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FROM THE PRESIDENT

Tuesday 15 February 2022

Northern Ireland Future Agriculture Policy Proposals: Consultation

I am writing to you enclosing the UFU submission to DAERA's consultation on Northern Ireland's Future Agriculture Policy Proposals, on behalf of our organisations' 11,500 plus members. This response was formulated after lengthy discussions at meetings of the UFU's 16 policy committees and ratified by the UFU's Executive. The detailed response covers a range of issues and outlines key measures that government should enact to help the farming sector thrive in the coming, potentially turbulent, years.

We now have an opportunity to work together to create a well-funded, refreshed agricultural policy that delivers for all sectors. The UFU believes it is essential for Northern Ireland to maintain at least the existing level of investment in farming. Farm businesses invest in the long-term, so an abrupt cliff-edge halt to long established policies and income streams must be avoided. We expect DAERA to provide sufficient time for a managed transition and for new policies to be agreed and implemented.

This is a once in a generation chance for the government to develop a NI specific agricultural policy that drives integration of profitable food production with high environmental and animal welfare standards. Any future policy should require that, while maintaining a range of purposes for financial support, any such assistance is linked explicitly to genuine active farmers.

Government therefore have a strategic interest in ensuring a sufficient level of domestic food production, in a volatile world this is a critical aspect of food security. Supporting domestic agriculture to ensure food security and stability of food supply should be included in the purposes for which financial assistance can be provided under any future policy. Farm businesses also have an important role to play in other strategic priorities such as energy and water supply, so these should be further areas to which financial assistance can be provided.

The UFU and its members believe we must use this opportunity to create the conditions for a productive, resilient and sustainable agricultural sector. We need to meet the expectations of the UK countryside and contributing to productive and robust economic growth. This consultation response therefore provides an opportunity to help meet these ambitions, and this response from the UFU provides recommendations on key measures which DAERA should enact to help ensure our farming sector thrives.

This response from the UFU was developed on the understanding that these proposals for a future NI Agriculture Policy were based on the UK's Climate Change Committee's recommendations for a Northern Ireland target on greenhouse gas emission reductions to enable the UK to meet its 'Net Zero' commitment by 2050. With the discussions within the NI Assembly still ongoing on the introduction of a related 'Climate Change Bill' for NI, these proposals for a Future Agricultural Policy might need to be revised. However, regardless of the reduction target set, we fully recognise that change is being demanded of NI agriculture. The UFU will continue to fight that any reduction in agriculture's GHG emissions must be based on expert scientific advice and sensible.

The UFU look forward to future engagement with DAERA on their views on the Northern Ireland Future Agricultural Policy Proposals.

Yours faithfully,

A handwritten signature in black ink, reading "Victor Chestnutt". The signature is written in a cursive style with a large, sweeping loop at the end of the name.

Victor Chestnutt

Northern Ireland Future Agriculture Policy Proposals: Consultation

1. The proposal is that payment will continue to be area based, use entitlements and that funding will be directed to active commercial farm businesses.

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

Yes, the UFU support a basic farm resilience payment based on productivity, efficiency and linked to inflation. Any future support measure should be simple, realistic, attainable and targeted towards genuine active farmers.

It is a matter of national interest to ensure that our country can feed itself, and a high level of domestic production capacity in a volatile world is a critical aspect of food security, therefore a basic farm resilience support measure can help in preserving this. Furthermore, without a lack of meaningful basic resilience support payment this could lead to a reduction in domestic production. This subsequently means a greater reliance on imports from other parts of the world, where we have no control over production standards, so effectively exporting and more than likely lowering our environmental, animal health and welfare standards. In 1984, the UK's overall food self-sufficiency was 78%. In 2021, it is 60%. It becomes more and more challenging to be global leaders in climate-friendly food if we allow our own production levels to drop.

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.

Disagree. There are some genuine businesses that produce grass silage for livestock however there are others who don't, and this is unfair which needs consideration as there may be some unintended consequences as many of these businesses are not taking the risk associated with active farmers. Some farmers may be part of a shared farming agreement so there needs to be careful consideration of this proposal.

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.

Agree they should not be eligible. If not producing a tangible output, then this does not justify a commercial farming business and does not justify support.

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: a) had cattle or sheep registered on APHIS; and/or (b) had at least 3 ha of an arable or horticultural crop during the reference period in an historic year or years? Explain your answer.

Agreed, however commercial pig and poultry farmers must also be included in the criteria for active farmers as many of these will also have land.

2. The proposed conditionalities outlined to be eligible to claim the Resilience Payment are aimed at environmental improvement.

(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.

Yes, agree there is a need to measure to manage and improve. However, many farmers get soil analysis completed themselves and this should be adequate not just relying on the DAERA proposed option.

The UFU could not support this condition if DAERA were to then use the results from the soil sampling scheme as part of their enforcement programme and therefore we must be reassured that this soil sample analysis would be kept confidential and only for the requirement to do/take part to avail of the resilience payment.

(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.

NMP is a useful tool for all farmers therefore should be encouraged but on the basis of a management tool and not for regulating farmers on nutrient applications. Many farmers produce NMP for specific reasons and this could continue. Many farmers need to understand what the soil testing scheme and LiDAR will provide first.

(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.

Yes, however there are concerns raised about the accuracy of this information and more detailed discussions would be needed on this aspect before this would be implemented. For example, the use of fertility boost semen, where 3 bulls of the same breed are used in the semen straw is a common occurrence within dairy herds. Similarly, some large herds run more than one bull with the herd. If these bulls are the same breed, it is impossible currently to determine the sire of the calf. Farmers should be required to register the sire information of one of the bulls on the farm/ or within the straw.

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

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

Yes. The UFU has historically been opposed to the principle of 'capping' however in this instance we recognise that this proposal relates only to the resilience payment which is to provide a basic safety net rather than payments in general and that it is both progressive within each proposed payment band rather than an absolute cut-off and also that it will be increased gradually over a period of time which will allow any business impacted an opportunity to adapt.

The UFU would support this capping mechanism also applying to the Farming with Nature Scheme.

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

The UFU do not support this proposed increase. Careful analysis is needed not to exclude horticulture high value crops and or high-grade seed potatoes.

UFU is a Union for all farmers and supports all active farmers. 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 is applied. The UFU has previously supported a 5 ha limit and this position remains. Special circumstances for the horticulture industry must also be recognised.

4. The proposal is that there will be a new crisis framework that will enable the Department to assess potential risks and determine the most appropriate intervention for a specific crisis.

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

The UFU support in principle. Farmers may need funding in crisis situations. However, there is concern amongst UFU members that this funding would come from the 'farmers' budget (top slice from payments). There is also concern about DAERA's ability to handle this fund and whether there is a need for industry involvement in the decision-making process when determining and dealing with a crisis. It should also be noted that this has the potential to be divisive if farmers from one sector had to contribute to support other sectors in crisis. The UFU would like to see more details of this proposal and be able to provide input to this discussion going forward. It might also be worth considering options for an interest free loan in a crisis.

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

The UFU support. This seems sensible and prevents anyone trying to claim for the headage quota and payment and not adhering to the resilience measures.

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

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

Disagree. There is evidence to support that reducing the age at first calving from an efficiency point of view as it can increase margins/cow and can leave you with potentially a smaller mature cow to maintain and from an environmental point of view by reduced emissions. Unproductive cows that are on the farm for long period of times shouldn't be kept. However, one of the biggest challenges beef suckler farmers face

with this is getting these first calving heifers back into calf for the second time. Sometimes it requires specific management and requires concentrate feeding to assist. Many suckler farmers have experienced that by allowing the beef bred heifer to mature to around 30-33 months which they have found easier to get back in calf the second time.

Another important point is that for native/traditional breeds like (but not limited to) Belted Galloway, Galloway, Highland, Irish Moile, Shorthorn, Speckle Park these animals tend not to reach maturity to later. If put in calf too early they lose their ability to survive in the conditions that they have been bred and developed for. We believe that these native breeds should be given some sort of exemption in this regard. –However, for other continental breeds that are farmed in lowlands the timeframe to allow the proposed transition should be at least 6 years not 4 years and monitored annually. Moving to 24 months calving for the dairy sector has been a huge challenge and has been achievable, however this has required significant investment, e.g. weighing platforms, state of the art handling facilities, grassland management that is a challenge in its own with a reduced growing season and open land in the hills and uplands. This proposal could potentially wipe out native breeds that graze on uplands and hard hills. These animals receive very little input with minimal or zero antibiotics and that it has the potential to bring unintended consequences to livestock producers in these areas. Many farmers may try to achieve this, but the reality of livestock farming can bring about problems, an infertile bull or a disease outbreak like IBR (Infectious Bovine Rhinotracheitis) or Leptospirosis so consideration would also need to be taken into account for such. Further engagement and consideration must be given to this.

The UFU are open however to discussion to extend this timeframe.

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

The UFU partially agree.

Reduced calving interval will minimize the number of days that the cow must be maintained, provide a better economic return from a feed efficiency point of view as and increase the number of calves produced over the cow's lifetime. CAFRE have indicated that reducing the calving interval from 415 to 365 days could bring about a saving of over £8,000 per annum, while we do not doubt this, achieving this is certainly a more of a challenge. Many suckler farmers have dedicated their life to reducing their calving interval and many are struggling to achieve 375-380 days, and CAFRE advisors would state that this is exceptional. CAFRE currently have a traffic light system for calving interval Green anything under 390 days, Amber 391-450 and Red over 450. While this proposal seems reasonable many suckler farms have their problems like an infertile bull, poor reception rates from AI, heat stress, slipping a calf as a result of TB testing etc.. So therefore, we believe that these issues must be taken into account. Many suckler farmers have found that while it may be unproductive to have a cow slip a few days on her calving interval it is probably cheaper for them to do this than cull the cow and replace. Many suckler replacements are purchased from ROI and many of the suckler farmers in NI are small part time farmers so this needs consideration too. We would also ask for the current timeframe to be extended to at least 6 years with an annual review of how this is working and welcome a graduated scale like the traffic light system.

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

No don't agree. A cow that has carried a calf to the point of birth and had a dead calf at birth rightly deserves support and if not more so. A dead calf could be registered dead-on APHIS, and tissue sampled for BVD, and this should be enough to qualify for the support. Anything less than this is just unfair and unjustifiable.

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.

Partially agree. Difficult to support when we do not know the details of the historic reference and it is difficult to understand without analysis that it would be based on an individual animal or herd average?

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

Agree that there needs to be some level of flexibility to trade quota however it is not a good idea to allow some individuals to buy large amounts of quota off smaller farms. This could have an impact on rural communities, so careful consideration needs to be given to the usage rules and reviewed regularly. Further guidance on this would be welcomed so everyone understands this purpose. As the usage rules are to be determined it is difficult to fully support at this stage. Further consultation and consideration needed.

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

Disagree at this stage but recognise principle. As the details of the retention period are yet to be decided it is difficult to support at this stage. However, it wouldn't be appropriate to have a situation where a producer could remove a calf off a cow to be sold/slaughtered soon after the calf is born to avail of the support. However, there will be circumstances arise that this may be the right thing to do so you do not want farmers retaining cows for unproductive reasons or health and safety reasons. The farmer should have the ability to choose a retention date. We would welcome more details on this proposal.

vi. 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.

No. We do not know all the details that are required at this stage, so we welcome more details on this proposal.

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

Partially agree. However, there is a huge variation in farm systems and types, careful consideration needs to be given to this and in particular, land type. There are many upland and hill farms producing very sustainable and environmentally friendly beef with minimal concentrate and antibiotics at an older age than 24 months.

Unintended consequences must be considered. Finishing cattle early must not result in increased slurry, ammonia and feed phosphorus otherwise this measure will exacerbate other environmental issues. There may also need to be exceptions for certain breeds.

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

Yes agree, NI only. It would be only fair and appropriate that the farm support is allocated to animals that are NI origin born and bred in relation to these beef transformation measures. NI farmers cannot avail of any government support in any other country currently. Not fair that cattle sold through livestock markets should be excluded. This was possible under the covid beef support package.

9. Do you agree with the proposed pace of phased implementation to reduce the age of slaughter to 24 months? Explain your answer.

No, this timeframe is too tight. How will it address the native/traditional cattle breeds that are in hard hill and upland areas as many of these mature slower naturally. These native/traditional breeds tend not to mature later than commercial cattle. Potentially, 6 years is a more appropriate timeframe and reviewed annually for all livestock. This would allow the sector to adapt and not create any natural market disturbances.

10. Do you agree a single minimum slaughter age of 12 months for all cattle? Explain your answer.

Yes, each carcass falls into several categories (A, B, C, D, E, Z). The Z category is "Carcase of animal (male or female) aged from 8 months to less" also know as veal to many. The vast majority of retailers do not accept beef in this category as part of their retail/customer specification. This would need to be further consulted with the meat industry and retailer sector if was to be amended going forward.

11 . What are your views on a single maximum slaughter age of 24 months for all cattle?

- should there be different maximum slaughter ages for bulls, steers and heifers? Explain your answer.

No, this timeframe is too tight. How will it address the native/traditional cattle breeds that are in hard hill and upland areas as many of these mature slower naturally. These native/traditional breeds tend not to mature later than commercial cattle. Potentially, 6 years is a more appropriate timeframe and reviewed annually for all livestock. An in-depth review of the average age at slaughter would need to be looked at and considered across the slaughter categories of breeds and for the above categories as they cannot be looked at as a whole and again perhaps hill livestock could be exempt from this?

12. Have you any other specific suggestions to provide support for other parts of the beef sector? Please outline these and explain your reasoning.

In Scotland they have a Scottish Suckler Beef Support Scheme (SSBSS) which was introduced in 2015 as part of their basic payment. This pays producers who produce male or female calves with at least three-quarter beef genetics. Scotland was able to

tailor the payments towards the geographic area. This is something that could be considered in NI but not by leaving any category out. Scotland also have a Less Favoured Area Support Scheme which is very similar to an Area of Natural Constraints Scheme and we feel that this is something that could also help assist the suckler beef and primary sheep sectors.

The development of a deadweight payment system that potentially could reward the yield and value of the carcass perhaps is worth considering alongside the existing system.

Another factor that might work well is greater transparency on cattle price reporting. In the Republic of Ireland prices are reported per plant and these are published in the farming press therefore allowing farmers and producers to openly see what factories are paying for cattle allowing them to make their own decision were to send their livestock.

The Republic of Ireland has a few different options for supporting the beef sector, these include Beef Environmental Efficiency Programme (BEEP) which incentivises farmers to weigh suckler cows and unweaned calves. They subsequently add on to BEEP called BEEP PLUS which supports farmers who vaccinate or meal feed suckler calves and for dairy farmers who weigh their dairy calves. In ROI they have a Beef Data Genomics programme (BDGP). In ROI the BDGP is being replaced by the the Suckler Carbon Efficiency Programme (SCEP). Under the Green, Low-Carbon, Agri-Environment Scheme (GLAS) in ROI it has a tailored category as “priority” which includes keeping rare breeds paid via an area payment which could be considered as part of the Farming for Nature Package. Also, the Areas of Natural Constraint (ANC) will continue in ROI and can also provide a lifeline for suckler farmers farming these challenging areas.

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

It is of great shock to primary producers that this consultation proposal has not considered direct support for the sheep sector given the reliance that primary sheep producers depend on agriculture support and given that it has been recognised and referenced by DAERA that it is a viable but a -vulnerable sector. There are 20,376 cattle and sheep farms in NI which shows the importance of sheep within the family farm structure in NI. The beef and sheep sector has the second highest number of employees employing over 5000 jobs in the agri-food sector. The beef and sheep sector has the largest agriculture output across all sectors at £521 million, producing 41,000 tonnes of sheep meat. The sheep sector had a valued output of £83.6 million in 2020.

Firstly, we would like sheep to the get right and proper recognition for direct support. The sheep sector currently provides a range of public goods which producers do not get any recognition for, this is wrong and needs to change going forward.

Secondly, we do not wish to see distortion on the island of Ireland in relation to sheep sector support. How is it fair that sheep producers in ROI should receive targeted support and we in NI don't?

Thirdly, without direct sheep support we believe that this will distort the market and the ratio/balance between cattle and sheep farming, which we require a balance that sustains the viability of both sectors and prevents any unattended consequences.

In Scotland, after decoupling there were schemes put in place for suckler beef cattle it was notable that the primary sheep numbers started to drop significantly, and we believe that this might happen here in NI. Therefore, it is critical that the primary sheep sector receives fair and proportionate direct support so that there is a balance between our commodities.

In the Republic of Ireland, they have a Sheep Welfare Scheme which its purpose was to improve animal health and welfare in the sheep sector, ensuring farmers provide higher standards than required. It includes improves lameness control, mineral supplementation for ewe's post mating, lambs post weaning, scanning pregnant ewes, meal feeding lambs post weaning, parasite control and flystrike control. There were also two scheme designs one for lowland flocks and the other for upland/hill flocks with flexibility in each. This ROI scheme is now entering year 6 and additional funding has been secured from €17m in 2021 to €19.5 in 2022 equating to approximately 18,000 farmers. Under the new proposal the payment per ewe will increase from €10 to €12 per ewe. The increase in funding shows the commitment that remains to support sheep producers in ROI. We see this as something that potentially could be of great benefit to the NI sheep sector to make it better resilient, continue to help with productivity, assist with its environmental sustainability and assist with a better and more constant supply for the end consumer.

The Livestock & Meat Commission for Northern Ireland provided DAERA with a report from The Andersons Centre (Options for supporting the suckler beef and sheep sectors in Northern Ireland) and it analysed the need to target sheep sector support with a proposal to offer £12 per breeding ewe (Sheep Welfare and Efficiency Payment). This payment was to target improving welfare of breeding ewes like that on the ROI scheme. The sheep sector has little emissions issues however there is a balance, and it should be considered as part of the cattle and sheep package, other societal needs around the security of supply and culture landscapes. We believe a targeted support scheme is something that DAERA should seriously consider for the NI sheep sector. Another proposal within this report was for the inclusion of a NI Rural Disadvantage Area Scheme which is basically the diminution of support under the Areas of Natural Constraint scheme that was in place previously. There remains a shortfall of support to these areas, and we believe that this proposal is something that should be consider once again and we believe this should come from the wider budget but is very relevant to the sustainability for the sheep sector.

Importance of Wool to NI

Wool is a by-product of the lamb industry. Whilst shearing is essential for animal welfare the costs of doing so are not covered by the value sheep farmers receive for their wool. The wool sector is therefore wholly reliant on the viability of the lamb sector for its survival. The vast majority of wool grown in Northern Ireland is harvested from breeding ewes with each shearing yielding approximately 2.5kg of greasy wool.

Ulster Wool is the largest wool handling business in Northern Ireland handling just over 50% of the clip. This year it will process and grade approximately 1.4m kg of greasy wool through its depot in Muckamore by a specialist team. In addition to the Muckamore grading depot Ulster Wool operates a network of 25 collection sites across

Northern Ireland which are all rural farming families. Wool handling fees make a material contribution to the economics of each of these agents.

Ulster Wool is expected to be paid in the region of £465k by British Wool for its wool handling services in 2021/2022 and its agents will be paid around £38k. Hauliers in Northern Ireland also benefit from transport business carrying graded wool to England for processing with the business generating revenue of approximately £70k per annum for transport hauliers. These figures are in addition to the value that Northern Irish farmers receive from their wool. Ulster Wool collects around 6% of all the wool handled by British Wool and represents around 4% of capacity at Europe's leading scouring plant which is located in Yorkshire.

Given the importance of wool to the NI sheep sector if there was not to be target sheep sector support then the risk of job loss to the rural community would only increase. The wool sector is just a small part in the overall sheep sector, but it demonstrates how much of a need that must be considered and the impact this has on household income as well as a whole. Many farms in rural areas work on parttime basis with low levels of income. Within the 2020 DAERA rural issues statistics, poverty levels in households in rural areas which are more than an hour's journey from Belfast are much higher than those of rural areas closer to the city. The cost of living for those in rural areas is also higher than those in city or urban areas so important that these statistics are not overlooked.

Importance of Livestock Markets in NI

There are over 30 livestock markets in NI and about approximately 19 of these operate weekly sheep sales which all employ local rural staff, and these jobs cannot be overlooked as well. Many of these markets provide services to their local communities and if sheep numbers were to fall because of no direct support, then the viability of these markets would be questionable. There are also several export assembly centres that operate around NI to facilitate the live export of sheep mostly from NI to ROI. Again, like livestock markets, these provide services to the local community by providing employment and if sheep numbers were to fall as a direct result of lack of support, then these operations many become unviable therefore creating a bigger concern on rural communities.

The National Sheep Association published a report The Complementary Role of Sheep in Upland and Hill Areas which gives details of the sheep sector economic output (food, genetics, wool and skins, niche markets, public goods). Environmental links and outputs (water management & flood alleviation, woodland, carbon & peat, heather & bracken, biodiversity, semi-natural landscapes). Societal links and Outcomes (tourism, recreation & diversification, culture & heritage, common land and crofting, sheep management skills, opportunities for new entrants). All highly relevant to the needs to the sheep sector in Northern Ireland. The full report can be found on the link below.

<https://www.nationalsheep.org.uk/workspace/pdfs/nsa-report-on-the-complementary-role-of-sheep-in-upland-and-hill-areas.pdf>

The livestock equivalent would play an important role here too, to protect the balance between the cattle and sheep sectors and provide flexibility for farmers.

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

Please see attached the UFU Farming with Nature proposal which should be taken as the UFU position on a preferred way forward for this package

The UFU welcome the drive to ensure the environment can become a 'profit centre' and support an outcome based approach.

The document mentions 'activity based prescription' and the UFU would have concerns that this will result in the same lack of flexibility that has been the scourge of all previous agri-environment schemes. The inability of NIEA to work with farmers particularly around sensitive habitats must change going forward otherwise farmers will continue to refuse to participate in such schemes.

There must be genuine partnership working and co-design. The UFU would support collaborative participation and robust monitoring and evaluation.

15. What are your views on proposals to prioritise actions through environmental improvements to reverse the trends in nature decline by creating and restoring habitats that are important for species diversity?

The UFU have concerns that this is again suggesting a hierarchy which would discriminate against farms without certain habitats on their land. The UFU proposes as in our Farming with Nature scheme that the scheme must be open to all farms in all sectors. Prioritising certain areas results in the perception that environmental works are only for certain types of farms rather than all farms.

There is concern that funding will be directed to eNGO landowners to carry out works that could be funded from other sources. Consideration must also be given to those farmers who received in perpetuity payments for designated sites and are effectively excluded from schemes. This is preventing the maintenance and management of sites across NI as it is not economical to do so without support payments.

Restoring habitats are an important factor however each habitat needs valued and considered as a one size fits all approach is too broad. Short, medium and long-term restoration plans need to be consulted and paid for outside of the agriculture support budget as much as possible. Further consideration is needed.

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

There are strong feelings that the scheme must only be open to Active Farmers and not landowners. It is not acceptable for landowners to be able to access this funding, this will result in large amounts of funding moving away from the farming community and there are also dual claim concerns.

There is potential for the resilience scheme to be used as the gateway to this scheme and this could rule out those who no longer have entitlements (some sold off to remove restrictions on the farm) or never had entitlements (e.g. pig/poultry). Those in this category are still active farmers.

3ha is acceptable minimum claim size but a cap should also be imposed on this scheme. Without a cap there is a potential for large landowners to receive significant sums of money over time which is not acceptable. This could result in a situation where large amounts of the funding pot could end up with a small number of very large landowners.

17. Do you agree with focusing on the habitat management actions listed as an initial mechanism to kick start improved awareness and capacity to manage environmental assets? Explain your answer.

Farmers in NI have been participating in agri-environment schemes for over 20 years. By suggesting the need to 'kick start improved awareness and capacity to manage environmental assets' DAERA are failing to recognise the significant amount of expertise that farmers already hold in terms of environmental management.

The UFU would refer DAERA to the measures proposed in the UFU Farming with Nature scheme. This is a wide ranging scheme to allow as many farmers as possible from all sectors including more intensive farms to avail of this part of the future support scheme. This includes cover crops which are not mentioned within the proposed list which seems an obvious omission.

A limited number of measures will limit the number of farms who will be interested in participating in the scheme. It is vital that as many farmers as possible can engage in agri-environmental measures therefore this list must be extended.

We would welcome money from outside the agriculture support budget being added to this measure and further consideration is needed.

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

If the payment rates are appropriate and the scheme is practical and appropriately administered which results in making the environment a true 'profit centre' on farms, then farmers will support and take part in the scheme. It is essential that farmers are fully involved in the co-design of any scheme going forward from an early stage.

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

The UFU would support this approach. These will help develop better schemes going forward. A key aspect of any scheme will be having facilitators that farmers can respect and work with. There are also some doubts as to whether eNGOs are the best organisations to carry out this roll. All sectors should be included in any test and learn schemes.

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

A key aspect of any scheme will be having facilitators that farmers can respect and work with. There are also some doubts as to whether eNGOs are the best organisations to carry out this roll. All sectors should be included in any test and learn schemes. For instance pilots on cover crops would be helpful to horticulture.

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

The UFU believes that given the right tools, NI farmers are capable of assessing and scoring the habitats they have on farm for payment. Environmental consultants should not be necessary and as much assistance as possible should be provided to allow the farmer to use his/her own skills and knowledge to deliver this scheme. This scheme should not become a profit centre for consultants and eNGOs.

Empowering farmers and providing them with the skills and any further help required will deliver greater environmental and on-farm benefits as the farmer takes ownership of his/her actions. The following will be required to assist with this process:

- i. Guidance/Information Packs: Guidance clearly setting out the requirements of the scheme. This should be provided in advance of the application period. For each habitat type / environmental management system the various indicator points on a scale should be clearly identified and set out to allow farmers to assess their farm.
- ii. Online tools: Videos and images will be key to explaining the scheme and scoring process.
- iii. Farmer trainers / advisers: Farmers across NI should be invited to become trainers/advisers for this scheme. These individuals should be responsible for delivering training events and providing assistance with the scheme as and when necessary. This peer support mechanism we believe will result in significant benefits.
- iv. DAERA advisers: Local advisers with the necessary experience should be available to assist farmers with habitat assessments, scoring and deliver. NIEA should not be involved at farm level.
- v. Discussion Groups: Facilitated by DAERA advisers and farmer advisers. New groups could be created or built into the existing BDGs.
- vi. Smart Phone applications: Applications should be promoted / developed to assist farmers with assessing and scoring habitats.
- vii. LIDAR mapping: LIDAR screening of Northern Ireland will give some baseline information in terms of location and quality of existing habitats.
- viii. Maps and satellite images: photo geo tagging etc.

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

These must be genuine partnership models with effective facilitation. Trust between the various players will be key and clear understanding of practical farming is needed from those who participate. The key driver for collaborative working is a facilitator that farmers can relate to – having the right person is the key to success. There is a concern that eNGOs will try and dominate any potential delivery models for their own gain.

The UFU would also suggest Farmers operating in group projects, Business Discussion Groups or specific 'Farming with Nature Groups' can peer review the scoring for outcome-based aspects. This is not an obligation but may help confidence and knowledge.

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

Support the policy proposals outlined but some concerns have been raised around biomethane / hydrogen and its inclusion within a future support model.

The UFU agree that peatland re-wetting should be funded from outside of the future agricultural policy. This is a wider societal issue and results in generational change and therefore must be treated separately.

It is essential that DAERA re-establishes a revised Greenhouse Gas Implementation Partnership in line with industry proposals that were submitted to the Minister with immediate effect to allow discussion on this aspect.

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

Agreed, however careful consideration is needed in terms of the carbon market and how this develops. There is a concern that farmers will be taken advantage of in terms of carbon credits and there must be proper advice and monitoring of this as the carbon market evolves. Further discussions are needed on this aspect. Establishing appropriate Measuring, reporting and valuation mechanisms will be key.

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

Yes, agree in principle, meaningful funding is needed, and practical schemes developed.

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However, in light of what seems a restricted budget limited to the monies received in basic payment scheme, this would be removing more funds from an already limited budget.

This aspect would have been funded previously from the NIRDP. There have been no clear indications as to how and when this funding stream will be replaced going forward. There is increasing concern that funding that was previously directed to farmers through Pillar 1 will now be required to cover support measures that would have historically fallen under Pillar 2. There are concerns that many of the grants are sold as 40% but in reality, they become much less the way the department have them designed.

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

Agree however 'alignment with DAERA policy objectives' should be extended to include improve efficiency and productivity.

All should be drawn up in consultation with the industry. If direct support is reduced too quickly then government may need to help food producers.

We are very concerned that capital support needs to be carefully targeted, and schemes designed to deliver the required outcomes, especially for minor and/or new enterprises. Experience shows that such well-designed and focused capital support can be very effective – e.g. the dedicated horticulture and potato capital support schemes operated very successfully in Rol over many years.

Focused ring-fenced schemes are important as experience also shows that once a value for money criteria is introduced in the selection process, the minor enterprises

inevitably lose out; hence the need for carefully targeted schemes designed in consultation with industry.

Sector specific. TAMS – example in ROI.

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

Capital assistance will be required to help farmers meet the increasing number of environmental challenges. Suggestions include air scrubbers, slurry treatment and management, innovative technologies, dirty water/ silo management.

There is also a need for a FBIS Tranche 2-type scheme. One which is open on an ongoing basis (no closing date/time limit). Consideration for an option to be open to young farmers.

In terms of the apple sector

- a. Fruit storage: provision of new facilities and upgraded existing stores in terms of efficiency and effectiveness.
- b. Planting of new orchards and or replanting of existing orchards – recognising all the associated costs of trees, posts, hare guards and labour.
- c. Equipment to mechanise aspects of fruit harvesting (e.g., bin trains) which will improve the timeliness of harvest and reduce the labour requirement.

The sector would hope to have the ability to suggest future changes to the list of items for grant approval to embrace new technologies as and when they become available and consider innovative learning outcomes from travel and learning from others.

OR move away from a DAERA list of items for funding and applications be based on a Business Plan for specific farm investment requirements.

For the Veg sector we suggest 60% capital grant for:

- any machinery relating to the growing and harvesting of vegetables (warranted secondhand machinery)
- washing and grading
- cooling
- production of green energy for the washing and grading

We suggest 100% funding for a coordinator to continue the growth of Veg NI to help attain the potential of the campaign and help to work with DAERA in the evolution of the horticulture sector in N. Ireland.

For the potato sector they can meet increased productivity resilience and environment gain through example's i.e.:

Precision equipment for sprays and fertilisers

Disease sensors

Storage to reduce waste as examples

RTK hub in NI for accuracy to 2”

Robotics.

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

The UFU recognise agricultural education and knowledge transfer are important however we are opposed that it should be compulsory. The Union is opposed to

making level 3 a requirement and there is a need to take into account other qualifications other than those linked to agriculture e.g. Economics /Accountancy etc. Furthermore, life time experience in Agriculture also needs to be taken into account and valued.

CPD must be beneficial for the farmer and not a 'tick box' exercise. It must be targeted at genuine active farmers and should be funded from other public sources.

There is a need to develop training for women in agriculture and more training in transferable skills.

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

BDGs are seen as an important and useful vehicle for knowledge transfer. Peer learning should be a key focus going forward. However, this model needs to be extended to ensure more farmers get involved. There also needs to be more improvements in terms of efficiencies within the current BDG scheme as there is a suggestion of funds being wasted.

CAFRE advisors should be available for farmers outside of BDG and other knowledge transfer and innovation programmes. Standardise Knowledge transfer schemes training including voluntary/ private training through the Skill Seeder app as used in Scotland. <https://www.skillseeder.com/>

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

Engage and consult with industry clearly illustrating the benefits – carrot and not stick approach.

For innovation to flourish within DAERA, there would need to be a culture change. A risk adverse mind set change is required allowing civil servants to learn from their mistakes. To be innovative, innovators need to fail fast and move on however this culture does not currently exist within DAERA and particularly NIEA. Bureaucracy is a major issue and a more streamline process is required for the process to work. It is also essential for scientists to collaborate, with a real need to get all players from the agri sector involved with science and innovation submissions.

Resource appropriately – both financially and physically and encourage and reward risk takers for adopting / agreeing to do a pilot / trials etc.

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

Yes, agree. Consideration of transferable skills business, engineering etc. A lack of formal qualifications should not be used as a barrier and could be perceived as discriminatory. The UFU is opposed to making level 3 a requirement and there is a need to consider other qualifications other than those linked to agriculture e.g., Economics/Accountancy.

Furthermore, lifetime experience in Agriculture also needs to be considered and valued.

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 are a key aspect, and it is vital that the appropriate persons are carrying out this facilitation role. Consideration should be given adjustment to membership of BDGs, with an extension to include on-farm systems, in the case of dairy, Robotic or housed systems. Rather than just geographically.

CAFRE currently are under resourced to service the Sector with the significant lack of technical advice for the intensive sectors. CAFRE must continue to develop education streams for intensive sectors. Whilst gains have been made with pig sector education at CAFRE, the importance of the intensive sectors must be emphasised.

NI has lost its research facility for Top Fruit with the closure of the AFBI Loughgall programme - this impacted upon CAFRE KTT delivery capability and hindered an appetite for innovative thinking within the industry. The economics of apple production and turbulent supply chain activity also impacts and highlights the need for tailored bespoke educational packages/workshops for growers delivering a mix of business, technical and environmental elements. In the absence of expertise from within CAFRE, consideration should be given to buying in specialist fruit advisers/consultants from GB or from the private sector.

Unlike most other areas of Agricultural production, there is no formal training available for young people who wish to enter the industry and a young growers academy supported by AFBI, CAFRE and DAERA coupled with learning from other growers both at home and beyond giving opportunity to collect CPD and certificate upon completion. Academy scholars should set their own aims and objectives for measurable tangible realistic outcomes. Perhaps there is opportunity to provide a recognised qualification in Fruit Production, e.g., through City & Guilds.

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

Yes. There must be a stronger focus on longer term land tenure in particular the need for generational renewal. Farm profitability is ultimately the key to achieving generational renewal. However, additional measures can be introduced to help facilitate this process. The UFU would support the introduction of fiscal measures for both generational renewal and longer-term land tenure like that in ROI. Support should also be introduced to encourage and develop farms where two or more generations of farmers are working together.

All businesses need to plan for the future. Lack of planning slows growth and opportunity for the farm family business expansion. It is recognised that planning must be realistic and be financially viable for the size of the family business. Farm businesses which actively employ longer term planning tend to be more successful. Involvement of younger generation, and nurturing their enthusiasm is key to development of a farm business.

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

Land tenure and conacre must be considered. It is completely inappropriate that this has been left out of this consultation document. Profitability will be the key to the delivery of a success generational renewal programme.

The UFU is opposed to making level 3 a requirement and there is a need to consider other qualifications other than those linked to agriculture e.g., Economics/Accountancy. Furthermore, lifetime experience in Agriculture also needs to be considered and valued.

Top fruit growers agree and see merit in planning – Phase 1 however Phase 2 and 3 currently undeliverable for Top Fruit as there are no structures or training available (see 31).

Top fruit growers suggest a 3rd level qualification for their sector to be ambitious and unrealistic with current CAFRE / DAERA resource.

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

This aspect would have been funded previously from the NIRD. There have been no clear indications as to how and when this funding stream will be replaced going forward. There is increasing concern that funding that was previously directed to farmers through Pillar 1 will now be required to cover support measures that would have historically fallen under Pillar 2. Unless this is additional funding the committee would question if this should be included at all given that the relevant training, advice and information is already freely available from other sources. However, there is recognition that the correct facilitation is helpful. The UFU are not convinced that this measure presents good value for money however recognises that the intentions are good in terms of the issue needs to be addressed.

35. 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.

The UFU agree on the principle of incentivising participation but not conditional on these objectives being achieved.

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

The UFU welcome the signal that DAERA want to help ensure delivery of a functioning supply chain and farmers and growers welcome the opportunity to engage and help take this forward.

However, the supply chain measures at present are not effective as we have no one to transfer the knowledge we require and, in some cases, (carbon) we have no knowledge to transfer

Furthermore, lack of transparency, trust and information within supply chains. Producer must be profitable. Equality of production standards essential despite any push for a cheap food policy. Farmers should only be competing with imported product of an equivalent standard. Local consumers consistently demand high quality, traceable food. A secure equitable supply chain is critically important. Government must ensure market transparency and timely, accurate market

information is made available. Transparency must not be linked to direct farmer support payments. The Grocery code adjudicator should have more power/teeth to protect integrity and fairness in the supply chain. Society attitude is in favour of cheap food which needs to change. Consumers need to understand the true cost of food e.g., environmental impact.

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

Yes, farmers and growers should help to facilitate this. Professional assistance may be needed to develop structures and mechanisms. It is suggested that a more transparent arrangement between producers and processors would benefit them both.

Grocery code adjudicator to have more power/teeth to protect integrity and fairness in the supply chain.

To support/encourage/incentivize the formation of producer groups/organizations to encourage cooperation/efficiency on input costs and sales.

38. Are there specific gaps in the approach that you feel need to be addressed? Explain your answer.

Local procurement.

All government – local first.

More support for promoting local food / produce.

Grocery code adjudicator – with producer responsibility.

AFCS scheme – further development.

Producer organisations.

Pilot schemes.

Protein scheme - should be developed and reflect environmental benefit delivered.

Collaboration between producers.

Government departments co-operation.

Market intelligence – what does consumer want.

Intelligence volume produced v volume needed.

Storage requirements.

39. Are there specific early actions that you would like the Department to take to support supply chain development in the agriculture and horticulture sectors? Explain your answer.

Measures to avoid monopolies. Lack of transparency in all supply chains especially red meat.

Procurement of local produce for schools, hospitals etc should be encouraged. Don't have to apply with EU competition rules.

Work towards changing cheap food policy attitude. Inform consumers about the environmental cost of imported food.

Do a critical analysis of supply chain

European innovation partnership – should be expanded and made available on a regular basis.

Groceries code adjudicator – be appointed for N Ireland and have full remit including producer protection within the role.

Opportunity to offer tax incentive / grant to encourage supply chains to work together and prove connection between and amongst all links in the chain.

Other working models exist – scoping study opportunity.

Before implementation considerable consultation opportunity welcomed by cereal growers prior to delivery.

An early action would be to help Veg NI to action a coordinator/ facilitator to engage growers, government and retailers to help in the evolution of the veg sector (growing demand, productivity and value in NI veg).

Growers are already encouraging retailers to acknowledge the strengths of Veg NI in the potential growing of consumer awareness and demand.

Focus must be on the promotion of NI dairy produce with the development and enhancement of the Dairy Council for Northern Ireland.

40. What are your views on the proposed uses for data provided via the proposed Soil Nutrient Health Scheme?

UFU supports the SNHS as announced earlier this year. Further discussion is needed with DAERA as to the appropriateness of sharing soil data with landlords. The data will provide a useful baseline for NI and for farmers.

There should also be an opportunity to split samples to allow farmers to do further assessment on micronutrients etc at their own cost to promote more precision management.

41. Do you agree that in order to maximise future support payments, applicants should have to demonstrate that they have a current (updated regularly) Nutrient Management Plan? Explain your answer.

Agree however it should be noted that considerable help and support will be needed to allow many farmers to prepare a relevant NMP. This should not become a box-ticking / regulatory exercise and should be promoted to drive efficiency, productivity and environmental improvements. The rules around this need to be carefully managed to ensure that these are done for the farmers benefit and accepted as such.

42. Have you further specific suggestions for how the data provided by the Soil Nutrient Health Scheme could be used or promoted by government?

This must not be used to regulate the industry otherwise farmers may choose to withdraw from the scheme. The data will be essential in determining a baseline position and will be vital in terms of determining the amount of carbon within the sector. This information may be useful for the industry to back up sustainability credentials to customers at an NI level.

This scheme could be used to enhance the ‘green’ image of farming, to make consumers aware that NI fruit is produced to energy and nutrient efficient standards with minimal environmental impact.

New recent research must be done locally to provide answers that a soil analyst will flare up. Recent research must provide answers to maximise farm potential.

43. Do you agree that the Department should pump prime the initiation of an industry led Livestock Genetics and Data Programme?

Yes, in order to encourage adoption of technology, DAERA should prime pump the funding.

Increasing genetic gain will bring about several benefits to the livestock sector for increased productivity, reduced GHG emissions and better for the environment. The cattle and sheep sector must encompass each other.

In respect to the dairy industry, dairy heifers need to be tested at a young age (before 1st lactation), to capture traits specific to dairy. This is more accurate than the testing of bulls.

44. Do you agree that farmers should be required to provide data for the Livestock Genetics and Data Programme as an eligibility condition of future support payments? Explain your answer.

In the absence of clarity of the “required” data, it is impossible to give a clear view as to whether this would be achievable at farm level. The requirements must be directly beneficial to the farmer and not onerous by their nature.

The broad principle of supplying genetic information in exchange for ensuring eligibility for future support is one which the AHW committee supports for the good of the industry. We recognise that there should be an encouragement for farmers to provide data in order to progress the genetic ability of their herds.

Whilst sire information in the whole is relatively achievable, we must consider some scenarios whereby this could be difficult to ascertain despite best practices. The use of fertility boost semen, where 3 bulls of the same breed are used in the same semen straw is commonly used within dairy herds and reports from AI companies cite that this is the most common type of straw used. The straw delivers fertility enhancements to the NI herd and must continue to be available. In that respect, farmers should be required to register the sire information of one of the bulls within the straw. Similarly, some larger herds run more than one bull with the herd. If these bulls are the same breed it is impossible to determine the sire of the calf. Farmers should be required to register the sire information of one of the bulls on the farm.

45. Do you agree with the proposal to develop knowledge transfer programmes to support farmers to adopt genetic improvement technologies? Explain your answer.

Yes, this is vitally important, and farmers should be encouraged to be part of the solution not forced to be. If the benefits become very clear there will be a natural uptake. Technology Demonstration farms could become the network to help with this message. Farmers will need to understand the figures and an education piece will need to be in place to assist. Sharing of information between peers tends to be well received as per the BDG principle. Peer-peer uptake of new technologies is successful.

Genetics should just not stop at livestock and the discussion should also be encouraged to be looked at within the horticulture, arable and potato industry e.g. gene editing.

46. Do you agree with the proposal to replace the current Cross Compliance system with the simplified 'Farm Sustainability Standards'? Explain your answer.

Agreed in principle to replace the current cross compliance system and to remove the listed measures. However significant concerns remain around the proposed FSS. Further discussion is needed on the negligent v intentional definitions. The document implies a greater move towards intentional penalties which is not appropriate. This is particularly concerning if a farmer has participated in a training course, he could face intentional breach which carry a higher penalty. This needs re-considered.

In addition, farmers must also have the option of being accompanied by a third party of their choosing during an on-farm compliance visit.

47. Have you specific suggestions for how compliance with the proposed Farm Sustainability Standards should be controlled? Explain your answer.

The UFU would support using the model outlined below to encourage better compliance. The UFU position previously has been to support a 'yellow card' warning system. We believe the model below is an effective way of developing this and dealing with issues and is something that was promoted during the discussions on the UFU/NIEA MOU. Fixed penalties seem a useful replacement, but the level of these penalties needs further debate; affordability between small and larger farms needs to be considered.

Training must be used to enhance knowledge and skills and not to 'tick a box'.

Compliance and engagement spectrum



48. Do you agree with the proposal that the current land eligibility rules should be revised to make all agricultural land (except hard features) eligible for direct payment under future area-based schemes? Explain your answer.

Broadly agree however more clarification needed on how this would impact entitlements.

49. Do you agree with the principles against which metrics should be developed?

Broadly agree. It is important to establishing baselines and underlying trends, monitoring progress and, where appropriate, benchmarking this progress against other regions.

50. What are your views on the high-level overarching metrics proposed?

The UFU is opposed to the 'one out all out' methodology for classifying water and habitats. This is an EU tool which fails to recognise the specific characteristics and can give a skewed view on the condition e.g., a habitat could be failing due to a single minor issue due to this definition. This needs reconsidered. Also, the frequency of monitoring needs explored further. It is not appropriate to use annual monitoring for SRP. The SALMS document recommended real time monitoring for problem waterways to properly understand the key issues. This has been trialled in the Upper Bann Catchment project and should be rolled out further.

51. What suggestions do you have for additional high level overarching metrics that need to be adopted or developed?

Economic multiplier analysis should also be used to identify and quantify the positive economic impact of local production along the input and service supply chains which support local production and processing.

A measurement of locally produced and consumed products v imported product consumed. To meet consumer needs, measure success of industry

52. What other metrics do you suggest are included in the suite of metrics but that would sit below or play a supporting role to the high-level overarching metrics?

The UFU believe there is merit in including number of people employed directly / indirectly and along the supply chain - further information required.

53. What are your views on the proposed outcomes regarding the Northern Ireland production horticulture sector?

The UFU after full consideration endorse and support the view of Veg NI.

Veg NI reiterates again, how encouraged it is that DAERA has recognised the huge

potential of the sector. Horticulture can make an important contribution assisting Government deliver across a number of policy areas. DAERA can be assured of the full support of Veg NI in delivering work programmes to meet the specific outcomes being sought. These outcomes align with Veg NI's objectives and indeed are the rationale for the vegetable producers voluntarily coming together to form the Group. The outcomes are ambitious and challenging but working in partnership with DAERA we are confident significant progress can be made towards their achievement. Veg NI has worked hard to overcome the historic fragmentation barrier and are seeking to provide a clear, coherent voice to Government, retailers and consumers. We recognise there are many challenges but collectively working together with the same aims, goals and values we can deliver the agreed outcomes. The "Parful Produce" campaign is evidence of this.

However Armagh Bramley do not anticipate doubling of the sector output. 5-7 turnaround is a very short and unrealistic window however acknowledging the work in ROI and huge demand for eating apples (3% self-sufficient in ROI) opportunity exists.

Concern as to how NI will access the market and rewards could be substantial with the right government long term support.

54. Do you agree with the policy proposals, regarding production horticulture? Explain your answer.

The UFU after full consideration endorse and support the view of Veg NI.

We agree with the policy proposals. Again, there is good alignment with the thinking of Veg NI. If we can evolve and develop a strong partnership with DAERA we can be the vehicle for knowledge, innovation and technology transfer to deliver against the four outcomes of productivity, resilience, supply chain and the environment. Stakeholder engagement is essential to communicate the policy proposals and Veg NI will assist as required. We recognise locally based R&D for a small sector like horticulture will be difficult. But through informed desk research at the initial stage leading to clear recommendations on the most applicable science for Northern Ireland it should be possible to develop the linkages/pathways for the R&D transfer to both DAERA and producers. We believe there is the opportunity to move forward at pace, overcoming the (sometimes perceived) barriers through a flexible and innovative approach to provide producers with cutting-edge knowledge and technology to allow transformational change of the horticultural industry and achieve the outcomes identified.

DAERA has put other structures in place for a bespoke scheme for N Ireland apple growers. How about a production club? For eating/dessert apples. Regardless of a name it needs co-operation between growers, maybe new blood and new growers could co-operate or find commonality going forward. Lots of variables within the industry scab frost 10 eating apple growers and 3 of them wiped out – include in risk section.

Loughgall is lost and gone so should NI be linking into GB and expect DAERA to fund same. Industry needs and must benefit from research. yes interested in accessing relevant R&D for both Bramley and eating apples

AFBI, CAFRE and DAERA should formalise an academy for young growers - training and development. CAFRE need to better support KTT Already do via BDG groups and yes good to learn from others within the industry both at home a throughout Europe.

Data collection is key for sound business decisions i.e., soil testing data or market analysis or weather station analysis across the region and beyond – variable frost impact and analysis beneficial also use data for insect control – aphid counts and traps for moth control and spray signal widow = improved environmental protection.

New technology is higher density orchard benefits going forward. Do need support for transition through adopting new technology.

55. Do you agree with the design principles regarding production horticulture, are there others you would like to see included? Explain your answer.

The UFU after full consideration endorse and support the view of Veg NI.

Veg NI agree with the design principles as there is a definite market failure in horticulture due to a devalued market in which we are currently trade in. This results in low margins hindering reinvestment and slowing down the productivity gains that are possible. These design principles mirror the objectives of Veg NI and with coordinated support can we a vehicle for the delivery of the outcomes. We want to develop an Action Plan with clear goals within a realistic timeframe, with agreed milestones to monitor progress and through producer co-operation and partnership with DAERA deliver the outcomes and make every effort not to be another well intentioned strategy that sits on the shelf and gathers dust!

In the past poorly designed schemes did not deliver the desired results. All future policy must be industry led. Strong recognition must be made for orchard sequestration. Industry must be involved in every aspect.

56. Have you specific suggestions for how success can be measured regarding production horticulture?

The UFU after full consideration endorse and support the view of Veg NI.

Success in production horticulture can be measured by improvements in productivity gains, growth in demand and margin realisation through a stronger supply chain and achievement of best-in-class environmental indicators, not just meeting the minimal standard. Other measurements include the level of training and professional development undertaken, innovation and technology adoption, new entrants into the industry including existing farmers from the beef and sheep sectors looking for an additional income stream by commencing commercial production horticulture. Import substitution tonnage of a range of fruit and vegetables that can be grown in Northern Ireland following upskilling and the adoption of new technologies. If consumers are educated to the health (immune system response/obesity/cardiology) and environmental benefits (carbon/climate change) of local, fresh produce the market pull will allow success to be achieved.

Reduce reliance on limited inputs i.e. PPP's
Encourage greater integration and learning from others

TFP a good indicator

Carbon balance on farm a success parameter

Note page 56 table 5 omits orchard contribution and must be recognised going forward.

Alternative harvesting methods. Limited efficiency suggestions within document need to be evaluated as most don't work within existing growing structures. i.e large kit i.e., robotics not the solution within foreseeable future here.

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

There is growing concern around the inconsistencies in planning policy between council areas. Farmers are being blocked/turned down for planning especially within areas that are designated and within the proximity to designated areas through no fault of their own.

Over the next few years' farmers will need to embrace and utilise a range of digital technologies in their businesses to help them farm more efficiently and productively. The current lack of digital coverage in some parts of NI is creating a huge barrier for farm businesses and putting them at a severe disadvantage. The UFU is calling on government to ensure a roll out of superfast broadband to all farms and growers and their rural communities, alongside complete mobile phone coverage.

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

No view

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

Throughout the consultation there is no mention of potato. The UFU believe the potato sector sits closer to horticulture than broad brush relationship with arable regarding supply chain and inhibitors for growth and productivity.

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

The UFU would like to note that agriculture should not be scapegoat for the average person's/ society's environmental impact. Agriculture has a part to play but climate action requires effort from every person and every industry.