improvement measures.

Five organisations (of which 3 were farming focused and 1 environment focused) and 6 individuals supported the concept of collaboration.

Facilitators

One farming focused organisation proposed that farmers should be facilitators. One environment focused organisation suggested collaboration with experienced eNGO organisations and local farmers.

Education/learning

Two organisations (1 farming focused and 1 environment focused) and 4 individuals commented on the topics of education, learning and peer support.

One farming focused organisation felt that DAERA should have more of an advisory role and not just target peer support at members of Business Development groups.

One individual proposed practical free workshops and more farm visits.

One individual suggested a mentoring partnership between 2 farmers and encouraging celebration and appreciation of habitats and biodiversity.

Business Development Groups (BDG)

Two individuals and 1 political party/representative responded to suggest that the current BDG model could be expanded or improved to incorporate DAERA led learning and peer to peer support.

FARMING FOR CARBON MEASURES

Q23. Do you agree on the proposals identified for low carbon emission farming practices? Explain your answer.

One hundred and eighty one responses were received to this question. Twenty nine were from organisations (of which 17 were farming focused and 8 environment focused), 152 were from individuals.

Twenty five responses from organisations (of which 16 were farming focused and 5 environment focused), and 98 individuals expressed support for the proposals identified for low carbon emission farming practices. Four responses from organisations (1 farming focused and 3 environment focused), and 54 individuals did not support the proposal.

The responses to this question raised a number of key themes which have been grouped as appropriate and summarised below:

Reducing numbers of non-productive livestock

Six responses from organisations were received (of which 4 were farming focused and 2 environment focused) and 4 from individuals. Three organisations (farming focused) were in favour of reductions in numbers of non-productive livestock while one (farming focused) organisation was not in favour. Two organisations (environmental focused) were in favour of overall reductions in livestock numbers. Three individuals were in favour of reductions in numbers of non-productive livestock while 1 individual was not in favour. Two organisations (farming focused) said that it was essential to maintain food production levels and that there was a risk of carbon leakage from reducing numbers of non-productive livestock.

Feed additives, breeding and health to reduce methane emissions

Six responses were received from organisations (of which 4 were farming focused and 2 were environment focused) and 8 from individuals. Two organisations said that improving health management and planning on farms would improve productivity and reduce emissions from livestock. One organisation (farming focused) said that genomic analysis should be utilised in breeding for reduced methane emissions. One individual said that there should be further research into the use of feed additives.

Reduced fertiliser use, urease inhibitor fertilisers, timing of fertiliser and slurry applications, management of slurry, legumes and herbs

Seven responses were received from organisations (3 environment focused) and 6 from individuals. One environment focused organisation said that further research should be carried out on the effects of urease inhibitor fertilisers on soil organisms.

Peatland rewetting and restoration

Eleven responses were received from organisations (of which 5 were farming focused and 5 environment focused) and 5 from individuals. Six organisations (of which 5 were farming focused and 1 environment focused) and 1 individual said that funding for peatland rewetting should be sourced from outside the agricultural support budget. Two organisations (environment focused) said that all upland peatland should be restored by 2045 and 60% of lowland peatland should be restored or actively managed by 2050. Two organisations (environment focused) also said that a ban on the use of peat in horticulture should be introduced by 2023.

Biomethane and hydrogen from anaerobic digestion

Seven responses were received from organisations (of which 2 were farming focused and 4 environment focused) and 6 from individuals. One organisation (farming focused) was in favour of biomethane and hydrogen generation from anaerobic digestion while 2 organisations (environment focused) were not in favour. Four organisations (of which 1 was farming focused and 2 environment focused) had concerns or urged caution. Two individuals were in favour of biomethane and hydrogen generation from anaerobic digestion while 2 individuals urged caution.

Two organisations (environment focused) and 1 individual said that anaerobic digestion presented challenges around the safe utilisation of digestate. Two organisations (1 environment focused) said that manure and slurry anaerobic digestion resulted in significantly lower emission mitigation than shifts to more plant based diets. One organisation and 1 individual said that anaerobic digestion development could skew land use decisions. One organisation (environment focused) said that proposals on AD and biomethane should not incentivise a perverse outcome of increasing livestock numbers. One organisation (environment focused) said that food waste reduction and animal feed should be prioritised over anaerobic digestion.

Alternative treatment of biogenic methane

One response was received from a farming focused organisation and 3 from individuals. One farming focused organisation and 3 individuals said methane was a short-lived pollutant resulting in methane having a neutral warming impact provided that the number of UK livestock remained at the same level.

Change in land use from livestock to arable farming and horticulture

Five responses were received from organisations (of which 3 farming were focused and 1 environment focused) and 8 from individuals. Three organisations (of which 2 were farming focused) and 4 individuals said that there should be a shift (or more balance) from livestock land use to arable or horticultural land use and improved synergies in nutrient recycling between livestock and arable farms. Three organisations (farming focused) and 1 individual said that there should be a focus on breeding improved arable and horticulture crops for yield and disease resistance. One organisation (environment focused) and 1 individual said that minimum tillage arable systems should be encouraged.

Land use strategy and modelling effects of measures on carbon emissions

Seven responses were received from organisations (of which 2 were farming focused and 5 environment focused) and 1 from an individual. Three organisations (environment focused) said that there was a need for a land use strategy and for land use modelling to assess the implications of proposed policy measures. One organisation (farming focused) said that there was a need to model the effectiveness of carbon reduction measures. One organisation said that there was a need for research to model the effects of horticultural practices on carbon emissions.

Nature based versus technological solutions for low carbon emission farming practices

Five responses were received from organisations (of which 4 were environment focused) and 1 from an individual. Three organisations said that nature based solutions and agro-

ecological farming practices should be prioritised and 2 organisations said there should be a balance.

Food waste reduction and movement to more plant based diets

Four responses were received from organisations (of which 1 was farming focused and 3 environmental focused) and 1 from an individual. Two organisations (1 farming focused and 1 environment focused) and 1 individual said food waste should be reduced. Three organisations (environment focused) said that diet change towards more plant based diets should be encouraged.

Q24. Do you agree with the principle of encouraging the Farming of Carbon as a business enterprise. Explain your answer.

One hundred and seventy eight responses were received to this question. Twenty six were from organisations (of which 16 were farming focused and 7 environment focused), 152 were from individuals.

Twenty three responses from organisations (of which 14 were farming focused and 6 environment focused), and 103 individuals expressed support for the principle of encouraging the farming of carbon as a business enterprise. Three responses from organisations (of which 2 farming were focused and 1 environment focused), and 49 individuals did not support the proposal.

The responses to this question raised a number of key themes which have been grouped as appropriate and summarised below:

Carbon measurement, standardisation of carbon calculation and farm carbon calculators

Six responses were received from organisations (of which 4 farming were focused and 1 environment focused) and 6 from individuals. Three organisations (2 farming focused) and 1 individual said that the process of calculating carbon needed to be standardised and made more specific to Northern Ireland situations. One organisation (farming focused) said that food (including imported feed) made available to the consumer needed to have a carbon measure associated with its production.

Training and knowledge transfer

Five responses were received from organisations (of which 4 were farming focused and 1 environment focused) and 2 from individuals. Five organisations (4 farming focused and 1 environment focused) said that carbon farming was very new terminology for many farmers and a lot more training, knowledge transfer and communications was required with the industry through experts in the fields of carbon farming and trading and through agricultural colleges.

Carbon off-setting and exploitation by non-agricultural sector actors

One response was received from an organisation ('other') and 7 from individuals. One organisation ('other') and one individual said that carbon offsetting was contentious and viewed by many as an attempt for corporations to greenwash their environmental obligations.

Retaining carbon credits within agriculture

Seven responses were received from farming focused organisations focused and 3 from individuals. Five farming focused organisations and 2 individuals said that carbon credits established should not be traded outside of agriculture. Three farming focused organisations and 2 individuals said they would be concerned that farmers would be taken advantage of in relation carbon farming. Two farming focused organisations and 3 individuals said that they were concerned about the impact of farming carbon on the supply of land for farming purposes.

Support for specific carbon farming measures

Forestry - nine responses were received from organisations (of which 1 was farming focused and 5 environment focused) and 3 from individuals. Six organisations (environment focused) said that there should be a much greater emphasis on planting native broad leafed tree species rather than conifers.

Agroforestry - eight responses were received from organisations (of which 1 was farming focused and 5 environment focused) and 2 from individuals.

Hedgerows - eight responses were received from organisations (of which 6 were environment focused) and 5 from individuals. Five environment focused organisations advocated for hedgerows to be cut on a 3-year rotation cycle.

Soil carbon - five responses were received from organisations (3 environment focused) and 8 from individuals. Two organisations (environmental focused) expressed concern over the potential of 'slurry infused' grassland to accumulate soil carbon.

INVESTMENT MEASURE

Q25. Do you agree the guidelines when considering future capital support? Explain your answer.

Seventy-seven responses were received to this question. Twenty-eight were from organisations (of which 17 were farming focused, 6 environment focused and 5 'other'). Forty-seven responses were from individuals, 1 anonymous and 1 political party/representative.

Thirty-nine responses, from 19 organisations (of which 11 were farming focused, 4 environment focused and 4 'other') and 20 individuals, agreed with the guidelines when considering future capital support.

A further seven positive responses (2 farming focused organisations, 2 environment focused and 1 'other, 1 political party/representative and 1 individual) were provided but did not directly answer the question.

Thirty-one responses (of which 4 were from farming focused organisations, 26 individuals and 1 anonymous) did not agree with the guidelines.

In agreement with the guidelines

Six responses from organisations (of which 3 were farming focused, 2 from 'other' organisations and 1 from an environment focused organisation) and 2 individuals welcomed the recognition of overcapitalisation.

Three responses from organisations (of which 1 was farming focused, 1 environment focused and 1 'other') and 2 individuals supported the concept of collaboration and co-operation. One individual supported the collaboration guideline but highlighted that collaboration and co-operation was not popular.

Five responses from organisations (of which 4 were farming focused and 1 environment focused) and 1 individual said capital support could be a very effective stimulus to encourage investment that had risk, was cutting edge or innovative.

Five responses from organisations (of which 2 were farming focused and 2 environment focused and 1 'other') and 4 individuals referred to the importance of supporting transition to investments that were environmentally friendly, low carbon and a balance of investment support that improved production efficiency, as well as benefitting the environment.

Not in agreement with the guidelines

Twelve responses from individuals, 1 farming focused organisation and 1 anonymous response stated that businesses should be judged on their individual merits, all farm sizes should be included and that small farms should not be discriminated against.

One response from a farming focused organisation referred to better terms for under-represented groups, citing young farmers and women up to 60yrs.

Four responses from individuals referenced the guidelines as complicated, high-brow, over the top and the need to cut the red tape.

One response from a farming focused organisation and 1 individual said collaboration did not work in its current form and that there were biosecurity issues to consider.

Other comments/suggestions

Three responses from farming focused organisations and 1 individual said leasing with maintenance contracts and using pre-owned warranted equipment should be encouraged and supported.

Two responses from organisations (1 farming focused and 1 'other') and 3 individuals said it was important to recognise the potential for schemes to inflate equipment costs.

Two responses from individuals said that future schemes should be equally funded across all sectors and not only funding big farms.

Two responses from farming focused organisations were seeking clarification on where future funding would come from.

One individual response suggested a future cap of around 400 hectares should be put on future capital support schemes.

One response from a farming focused organisation agreed with the guidelines, adding that grant schemes needed to be easier to access and available to all enterprises and farm sizes.

One individual response said DAERA supported big machinery that might or might not be environmentally friendly and cost more when used by contractors, hence farm costs could go up.

One farming focused organisation suggested productivity should be measured in relation to inputs versus outputs and more emphasis should be put on lowering inputs and moving towards grass based systems that cattle thrived on.

Q26. Do you agree the draft design principles when considering future capital support? Explain your answer.

Sixty-nine responses were received to this question. Twenty were from organisations, just over half were from farming organisations. Forty-one were from individuals and 1 anonymous response.

Thirty-six responses, (8 from farming focused organisations, 4 environment focused organisations and 5 'other') and 19 individuals, agreed with the draft design principles when considering future capital support.

A further eight positive responses (3 from farming focused organisations, 2 environment focused organisations, 1 political party/representative and 1 individual) were provided but did not directly answer the question.

Twenty-five responses (of which 3 were farming focused organisations, 21 individuals and 1 anonymous) did not agree with the principles.

In agreement with the principles

Five responses from organisations (of which 3 were environment focused, 1 farming focused and 1 'other') and 1 individual response agreed with the principles as essential in ensuring capital support sought to contribute to the delivery of wider policy objectives particularly environmental outcomes and environmental public goods.

Five responses from organisations (of which 2 were environment focused, 2 farming focused and 1 'other') and 1 individual response agreed that capital schemes should align with DAERA policy objectives.

Four responses from organisations (of which 2 were environment focused and 2 farming focused) and 1 individual response agreed that schemes should be designed to deliver the intended outcomes of the strategy.

Three responses from farming focused organisations and 1 individual recognised that any capital support must align with one or more of the four DAERA strategic priorities.

One response from an 'other' organisation agreed the principles fitted with addressing key environmental and societal issues in delivering the outcomes of Northern Ireland Executive/DAERA policies.

Four responses from organisations (of which 3 were farming focused and 1 'other') and 1 individual response referenced value for money (VFM), including that focused ring-fenced schemes were important as experience showed that once a VFM criteria was introduced in the selection process, the minor enterprises inevitably lost out.

Three responses from farming focused organisations and 2 individual responses said schemes should be designed in consultation with the industry.

One environmental focused organisation said support must incentivise investment that delivered the outcomes of this strategy and not just those items currently favoured by the industry.

One individual response agreed support should be targeted where there was the greatest need, with cost benefit analysis and a business plan to justify.

Not in agreement with the principles

Two individual responses thought the principles were too complicated and elaborate.

One individual response said future capital support must be targeted at agricultural transition, and clarity provided that no expansion would be supported that increased CO₂, Methane, Ammonia etc., until there was a clear trend towards sustainability in NI agriculture.

One individual response said it was important to adopt a more wide-reaching set of principles as this would lead to better outcomes for the nature and the rural community.

One farming focused organisation said the design principles did not take into account horticulture with the exception of environmental investments and seemed to focus on maintaining existing production systems, with no focus on investments to expanding appropriate areas or funding new technologies or modernisation.

Other comments/suggestions

Two responses from farming focused organisations and 1 individual response said experience showed that well-designed and focused capital support could be very effective, providing the example of the dedicated horticulture capital support scheme in RoI.

One farming focused organisation agreed that the principles achieved the right balance between using public funds and private benefits.

Five individual responses referenced support for and inclusion of small farms.

Q27. Have you any suggestions on the capital assistance that might support the agriculture and horticulture sectors? Explain your answer.

There were eighty-four responses to this question. Thirty-one were from organisations, with over half from farming organisations. Fifty-one in total were from individuals. There were 2 anonymous responses.

Suggestions

Three responses from organisations (of which 1 was farming focused, 1 environment focused and 1 'other') and 7 individual responses suggested support for small farms, smaller items and small scale organic/nature friendly farms.

Eight responses from organisations (of which 5 were farming focused, 2 environment focused and 1 'other') and 6 individual responses suggested support for horticulture across a range of areas including: precision equipment; harvesting equipment; growing equipment; robotics; storage; new entrants; locally sourced nurseries; and advice from DAERA advisers.

Four responses from organisations (of which 1 was environment focused and 3 'other') and 3 individual responses suggested that collaboration should be considered, for example, cooperatives to share machinery, farmer to farmer networks, partnership working and for slurry treatment.

One response from a farming focused organisation and 3 individual responses suggested support for young farmers and also that support should not be discriminatory based on age.

One farming focused organisation and 6 individuals made suggestions for the improvement, maintenance, upgrading, refurbishment and restoration of farm buildings and handling facilities to improve ventilation, help the heritage of the countryside and help keep down the carbon emissions caused by new building.

Two farming focused organisations and 1 political party/representative referred to improving efficiency, the efficient use of all inputs (labour, water, etc.) and specialised labour efficient equipment.

Five responses from organisations (of which 4 were farming focused and 1 'other'), 2 individuals and 1 political party/representative suggested support was needed for environmental and carbon reduction projects that neither added to income potential nor removed costs.

Four responses from farming focused organisations and 2 individuals supported investment in emerging technology, innovation and automation, stating that previous schemes did not provide support for innovative or novel technologies.

Two responses from organisations (of which 1 was environment focused and 1 'other') and 1 individual suggested support for pilot schemes.

Three responses from organisations (of which 2 were farming focused and 1 environment focused), and 2 individuals suggested support for slurry treatment and management, and assistance to develop the use of AD on farms and other forms of renewable energy.

One response from an environment focused organisation and 1 individual suggested capital assistance may be required from government to implement policies for the supply of public goods, and capital assistance for public goods, for which there was no economic return, was likely to be best delivered through the farming for nature programme.

Two responses from organisations (of which 1 was farming focused and 1 'other') and 1 individual said business capital assistance should be determined by the usual lending houses, depending on the banks willingness to lend and the interest rates.

Other suggestions

Other suggestions made by an individual response included: industry consultation; farmers and vets to collaborate; there were currently no measures to support renewable technology in agriculture; exhaust emission technology installation grants for tractors, forklifts, etc.; support for the sheep sector; recognised the changing world we live in and support societal changes to live more sustainably, for example non-traditional protein sources, biological substitutes and non-traditional crops; and too much LESSE to the detriment of other sectors.

KNOWLEDGE MEASURES

Q28. What are your views on the approach to Knowledge Transfer and Innovation for land managers, farmers and workers set out in this document?

One hundred and five responses were received to this question. Thirty seven were from Organisations, (of which 23 were farming focused and 8 environment focused), 66 were from individuals and 2 were from political parties/representatives.

Thirty three organisations, (of which 19 were farming focused and eight environment focused), 45 individuals and 2 political parties / representatives indicated broad agreement for the proposed approach to Knowledge transfer and Innovation for land managers.

Seven individuals did not support the proposals.

Key themes raised

Thirty two organisations (of which 19 were farming focused and 8 environment focused), 66 individuals and 2 political parties/ representatives recognised the importance of education and knowledge transfer in helping to achieve the policy outcomes set out in the consultation document.

Seven organisations, (of which 6 were farming focused and 1 environment focused), 1 individual and 1 political party/representative expressed support for continuous professional development (CPD) for farmers. One farming focused organisation proposed a CPD type scheme whereby someone in receipt of entitlement payments had annually to accumulate a certain number of points to ensure their CPD was relevant and current.

One farming focused organisation indicated that to achieve real scalability more focus should be applied to the whole range of experts engaging with farmers, and 1 environment focused organisation stated that capacity building within the sector through skills and education was a good investment of time and money.

One farming focused organisation and 1 political party / representative stated that there was a need to develop training for women in agriculture, while 1 organisation ('other') stated that the proposals did not recognise the role of women.

One farming focused organisation and 1 political party / representative stated that there was a need to develop training in transferable skills.

Two organisations, (one farming focused), 2 individuals and 2 political parties/ representatives expressed concern of making a Level 3 qualification in agriculture a requirement for farmers. One farming focused organisation expressed the view that that qualifications other than those linked to agriculture needed to be taken into account. Three organisations, (2 farming focused), 1 individual and 1 political party/ representative indicated that lifetime experience in agriculture must be taken into account.

Five organisations, (of which 3 were farming focused and 2 environment focused) identified the need to address gaps in research or in specialist areas and 1 farming focused organisation identified the need for external expertise.

One organisation ('other') and 7 individuals stated that programmes should be available locally and 3 individuals and 2 organisations, (one environment focused), supported online delivery being available.

One individual responded that Technology Demonstration Farms were unrealistic for the average farmer. Ordinary farmers with exemplary benchmarking figures should be used as demonstration farms, while another individual responded that it was all in an elite setting for those that had gold standard and did not support visitors coming on farm.

One individual responded that it was definitely not for them, while another responded that it was a waste of time as they were so basic indicating that a 16 year old who had properly worked at home would know more than a lot of degree students. Again free open market and the poor would fail and the successful would flourish.

Other comments made

One organisation ('other') responded that they supported any knowledge transfer and innovation programmes for land managers, farmers and workers which encouraged innovation through the provision of financial assistance to landowners in respect of the creation of access routes on their land for the public on foot, cycle or horseback. It was very willing to support inclusion of this type moving forward and provide landowners with further guidance and support to help deliver this.

One individual responded that the existing provision was undoubtedly delivered to a high standard and worked well for major enterprises such as dairy, beef and sheep. They indicated that there was also merit in CPD activity being considered as part of the evidence of "active farming" however, saw great merit in the "Horizon Scanning" model contained in the "Recommendations for Developing Sustainable Arable Production in NI" through which relevant research and knowledge elsewhere in the world, and in other industries, could be sourced and evaluated for application here at very limited cost.

One individual suggested that Greenmount should maintain a free to access database of the latest everything, shed designs, yard designs veterinary advice, knowledge transfer, all advice in a simple to search database to benefit all.

Q29. Have you specific views on how to best to encourage the participation of land managers, farmers and workers in Knowledge Transfer and Innovation programmes?

Ninety five responses were received to this question. Thirty four responses were received from organisations, (of which 19 were farming focused and 8 were environment focused), 59 were from individuals and 2 were from political parties/representatives.

Key themes raised

Nine organisations, (of which 3 were farming focused and 6 environment focused), and five individuals supported peer to peer learning and that this should be a key focus going forward.

Eight organisations, (of which 7 were farming focused) and six individuals responded that, ensuring programmes were relevant and farmers could see the benefit, would encourage participation.

Nine individuals responded on the need for a payment to encourage participation. Two organisations, (1 farming focused and 1 environment focused) and 5 individuals suggested the use of financial incentives to encourage participation. Five organisations, (of which 3 were farming focused), and 5 individuals responded that participation should be a conditional element for receipt of payments

One organisation, (environment focused) and 1 individual responded that farmers should be required to join local groups.

Three organisations, (one farming focused) and 8 individuals stated that local delivery was important as was the use of online delivery. One individual responded that online delivery could be difficult to access by older farmers.

Three organisations, (of which 2 were farming focused), 1 individual and 1 political party / representative responded that advisers should be available to all farmers outside of Business Development Groups and Innovation programmes.

Two farming organisations and 1 political party/representative responded that the Business Development Group scheme should be extended to ensure more farmers got involved.

One environment focused organisation and 1 individual suggested the establishment of a knowledge transfer hub where specialist information could be available.

One farming focused organisation stated that a family approach was needed to widen involvement to include young farmers and women. A need for training for women in agriculture was identified by 1 political party / representative.

Two environment focused organisations responded on using partnerships for delivery and one supported the use of specialists.

One environment focused organisation stated that identifying and supporting a cohort of farmers that would be trail-blazers in terms of transitioning would allow development of reference farms that could host site visits and educational actions.

One farming focused organisation suggested that the use of social science should form a central aspect of a knowledge transfer proposal and this would provide an insight into farmers' decision making.

Other comments made

One farming focused organisation responded that the introduction of Level 2 educational courses for young farmers and new entrants was a poorly designed scheme, as it forced many non-farming members to attain a qualification that they would never use. It indicated that it was a means to an end for them to get included within a farm business to receive entitlements and the outcome was not what the scheme was designed for.

One individual suggested that the Farm Advisory System quarterly newsletter could be used to advertise the available programmes and current opportunities.

One individual responded that good monitor farms similar to NZ and QMS versions should be considered.

One individual responded that only young farmers who had a recognised qualification in agriculture or horticulture should be aided.

One individual responded that the number of part time farmers in NI needed to be considered and supported.

Q30. Have you specific views on how best to encourage the adoption of innovation by land managers, farmers and workers?

Eighty eight responses were received to this question. Thirty six responses were received from organisations, (of which 21 were farming focused and 9 were environment focused), 51 were from individuals and 1 was from a political party/representative.

Key themes raised

Six organisations, (of which 5 were farming focused) and 6 individuals responded that ensuring programmes were relevant and farmers could see the benefit would encourage innovation adoption.

Nine organisations, (of which 6 were farming focused and one environment focused) responded that provision of financial incentives would encourage innovation adoption. One farming focused organisation and one individual stated that risk takers and those who engaged early should be encouraged and rewarded and one individual stated that those who failed to engage should be penalised. One farming focused organisation indicated the provision of capital grants to encourage innovation adoption. One environment focused organisation responded that to encourage innovation DAERA could establish an innovation challenge fund to provide rapid access to financial support for innovative solutions that could scale. One individual suggested a point scheme. Three individuals responded that payment would encourage innovation adoption.

One environment focused organisation responded that many current schemes stifled innovation by being prescription based, or where farmers were afraid of breaching rules. From an agri-environment perspective, the move away from prescription-based payments to a results-based system would encourage innovation and farmers would be motivated to develop best practice for increased payments.

One farming focused organisation responded that a basic tenet of the scheme structure was that the majority of investments must go toward projects for development or process improvement, thus including investments in R&D, more efficient systems or equipment. It strongly believed that focusing support on development and improvement actions would drive the adoption of innovation.

Five farming organisations and 3 individuals supported peer delivery to encourage adoption. Two organisations, (one of which was environment focused) suggested the use of local facilitators to encourage innovation adoption.

Five organisations, (of which 2 were farming focused and 3 environment focused) and 3 individuals supported the use of farm visits and demonstrations for encouraging innovation adoption.

Two environment focused organisations and 4 individuals responded that innovation adoption should be linked to receipt of farm payments.

Two organisations, (of which 1 was farming focused) and six individuals stated that online and local delivery was important.

One farming focused organisation and one political party / representative encouraged the Department to engage and consult with the industry, while one farming focused organisation responded that it was essential for scientists to collaborate, with a real need to get all players from the agri sector involved with science and innovation submissions. One environment focused organisation encouraged the co-design of schemes and another environment focused organisation encouraged farmer to farmer led research as well as institute led research. One farming focused organisation responded that specialists and experts should be utilised in programme design.

One farming focused organisation and 2 individuals responded on the need to widen access to existing programmes and one political party / representative responded that advisers should be available to all farmers.

One farming focused organisation responded that the current approach was not reaching enough people and not having enough impact and one farming focused organisation responded that scalability must be a fundamental objective of the programme. One farming focused organisation indicated that to achieve real scalability, more focus needed to be applied to the whole range of experts engaging with farmers (vets, nutritionists, processors' field officers, AI providers etc.).

One farming focused organisation responded that a focus should be on developing the knowledge and skills to adopt lower input type farming systems.

One environment focused organisation encouraged the transfer of farms to younger generation, including lease and partnership arrangements as the current age-profile of farmers did not encourage innovation.

One individual suggested that Greenmount / DAERA should maintain a free to access database of the latest everything, shed designs, yard designs veterinary advice, knowledge transfer - all advice in a simple to search database to benefit all.

Other comments made

One organisation ('other') responded that innovation would be adopted by workers if they were successfully retained by employers. One major problem with agri-production was the high rate of employee turnover.

One individual responded to reference what has worked elsewhere and tailor it for Northern Ireland.

One individual responded that the best adopters of innovation were those who were keen to drive efficiency and willing to take the risk that innovation fails. These were invariably at the larger end of the farming businesses as these businesses could occasionally afford to underwrite the risk required. The individual indicated that the proposed capping of resilience payments would discourage innovation by those most capable of trying it out, and those capable of bringing it to the marketplace.

One individual advocated a phased approach to allow farmers time to realise the need for sustainability of their own business whether that be a farm business on its own or farming

combined with an income generated from another source. Gradual withdrawal of support i.e. the resilience payment would lead to this realisation.

One individual responded by saying that Government should 'stop telling people how to run their business'.

One individual responded by saying that farms should be passed onto the younger generation.

One individual responded by saying – 'stop the big farmers getting bigger and leave the small farmers alone'.

One individual indicated the need to be part of wider social/cultural measures to encourage farmer leadership in local communities and encourage greater cooperation and collaboration.

Q31. Are there gaps in the current provision Knowledge Transfer and Innovation programmes that need to be addressed?

There were ninety six responses received to this question. Thirty eight responses were received from organisations, (of which 20 were farming focused and 11 environment focused), 57 were from individuals and one response was from a political party/representative.

Thirty six organisations, (of which 18 were farming focused and 11 environment focused), 40 individuals and one political party/representative indicated that there were gaps in the current provision that needed to be addressed.

Eleven individuals responded that there were no gaps in the existing provision that needed to be addressed.

Key themes raised

Seven organisations, (5 of which were environment focused) and 4 individuals responded that there were gaps on environmental matters within the current provision of knowledge transfer and innovation programmes.

Four organisations, (of which 1 was farming focused and 3 environment focused) and 1 individual identified that soil management was a gap in the current provision.

Two farming focused organisations identified gaps in research. Three farming focused organisations and 1 individual responded that relevant research elsewhere in the world should be evaluated and that farmers should travel outside Northern Ireland to see innovation. Four farming focused organisations and 1 individual responded that external specialists / experts should be used. One farming focused organisation highlighted that specialist enterprises in horticulture now routinely used commercial “experts” from GB and Netherlands to guide their business and asked if it was fair that this was self-funded while major enterprises such as dairy and beef received significant “free” technical support from CAFRE / AFBI? The organisation indicated that Knowledge transfer provision needed to be sufficiently flexible to cater for and support minority and innovative new enterprises, as well as those involved in mainstream production. It recognised that finite resources and funding meant that local research must be prioritised. This requirement was particularly identified within the horticulture sector.

Two farming focused organisations identified data and use of data as an important area.

Two farming focused organisations responded that the BDG model should be more farmer led rather than led by DAERA facilitators/DAERA agendas with those participating sharing more detailed information on their business with a view to showing improvements. The facilitators were a key aspect, and it was vital that the appropriate persons were carrying out this facilitation role. One farming focused organisation emphasised the need to ensure Business Development Group members had a say in what they would like to see as well as facilitator input as to what the members needed. It indicated that it was important to work closely with the industry, HMRC etc. to ensure farmers had the right knowledge at the right time and suggested that Business Management taught in mid-20 rather than age 17 would be more meaningful.

One farming focused organisation responded that an adjustment to Business Development Group membership should be considered, with an extension to include on-farm systems rather than just geographically. The examples of robotic or housed system for dairying were given.

One individual responded that most of the current KT and Innovation programmes were targeted at the average farmer. Many who were early adopters of innovation were not getting the support they also required. In Business Development Groups there seemed to be a small number of top performing farmers who demonstrated good practice to the rest of the group, but gained little from the process themselves. There should be specialised groups with only the very best farmers in each sector that could provide the learning challenge for them also. Most of the current and previous programmes focused on the skills associated with day to day farming. There were currently no programmes to develop business management skills for farm owners and managers. Equally, there was no training in NI to develop leaders for the industry, such as the Challenge of Rural Leadership and Advanced Farm Business Management courses run in GB. Farmer leadership development was also identified as a gap in the current provision by another individual.

One farming focused organisation responded that CAFRE was currently under resourced to service the sector with the significant lack of technical advice for the intensive sectors. This organisation also responded that CAFRE must continue to develop education streams for intensive sectors.

One farming focused organisation responded that only farmers who were involved in Business Development Groups had access to DAERA farm advisors. This discriminated against the vast majority of farm businesses regarding information and help. The farming community should be entitled to avail of well-trained professional advisors regardless of their membership of groups. One farming organisation also responded that Business Development Groups must reflect the whole of the farming community. One political party / representative stated that the Business Development Groups Scheme was an important vehicle for Knowledge transfer, but should be extended to include more farmers. CAFRE advisors should also be made available for farmers.

Two organisations, (of which one was environment focused), responded that there needed to be more co-operation between delivery agencies.

Two environment focused organisations responded that farm business management planning based on maximum sustainable output was a gap.

Two organisations responded on the need to be more inclusive for the less well educated, with one responding that a range of education delivery options should be offered to take account of varying levels of literacy and numeracy skills among older farmers and landowners.

One farming focused organisation, one individual and one political party/representative responded that there was a need for training on transferable skills. One farming focused organisation responded that to achieve real scalability, more focus should be applied to the whole range of experts engaging with farmers to improve knowledge transfer outcomes.

One environment focused organisation responded that there was a gap in support for farmers with a portfolio career or landowners managing their land for nature.

Two individuals responded that gaps existed on training on veterinary related topics and one farming focused organisation identified the sustainable use of antibiotics. One individual identified finishing hill lambs for slaughter as a gap and another individual identified training in regenerative agriculture as a gap.

Two individuals responded that poster farms for CAFRE were unrealistic and not representative of regular farms in NI. One individual stated that some well-run farms from Business Development Groups and Environmental Business Development Groups should be used. One individual responded that all those business development farm visits and technology displays were set at the gold standard with only the elite of farming accessing. This respondent went on to say that the way to plug that gap, was to have a subject matter expert who could offer guidance and advice.

One political party / representative identified training for women in agriculture as a gap in the existing provision.

One farming organisation responded that gaps existed in knowledge and skills training for employees where English was not the first language.

Other comments made

One organisation ('other') responded that there was presently a lack of access provision for the public on foot, cycle and horseback which was a gap in potential business opportunities for landowners. This organisation also responded that there was presently a lack of an Access provision programme which would help fulfil these outcomes.

One organisation ('other') responded on the need to address labour market supply side challenges post-Brexit and the retention of the AWB and the extension of policies to raise pay and improve conditions and for wider trade union recognition across the sector. It highlighted the important role of trade unions in encouraging upskilling and the adoption of innovation and knowledge-transfer across the agri-food sector.

One individual recommended the Teagasc resource and indicated that a more joined up approach would be beneficial.

One individual responding in relation to a firm of rural chartered surveyors regulated by the RICS indicated that many businesses would benefit from advice from its professional advisors to support bringing together advice from the various experts that a farming business may avail of and suggested it would be open to exploring a surveyor's support service for mid-and-small sized businesses in Northern Ireland, particularly young farmers.

GENERATIONAL RENEWAL

Q32. Do you agree that there is a need to encourage longer-term planning for farm businesses? Explain your answer.

One hundred and sixty responses were received to this question. Thirty three were from organisations (of which 19 were farming focused and 8 environment focused), 126 were from individuals and 1 from political parties/representatives.

Thirty three responses from organisations (of which 19 were farming focused and 8 environment focused), 111 individuals and 1 political party/representative expressed support for the need to encourage longer term planning for farm businesses.

Sixteen individuals did not agree that there was a need to encourage longer term planning for farm businesses.

In agreement with the proposal

Twenty two responses from organisations (of which 15 were farming focused and 6 environment focused) and 23 individuals expressed the view that encouraging longer term planning for farm businesses was very important.

Thirteen organisations (of which 10 were farming focused and 2 environment focused) and 14 individuals specifically highlighted support for succession planning and generational renewal within long term planning.

Five organisations (4 farming focused and 1 environment focused) and 2 individuals highlighted longer term land tenure as being important for longer term planning within a farm business.

Three farming focused organisations and 2 individuals identified tax incentives / fiscal arrangements as being important and linked to longer term planning of farm businesses.

Two organisations (one of which was farming focused) and 3 individuals highlighted the importance of longer term planning to encourage new / younger entrants into the industry.

Not in agreement with the proposal

Two responses from individuals stated that longer term planning was not possible due to the constant changes in farming.

One individual stated that an All Ireland Agricultural Policy was required before longer term planning would be possible.

Two individuals felt that it was a family matter and the DAERA should not be involved.

One individual felt that it was working well as it was.

One individual felt that each generation should be allowed to run its course, particularly mentioning concerns regarding divorce within the next generation.

Other comments/suggestions-

One individual commented that planning for illness was also something which should be considered.

One individual and one farming focused organisation highlighted the need for engagement regarding the legal and financial requirements.

Q33. What are your views on a Generational Renewal Programme and the proposed three phase approach?

Eighty four responses were received to this question. Thirty one were from organisations (of which 20 were farming focused and 6 environment focused), 52 were from individuals and 1 from political parties/representatives.

In agreement with the proposal

Thirteen organisations (10 farming focused and 3 environment focused) and 24 individuals expressed agreement with the Generational Renewal Programme and the proposed three phase approach.

Three farming focused organisations and one individual stated that land tenure and conacre should be considered as part of the generational renewal programme.

Two farming focused organisations and 1 individual emphasised linkage between taxation incentives and generational renewal.

Six organisations (of which 5 were farming focused), although in agreement with the proposed generational renewal programme and the three phased approach, expressed concerns regarding the inclusion of a Level 3 programme.

Not in agreement with the proposal

One farming focused organisation and 4 individuals disagreed with the generational renewal programme and the proposed three phase approach.

One farming focused organisation felt that the proposed programme was too simplistic to cover the very many different situations on family farms.

Other comments/suggestions-

One 'other' organisation recognised that succession at all levels could and in many cases, be the cause of anxiety and suggested that in many cases, there was an often-unjustified fear of land ownership passing out of the family voluntarily or involuntarily and particularly as a consequence of a sale as a result of uncontrollable external factors such as divorce in the successor generation. These perceived threats were, like sales to fund long term care, in the minority and it could be an issue of perception rather than reality. Whilst proper planning could not completely avoid these risks it could significantly mitigate against this risk and achieve successful succession planning. Further protection against these perceived risks and tangible incentives for succession planning and generational renewal being built into any future schemes as they have been in other jurisdictions could only increase the likelihood of such future schemes producing better outcomes.

Two organisations ('other') stated the need for participants to have access to proper professional advice with one highlighting difficulties in seeing through the process of seeking professional advice. It was suggested that in part this may be due to a lack of signposting to suitably qualified and experienced professional advisors who understand farming and the rural sector adequately. The Farming Connect scheme that operates in Wales (Farming

Connect - helping you drive your business forward | Farming Connect (gov.wales)) was highlighted as a good example of how in part this might be achieved.

One organisation ('other') highlighted that the capital tax regime would be a significant driver of decision making – in how the business of farming the land was managed and held.

Three farming focused organisations and 1 individual stated that the programme needed to be available to smaller farms

Two individuals felt that a retirement scheme for farmers needed to be considered.

Q34. Do you agree with the inclusion of knowledge and skills development within the Generational Renewal Programme? Explain your answer.

One hundred and forty three responses were received to this question. Thirty one were from organisations (of which 16 were farming focused and 8 environment focused) and 113 were from individuals.

Thirty responses from organisations (of which 16 were farming focused and 8 environment focused) and 89 individuals agreed with the inclusion of knowledge and skills development within the Generational Renewal Programme.

One organisation and 24 individuals did not agree with the inclusion of knowledge and skills development within the Generational Renewal Programme.

In agreement with the proposal -

Fifteen organisations (of which 10 were farming focused and 4 environment focused) and 27 individuals emphasised the importance of the inclusion of knowledge and skills development within the generational renewal programme.

Three farming focused organisations and 2 individuals stated that the inclusion of knowledge and skills was important – but not just academic support, highlighting that travel and experience on other farms would do more to develop vision and innovation than academic studies.

One individual stated that there was a particular need for the older generation to learn about succession planning.

Four organisations (of which 2 were farming focused and 2 environment focused) and 5 individuals expressed concerns about the inclusion of a level 3 qualification within the generational renewal programme with 2 farming focused organisations highlighting that a NVQ Level 3 or other qualification was one indicator of competence and willingness to change, but not the only indicator.

Three individuals highlighted that knowledge and skills development should not be too narrow, or restricted to a Level 3 qualification.

Two individuals stated that a Level 3 qualification may not be achievable for everyone, while 2 environment focused organisations questioned whether a Level 3 qualification was sufficient.

One individual agreed with the inclusion of knowledge and skills development within the generational programme as long as there was no cost to the participant.

Not in agreement with the proposal-

One farming focused organisation stated that more clarity was required in relation to the inclusion of knowledge and skills.

One individual felt that knowledge and skills development should be optional.

Two individuals disagreed with the inclusion of knowledge and skills development within the generational renewal programme stating that if someone was taking over a farm business they would already have / or acquire the necessary skills.

Two individuals felt that there should not be government intervention in private matters.

One individual disagreed with the inclusion of knowledge and skills development within the generational renewal programme as they felt that it was comparable to any other industry.

Other Comments / suggestions-

Two farming focused organisations had concerns regarding funding of knowledge and skills development with one stating that there needed to be much more clarity where the funding for this would come from as previously this was Pillar 2 monies

One farming focused organisation stated that this aspect would have been previously funded from the NIRDP and there had been no clear indications as to how and when this funding stream would be replaced going forward. There was increasing concern that funding that was previously directed to farmers through Pillar 1 would now be required to cover support measures that would have historically fallen under Pillar 2.

Five organisations (of which 1 was farming focused and 4 environment focused) suggested important areas for knowledge and skills development including: business management and data handling, good basic understanding of general business awareness/management and understanding of finance and tax, best practice, innovation, efficiency, environmental management, carbon, nature friendly / agroecological farming.

One individual agreed with the inclusion of knowledge and skills development within the Generational Renewal programme but highlighted that there was a lack of opportunities to acquire knowledge and skills.

One organisation ('other') highlighted that the current dependency on the use of Conacre agreements (for short term seasonal occupations of land) had resulted in limited access to longer-term occupation of land which in turn lead to an inability for new entrants to enter the sector and those existing farmers who might wish to expand, to do so. This in turn prevented investment. Access to land was a key feature of improved productivity in the sector and mechanisms in a new agricultural policy that would encourage progression in this area would be welcomed by the sector and those professionals advising owners and occupiers. The current Land Mobility Scheme was welcomed but would presumably benefit from incentives to increase participation.

Q35. Do you agree that incentives should be provided to those participating on the Generational Renewal programme on achievement of specific objectives or on progress made? Explain your answer.

One hundred and forty one responses were received to this question. Twenty nine were from organisations (of which 16 were farming focused and 8 environment focused), 126 were from individuals and 1 from political parties/representatives.

Twenty seven responses from organisations (of which 14 were farming focused and 8 environment focused), 92 individuals and 1 political party/representative agreed that incentives should be provided to those participating on the generational renewal programme on achievement of specific objectives or progress made.

In agreement with the proposal -

Nine organisations (of which 7 were farming focused and 1 environment focused) and 9 individuals agreed that providing incentives to those participating on the Generational Renewal programme was positive.

One farming focused organisation and 2 individuals stated that the inclusion of incentives for those participating on the Generational Renewal programme on achievement of specific objectives or progress made would encourage participation.

Six organisations (of which 3 were farming focused and 2 environment focused) agreed that incentives should be provided to those participating on the Generational Renewal Programme on achievement of specific objectives or progress made.

One farming focused organisation agreed on the principle of incentivising participation but not conditional on objectives being achieved.

One individual felt that if people were open to learning they should be rewarded.

One individual felt that incentives should be pension type support.

One individual did not support incentives to retire but strongly supported loans to help new entrants develop new enterprises (before they were in a position to demonstrate competence and success to commercial lenders), travel to gain experience on other units and develop interpersonal skills, and ongoing CPD and career development.

One individual agreed with incentives but stated that they should cater for a range of entrants to the industry, including older entrants and believed the focus to be too narrow.

One farming focused organisation agreed with the provision of incentives but not at the expense of resilience payments.

Two individual farmers highlighted that incentives should be included for both younger and older new entrants, and that it needed to include smaller farmers.

Two individuals highlighted that a return on investment or improving income and job satisfaction were most important.

Not in agreement with the proposal-

Three responses from individuals felt that the government should not intrude in private business.

One farming focused organisation and 3 individuals felt that participation in the programme should be sufficient incentive. One individual felt that farmers shouldn't receive taxpayers money to do necessary business practice.

One individual disagreed with the inclusion of incentives as the incentive should be the resilience payment.

One individual disagreed with the inclusion of incentives stating that the incentive should be a steady guaranteed payment.

Other comments/suggestions-

One farming focused organisation stated that there should be incentives through tax breaks for long term leases or improved grant rates for new entrants or for farm businesses that could demonstrate a recent succession plan being implemented. It highlighted that there needed to be schemes similar to what had been implemented within the ROI for long term leasing and TAMS grants. Long term leasing of land allowed planning by successors or tenants to plan for their future and to develop their business as a viable model.

One environment focused organisation indicated that while incentives should be provided to those providing access to new entrants to pursue a career in farming, focus should be on removing barriers to new entrants.

One political party/representative supported the development of schemes that were an incentive to both the young farmer, senior farmers and women farmers. For example, early retirement schemes and farm partnerships. They stated that support must be made available to young farmers, women farmers and new entrants to get them established in the business which should include financial, educational and health and safety measures.

SUPPLY CHAIN MEASURES

Q36. What are your views on the scope and effectiveness of existing supply chain measures (market transparency/information, education and knowledge transfer, incentivisation schemes and regulation) to help deliver a more efficient, competitive supply chain?

Seventy seven responses were received to this question. Twenty eight were from organisations (of which 18 were farming focused, 6 environment focused and 4 from 'other'), 1 anonymous and 48 were from individuals.

The majority of responses that were received were not specific to existing supply chain measures.

There was strong agreement from both organisations and individuals that more needed to be done to create effective functioning supply chains.

Fourteen organisations (of which 11 were farming focused and 3 environment focused) and 17 individuals raised the need for greater transparency, traceability and fairness across the entire supply chain to improve trust and sustainability.

Seven farming organisations and 4 individuals raised the need to improve information flow and communications. This was seen as a way to improve trust, integration and business decisions as well as a better understanding of market signals.

One individual referred to the DAERA Farm Business Data Book which provided a limited analysis of costs and contrasted it with the Teagasc 'Crops, Costs and Returns' publications which provided more useful and informative view of true margins.

Four organisations (of which 1 was farming focused and 3 environment focused) raised the need to focus on the benefits of shorter/direct supply chains and driving the buy-local agenda. They suggested this should be supported with better government procurement policies to prioritise local produce and encourage the development of local markets. Food produced in Northern Ireland should be appropriately marketed to consumers to highlight green credentials and should be given preferential treatment in terms of retail pricing and improved returns for local producers.

Eight organisations (of which 6 were farming focused, 1 environment focused and 1 'other') and 4 individuals supported more collaboration initiatives including further development of the Agri-Food Cooperation Scheme, encouraging Producer Organisations and facilitating more cooperation generally throughout the supply chain. They suggested this was a way to drive efficiencies, share knowledge and resources and encourage more sustainable supply chains.

Other Comments

Four farming organisations suggested the role of the Grocery Code Adjudicator should be extended to protect integrity and fairness and improve transparency.

Q37. Do you agree the three proposed policy areas when considering future supply chain measures? Explain your answer.

One hundred and fifteen responses were received to this question. Thirty four were from organisations (of which 24 were farming focused, 6 environment focused and 4 from 'other' organisations), 75 were from individuals, 5 were anonymous and 1 from a political party/representative.

Thirty three organisations (of which 24 were farming focused, 6 environment focused and 3 'other'), 47 individuals, 3 anonymous and 1 political party/representative agreed with the three policy areas. Of the 31 respondents who disagreed with the three policy areas only 3 provided rationale for their view. The vast majority of suggestions submitted to this question were therefore in agreement with the three proposed policy areas.

Several respondents provided similar responses to Q36 and in some cases respondents quoted 'See Question 36' or 'See Above'.

Three farming focused organisations and 1 individual raised the requirement to include the entire supply chain in policy proposals. They suggested this as a way to reduce fragmentation and mistrust whilst allowing producers to develop their business and better meet consumer requirements.

Six organisations (of which 2 were farmer focused and 4 environment focused) and 1 individual raised the need to encourage local production for local consumption/shorter supply chains. Similar to question 36 respondents suggested that Government should provide support for better procurement policies to prioritise local produce and encourage the development of local markets. Food produced in Northern Ireland should be appropriately marketed to consumers to highlight green credentials and should be given preferential treatment in terms of retail pricing and improved returns for local producers. Consumers need to know where their food comes from and see value in this. They also highlighted the importance of close links between the Northern Ireland Food Strategy and future Agricultural policy in order to facilitate sustainable local production.

Three farming organisations and 1 individual raised the need to encourage formation of Producer Groups/Organisations. They suggested this as a way to encourage cooperation/efficiency on input costs and sales, provide stability as well as strengthening farmers' position/bargaining power throughout the supply chain.

Seven organisations (of which 6 were farming focused and 1 'other') and 2 individuals raised the need for greater market intelligence/skills/professional assistance. They suggested this would allow structures and mechanisms to be developed to encourage farm businesses to better collect, share and use market intelligence data.

One environment focused organisation raised the need for strong policy coherence between Supply Chain Measures and the Northern Ireland Food Strategy Framework. They recommended that a focus on public sector procurement of local sustainable food would benefit local producers and reduce carbon footprint.

Other Comments:

One political party/political representative stressed the need for more fairness for producers in the supply chain and a review of public sector procurement practices, with progress on government work towards this monitored by an independent body.

Q38. Are there specific gaps in the approach that you feel need to be addressed? Explain your answer.

Ninety six responses were received to this question. Twenty were from organisations (of which 11 were farming focused, 5 environment focused and 4 from 'other'), 5 anonymous and 71 were from individuals.

Twelve organisations (of which 8 were farmer focused, 2 were environment focused and 2 'other'), 2 anonymous and 38 individuals agreed there were gaps in the approach which needed to be addressed. Around one third of those who replied 'Yes' to confirm there were gaps in the approach did not provide any feedback as to why this was the case.

Eleven organisations (of which 6 were farming focused and 4 environment focused and 1 'other') and 5 individuals raised the need to encourage local production for local consumption/shorter supply chains. Similar to questions 36 and 37, respondents suggested Government should provide support for better procurement policies to prioritise local produce and encourage the development of local markets. Food produced in Northern Ireland should be appropriately marketed to consumers to highlight green credentials and should be given preferential treatment in terms of retail pricing and improved returns for local producers. They suggested consumers need to know where their food comes from and see value in this. They also highlighted the importance of close links between the Northern Ireland Food Strategy and future Agricultural policy in order to facilitate sustainable local production.

Nine organisations (of which 7 were farming focused, 1 environment focused and 1 'other') and 3 individuals raised the need to encourage more supply chain co-operation through the current Agri-Food Co-operation Scheme, Producer Groups/Organisations or other means. This was seen as a way to exchange information, encourage cooperation/efficiency on input costs and sales, provide stability as well as strengthening farmers' position/bargaining power throughout the supply chain.

Five organisations (of which 4 were farming focused and 1 'other') and 3 individuals raised the need to improve producer access to and awareness of market intelligence. This was considered a way to better understand consumer requirements and assisting in the determination of, volume of product produced versus volume of product needed and would also assist with storage requirements.

Other Comments

Two farming focused organisations suggested the role of the Grocery Code Adjudicator should be extended to protect integrity and fairness and improve transparency.

One farming focused organisation and 3 individuals raised the need for greater transparency, traceability and fairness across the entire supply. This was seen as a way to improve trust and sustainability throughout the supply chain.

Q39. Are there specific early actions that you would like the Department to take to support supply chain development in the agriculture and horticulture sectors? Explain your answer.

Ninety eight responses were received to this question. Nineteen were from organisations (of which 11 were farming focused, 4 environment focused and 4 'other'), 74 were from individuals.

Thirteen organisations (of which 8 were farmer focused, 2 were environment focused and 3 'other'), 2 anonymous and 45 individuals (agreed there were early actions that could be taken).

Around one quarter of those who replied 'Yes' to confirm there were early actions did not provide any specific recommendations on these.

Two farming focused organisations and 2 individuals raised the need to include the entire supply chain in policy proposals. They suggested this was a way to reduce fragmentation, improve communications and help achieve a fair distribution of margins.

Eleven organisations (of which 6 were farming focused, 4 environment focused and 1 'other') and 4 individuals raised the need to encourage local production for local consumption/shorter supply chains. They suggested Government should provide support for better procurement policies to prioritise local produce and encourage the development of local markets. Food produced in NI should be appropriately marketed to consumers to highlight green credentials and should be given preferential treatment in terms of retail pricing and improved returns for local producers. They also expressed a view that consumers need to know where their food comes from and to see value in this. They also highlighted the importance of close links between the Northern Ireland Food Strategy and future Agricultural policy in order to facilitate sustainable local production.

Seven farming focused organisations and 2 individuals raised the need to encourage more supply chain co-operation through the current Agri-Food Co-operation Scheme, Producer Groups/Organisations or other means. This was seen as a way to exchange information, encourage cooperation/efficiency on input costs and sales, provide stability as well as strengthening farmers' position/bargaining power throughout the supply chain.

Four farming focused organisations and 3 individuals raised the need to improve transparency and quality of information feedback information to producers. This was seen as a way to improve communications and trust and make better informed business decisions on the quality of produce.

Other comments

Four farming organisations and 3 individuals raised the need to strengthen the role of the Grocery Code Adjudicator/establish a Supply Chain Ombudsman to protect integrity and fairness and improve transparency.

Two farming focused organisations suggested appointing a vegetable coordinator to enhance grower cooperation and facilitate engagement between growers.

SOIL TESTING AND LIDAR

Q40. What are your views on the proposed uses for data provided via the proposed Soil Nutrient Health Scheme?

One hundred responses were received to this question. Thirty were from organisations (of which 17 were farming focused, 8 environment focused and 5 'other'), 70 were from individuals.

Thirty responses from organisations (of which 17 were farming focused, 8 environment focused and 5 'other'), 60 individuals expressed support for the uses for the data provided by the Soil Nutrient Health Scheme, 10 individuals did not support the proposed use of data provided by the Soil Nutrient Health Scheme.

In agreement with the proposed uses for the SNHS data

Thirty responses from organisations (17 farming focused, 8 environment focused and 5 'other') and 60 individuals expressed the view that the data from the Soil Nutrient Health Scheme was needed to establish soil nutrient and carbon baselines across Northern Ireland and that Lidar maps were important for making informed management decisions and directing future policy.

An environment focused organisation stated the SNHS was an essential element in moving NI agriculture towards environmental sustainability and hence achieving outcomes.

A farming focused organisation stated that it supported the use of Lidar data in assisting the delivery of several key policy objectives outlined in the consultation document.

Not in agreement with the proposed uses for the SNHS data

Eight responses from individuals had concerns how the data would be used. Two individuals suggested small farms or hill farms would be disadvantaged.

Other comments/suggestions

One organisation ('other') stated that consideration should be given to the overall Phosphorus balance in Northern Ireland and how this could be dealt with given the levels of Phosphorus in rivers.

Q41. 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? Explain your answer.

One hundred and fifty responses were received to this question. Twenty Seven were from organisations (of which 15 were farming focused, 7 environment focused and 5 'other'), 123 were from individuals.

In agreement with the use of Nutrient Management Plans to maximise future support payments

Twenty three responses from organisations (of which 13 were farming focused, 6 environment focused and 4 'other'), and 76 individuals agreed that in order to maximise future support payments, applicants should have to demonstrate that they have a current, (updated regularly) Nutrient Management Plan.

Two farming focused organisations and 1 environment focused organisation had good advice in relation to support for farmers being essential to maintaining nutrient management plans.

One farming focused organisation and 2 environment focused organisations recommended that linking nutrient management planning as a requirement for future support payments was essential to scheme success.

Two farming focused organisations highlighted the need for planning in regard to monitoring of nutrient management planning by farmers.

One environment focused organisation highlighted the importance of not providing nutrient recommendations on areas of habitat or peatlands.

One environment focused organisation highlighted the importance of nutrient management planning to support the achievement of long term improvements in biodiversity, air, water quality, soil health, carbon capture (sequestration) and/or GHG emissions reductions.

Not In agreement with the use of Nutrient Management Plans to maximise future support payments

Four organisations (of which 2 were farming focused, 1 environment focused and 1 'other') and 47 individuals did not agree that in order to maximise future support payments, applicants should have to demonstrate that they have a current, (updated regularly) Nutrient Management Plan.

One farming focused organisation stated that nutrient management planning should not be needed in order to maximise future support payments as this could become just a tick a box exercise.

One farming focused organisation stated there must be a Knowledge Transfer programme to help educate and understand a NMP so that farmers and land managers became willing to complete them as a useful tool.

General individual views not in agreement included there not being a need for NMP as it only added to the admin burden on farmers.

Q42. Have you further specific suggestions for how the data provided by the Soil Nutrient Health Scheme could be used or promoted by government?

Fifty-Six responses were received to this question. Twenty were from organisations (of which 10 were farming focused, 7 environment focused and 3 'other'), 36 were from individuals.

Twenty responses from organisations (of which 10 were farming focused, 7 environment focused and 3 'other'), and 36 individuals made good suggestions on how the data provided by the SNHS could be used or promoted by government.

Suggestions from organisations for how data provided by the SNHS could be used or promoted by government included

Ten organisations (of which 6 were farming focused and 4 environment focused) highlighted ongoing promotion of catchment scale results, as key to, enhance green image of farming, sustainability credentials and a national score card for individual farm benchmarking.

One farming organisation recommended that data must not be used to regulate the industry, otherwise farmers may choose to withdraw from the scheme.

Two environment focused organisations suggested using data 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 or to support targeted remedial actions.

Three farming focused organisations and 1 environment focused organisation suggested baseline data estimates on carbon could be used to provide insight into sequestration rates, to assess agricultural progress towards Zero-Carbon requirement by 2050 and to form a basis for implementing carbon budgeting at individual farm level.

Suggestions from individuals for how data provided by the SNHS could be used or promoted by government included

Four individuals suggested the data should be used to promote learning and provide an education programme to showcase how to improve soil health.

Three individuals suggested that data should be open source.

Two individuals suggested that rewards should be directed to those making the least negative environmental impacts.

One individual suggested farms that were 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.

One individual stated the data provided an opportunity to reward farmers for protecting and regenerating soils, including improving soil structure, main benefits of which were: Better root support, access to air and water, nutrient uptake for most efficient cropping, percolating and purifying farm run-off, carbon storage and supporting biodiversity.

One individual stated that data would be important to show what all sectors of agriculture were currently contributing to GHG emissions and also what each land type was contributing be it SDA, DA or lowland.

LIVESTOCK GENETICS AND DATA

Q43. Do you agree that the Department should pump prime the initiation of an industry led livestock data and genetics programme?

One hundred and sixty three responses were received to this question. Thirty four were from organisations (of which 20 were farming focused and 8 environment focused), and 60 were from individuals.

Thirty two responses from organisations (of which 20 were farming focused and 8 environment focused), and 70 individuals expressed support for the Department to pump prime the initiation of an industry led Livestock Genetics and Data Programme. Two responses from organisations ('other'), and 49 individuals did not support the proposal but did not give specific answers.

In agreement with the proposal

Three responses from farming focused organisations expressed the view that the proposal was extremely important particularly with regard reducing Greenhouse Gas Emissions (GHG'S).

Three responses from farming focused organisations and 1 individual, supported the proposal and highlighted that any programme should encompass all ruminant sectors.

One farming focused organisation stressed the importance of having the veterinary profession involved in the development of the programme.

Not in agreement with the proposal

Two organisations ('other'), didn't support the proposal but didn't give specific answers or comments on the question.

Other comments/suggestions

Two environment focused organisations suggested that any genetic improvement programme must take account of traditional breeds

One environment focused organisation stressed that it was essential that this programme was funded as only part of wider essential data collection measures, which would improve baselines for biodiversity, greenhouse gas emissions, and other environmental metrics.

Q44. Do you agree that farmers should be required to provide data for the genetic improvement and data programme as an eligibility condition of future support payments? Explain your answer.

One hundred and sixty responses were received to this question. Thirty were from organisations (of which 17 were farming focused and 7 environment focused), 120 were from individuals and 1 was from a political party/representative.

Twenty four responses from organisations (of which 13 were farming focused and 7 environment focused), and 61 individuals expressed agreement that farmers should be required to provide data for the Livestock Genetics and Data Programme as an eligibility condition of future support payments. Six responses from organisations (of which 4 were farming focused and 2 'other'), 59 individuals and 1 political party/representative did not support the proposal.

In agreement with the proposal

Three responses from farming focused organisations, and 2 individuals expressed the view that farmers should be required to supply data for the livestock genetics and data programme but the process of supplying data needed to be uncomplicated and not too onerous.

Nine responses from organisations supportive of the proposal (7 farming focused and 2 environment focused) and 2 individuals cited a range of benefits.

Of these:

- Seven organisations (5 farming focused and 2 environment focused) and 2 individuals highlighted that the supply of data would be critical to deliver improved productivity across the ruminant livestock sectors;
- Eight organisations (7 farming focused and 1 environment focused) and 2 individuals suggested that the supply of data would be helpful to get farmers to engage in a ruminant genetics programme; and
- Two farming focused organisations suggested that supplying data would help farmers with their decision making.

Three farming focused organisations and 2 individuals suggested that farmers should be financially rewarded for supplying data.

Not in agreement with the proposal

Two farming focused organisations did not support the proposal stating that they were unsure if it was achievable and citing the requirement for more detail.

One political party stated that it could not support the proposal without further detail being provided.

One farming focused organisation which did not support the proposal suggested that farmers should be rewarded for participating but not penalised for not participating.

Three individuals suggested that farmers were already overburdened with paperwork.

Four individuals highlighted that farmers should be left to their own devices.

Three individuals thought that farmers were already making sufficient genetic improvement.

Other comments/suggestions

One farming focused organisation, 1 environment focused organisation and 3 individual suggested that collating data would help farmers recognise the detrimental impact of poor performance on the reduction of GHG's.

Q45. Do you agree with the proposal to develop knowledge transfer programmes to support farmers to adopt genetic improvement technologies? Explain your answer.

One hundred and sixty two responses were received to this question. Thirty two were from organisations (of which 21 were farming focused and 6 environment focused), 120 from individuals and 1 from a political party/representative.

Twenty five responses from organisations (of which 19 were farming focused and 6 environment focused), 86 individuals and 1 political party/representative expressed support for the proposal to develop knowledge transfer programmes to support farmers to adopt genetic improvement. Three responses from organisations (of which 2 were farming focused), and 34 individuals did not support the proposal.

In agreement with the proposal

Twelve responses from organisations supportive of the proposal (10 farming focused and 2 environment focused), and 15 from individuals cited a range of benefits.

Of these:

- Eight organisations (6 farming focused and 2 environment focused) and 7 individuals suggested that Knowledge Transfer programmes would be essential to ensure farmers understand the technologies required to deliver genetic improvement.
- Three farming focused organisations highlighted the benefits of using Technology Demonstration Farms to assist Knowledge Transfer
- Two farming focused organisations and 1 individual highlighted the benefits of peer to peer learning through groups.

One political party/representative was supportive of the proposal, highlighting that technology demonstration farms would be important to assist farmers to gain a better understand of data related to genetic improvement.

Not in agreement with the proposal

No organisations or individuals expressed a specific relevant opinion against the proposal

CONTROLS AND ASSURANCE

Q46. Do you agree with the proposal to replace the current Cross Compliance system with the simplified 'Farm Sustainability Standards'? Explain your answer.

One hundred and forty two responses were received to this question. Thirty-two were from organisations (of which 16 were farming focused, 8 environment focused with a further 8 'other'), 105 were from individuals focused and 5 were from anonymous respondents. Two responses from 'other' organisations, 26 individuals and 1 anonymous respondent did not support the proposal. There were also a number of responses made which were not relevant to the proposal.

In agreement with the proposal

Six responses from organisations (of which 4 were farming focused and 2 environment focused) expressed the view that the proposal provided simplification over current Cross Compliance. Eight individuals expressed the same view.

Four organisations (of which 2 were farming focused) and 5 individuals welcomed the emphasis on education and training in the proposal. One individual stated that the proposed move away from a 'penalty culture' towards a system of training and advice was a sensible approach. One farming focused organisation and 1 individual said that improved guidance, training and balance between sanction and guidance / advice at inspection would help with compliance.

Five organisations (of which 3 were farming focused) and 3 individuals expressed the view that the new approach to penalties was needed including fixed penalty notices and an overall system with sufficient deterrent but proportionate to the offence.

Two farming focused organisations expressed the view that further discussion was needed on the negligent versus intentional penalty definitions within the penalty system. One individual stated that publication of examples of infractions which would warrant a financial penalty would be useful.

Four organisations (of which 2 were farming focused) stated that a pro-active communications programme would be essential to generate positive support and an understanding of requirements.

Three environmental organisations welcomed the inclusion of habitat and biodiversity protection, landscape and heritage protection including archaeological features and the increased protection for semi-natural habitats under 2ha in size.

Four organisations commented on the use of remote sensing as an integral part of the controls process. Two organisations (1 environment focused and 1 farming focused) expressed concern that remote sensing would be used by default, instead recommending a mix of on-farm inspection and remote sensing to ensure a good balance of coverage and detail.

Not in agreement with the proposal

Five responses from individuals questioned the need for the proposal and considered that having fewer rules would not necessarily result in simplicity.

One 'other' organisation put forward a concern around the use of legislation for enforcement as a method for simplifying Cross Compliance, and the need to avoid new threats to heritage assets that were not designated.

Other comments/suggestions

Three organisations (of which 1 was farming focused and 2 environment focused) and 2 individuals questioned the logic of removing certain SMRs and GAECs from the proposal simply because a limited number or no non-compliances had been detected.

Two environment focused organisations expressed the view that the exclusion of certain SMRs and GAECs from the proposal would not lead farmers to follow best practice if legislative underpinning were to be removed and would lead to a potential loss of environmental resource protection.

Three organisations (of which 2 were farming focused and 1 environment focused) stated that the proposal for a farmer to face an intentional penalty if they have participated in a relevant training course needed to be reconsidered.

One 'other' organisation cited the need for engagement with the veterinary profession on the standards and underpinning requirements to be vital.

One environment focused organisation commented that in understanding how to best achieve proportionate compliance of any future soil-specific regulations in Northern Ireland, DAERA should consider the 8 Farming Rules for water (8 FRfW) introduced in 2018 to achieve regulatory compliance with aspects of the EU Water Framework Directive - equivalent to the 2017 Water Environment Regulations in Northern Ireland. The challenge with the 8 FRfW was not so much with the rules themselves, but with their communication, awareness raising, enforcement and clarity about penalties, and these were the considerations that should be borne in mind.

One environment focused organisation contended that environmental governance in Northern Ireland continues to be inadequate and recommended that any changes to agricultural controls and assurances must account for the three-part governance framework including NIEA (and any future independent Environmental Protection Agency), the new government watchdog - Office for Environmental Protection (OEP), and where relevant in relation to matters surrounding the Protocol on Ireland/Northern Ireland, the European Commission to ensure compliance and drive improvements in the natural environment.

One environment focused organisation whilst welcoming moves to ensure that a minimum set of universal rules would apply to all farmers in receipt of public payments, expressed concerns that the proposal risked replicating many of the issues previously associated with Cross Compliance.

Two environment focused organisations commented on the significant increase in DAERA resource required for the knowledge/education aspect of the proposal to be effective.

One farming focused organisation and 1 individual commented on the benefits of the establishment of a meaningful earned recognition system for the standards in the proposal, as set out as part of the Northern Ireland Beef and Lamb Farm Quality Assurance Scheme.

One environment focused organisation suggested the creation of a 'Guidance Hub' to bring together existing regulations 'under one roof' and signpost farmers to the right providers for information and advice in the field of agricultural regulation.

Q47. Have you specific suggestions for how compliance with the proposed Farm Sustainability Standards should be controlled? Explain your answer.

Fifty-three responses were received to this question. Twenty-five were from organisations (of which 15 were farming focused, 8 environment focused with a further 4 'others'), 27 were from individuals focused and there was 1 anonymous respondent. There were no suggestions from political parties or political representatives made in respect of the proposal and a number of suggestions were made which were not relevant to the proposal.

Farming focused organisations put forward a range of suggestions. These included the analysis of central computer records to minimise the level of on farm checks to validate compliance. Suggestions for the penalty system included the need for fixed penalties to be proportionate, following the 'polluter pays' principle, with an education aspect prior to penalty application and a yellow card/warning system or training course option (as in speeding offences) for minor infringements. Consultation with Industry on any fixed penalty approach was suggested. Suggestions for the inspection process included the establishment of an earned recognition system for NI Beef and Lamb FQAS standards and more advice and assistance at inspection, in particular regarding TB, as opposed to the imposition of penalties. Clear communication with use of IT in monitoring and compliance was also suggested.

Suggestions by individuals included random and targeted on-farm inspections, spot checks and farm audits; earned recognition in the controls process e.g. NI Beef and Lamb FQAS; water monitoring downstream of farms on river catchments, improved environmental regulation and penalties; a confidential hotline; and inspections carried out without inspector discretion.

Suggestions from environment focused organisations included use of on-farm inspection and remote sensing with increased inspection rates for environmental protection. Yearly farm audits were also suggested. The availability of publicised methods for public reporting of potential infringements was put forward. Suggestions for the penalty system included taking an advisory led approach, with sufficient penalties, supported by external monitoring, and incorporating knowledge transfer rather than penalties for non-compliance. Discretion and advice for minor non-compliances was also suggested. It was also suggested that in implementing the proposal lessons learned from other jurisdictions, for example Scottish Environmental Protection Agency (SEPA) around the advice led approach to enforcement and the Defra 8 Farming Rules for water (8 FRfW) around communication, awareness raising, enforcement and clarity about penalties, need to be considered. Monitoring to ensure that there were no adverse impacts from the removal of any current Cross Compliance requirements was also suggested.

Suggestions from 'other' organisations included a warning system for first and minor offences; on farm spot checks with no notice given; water monitoring below farms on river catchments; and use of civil sanction.

Q48. 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? Explain your answer.

One hundred and fifty responses were received to this question. Twenty six were from organisations (of which 16 were farming focused, 6 environment focused and 4 'other') 116 responses were from individuals, 7 were anonymous and 1 response was from a political party/representative.

One hundred and thirty two expressed support for a change to the land eligibility rules. Eighteen others did not support the proposal (1 farming focused organisation, 13 farmers and 4 individuals).

In agreement with the proposal

Twenty one responses from organisations (of which 15 were farming focused and 6 were environment focused) and 54 individuals expressed the view that this proposal was a sensible and logical change to policy which would simplify administration at farm and agency level.

Three farming focused organisations and all 6 environment focused organisations focused on the positive impact on biodiversity and farm habitat areas of the proposal. They considered that the inclusion of all agricultural land has the potential to secure positive environmental benefits for habitats such as raised bog and scrub and the proposal should prevent perverse outcomes such as removal of vegetation simply to increase the area of eligible land or because of fears of penalties, but such areas must be managed appropriately.

Two 'other' organisations considered that the CAP had resulted in the loss of many high quality small habitats and that making all eligible land for direct payments should be considered equitable to all farm lands and not disadvantaging geographically or be scale/size.

Three farming focused organisations agreed with the proposals but highlighted that clarification would be needed on how this would impact on payment entitlements.

One political party/representative agreed that the proposal had potential but it needed to be kept under regular review as changing data and mechanisms would mean adapting to evolving situations.

One farming focused organisation and one individual commented on the benefits of the simplification of the land eligibility rules on improved understanding of what was required.

Not in agreement with the proposal

One response from a farming focused organisation felt the proposal diluted the support available for the 'active farmer' and food producer.

Seventeen individuals did not support the proposals because they considered that land which was not in agricultural use should not receive payment. Also, the proposal would potentially lead to a problem with land abandonment. Clear management requirements for

dense rush, scrub and bracken would be needed along with definitions for what was a 'hard feature' and what was 'agricultural land'.

METRICS, MONITORING AND EVALUATION

Q49. Do you agree with the principles against which metrics should be developed?

One hundred and five responses were received to this question. Twenty five were from organisations (of which 13 were farming focused, 6 environment focused and 6 'other') and 80 responses were from individuals.

In agreement with the proposal

Twenty three responses from organisations (of which 12 were farming focused, 5 environment focused and 6 'other').

Forty seven responses from individuals also agreed with the principles against which metrics should be developed.

Not in agreement with the proposal

Two responses from organisations (of which 1 was farming focused and 1 environment focused).

Thirty three individuals did not agree with the principles against which metrics should be developed.

Q50. What are your views on the high level overarching metrics proposed?

Eighty three responses were received to this question. Twenty six were from organisations (of which 13 were farming focused, 7 environment focused and 6 'other') and 57 were received from individuals. The views expressed were not limited to metrics, monitoring and evaluation.

Key Themes raised

Three organisations (of which 1 was farming focused, 1 environment focused and 1 'other') and 2 individuals expressed the view that there should be direct engagement with industry regarding the metrics proposals.

Two organisations (of which 1 was farming focused and 1 environment focused) and 3 individuals felt that longer term monitoring taking into account validation (of standards), accountability and transparency would be of benefit.

Two organisations (1 farming focused and 1 environment focused) and 2 individuals stated that metrics were important to measure success and for benchmarking.

Two organisations (1 farming focused and 1 'other') felt that farm types and sector levels should be considered when producing data.

One organisation (farming focused) and 3 individuals felt that simplicity and clarity were important.

One response from an organisation (farming focused) stated that it was important that Gross Value Added applied to the entirety of the supply chain.

Q51. What suggestions do you have for additional high level overarching metrics that need to be adopted or developed?

Seventy responses were received to this question. Twenty four were from organisations (of which 12 were farming focused, 7 environment focused and 5 'other') and 46 were received from individuals. The views expressed were not limited to metrics, monitoring and evaluation.

Key Themes raised

Three responses from organisations (of which 1 was farming focused and 2 environment focused) and 2 individual responses expressed the view that there should be additional metrics relating to nature and the environment including metrics on biodiversity; river quality; species abundance; species extinction risk; condition of protected areas; and priority habitats and non-priority habitats.

Three responses from organisations (of which 2 were farming focused and 1 environment focused) and one individual response expressed the view that there should be a measurement of locally produced and consumed products compared to imported products consumed.

Two responses from organisations (1 farming focused and 1 'other' organisation) and one individual response expressed the view that a social metric should be considered.

One response from an organisation (farming focused) and 1 individual response expressed the view that metrics should be tailored to different farm types/sizes and locations and that sectoral specific metrics might be required.

One response from an organisation (farming focused) and 1 individual response expressed the view that metrics should be kept simple without any 'gold-plating'.

One organisation (farming focused) expressed the view that additional metrics should be informed as part of regular reviews.

Other Comments/Suggestions

Three responses (1 farming focused organisation, 1 'other' organisation and 1 individual) expressed the view that more clarity was needed.

Q52. 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?

Seventy seven responses were received to this question. Twenty eight were from organisations (of which 13 were farming focused, 9 environment focused and 6 'other') and 49 were received from individuals. The views expressed were not limited to metrics, monitoring and evaluation.

Key Themes raised

Five organisations (of which 2 were farming focused and 3 'other') and 4 individuals expressed the view that a social or employment metric could be included for example the number of people employed along the supply chain, average pay for farm workers or supply of labour and uptake of vacancies in the sector.

One organisation (farming focused) suggested that animal mortality and vaccination rates could be included and that these metrics would support higher level metrics on productivity and sustainability.

Three organisations (of which 2 were environment focused and 1 'other') expressed the view that ecological indicators should be included such as overall land use or landscape character quality, water quality and soil quality.

Three organisations (of which 2 were environment focused and 1 'other') and 1 individual suggested that metrics on area of land protected and managed for biodiversity, habitat connectivity and condition of habitats should be included.

Other comments/suggestions

Two organisations (farming focused) and 1 individual expressed the view that a simple and easy to understand approach should be taken in relation to metrics.

Two organisations (1 farming focused and 1 environment focused) wanted specific engagement on metric development as well as more detail on the metrics proposed.

One organisation (environment focused) suggested the use of scorecard assessment and annual monitoring of agri-environment habitats, linked to payment rates suggesting this would also provide annual data on a range of plant and habitat indicators.

HORTICULTURE

Q53. What are your views on the proposed outcomes regarding the Northern Ireland production horticulture sector?

Fifty six responses were received to this question. Twenty two were from organisations (of which 12 were farming focused, 6 environment focused, and 4 'other') and 34 from individuals.

The proposals as a whole were broadly welcomed by 11 organisations (of which 7 were farming focused, 2 environment focused, 2 'other') and 10 individuals.

One farming focused organisation responded that the outcomes aligned with their own organisation and that they shared DAERA's views about horticulture's potential economic and environmental contributions including carbon. Two environment focused organisations commented on the potentially positive contribution to carbon reduction, environmental, health and food security targets. Another environment focused organisation commented that the outcomes were attainable in an area of huge potential. Others responses were more targeted and were set out against the outcome themes below:

Two-fold increase in the output of the sector

One farming focused organisation responded that growth must be market and not supply led and another 2 farming related organisations responded that growth needed to be based on good supply chain data.

Three farming focused organisations responded that the outcomes were ambitious / challenging with 1 farming focused organisation sceptical that the proposal would be significantly responded to by the sector. One farming focused organisation responded that it may be hard enough to sustain the sector's existing scale in the face of adverse pressures. Another farming focused organisation responded that market dynamics were exerting strong opposing pressures with issues of the allocation of value in the supply chain. Two farming focused organisations and 1 other individual highlighted that labour costs and availability would have a major restriction on achieving market growth. One 'other' organisation responded that some parts of industry would have problems increasing output and 2 individuals responded that they would be surprised if doubling of output could be achieved in timeframe. The Bramley Apple Sector was highlighted by 1 farming focused organisation as a sector that could not achieve targeted growth in the timescale due to crop lifecycle but that there were longer term opportunities for dessert apple production.

One farming focused organisation responded that the Northern Ireland Protocol brings opportunities and 1 other individual responded that the sector needed post-Brexit support to be self-sustainable.

One farming focused organisation suggested controlled environment farming may grow and another suggested it may be beneficial to attract horticultural operators from elsewhere to NI. One farming focused organisation suggested growth might be aided by clear steers with regard to public procurement and another suggested there were considerable opportunities to grow (even double) the market for ornamental plants. One environment focused organisation called for the industry to supply locally sourced and grown trees. One individual responded that with appropriate support through grants/loans, market research and

collaboration a doubling of production within five years was a feasible target. Two individuals responded that this should lead to more local supply and less imports.

Collaborating and co-operating

Two farming focused organisations felt confident that in partnership with DAERA significant progress could be made and one other individual suggested that government must work with the industry to identify the barriers to expansion.

One individual responded that the current Industry Stakeholder Group needed to have representation from the arable and horticulture sectors or subgroups or else sub groups established to input to ongoing policy development and the design of policy implementation programmes.

One individual felt some form of “carrot” would be required to encourage cooperation.

Integrated, efficient, sustainable, competitive and an effective functioning supply chain

One farming focused organisation responded that the limited availability of robust statistical and economic data for the sector was a significant problem. One individual responded that support must be based on sound market research and be demand led and 1 individual responded that reliable market data on prices and trends coming from government or universities was essential.

One individual responded that the supply chain issue was huge for smaller growers and that many current growers used the farmers’ markets. One individual responded that the horticulture sector was dictated to by major retailers and 1 farming focused organisation thought support should be available to develop markets outside Ireland.

One ‘other’ organisation supported having an integrated supply chain but felt labour supply and low wages were a concern and a limitation.

Knowledge-driven, data-driven and Innovative-led, engaged with science

Three individuals responded making single suggestions of growing products for the pharmaceutical sector; production of plant based packaging materials and locating horticulture facilities adjacent to waste heat respectively.

One individual suggested that good husbandry needed to be encouraged

One individual responded that DAERA needed to supply knowledge, market research, support and knowledge sharing and transfer to improve the situation and that simple technology should be researched to the benefit of the NI horticulture sector.

One farming focused organisation stated that considerable investment was required in new improved growing facilities, in automation /robotic machinery for plant handling and in precision control of plant growth and development.

One ‘other’ organisation, 1 environment focused organisation and 1 individual indicated that more farmers should be encouraged to diversify and enter this sector.

One individual responded that horticulture needed all the support mechanisms if it was to thrive and play the role in productive land use.

One farming focused organisation thought that a review of land that might be suitable but had been overlooked could inform the market as part of a larger piece of work to see what horticultural operations were agronomically & economically feasible at scale in NI.

Environmentally sustainable

One environment focused organisation thought that environmental gains should be designed in at the start of the initiative and another environment focussed organisation

thought it important that environmental targets in the outcomes more than compensated for growth.

One farming focused organisation and 1 individual responded that a detailed analysis of the carbon footprint of proposals was needed to ensure that the outcome would genuinely contribute to a transition to a low carbon economy and 1 farming focused organisation, 1 environment focused organisation and 1 'other' organisation suggested horticulture might potentially replace some elements of environmentally damaging livestock production.

One environment focused organisation thought the all-island pollinator plan should be linked to the proposals and 1 individual responded there should be focus on maintaining diversity alongside sustainability.

Other General comments within Responses

One farming focused organisation responded that it was encouraged that DAERA had recognised the huge potential of the sector and 2 farming focused organisations responded that horticulture could make an important contribution assisting Government deliver across a number of policy areas.

One farming focused organisation responded that there was a strong public policy sense that there should be more fruit and vegetable production in the United Kingdom and more local production.

Two environment focused organisations indicated that horticulture contributed to public benefits in relation to health and that growth in the sector would contribute to a healthier, more sustainable diet and improved environment.

One individual responded that horticulture was overlooked in the past and another individual responded that widening of what constituted a horticulture business was welcomed. One 'other' organisation suggested a need for start-up grant for new entrants.

Q54. Do you agree with the policy proposals, regarding production horticulture? Explain your answer.

Fifty seven responses were received to this question. Eighteen were from organisations (of which 12 were farming focused, 2 environment focused and 4 'other') that indicated agreement. Thirty nine individuals responded, with 33 in favour and 6 against the proposals. Responses were wide ranging and have been summarised against broad headings below.

Focus on production horticulture

One environment focused organisation recommended that native trees and hedges were specifically included within the stated focus for production horticulture.

Collaborating and co-operating

One farming focused organisation responded that in a strong partnership with DAERA its organisation could be the vehicle for knowledge, innovation and technology transfer.

Four farming focused organisations and 1 individual responded that stakeholder engagement was essential to communicate the policy proposals, that the design of support schemes would be very important and that it was vital for the sector to be involved from the earliest opportunity in that design process. One farming focused organisation responded that without direct input from industry representatives there was a danger that opportunities would be overlooked. One 'other' organisation responded that policy programmes should be developed with social partners. One individual highlighted that people in the sector were frequently reluctant to share information.

Creating improved supply chain integration

Two farming focused organisations agreed with the need of development of supply chain integration and collaboration including the need for improvements in the transparency and trust within the different supply chains which currently operate.

One farming focused organisation responded that support should not be limited to cooperative enterprises. Improved integration, collaboration and cooperation could reduce costs but increased specialisation could also do this and was sometimes easier to achieve and more successful than co-operation.

Two farming focused organisations, 1 'other' organisation and 1 individual responded that Government procurement practice provided an opportunity to both increase the use of local produce and demonstrate high standards of supply chain trust and communication.

One farming focused organisation responded that there was considerable scope for the potential role of Producer Organisations in ornamental horticulture production and called for discussions with DAERA. One individual called for an accessible communication and information hub for their subsector.

One individual responded that small scale growing was not profitable enough to encourage newer growers to 'give up the day job'.

Providing access to R&D cutting-edge knowledge transfer and innovation support programmes

Two farming focused organisations responded that locally based Research & Development (R&D) for horticulture would be difficult but that through informed desk research leading to clear recommendations on the most applicable science for NI it should be possible to develop the linkages/pathways for R&D transfer to both DAERA and producers.

One individual responded that Horticulture R&D was neglected compared to mainstream agriculture and 1 farming focused organisation responded that R&D for NI should link into GB and DAERA should fund essential R&D to benefit the Industry.

Facilitating learning from others

One farming focused organisation responded that CAFRE needed to better support KTT but acknowledged the current successful BDG groups and learning from others within the industry both at home and throughout Europe.

Optimising precision of data

One farming focused organisation responded that data collection was key for sound business decisions and another farming focused organisation responded that it provided reports to its subsector on market trends and attitudes to sustainability.

Supporting businesses transition through knowledge and support for adoption of new technology

Three farming focused organisations and 1 individual responded that an integrated support package was needed which would include for example capital support, business mentoring, education and technical support from world class experts. One farming focused organisation responded that substantial policy effort was needed to achieve the intended gains.

Two farming focused organisations responded that there was the opportunity to move forward at pace, through a flexible and innovative approach to provide producers with cutting-edge knowledge and technology to allow transformational change and 1 farming focused organisation recognised the vital importance of up-to-date industry-leading knowledge transfer and continued professional development.

One farming focused organisation suggested a bespoke scheme for apple growers for eating/dessert apples where new growers could co-operate and support given for transition. One farming focused organisation suggested that AFBI, CAFRE and DAERA should formalise an academy for “young growers”.

One farming focused organisation responded that it might be better to introduce and develop a new high technology sector to NI rather than upgrading existing sectors and 2 individuals responded that they would like to see support for controlled agriculture production. One farming focused organisation indicated that major automation and technology was required to compensate for insufficient labour which would be a major constraint going forwards.

One farming focused organisation stated that the industry needed support in terms of staff and management development, to develop green sustainable practices, identify opportunities and implement world leading practices. One individual responded that increase knowledge of production and marketing was necessary

Two farming focused organisations highlighted that Republic of Ireland (ROI) competitors have had a targeted and generous grant stream for horticulture for over 2 decades and that ROI provided marketing, benchmarking and training support to growers and 1 individual and 2 farming focused organisations commented that horticulture would benefit greatly from capital investment.

One farming focused organisation responded that industry must be consulted on any detailed measures and that a key driver should be the efficient use of inputs. One farming focused organisation responded that it was currently providing considerable support and direction to growers to achieve green sustainable business development in ornamental production. One 'other' organisation responded that there need to be an environmental action plan to improve pollination and crop rotation and 1 individual suggested that an environmental proposal was needed to improve pollination.

Against

Responses made from those against cited lack of information; a need for more support; being unsure; environmental damage being done by large scale farmers and just wishing to maintain the status quo.

Other Comments

One farming focused organisation responded that as well as promoting local produce, public good could be delivered through achieving dietary changes and improvements in mental wellbeing. One individual responded that horticulture was a very important part of the food supply chain and the sector should be supported and encouraged to expand. One environment focused organisation responded that local produce had potential to benefit human health, reduce food miles and contribute to achieving Net zero targets.

Two farming focused organisations thought that there was nothing radically new or innovative in the proposals and 1 farming focused organisation indicated that a substantial policy effort was needed to achieve the intended gains. One individual responded that there was a need to be more ambitious to produce carbon neutral food by 2050. One individual responded that growers had the energy and initiative to meet the challenge but that financial rewards must justify the risk and investment.

One individual responded that generational renewal and farm investment measures should apply to horticulture and 1 individual responded that here was an obvious link to generational renewal with horticulture providing the perfect opportunity for the next generation to add new enterprises to the farm.

Q55. Do you agree with the design principles regarding production horticulture, are there others you would like to see included? Explain your answer.

Seventy nine responses were received to this question. Eighteen were from organisations (of which 8 were farming focused, 6 environment focused and 4 'other') and 61 were from other individuals.

Of the farming focused organisations 5 were broadly in favour and 3 had reservations. Five of the environment focused organisations were in favour and 1 had reservations and the 4 'other' organisations were broadly supportive. Of the individuals who responded 43 were supportive and 18 were against.

Two farming focused organisations, 1 environment focused organisation and 1 individual responded that the principles were good but too limited conservative and that focus should be on areas of opportunity as well as market failure. One individual responded that the principles could be stronger, more assertive and optimistic. One farming focused organisation thought that the principles appeared more generic than directed to the end being considered.

Two farming focused organisations and 1 individual felt there should be explicit recognition of the link in the principles to national wellbeing and diet.

One 'other' organisation responded that nature friendly horticulture should be the goal.

Focus on where there was strong evidence of market failure limiting the achievement of government's policy objectives

One farming focused organisation responded that there was definite market failure in horticulture due to a devalued market in which trade took place with low margins hindering reinvestment and reducing the productivity gains that were possible.

One environment focused organisation gave the examples of market failure in relation to the supply of suitable trees for planting in Northern Ireland.

One farming focused organisation responded that it was unclear of the principle of market failure.

Support the transition towards a low carbon economy

One environment focused organisation responded that horticulture transition to a low carbon production would make a vital contribution to overall carbon reduction. One farming focused organisation responded that recognition must be made for orchard sequestration and 1 individual responded that floriculture had the potential to greatly contribute to low carbon economy.

One environment focused organisation responded that importing trees generated a larger carbon footprint through additional transportation costs and that supporting local growers to provide locally sourced and grown trees aligned with the objectives set out in the DAERA Green Growth strategy for NI. One environment focused organisation responded that if reliance on imports could be reduced this would contribute to reducing carbon footprint for these products.

One 'other' organisation responded strongly agreeing on the focus to a just transition to a low carbon economy involving producers and workers.

One individual responded that attention should be paid by research into how smaller-scale growers could access innovative technology to heat structures.

Provide policy cohesion - linking of existing and future strategies, policies and actions that can deliver climate, environment and sustainable economic growth - a policy portfolio approach

One individual responded that there needed to be a strong element of local community engagement in the scheme design to ensure education and development of local markets for fresh produce. This then may in time help resolve sector labour issues if people could see opportunities in horticultural production.

Other comments/suggestions

A range of other responses were received against this section including:

Three farming focused organisations indicated that they wanted a clear action plan with goals that could be monitored and taken forwards in partnership with DAERA. One farming focused organisation responded that all future policy must be industry led.

One farming focus organisation responded that it did not agree with the use of hydroponics or vertical farming.

One individual responded that Agriculture could learn much from horticulture which tended to be more resource efficient and willing to adapt to technological change.

Q56. Have you specific suggestions for how success can be measured regarding production horticulture?

Thirty two responses were received to this question. Sixteen organisations (of which 9 were farming focused and 3 environment focused) and 16 individuals responded with the following collective suggestions of how to measure horticulture production success:

Monitor import substitution

Monitor import substitution of a range of fruit and vegetables that can be grown in Northern Ireland; monitor source of the produce on supermarket / garden centre shelves; measure of the success (or failure) of local produce to compete when in season.

Measure productivity gains

Measure productivity; market growth and margins achieved.

Baseline data on industry

Establish baselines for number of new entrants; number of businesses; scale of production; period of production; labour; supply chain; and horticulture career opportunities:

Monitor sustainability measures

Track use of chemicals, plastic and peat per unit of output; calculate carbon balance on production units; assess the basic standard of living of workers employed in this sector.

Draw information from informed stakeholder groups

Track through information provided by a supported Horticulture Industry Forum; or Producer Organisations.

IMPACT ASSESSMENTS

Q57. 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.

Sixty eight responses were received to this question. Twenty three were from organisations (of which 12 were farming focused and 3 environment focused), 44 were from individuals and 1 from a political party/representative.

Key themes Included

Impact of 10 ha minimum claim size

Two responses from organisations (of which 1 was farming focused and 1 'other'), 20 individuals and 1 political party/representative referred to the proposal to increase the minimum claim size threshold to 10 ha and the impact this would have on small farmers. One response from a political party/representative referred to the impact on the cost of land if small farms were excluded from payments.

Upland areas

One response from a farming focused organisation requested that the rural needs in upland areas should be taken into account to sustain populations in these areas.

Planning

Seven responses from organisations (of which 6 were farming focused and 1 'other'), 4 individuals and 1 political party/representative referred to need to address issues and inconsistencies in planning policy.

Improved services in rural areas

Three responses from organisations (of which 2 were farming focused and 1 'other'), and 2 individuals called for improved mobile phone coverage. Four responses from organisations (of which 3 were farming focused), and 2 individuals called for improved broadband. Two responses from farming focused organisations advised of an opportunity for Northern Ireland to become a world leader in precision management and guidance through the provision of an RTK network to enhance / supplement the GPS signal. One response from a farming focused organisation referred to the need for a better electrical connection in rural areas.

Two responses from organisations (of which 1 was farming focused and 1 environment focused) and 1 individual referred to the need for better infrastructure in rural areas with 2 responses from organisations ('other') requesting safe off road routes in the countryside. One response from a farming focused organisation and 4 individuals referred to the need for better transport in rural areas. One individual referred to the need for a better police presence.

Health

Two responses from organisations (of which 1 was farming focused and 1 environment focused) referred to measures to increase mental health. One individual referred to mental health support for young people. One individual referred to better access to health and other services.

Tourism

Two responses from environment focused organisations and 1 individual referred to rural tourism.

Employment

One organisation ('other') responded that the lack of any measures specific to workers or any measures to address the labour market supply crisis affecting much of agriculture was a major deficiency. One response from an environment focused organisation referred to jobs for young people through a Green Jobs Scheme. One response from a farming focused organisation indicated that where land use and business change supported better incomes and rural economies, it should be allowed to develop and be supported.

Schemes and programmes

One response from an organisation and two individuals referred to bringing ANC scheme back. One response from an organisation ('other') and two individuals suggested the Levelling Up process should be completed.

One individual was not satisfied with the banding of equipment in all farm modernisation grants.

One individual suggested that there should be a sheep scheme.

One organisation (environment focused) responded that there was a need to ensure access to agri-environment and other measures.

One response from an organisation (environment focused) suggested farmers should be supported to diversify through retraining and reskilling, direct selling through farmers' markets, farm shops, and farmers' co-operatives, fruit and vegetable production, timber production and tourism and outdoor pursuits.

One response from an organisation (environment focused) welcomed the inclusion of a thematic pillar in the Rural Policy Framework for Northern Ireland dedicated to empowering and enabling rural communities to tackle the nature and climate crises.

One individual suggested that more training courses were set up regarding the challenges that faced small farmers often working alone.

Other Comments/Suggestions

Two individuals referred to a TB Vaccination programme.

Two individuals referred to the merits of a social farm.

One individual referred to the need for young people to be encouraged to Krause rural and that access to housing was critical. One individual referred to the condition of farm buildings.

One response from a farming focused organisation requested that almost all of the proposals would need to be completely revisited if the Climate Change Bill (No.2) passed through the remaining stages of the legislative process without appropriate mitigations/amendments.

One individual referred to the need for enforcement against those who were damaging hedgerows and habitat. One individual referred to the need to improve the wild life and environment and reduce over application of chemical fertiliser.

Q58. 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.

Forty three responses on equality issues were received to this question. Eleven were from organisations (of which 5 were farming focused, 3 environment focused and 3 'other'), 30 were from individuals and 2 were from political parties/representatives.

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

Key themes raised

Four farming focused organisations and 19 individuals were concerned about potential equality issues and discrimination with the proposal to increase the minimum claim size threshold to 10ha.

Six individuals responded that the proposal to increase the minimum claim size threshold to 10ha could result in religious background discrimination.

Five responses (1 organisation 'other' and 4 individuals) commented on encouraging females into the farming sector with 1 response commenting on succession.

Three individuals and one farming focused organisation responded on young farmer concerns which included encouraging younger college trained staff into the sector. One individual was concerned that the proposals inferred that older farmers needed to be replaced with younger people to facilitate positive change.

One political party/representative requested a review of DAERA's Equality and Human Rights Screening. One political party/representative raised concerns regarding rural issues including, rural broadband, mobile phone signals, transport infrastructure and planning.

Other comments/suggestions

Three individual responded that hill farmers had not been recognised and one individual felt that sheep farmers had been left behind in the consultation. One individual raised mental health concerns and one referenced the effects of remoteness on quality of life. One environment focused organisation raised potential lack of access to schemes due to disability or lack of education opportunities; one 'other' organisation was concerned that policy may not consider workers' pay and conditions, trade union recognition or upskilling; and one 'other' organisation emphasised importance of improved and enhanced off road access to better connect public with natural environment.

Q59. 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.

Twenty one responses were received to this question. Nine were from organisations (of which 8 were farming focused and 1 other organisation), and 12 were from individuals.

Key themes Included

Outcomes and monitoring

One 'other' organisation and two individuals suggested that any new actions should not be onerous on the farm businesses and should have proportionate bureaucracy. One farming focused organisation indicated that new policies should not limit farming's ability to respond to new challenges.

One farming focused organisation suggested synchronization of dates for different schemes to ensure an even spread of work throughout year.

One farming focused organisation suggested that any future support scheme needed to be underpinned by an effective regulatory baseline to ensure that all farmers were operating on a level playing field and meeting minimum regulatory requirements.

One individual requested the reduction of multiple copies of letters and was in favour of more face to face correspondence.

One farming focused organisation suggested that data should be provided in a more user friendly way to the older generation.

One individual was an advocate of the status quo.

Advisors

One farming focused organisation suggested that the farming community should be entitled to avail of well-trained professional advisors regardless of their membership of groups.

Other Comments/Suggestions

One response from a farming focused organisation requested that almost all of the proposals should be revisited if the Climate Change Bill (No.2) passed through the remaining stages of the legislative process without appropriate mitigations/amendments.

One farming focused organisation believed that the potato sector sat closer to horticulture than the broad brush relationship with arable regarding supply chain and inhibitors for growth and productivity.

One individual suggested that the tax law should be reviewed.

One individual referred to planning issues and the need for a greater understanding of farming culture in Northern Ireland.

Q60. 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.

Fifty two responses to this question were received. Eighteen were from organisations (of which 10 were farming focused, 5 environment focused, and 3 'other'), 31 from individuals, two anonymous responses and one political party/representative.

Key themes raised:

Monitoring and assessment during policy application.

Three environment focused organisations, 2 farming focused organisations, and 2 individuals highlighted the need for continual monitoring and assessment when translating policy into delivery to ensure no unintended consequences.

Water pollution from slurry and chemicals.

Four individuals and one organisation ('other') expressed concern regarding the pollution of watercourses with slurry, chemical fertilisers and chemicals such as MCPA and glyphosate. Two individuals stated that the slurry closed season should be reviewed as farmers know best when to apply slurry.

Climate change challenge and carbon sequestration.

Four individuals and two farming focused organisations highlighted the climate change challenge for farmers and recognised the opportunities of carbon sequestration from soils, hedgerows and trees. One farming focused organisation, and 2 individuals stated that the import of food from other countries could potentially cause environmental harm in other parts of the world.

Balancing food production and environmental objectives.

Two individuals, two farming focused organisations and one political party/representative highlighted that farming was receiving the blame for many environmental problems and that food production should be considered in parallel with the environment.

Incentives for farmers.

One individual and two organisations ('other') stated that a transition to sustainable farming should be incentivised with continued maintenance payments.

Energy Crops.

One organisation ('other') and two individuals stated the Department should encourage and support the production of energy crops.

Plastic bale wrap.

Two individuals asked what they should do with their plastic bale covers.

5. Way forward

This consultation, and the significant response to it, forms a key part of the information necessary to enable final decisions to be made on the next steps for the development of future agricultural policy for Northern Ireland.

List of Consultation Questions

Q1 (i) Do you agree that income support is needed in the form of a Resilience Payment set at an appropriate level?

Q1 (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? Explain your answer.

Q1 (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? Explain your answer.

Q1 (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?

Q2 (i) Participation in soil testing, including Light Detection and Ranging (LiDAR) – do you agree with this being a condition to claim the Resilience Payment? Explain your answer.

Q2 (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? Explain your answer.

Q2 (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? Explain your answer.

Q3 (i) Do you agree with the proposal that progressive capping of the Resilience Payment will apply above £60,000? Explain your answer.

Q3 (ii) Do you agree with the proposal to increase the minimum claim size threshold to 10 ha? Explain your answer.

Q4 (i) Do you agree with the principles proposed in the development of a Crisis Framework? Explain your answer.

Q5. Do you agree that payments under the Headage Sustainability Measure will be made only to businesses in receipt of payments under the Resilience Measure? Explain your answer.

Q6 (i) Reducing age of first calving – do you agree with this measure and the pace of phased implementation proposed? Explain your answer.

Q6 (ii) Reducing the calving interval - do you agree with this measure and the pace of phased implementation proposed? Explain your answer.

Q6 (iii) Do you agree payment should be made only to qualifying suckler cows where live calves are registered with DAERA? Explain your answer.

Q6 (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? Explain your answer.

Q6 (v) Do you agree that the payment quota may be traded and usage rules will apply? Explain your answer.

Q6 (vi) Do you agree that there should be a retention period of at least 6 months? Explain your answer.

Q6 (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? Explain your answer.

Q7. Do you agree on the proposal to slaughter clean beef animals at 24 months to make the sector more productive and environmentally sustainable?

Q8. Do you agree that only animals born and bred in Northern Ireland should be eligible for support under the Beef Transformation Measure?

Q9. Do you agree with the proposed pace of phased implementation to reduce the age of slaughter to 24 months? Explain your answer.

Q10. Do you agree a single minimum slaughter age of 12 months for all cattle? Explain your answer.

Q11. 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? Explain your answer.

Q12. Have you any other specific suggestions to provide support for other parts of the beef sector? Explain your answer.

Q13. Do you have any specific suggestions for incentivising productivity in breeding ewes? Explain your answer.

Q14. What are your views on the suggested policy proposals and environmental principles to be incorporated within the Farming for Nature Package?

Q15. 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?

Q16. Do you agree with the proposed eligibility criteria and minimum claim size proposals? Explain your answer.

Q17. 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? Explain your answer.

Q18. Do you have specific suggestions for other quick win management actions?

Q19. What are your views on proposals to introduce 'Test and Learn' pilots?

Q20. Have you specific suggestions for other components that could be incorporated into 'Test and Learn' pilots?

Q21. What needs to be in place to support delivery of an outcome-focused approach? Explain your answer.

Q22. Have you specific suggestions for partnership delivery models that will encourage collaborative working?

Q23. Do you agree on the proposals identified for low carbon emission farming practices? Explain your answer.

Q24. Do you agree with the principle of encouraging the Farming of Carbon as a business enterprise. Explain your answer.

Q25. Do you agree the guidelines when considering future capital support? Explain your answer.

Q26. Do you agree the draft design principles when considering future capital support? Explain your answer.

Q27. Have you any suggestions on the capital assistance that might support the agriculture and horticulture sectors? Explain your answer.

Q28. What are your views on the approach to Knowledge Transfer and Innovation for land managers, farmers and workers set out in this document?

Q29. Have you specific views on how to best to encourage the participation of land managers, farmers and workers in Knowledge Transfer and Innovation programmes?

Q30. Have you specific views on how best to encourage the adoption of innovation by land managers, farmers and workers?

Q31. Are there gaps in the current provision Knowledge Transfer and Innovation programmes that need to be addressed?

Q32. Do you agree that there is a need to encourage longer-term planning for farm businesses? Explain your answer.

Q33. What are your views on a Generational Renewal Programme and the proposed three phase approach?

Q34. Do you agree with the inclusion of knowledge and skills development within the Generational Renewal Programme? Explain your answer.

Q35. Do you agree that incentives should be provided to those participating on the Generational Renewal programme on achievement of specific objectives or on progress made? Explain your answer.

Q36. What are your views on the scope and effectiveness of existing supply chain measures (market transparency/information, education and knowledge transfer, incentivisation schemes and regulation) to help deliver a more efficient, competitive supply chain?

Q37. Do you agree the three proposed policy areas when considering future supply chain measures? Explain your answer.

Q38. Are there specific gaps in the approach that you feel need to be addressed? Explain your answer.

Q39. Are there specific early actions that you would like the Department to take to support supply chain development in the agriculture and horticulture sectors? Explain your answer.

Q40. What are your views on the proposed uses for data provided via the proposed Soil Nutrient Health Scheme?

Q41. 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? Explain your answer.

Q42. Have you further specific suggestions for how the data provided by the Soil Nutrient Health Scheme could be used or promoted by government?

Q43. Do you agree that the Department should pump prime the initiation of an industry led livestock data and genetics programme?

Q44. Do you agree that farmers should be required to provide data for the genetic improvement and data programme as an eligibility condition of future support payments? Explain your answer.

Q45. Do you agree with the proposal to develop knowledge transfer programmes to support farmers to adopt genetic improvement technologies? Explain your answer.

Q46. Do you agree with the proposal to replace the current Cross Compliance system with the simplified 'Farm Sustainability Standards'? Explain your answer.

Q47. Have you specific suggestions for how compliance with the proposed Farm Sustainability Standards should be controlled? Explain your answer.

Q48. 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? Explain your answer.

Q49. Do you agree with the principles against which metrics should be developed?

Q50. What are your views on the high level overarching metrics proposed?

Q51. What suggestions do you have for additional high level overarching metrics that need to be adopted or developed?

Q52. 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?

Q53. What are your views on the proposed outcomes regarding the Northern Ireland production horticulture sector?

Q54. Do you agree with the policy proposals, regarding production horticulture? Explain your answer.

Q55. Do you agree with the design principles regarding production horticulture, are there others you would like to see included? Explain your answer.

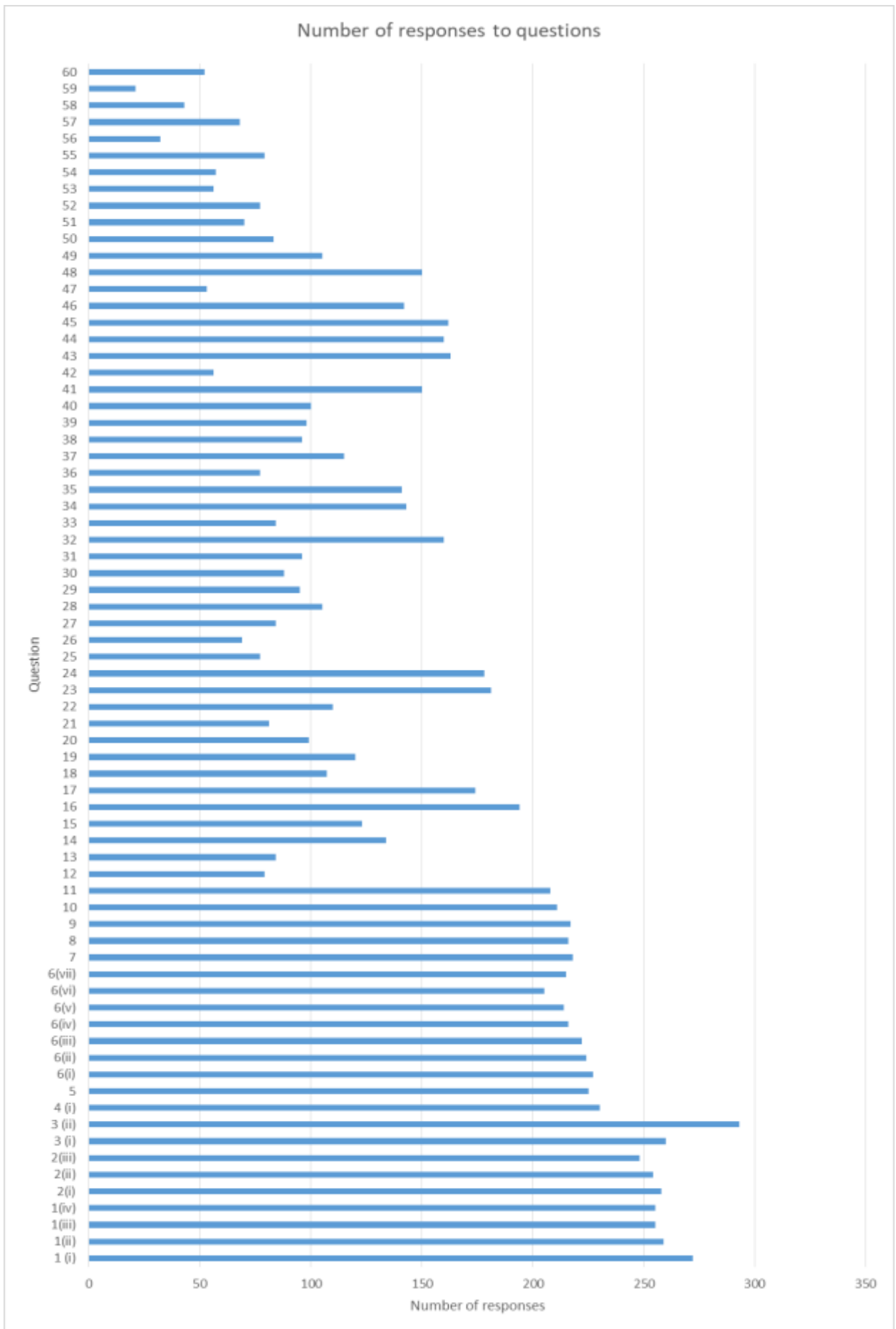
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Q59. Are there any regulatory impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

Q60. 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.



Respondents to the Consultation: Organisations/Representative Groups

Agricultural Consultations Association (NI)	Nature Friendly Farming Network
Agricultural Law Association	NI Arable Strategy Group
AgriSearch	NI Meat Exporters Association (NIMEA)
AI Services NI Ltd	Northern Ireland Agricultural Producers' Association (NIAPA)
Belfast Hills Farmers Group	Northern Ireland Environment Support Team (NIEST)
British Veterinary Association (Northern Ireland Branch)	Northern Ireland Environmental Link (NIEL)
Central Association of Agricultural Valuers (CAAV)	Northern Ireland Local Government Association (NILGA)
Chartered Institute for Archaeologists (CIfA) & Council for British Archaeology (CBA)	Northern Ireland Soft Fruit Growers Association
Council for Nature Conservation and the Countryside (CNCC)	Northern Ireland Water
Dairy Council for Northern Ireland	Northway Mushrooms Ltd
Farmers for Action NI	Outdoor Recreation Northern Ireland
Fermanagh and Omagh District Council	Rare Breeds Survival Trust (RBST)
Fermanagh Ulster Unionist Association	Rural Community Network
Food, Farming and Countryside Commission	Rural Support
Friends of the Earth	Sinn Féin
Grower's NI	Sustainable Soils Alliance
Horticulture Forum for Northern Ireland	The British Horse Society Ireland
Horticulture Trade Association	The Gibson Trust
Institute of Chartered Foresters	The National Trust
Irish Moiled Cattle Society	The Royal Society for the Protection of Birds Northern Ireland (RSPB)
Keep Northern Ireland Beautiful	Ulster Arable Society
Lack Community Group	Ulster Farmers Union (UFU)
Livestock and Meat Commission for NI	Ulster Wildlife
Mountaineering Ireland	Unite the union
National Beef Association	Veg NI
National Office Animal Health (NOAH)	Woodland Trust Northern Ireland
National Outdoor Recreation Forum	Young Farmers' Clubs of Ulster
National Sheep Association	

Respondents to the Consultation: Individuals

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Martin Bradley	Pat Donnelly	Peter Hynes
Kyle Bradshaw	Ian Duff	Philip Ingram
Darragh Browne	Caroline Duffy	Thomas G Jamison
Margaret and William Burleigh	Christopher Duffy	Patrick J Johnston
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Maurice Burns	Ryan Duffy	Tony Johnston
Phelim Burns	Derek Dunn	Paul Kane
Terence Byrne	William Dunwoody	Sean Keenan
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Shane Campbell	Barbara Ellison	Gerard Kelly
Francis Caraher	Barbara Erwin	Michael Kelly
Martin Carey	Fred Farrelly	Colm Francis Kenny
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Geraldine Connor	Bob Foy	Francis Lowry
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Michael Cunningham	Steven Golemboski-Byrne	Arthur Maginnis
Paschal Cunningham	Donal Gormley	Lee Maginis
Cllr Siobhán Currie	Donal Grant	Ed Mallon
Brendan Darcy	Pat Gray	Gerard Marsden
Gerard Deery	Sheamus Greene	Kieran Marsden

<p>John Martin Roy Mayers Vincent McAlinden Malachy McAlister Peter McAllister Colm Mc Ateer James McAteer Malachi McCann Shane McCann Martin McCarney Declan McCarron Pat McCartan Damian McCloskey Edward McCullagh Gerard McCullagh Brigid McDonnell Shannon McDonnell Alan McGaffin Declan.Cormac & Mairead McGarvey Pearse McGee Colin McGrath Tony McGrath Liam McGuickin Adrian McGuire Brendan McGuire John McGuire Judith McGuire Ryan McGuire Shane McGuire John McGurl Maurice McHenry Martin McKee E & H McKeegan Declan McKenna Cormac McKervery Thomas McKillop Gerard McLaughlin Seamus McMenamain Oliver McMullan Daniel McNally Richard McNeely</p>	<p>Hugh McNeill Emmet McNulty Sean McPeake Martin McShane Ross McVitty David Millais Andy Millar Bryan Millar Glenn Millar Sheila Mills R and D Milne Mark Mimmagh Barry Molloy Martin Monaghan Stephen Montgomery Robert Moore Thomas David Moorhead Gerard Morris Micheal Mowen B Moynagh Patrick Mulholland James Mullan Anthony Mulligan Oisin Murnion Kevin Murphy Seamus Murphy Sean Murphy Patrick Murray Michael Nicholas Patrick Nicholas Dermot O'Brien Lynn O'Brien Patrick O'Donnell Catherine O'Hara Anne O'Harte Michael O'Harte Aodh O'Neill Bridget O'Neill Erin O'Neill Martin O'Neill Ruairi O'Neill Sean Palmer</p>	<p>Ron Patterson Neil Patton Robert Anthony Pollock James Quinn Paul Reihill Leslie Ross W.M. Ross Thomas Savage Patrick Savage Catherine Sharkey Andrew Simpson Stephen Simpson Alex Skuce Jonny smith Gregg Somerville Eileen Sung Gareth Thompson John Treacy Robert Trimble Anna Truesdale Gerard Tumelty Campbell Tweed Anne Marie Ward Martin Ward Rosie Ward Colm Warren Robert Watterson Ethel White David Wilson James Wilson Gavin Winters Rory Woods Blakiston Houston Estates alexandernark1 Alistair Bernard Christopher Damien Jonathan Mary Peter Sujata</p>
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