

## Environmental/nature/conservation bodies

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## 54. Butterfly Conservation NI

### **Response of Butterfly Conservation Northern Ireland Branch to the Consultation on the Rural Development Programme 2014-2020**

The Northern Ireland Branch of Butterfly Conservation was formed in 1985. We are part of a UK wide charity and our aims, in line with our parent organization Butterfly Conservation are: ‘Saving butterflies, moths and our environment’. Conserving butterflies will improve our whole environment for wildlife and enrich the lives of people now and in the future. The local Branch currently has more than 220 members in Northern Ireland supporting our conservation aims.

#### **Why take initiatives to help butterflies?**

Butterflies and moths are intrinsically valuable and are worthy of conservation in their own right. The long history and popularity of butterfly study have provided a unique data resource on an insect group unmatched in geographical scale and timescale anywhere in the world. This has proved extremely important for scientific research on climate change.

Butterflies and moths are indicators of a healthy environment and healthy ecosystems. Areas rich in butterflies and moths are rich in other invertebrates. These collectively provide a wide range of environmental benefits, including pollination and natural pest control. Moths and butterflies are

also an important element of the food chain and are prey for birds, bats and other insectivorous animals.

### **Economic value for agriculture**

The total value of pollination services to UK agriculture was £603 million in 2010

<http://www.publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/668/668we18.htm>

The global value of pollination services was estimated at \$215 billion (Gallai et al., 2009). Along with bees and other insects, butterflies have an economic value providing invaluable 'pollination' services to agriculture – we can't afford to be without them!

### **Submission of the Senior Regional Officer, Butterfly Conservation Northern Ireland**

On behalf of the Northern Ireland Branch of Butterfly Conservation, the Committee fully endorse the submission of the Senior Regional Officer, Butterfly Conservation NI and ask the Department of Agriculture and Rural Development to take strong and meaningful measures in their review of the Rural Development Programme 2014-2020 to help both butterflies and agriculture.

Yours sincerely

**John O Boyle**

**Chairman**

**Butterfly Conservation, Northern Ireland Branch, 21 October 2013**

# Response to RDP 2014-2020

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## **Introduction**

Butterfly Conservation's main concerns within the Rural Development Programme, is the provision of Priority 4 – Restoring, preserving and enhancing ecosystems dependant on Agriculture, Food and Forestry Sectors. As the only compulsory element within Pillar 2, it is clear that European officials recognise the importance and necessity of this element in delivering positive returns on a range of environmental issues.

The delivery of this Agri-environment option, or 'Environmental Farming Scheme' is seen by Butterfly Conservation as absolutely critical in order for Northern Ireland to fulfil our obligations to both Natura 2000 sites and features, and also to the Habitats Directive priority habitats and species.

As such, this consultation focuses mainly on that theme with some further thoughts and considerations of the other priorities and how they work with Priority 4, including how Pillar 1, the single farm payment, enforces Good Agricultural and Environmental Condition regulations (GAEC).

It is essential that whatever scheme is decided upon, the outcomes and measurements of success directly link to how this scheme has helped us achieve our European environmental commitments for example, to good water quality and priority species and habitats. If the scheme is not outcome led, and does not feed into achieving these wider European obligations, then it will fall short on delivering anything of tangible benefit at all.

## **Priority Theme 4: Restoring, Preserving and Enhancing Ecosystems dependant on Agriculture Food and Forestry Sectors**

It is widely recognised by the environmental sector that Agri-environment schemes are THE main driver in maintaining favourable status of our Natura 2000 sites. Likewise, read any of our Northern Ireland landscape, habitat or species actions plans, and again, the onus is on Agri-Environment schemes to deliver sufficient provision for the ongoing maintenance and restoration of these habitats, creatures, ecosystems, and ensuring the integrity and quality of the ecosystem services they provide such as flood prevention, clean water, clean air and carbon sequestration.

There is no other funding stream available to landowners in Northern Ireland at present that can deliver the breadth of options across a wider enough area to truly start to address the issues of habitats and species currently in unfavourable condition. A key outcome of the Agri-environment scheme option must be SMART outcomes, directly related to ensuring those designated sites supported by the scheme are in favourable or at the very least, unfavourable recovering condition by the end of this current round of RDP funding.

In addition to this Butterfly Conservation has produced several reports that demonstrate the vulnerability of our priority butterfly species, with their very specific habitat requirements, over the more robust wider countryside species. (Most recent 'State of UK Butterflies 2011' <http://butterfly-conservation.org/files/soukb2011.pdf> Page 10). If habitats are in good condition, and populations are able to function within them, they are far less likely to be affected by seasonal and climatic variations – e.g. wash out summers. It is widely acknowledged that butterflies are a crucial biodiversity indicator, and their rising and falling fortunes are echoed in our wider wildlife.

With this evidence, we strongly advise that the majority of monies distributed under Priority 4 should go to priority habitats and support 'Specialist' priority species, rather than those of the wider countryside, which by their very nature are more resilient. We believe that if GAEC cross compliance regulations within Pillar 1 are properly explained and enforced, then the wider countryside should already be delivering for biodiversity. This leaves more money available within Pillar 2 to properly address and enhance ecosystem and biodiversity needs, which is its primary function.

Woodland is discussed separately, see Page 7.

### **Question 12 – Do you think that the proposed structure of the next Agri-environment scheme is appropriate?**

No.

At a meeting between DARD staff, CNCC and various NGOs at Dundonald House on Tuesday 8<sup>th</sup> October, it was obvious that DARD had no ratio in mind for the provision of this funding between the different proposed 'Environmental Farming' streams; Wider Countryside, Targeted and Groups.

On page 56, point 8 of the RDP document DARD asserts "DARD will aim to target support to achieve the greatest environmental benefit". If this is truly the objective of this scheme, then the emphasis of payment provision must be to designated sites, then to neighbouring areas of undesignated, unimproved land that buffer or connect these sites, then to isolated areas with priority species interest, then to unimproved ground that buffer these priority species areas, and finally to the wider countryside ("improved" ground under DARD definitions).

Butterfly Conservation is concerned by the 'Wider Countryside' option proposed by DARD at this meeting as under their definition, Wider Countryside was purely improved land. Although Butterfly Conservation welcomes the idea that farmers in improved farming areas wish to also do something for biodiversity, it is felt that too much focus on this element of the scheme would potentially suck up a large amount of the schemes resources. This is already a very small pot of money and less than in previous years so the emphasis is to use it as efficiently and effectively as possible to deliver high quality environmental outcomes.

Should there be too much emphasis on the improved countryside, this scheme will deliver very few real wins for biodiversity as it would potentially deliver a large number of small scale, low impact greening options with minimal overall biodiversity increase, rather than focusing Agri-environment funding on areas which will deliver the biggest wins for biodiversity and ecosystems, by restoring, enhancing and connecting our already degraded priority habitats and building real resilience and long term integrity of our Natura 2000 network. This network of sites, (SACs and SPAs) combined with sites designated nationally under the Environment Order (ASSIs) is critical for ensuring the long term survival and preservation of our priority species and habitats. Equally, in order to effectively deliver ecosystem services such as flood limitation and carbon sequestration, our priority habitats need to be in favourable condition.

One big worry is the lack (at time of writing) of a land capability map for the country. Without bringing all our topographical, land use, designation, water quality, flood risk, species etc information together into one map, how can we make decisions on the best outcomes or help landowners make the best choices for the land that they have? A land capability map is required before the scheme hits the ground to ensure landowners can make the very best decisions for their farm business based on the constraints or opportunities presented by the land they manage.

Please see Page 7 for comments on Butterfly Conservation's concerns on farmers being able to access the RDP. With improved mapping available to landowners, they will be able to quickly and easily see how they can link up with others in their area to deliver wider reaching 'landscape scale' group projects that help them access Agri-environment funding, but also, more critically, lead to a more integrated and connected approach to habitat and species conservation. It is essential that in the roll out of this scheme, there is some way for farmers to make contact with one another locally through the online system to increase connectivity of the farming community and their ability to effectively work together, but as a by-product also better improve the connectivity of our landscapes. Equally, there is a very strong role for advisors be they from Agencies such as DARD, Rivers Agency or the NIEA, or from NGOs working in a liaison role, to best help landowners access and use the scheme to best realise the economic and environmental benefits of RDP.

Ideally farmers will be able to work together to develop Group projects where they can work at a landscape scale to deliver wider benefits for biodiversity. In this instance landowners on improved land would be able to enter the scheme, but as part of a group option where the emphasis is on increasing the resilience and connectivity of Natura 2000 sites, priority habitats, or a landscape that will benefit a biodiversity feature, such as a priority species. (Butterfly Conservation are thinking in particular of species such as the Marsh Fritillary butterfly) Likewise, improved land could be brought in within the group along river systems where there is a water quality objective, but we feel very strongly that improved land should have the caveat of entering the scheme ONLY where there is proven outcomes for specific priority habitat and species or water quality drivers within a Group application.

In addition to focusing the scheme on areas of priority habitats and species, it is absolutely critical that any AES option rolled out is outcome led in measuring/auditing its impact. All too often the measure of success of these schemes has been whether the money was spent, rather than what the money actually achieved. We know our priority habitats and species are in decline based on the findings of numerous studies, despite years of NICMS and similar schemes support. Rather than constrictive prescriptions, landowners should be informed what the habitat should look like based on the criteria for 'Favourable Condition' used by NIEA. **It is essential DARD and NIEA work closely to agree outcome led criteria for measuring the success of Priority 4 options.**

### **Question 13 – Do you agree that funding should be prioritised in the first instance to support the management of designated sites?**

Yes.

Our first priority is to designated sites. We would recommend DARD work closely with Natural Heritage within NIEA to come up with criteria for prioritising designated sites, based on the findings of the recent Article 17 reporting programme (due to be published on the JNCC website in late October 2013)

Our second priority is the connectivity and integrity of designated sites. This is where the Group option comes into its own and potentially a couple of case studies where landowners/angling groups etc have worked together to work at landscape scale would be useful in showing landowners how these group options work in practise. Butterfly Conservation recently produced a report on landscape scale habitat and species management "Landscape Scale Conservation for Butterflies and Moths" which cites examples in a variety of habitats from across Britain although at time of writing we have no specific Northern Irish example.

<http://butterfly-conservation.org/files/landscape-scale-conservation-for-butterflies-and-moths-low-resolution.pdf>

Our third priority is unimproved land that contains priority habitat types. Again, Butterfly Conservation would recommend DARD and NIEA work closely together to best target funding at the priority habitats most in need of support, and the priority habitat features of the different landscape target areas of Northern Ireland – e.g. fens in County Down, Blanket Bog in County Antrim, Species-rich Grasslands in County Fermanagh. Some kind of weighted scoring system could be used to encourage landowners with locally important habitat types to try and enter the scheme?

**Question 14 – Do you think that an element of training should be a compulsory part of the scheme?**

Yes, and not just within the scheme but amongst Agency staff as part of the roll out of this scheme.

One thing that has become clear in meeting with different groups to discuss how to respond to this scheme is a fundamental issue in communication. DARD and NIEA use quite different language to interpret our landscapes. Firstly, before thinking of educating the landowners who will be receiving this scheme, it is essential there is also education of DARD staff in priority habitats, species and our European obligations to these. Not at management level, but amongst those who are going out and inspecting farms and delivering advice on countryside management. DARD language can be too broad brush. For example; ‘species rich grassland’ is not a blanket term, there are many different types of species rich grassland, and each type requires subtly different management to keep it and the species it supports in good condition. Equally, it is important to not become so technical about detail that farmers and advisors are lost, but a strong glossary and good definitions will be essential in ensuring the successful delivery of this scheme.

It is essential landowners have an opportunity to experience the landscapes they are being asked to conserve by visiting recognised ‘Flagship’ sites, e.g. National Nature Reserves where habitat management is being carried out in the best possible way. Often having this visual experience and being able to question practitioners already carrying out high quality work is essential to landowners having a better understanding of what is expected.

There must be opportunities for landowners to be able to meet and discuss best practise management options throughout the year, and perhaps there could be habitat focus conferences and workshops provided through NGOs and Greenmount to help spread knowledge of good environmental management. Many of these groups already provide training throughout the year and it would be useful to increase communication between NGOs and DARD so that if a certain group of habitats were coming into the scheme, the NGOs would be able to respond accordingly by helping to support knowledge dissemination around that topic in the areas of take-up.

**Question 15 – Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?**

Butterfly Conservation believes it is important to encourage a greater take-up of landscape scale management options, be they for river systems or for priority habitats and species. There has been a paradigm shift in conservation thinking in the last decade to recognising that conservation works far more effectively if addressed at a landscape scale, rather than a local one. It is important that landowners are

provided with a list of sources of advice e.g. local councils, Agencies and NGOs, who are able to help provide them with the best advice possible for getting the very most out of their Group schemes for biodiversity and ecosystem services.

**Question 19 – Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?**

Areas of Natural Constraint are a contentious area due to changes proposed in the new scheme and uncertainty between providing basic income support to ANC landowners through Pillar 1, or developing more targeted Agri-environment options in Pillar 2.

On Pages 56/57 of the consultation document DARD states “Therefore addressing the broad environmental issues in the ANC (as outlined above) would seem to be more appropriate to an agri-environment scheme and the priority given to addressing these would need to be considered against other agri-environment priorities.”

Without a base map adequately outlining the areas of Northern Ireland that currently, under EU Regulations, qualify as ANC, it is difficult to give adequate help. However, Butterfly Conservation recognises that Areas of Natural Constraint are also highly likely to also be areas of High Nature Value (HNV) farmland. There is likely to be a mosaic of land use within an ANC area with a patchwork of ANC Improved, ANC Unimproved and ANC Unimproved and Designated. AES payments should be prioritised towards ANC Unimproved and Designated and ANC unimproved. Whereas, within Pillar 1 there should be equivalent for ANC payments focused on those landowners with purely improved land within ANC areas as they will be unlikely to be able to deliver high level environmental benefits due to the improved nature of their ground. Here there is a much stronger case for income support as, as their land has limited potential to deliver environmental options, they would be ineligible for a HNV or AES anyway.

It is important to remember that in ANC landscapes, these payments may be the only thing allowing people to remain on the land and underpin the integrity of rural communities. It is also essential to recognise that ANC present far richer opportunities than non-ANC for High Nature Value farming and celebrate them as such, rather than focusing on negative aspects of production. ANC will never produce at the high rates of non-ANC, but the environmental and biodiversity opportunities within ANC are far greater than outside these areas.

## **Provision for Woodlands within Pillar 2**

Woodlands are a major component of our landscape and have a major role to play as a habitat but also as a source of revenue from fuel and other product production. It is frequently stated that Ireland has the lowest woodland cover of any country in Europe and there are many drivers to increase our woodland coverage. Woodland also presents a very easy habitat to monitor, especially the creation of new woodland, as it is easy to keep track of how many trees were planted, and the final result in a field planted with new young trees.

Butterfly Conservation is concerned that although we wish to increase woodland cover, we focus almost entirely on creating 'new' woodlands by planting up areas with new trees. The succession of abandoned or hard to reach areas first to scrub and then on to emerging woodland should also be recognised as an important factor in increasing our woodland cover. Indeed, from a biodiversity point of view it could be argued that woodlands that have developed naturally have a much more diverse flora and appropriate soil types than planting on improved fields, which will take many decades to truly be a woodland in the full sense of the word, with all associated flora and fauna.

In recent years with more scrutiny of the Single Farm Payment criteria, a large area of this emerging woodland have been razed across the country, rather than a more informed and targeted approach being taken. It is very important that scrub areas are mapped sufficiently, and DARD recognise that these areas will at some point no longer be classified as mature scrub but instead change to established woodland. This is inevitable and recognising we live in a world where habitats will mature over time is crucial to a holistic and effective rural development programme.

Equally, for those lobbying for more woodland cover, a much more targeted and informed plan as to WHERE all this new woodland should be needs to be publically available. It is very important that woodlands are not prioritised over other types of habitat and care is made that new woodland does not have a negative effect on other types of habitat such as species-rich grassland or heathland.

When creating newly planted woodlands, Butterfly Conservation would encourage policy makers and landowners to think about the long term economic value of the woodland and how they will make use of it. There are an increasing number of wood burning stoves and an increasing reliance on natural materials for heating homes. There is an opportunity to create a vibrant firewood production economy whilst at the same time managing woodlands in a sustainable way. Likewise, with people becoming more aware of how materials are sourced, growing trees for local timber, harvestable in 50-100 years is an important consideration for land owners. It is not practical for a small land owner to grow this sort of timber in an economical way, but we should be thinking at a strategic level about setting up woodland co-operatives where landowners are able to work together to create landscape scale woodland management strategies.

Also, access to the woodland is very important at the initial design stage. Landowners need to consider how they will access woodlands to harvest timber in the future in the initial plans. Planting up along river edges and creating buffer strips as part of pollution prevention plans is a quick and easy way of increasing cover. With modern mapping techniques it should be very easy to identify key areas where this sort of management is required thought NI, and equally as the scheme evolves, how much has been achieved in this way. Buffering existing woodlands and increasing woodland cover in the landscape around them should also be considered.

Landowners who fulfil these criteria in their basic farm maps should have this option clearly highlighted as a departmentally favoured one for their ground with a



higher chance of inclusion in the scheme if they take up this option. Both of these options fit well into the 'Group' project suggested within Priority 4.

### **Habitat Restoration**

As well as creation of new habitat and maintenance of existing habitats, it would be really good to see restoration of habitats within the Priority 4 options. So much of our designated land is in unfavourable condition at present, providing money within Pillar 2 for options that will quickly improve condition through restoration techniques such as drain blocking, re-seeding with heather, re-establishing sphagnum on bog sites etc could have major benefits both for the long term conservation of the habitat, but also for helping Agencies to work towards much better environmental condition for our designated sites by 2020.

### **Accessing the Rural Development Programme**

It has been made clear that DARD wish RDP to be completed as much as possible online. At the various meetings attended by Butterfly Conservation it appeared that there were grave concerns from landowners about the practicalities of this. Many areas of the rural landscape have very poor internet connection speeds. Presumably, with the mapping layers required to be accessed in order to make sensible decisions about land use on their farms, high speed connection will be required to cope with amount of data transferred. Many landowners will not be able to get this information due to dial-up speed internet. What provision will be in place for these land owners? Does DARD have any figures for the numbers of landowners these issues with internet speed will affect?

More importantly, there are a large number of farmers who are not computer literate who will be immediately penalised as they will be totally unable to access the scheme at all. What provision will be made for these landowners, both in informing them about the scheme in the first place and then working with them in order to help them participate?

From work carried out in recent years, Butterfly Conservation is aware one of the most important areas for Marsh Fritillary in Northern Ireland is Fermanagh and South Tyrone. Here, the average age of landowners is over 50 and farms are very small in size. We are gravely concerned that there will be a very low uptake of Pillar 2 in these areas due to the technological requirements of accessing the scheme, and as such, many landowners who deserve the chance to be awarded funding for the quality of the habitats and species on the land they maintain will not be able to participate. This would have a long term, negative impact on both the biodiversity and environmental integrity of these areas and, more worryingly, potentially lead to even higher levels of land abandonment than at present. This could have a devastating impact on rural communities in the long run.

## **Conclusion**

Targeted Priority 4 Agri-environment options offer an unprecedented opportunity to provide real, tangible benefits for our biodiversity, for our ecosystems, and most importantly for our landowners, by recognising the unique and important nature of the land they manage. In order to do this effectively, it is essential that DARD consider what outcomes they want by 2020, both within the Agricultural sector, but also cross-department, for the Environment, for the Economy and for the communities living and working these landscapes. An outcome led scheme is essential, we need to know what we want and then tailor the options and the criteria to ensure we can achieve that.

Butterfly Conservation Northern Ireland maintains that ensuring that these schemes support and enhance our European environmental obligations is essential. We urge DARD to continue to work closely with NIEA and others in order to ensure the new RDP is as effective as possible, that it targets the areas of the country where it is most needed, that implementation has no negative effects on existing biodiversity, and that monitoring the results shows we are no longer in decline, no longer in unfavourable condition on our designated sites, but working positively to move into favourable condition, benefitting us all.

# 55. Council for Nature Conservation and Countryside

## **European Union - Priority 1**

### **Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas**

#### **Question 1**

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

#### **Comment**

Definitely! Whilst many producers and SMEs have a wealth of knowledge particular to their own field, the wider sustainability and ecosystem services issues are seldom their main concern. There is a need to provide training on how those wider issues can be addressed at all points in the supply chain. In particular, soil management is an area that would benefit from targeted training. As well as having the potential to improve productivity the latter training could improve soil carbon retention and reduce siltation to waterways.

More widely, we would welcome the continuation of the Focus Farm Network, which could provide a starting point for wider Farm Exchange Visits. We think farmer to farmer knowledge transfer is an effective method of training, particularly when coupled with advice from external specialists. There is great opportunity to widen the current scope of this scheme to include areas such as conservation of the natural and built heritage which would then lead to greater understanding of ecosystem services generally. Furthermore, there is a need for targeted advice for those farmers with designated sites on their land to improve their understanding of the

management objectives.

In the discussion of the proposals, we assume reference to farmers/growers includes foresters, but we would like to see this explicitly stated in the final scheme, as clearly their sector would also benefit from this activity.

## **Question 2**

What do you think the role of the innovation broker should be and what skill sets should they have?

### **Comment**

The role of innovation broker should be as a knowledge source, mentor, change manager and facilitator that can assist farmers, either singly or in groups, to innovate within their business. As such, they will need to be independent and impartial, with easy access to appropriate sources of knowledge and information.

There is also a role for the innovation broker around conservation issues such as ecosystem services, catchment management, and habitat and species projects. This could be extended to management of conservation and/or common grazing.

In all the examples give in the consultation document, we feel there is a common theme of ecosystem services that should be emphasised and this would an appropriate starting point for innovative thinking. We also feel that the innovation broker will need to have a good understanding of the challenges facing the farming and forestry industries from the need to deliver the environmental outcomes required by EU Directives.

## **European Union - Priority 2**

### **Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability**

## **Question 3**

In light of the restrictions posed by the definition of ‘young farmer’ in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

### **Comment**

We agree that there is no case for a specific support scheme for young farmers, but recognise that without new entrants, farming and forestry will not have a viable future. However, targeted support through enhanced grant rates to young farmers who are a partner in the business or head of holding should be considered. For example, development of a business plan that integrates the advantage which can be gained from conservation management, ecological outcomes and the delivery of environmental goods and services could achieve significant benefits, particularly when delivered through an accredited scheme.

On a more general point, we would urge the ‘young farmer’ definition be extended to include ‘young forester’, as the same arguments apply in this sector as they do in the farming one.

#### **Question 4**

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

In the context of a reduced Pillar 2 budget and the breadth of priorities for delivery, the ceiling on Tier 3 seems disproportionately high. We would prefer to see this tier omitted completely and the grant rate for Tier 2 be raised to 50%.

#### **Question 5**

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

Given that many of the proposed schemes will not require planning permission or fall under the heading of permitted development, we believe it to be essential that each case is screened to ensure it causes no environmental damage. Too often in the past small areas of bog, wetland, or other valuable wildlife habitat have been sacrificed in the name of progress and this must not be allowed to happen as a result of these proposals.

#### **Question 6**

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

In the detail of the proposed schemes, we note the omission of the forestry sector and would argue for their inclusion. Given that not all the schemes will be subject to planning approval, we believe there is a need for safeguards/conditions to be built into all the schemes so that the funds do not cause negative environmental impacts.

One specific scheme that we feel should be included is constructed wetlands, where the AFBI research has shown significant advantages for both the farmer and the environment.

Given the scale of applications for planning approval for renewable systems already made without grant-aid, we feel there is absolutely no case for any further incentivisation in this area. Indeed, any additional funding would not be in the public interest as it would serve to take land out of primary production of food and potentially raise energy costs. However, this point does not take away from the need for investment in more energy and resource efficient equipment and techniques, which should be encouraged.

#### **Question 7**

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

We would contend that collation and sharing of development group farm performance should be a mandatory outcome from any proposed scheme. However, this should be one of the required outcomes of funding in the first place, rather than a specific reimbursement refund. This would then encourage applicants to think about outcomes when putting together their proposal.

There is particular merit in this approach when the group is part of a recognised business support network, so consideration should be given to incentivising such membership.

### **Question 8**

How should participants in development groups be selected?

Comment

We can see no case for a selection process for entry to such groups, particularly since they are funded from public money. However, there should be rigorous criteria that require active participation in order that value for money can be demonstrated.

## **European Union - Priority 3**

### **Promoting Food Chain Organisation and Risk Management in Agriculture**

#### **Question 9**

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Para 7 of this section (rightly) refers to the environmental and climate benefits that derive from a collective approach, but the proposals do not seem to include examples of where this would apply. We would generally support the proposals, as they could lead to the outcomes stated. However, the environmental and sustainability outcomes need to be a requirement against which any of the new schemes must be tested and any that do not give significant benefit in these areas should be rejected.

Given the scale of investment proposed under Tier 2, we feel that the business appraisal process should include an environmental impact assessment.

We also feel there is considerable scope for support under this Priority for adoption by the industry for relevant sustainability/environmental accreditation. Membership of such schemes has the potential to add value to the product in addition to the environmental benefits and should be encouraged.

### Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

Since small scale processors (turnover <£250k?) may find access to match funding difficult, we feel that a tiered system may have merit in that it could boost uptake from small producers and allow them to grow.

### Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Whilst the proposed support areas are agreed, we do feel that there is merit in considering inclusion of a specific conservation management theme. This could then enable producers to implement co-operation schemes in areas of unimproved grassland such as the Fermanagh limestone areas, rush pastures, or the Mourne heathlands.

We also feel that there should be scope for inclusion of both biodynamic and organic accreditation, given that these systems deliver significant benefits for ecosystem services.

## European Union - Priority 4

### Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

#### Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

We have significant reservations about the structure of the next AES, as we feel that it has been developed in isolation to the wider context of environmental outcomes from SFP cross-compliance, ANC payments and 'greening' requirements. Without these being considered, it is difficult to see how overlap and contradictions will be avoided.

Nowhere in this section can we find mention of outcomes. We feel that the stated objective for the Priority is flawed. To merely *support* agricultural production methods etc, is too limited a scope and should be widened to *deliver positive outcomes for the environment*. Given the limited funding available for the AES, there is no case for payments that cannot be shown to deliver a positive outcome for the environment or benefit to ecosystem services.

In terms of the proposed suite of options, there is insufficient detail for sensible comment, although we support the overall objectives stated in para 8 of this section. We acknowledge that some stakeholders have been given sight of early proposals for the AES and have based our responses on the further details provided, but would urge further consultation as all the layers of AES are developed.

Although there is no universally accepted definition of High Nature Value farmland, the absence of a working definition in the consultation means that respondents will not be clear about what is proposed. It is strongly recommended that this term is clarified before further discussion using this term.

We support the development of a targeted level approach and would like to see acknowledgement of the contribution that it will make towards meeting the requirements of EU commitments such as the Birds, Habitats and Water Framework Directives.

We understand the proposed wider level scheme will focus on “improved grassland” and assume this to be Permanent Grassland which we would consider to be mainly intensively managed ryegrass with eutrophic soils. The focus would, without doubt give clear, temporary biodiversity gains but it would do little to address the now well-documented, long-term loss of habitats and reduced ecological condition across the farmed countryside as a whole.

### **Question 13**

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

#### **Comment**

Completely. NI has obligations under the relevant Directives to manage designated sites to achieve their conservation objectives and we believe that AES are the most effective way of achieving this. However, the same Directives also carry obligations to protect habitats and species in the wider countryside outside designated sites, so we would like to see schemes designed in a way that delivers those outcomes too. To do this will require significant effort in design of methodology that makes the scheme attractive to the relevant farmers. Furthermore, we feel there is a real danger that the ‘Active Farmer’ definition may prevent some landowners from participating in AES and this needs to be taken into account.

Experience from the prioritisation used for the NICMS 3 scheme shows that there can be unintended consequences if entrants are selected on the basis of whether they have any part of a designated site on their land. We recommend development of a more discriminating selection process that is based on clear outcomes set before the scheme opens. We would also like it to be subject to a sensitivity test to ensure small changes of conditions do not yield large changes of uptake availability.

### **Question 14**

Do you think that an element of training should be a compulsory part of the scheme?

#### Comment

We feel training should be a compulsory element, as it would contribute significantly to successful scheme delivery and help achieve required outcomes. In particular, there will be a need for specialist advice and guidance around designated site management that will probably be specific rather than generic and this would be most suitably delivered by NIEA. However there is a case for a more general advisory support at both levels of the schemes that could be outsourced to NGOs or suitable advisors. Dedicated funding for this should be investigated from Priority 1, as it would seem to fit its objectives.

#### Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

#### Comment

It is unclear from the consultation what outcomes are being sought from such funding.

The Lawton Report 'Making Space for Nature' (2010) identified that many of England's wildlife sites were too small and too isolated, leading to decline in many habitats and species. It advocated a strong and connected natural environment, managed at a landscape scale. We feel that cooperation measures have the potential to deliver benefits on such a landscape scale and would support measures where they can be shown to deliver further gains in environmentally positive outcomes. In particular, they have the potential to ameliorate potentially negative effects such as habitat loss and fragmentation if targeted properly and carefully.

There are examples such as eradication of invasive species, peatland management, commonage grazing, riparian habitat management, and species-based projects that should be examined to determine measurable outcomes that can be set in order to demonstrate the effectiveness of such schemes. It is emphasised that such a measure needs to deliver beyond the Cross Compliance environmental management requirements.

Uptake of this measure will, we believe, be dependent upon effective facilitation, which would seem to fit well under the Priority 1 innovation broker concept.

#### Question 16

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

#### Comment

We believe that the next AES should contain an Organic Management Option that would encourage farmers to continue to farm organically, as we believe that organic farming demonstrates clear advantages for biodiversity and ecosystem services over conventional farming.



Please see the attached paper from the Research Institute of Organic Agriculture FiBL that cites many supporting studies. FiBL Switzerland, FiBL Germany and FiBL Austria are centres for research and consulting on organic agriculture.

### Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

#### Comment

A shortfall in uptake of planting schemes has been evident for both the last 2 RDP periods and stems from a complex mix of socio-economic factors. Although no single factor is to blame, the result is that the landowner does not feel that it is “worth their while” to plant trees. When factors change this view, such as grant rates increasing, then more landowners plant trees.

Not all land is suitable for farming activity, whether directly by the landowner or when in conacre, but some is eminently suitable for the creation of woodland and thus grants should be aimed at incentivising owners to plant on this land, particularly where added ecosystem services will be delivered.

### Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

#### Comment

The removal of the income forgone element of planting grant will, we feel, remove any incentive for farmers to plant trees in anything other than tiny parcels of land that would deliver little benefit for either biodiversity or ecosystem services. Aside from these benefits, there is strong evidence that the woodland supply chain is currently experiencing a strong increase in prices due to increased demand for biomass. If this trend were to continue without additional timber becoming available then much of the investment in biomass power and heating is at risk of being wasted, and we could see a decline in woodland area as more is cut than is planted.

### Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

#### Comment

To answer this question, we would ask whether there is any evidence that LFA support has delivered any benefits for the environment. Based on prescriptive measures, there has been insufficient emphasis on outcomes in past schemes. In the absence of evidence of intended

environmental outcomes, we feel the balance of benefit has been as an income support measure. We agree with the proposal to support these areas from Pillar I.

Many farming units within ANCs are marginal in terms of financial viability and income support is therefore required to maintain a viable farming unit and decrease the risk of abandonment. Whilst habitat degradation/loss remains a problem in hill areas that can be addressed through AES measures, there are elements of cross-compliance that can work counter to the desired environmental outcomes, particularly where sensitive habitats are concerned. Care needs to be taken to ensure that adequate funding is available to ensure habitat degradation does not occur either due to fragmentation or due to agricultural intensification.

It is felt that a final decision would benefit from analysis of the impact of moving to a flat rate basic payment on farm incomes within ANC. A flat rate may increase the level of income directed towards such farms and thereby assist their financial stability, so would suggest that a more effective policy would be to address environmental issues associated with the uplands through an agri-environment option rather than via the ANC route.

## **Question 20**

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

### **Comment**

It is essential that the 'Active Farmer' definition does not preclude owners of priority habitats from being rewarded for the ecosystem services their land delivers. Again, we would wish any measures to be designed to produce environmental outcomes, rather than merely a mechanism to deliver funds to farmers for going through a set of actions that are derived from a generic rather than specific approach.

## **European Union - Priority 5**

### **Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors**

## **Question 21**

Should renewable energy technologies be included in a farm business development grant scheme?

### **Comment**

CNCC is supportive of all renewable energy technologies where the impacts result in a more sustainable use of resources and agree they should be included in the grant scheme. However, we recommend that applications should be carefully screened to ensure the impact on the environment is positive.

## Question 22

Which renewable energy technologies, if any, should be supported?

### Comment

We feel there are opportunities to reduce the environmental impacts from farming such as local processing of poultry litter.

While we are supportive of all renewable energy technologies where the impacts result in a more sustainable use of resources we have some reservations about potential effects on the natural environment. For example in the absence of evidence to the contrary, we have reservations about the impact of grass/slurry-based AD, as this may serve to take grass out of agricultural production, increase release of atmospheric nitrogen and damage soil structure and function. Anecdotal evidence suggests that AD plants require additional feed material such as food waste or maize silage to function well in NI, so consideration needs to be given to the permitting of such activities and appropriate disposal of the leachate.

We would also have concerns about wind turbine developments on peatland, which can cause increased oxidation of the peat through construction methods, and consequent release of stored carbon to the atmosphere.

Hydropower installations also have the potential to cause serious environmental harm to fish and other aquatic organisms, and we believe that individual applications need to be considered in the context of other existing and planned hydropower schemes within the catchment, and require careful assessment of the potential impacts.

## Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

### Comment

Apart from serving to minimise the losses from voltage change and transmission, we can see little argument for restricting the use of energy produced on-farm to direct support of agricultural activities. Such restrictions are a legacy of an inappropriate NIROCs rate and there is no evidence that they have served to improve business efficiency and environmental sustainability. We would, however, support any proposals that would encourage farmers to employ an appropriate mix of on-farm solutions that lead to a more sustainable industry where waste (of any sort) is reduced.

## Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

### Comment

The consultation document highlights the aim to increase forest cover to 12% of land area, but it is misleading to suggest that this will be achieved within the RDP period. We agree with the

proposal, as this would deliver increased ecosystem services such as biodiversity, recreation, landscape enhancement and rural tourism. We also believe that those outcomes could be achieved through improved management of the existing forest estate and would like to see this similarly incentivised.

### **Question 25**

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

#### **Comment**

We support measures such as this that encourage more sustainable use of resources. It is clear from the recent Article 17 report that there is a problem of habitat degradation in NI/UK/EU due to deposition of atmospheric nitrogen arising from agricultural activities. We believe that METS offers part of the solution to this problem and uptake should be encouraged through this measure.

### **Question 26**

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

#### **Comment**

We anticipate an increase in demand during the programme period, as farms modernise and intensify whilst still seeking to remain within the environmental requirements. Opportunity to share capital costs through co-operatives or syndicates should be encouraged.

### **Question 27**

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

#### **Comment**

We believe all RDP measures should ideally be outcome based, so in this case that would be represented by improvements in habitat condition and water quality over time. Unfortunately, the timescale for impact to be detected is likely to make this impossible to measure directly, so behavioural change would serve as a useful proxy in the meantime.

### **Question 28**

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

#### **Comment**

The main barrier to soil testing is a lack of appreciation of the benefits that can be achieved from it. Availability of machinery mounted and desk-based GIS systems have already led to more efficient resource use and significant productivity benefits for arable farmers. Such systems, when linked to detailed soil analysis, have potential to offer similar improvements in the dairy sector as well. We would like to see advice and mentoring made available to promote the advantages of this approach.

On a wider front, we also believe there are wider efficiency benefits from a widespread use of GIS by farmers and landowners. DARD should actively encourage this through making farm maps available as GIS overlays and accepting information in GIS format from farmers and foresters. We accept that there is a need for facilities for those uneasy with new technology, but do not feel the entire industry should be held to the pace of the slowest travellers.

### **Question 29**

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Peer learning is normally very effective within the farming community and we have no doubt that this would be the case for NMS.

### **Question 30**

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

We note the success of funding of middens within the Burren LIFE project and suggest this aspect should be considered. We also believe that Constructed Wetlands have potential to deliver a wide range of ecosystem services and are worthy of consideration.

## **European Union - Priority 6**

### **Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas**

#### **Question 31**

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

### Comment

We welcome the proposed schemes, particularly where they encourage development of holistic solutions to problems that traditionally are seen as the responsibility of a single sector of government. Sustainability generally and environmental matters specifically are too often seen as an afterthought and this approach should help embed them in decision-making. In particular, the health benefits of countryside recreation are well documented, but few resources are spent in developing the available activities.

The inclusion of rural tourism is particularly welcome, but any spend needs to be strategic if investment is to be effective. To this end, we would like to see specific funding options aimed at supporting natural and built heritage projects in rural areas. These options could range from direct support to restore vernacular rural dwellings through to development of management plans for AONBs and designated sites.

### Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

### Comment

Local communities have been active in pursuing funding to support biodiversity projects which deliver a wide range of other benefits such as social cohesion and sense of belonging. Such areas should be considered for funding from the RDP. There are also opportunities with green spaces in village renewal settings where semi-natural areas beneficial to wildlife can be encouraged. Both these suggestions would also contribute to the tourism appeal of the countryside.

### Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

### Comment

Clearly there are advantages for an all-island approach to wildlife and habitat management, particularly where designated sites are concerned. The framework for co-operative management already exists at a government level for biodiversity and water issues, but the proposed scheme has the potential for a more bottom-up approach. In terms of the proposed areas of cooperation, we caution against spreading the net too widely, given the dangers of double funding and remit of the established European funds.

### Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

Any such scheme should focus on rural areas of greatest need (if funded by the RDP).

## **DELIVERY MECHANISMS**

### **Question 35**

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

We do not believe that the LEADER approach should be allocated a specific budget, but rather that it be used to deliver in the areas that are most appropriate for this approach. Experience from past programmes emphasises the importance of having the necessary technical expertise available to effectively deliver the relevant threads of the programme.

### **Question 36**

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

We feel the LEADER approach to be most appropriate to village and local area renewal, basic services and anti-poverty measures. Cluster areas should be aligned to the new RPA areas, rather than persisting with the ones from the current programme.

### **Question 37**

Which measures/schemes should DARD deliver itself and why?

Comment

We believe DARD should deliver those measures where they have relevant skills and expertise, but only if they are properly resourced to do so. Where resources or skills/expertise are lacking then they should form appropriate partnerships. There is good evidence from the environmental sector that this is an effective approach that delivers excellent value for money for the taxpayer.

### **Question 38**

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

We believe that NIEA is uniquely placed to deliver advice in partnership with DARD for agri-environment schemes, particularly in the context of the targeted scheme.

Whilst we welcome the involvement of NITB in aligning rural tourism needs with the overall strategic picture, we are cautious about extending it to delivery at present. Their position is too often seen by the rural community as Belfast-based and urban focused and this attitude would be a considerable barrier for them to overcome were they to be responsible for delivery. Given that Councils have responsibility for public access we believe that they should at least be partners in any rural tourism projects that involve improved access to the countryside.

## **FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS**

### **Question 39**

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

#### **Comment**

Funding should be allocated according to priorities and needs, but tempered with the requirement that all outcomes must be measurable. There are many areas of the programme where other funds are available, so priority should be given to those measures that cannot avail of the alternatives.

### **Question 40**

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

#### **Comment**

Those measures that deliver cross-cutting benefits, such as ecosystem services through AES, should receive top priority. We would also prioritise funding to measures that deliver public benefits and those that contribute to delivery of the agri-food strategy and tourism objectives, provided that they do not cause environmental damage.

### **Question 41**

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

#### **Comment**

Given that there is little hard evidence that the Pillar 1 measures deliver much environmental benefit (witness the 2008 European Court of Auditors report into cross-compliance), we would like to see the maximum amount possible transferred to Pillar 2 and used to deliver environmental outcomes.



## **ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020**

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

### Comments

We feel strongly that consideration for the environment and natural capital are essential elements for the goal of achieving a viable sustainable agri-food industry in NI. For too long we have taken their contribution to our well-being for granted and consequently have greatly depleted them. Agriculture depends on them for its success and it is only by considering them at every stage that the industry will become truly sustainable. The NIRDP has great potential to improve matters by rewarding outcomes that minimise impact on the environment, restore degraded habitats or widen understanding of the importance of the environment.

As touched upon in the earlier answers, we are disappointed that there is not a more joined up approach to delivery of environmental benefits across the RDP. Pillar 1 payments are predicated on cross-compliance measures that protect public goods and the environment and Pillar 2 measures should provide additional benefits. Without details of the lower levels of the pyramid it is difficult to prioritise the higher levels.

Below are other points that we feel should be taken into consideration in the new programme;

- **Conservation of Genetic Resources** – there is increasing recognition of the need to protect surviving plant cultivars and native domestic livestock breeds of historic importance. We would like the RDP to consider support for traditional breeds of apples and to continue and widen support for native livestock. In particular their role in conservation grazing situations should be supported.
- **Carbon storage** – we would like to see consideration of carbon storage given much higher profile within the measures. The proposals (Focus area 5E) include forest plantation as the main mechanism to meet the climate change objective. NI has significant reserves of carbon in peatland, gleyed/peaty soils and unimproved grassland. We feel there should be measures to encourage land management that protect habitats that both store and capture carbon, such as measures to reduce fire risk and the restoration of areas of bare and drained peatland. Furthermore, reduction of fire risk would also yield significant benefits for water quality.
- **Landscape** – we are pleased to see acknowledgment of the need for a more strategic approach through green infrastructure and ecosystems services is required.
- **Invasive Species** – provision should be made within the programme for measures designed to offset the environmental damage caused by invasive alien species. This would seem prudent with the imminent introduction of a new EU Regulation requiring their control.

## 56. Countryside Alliance

### ***Priority 1 - Fostering Knowledge Transfer and Innovation (cross-cutting)***

CAI feels that there is a need to provide additional and broader training within the agricultural and forestry industry. Any support offered can only be of benefit to these sectors. In this age, farmers have to diversify; they are being forced to venture outside their prior area of expertise and we feel there should be support for this.

In recent years, there has been increased awareness of the importance of the forestry sector. Therefore, education to further improve this sector should be advantageous. CAI fully believes that there is also a duty to maintain Northern Ireland's heritage and traditions, and that a balance needs to be found between innovation and tradition.

We would like to see farm and job safety training taking a large place in Priority 1. Knowledge and innovation should underpin all other priorities. Increasing skills and education will be beneficial to any scheme or priority within the proposed Rural Development Programme.

### ***Priority 2 - Enhancing competitiveness of all types of agriculture and enhancing farm viability***

CAI has concerns regarding the lack of support available to young farmers. It may be the case that due to the restrictions imposed by the EU definitions that there is no case for specific support for the so called young farmers. We do not believe this definition is appropriate and feel that Northern Ireland's young farmers will suffer from this.

The future of our agricultural industry and associated sectors is in the hands of these young farmers, and they need support within the industry. Whilst a change of definition from the EU is not realistic in the short term, support, both financially and emotionally, for young farmers should be implemented from DARD.

We support the proposed schemes, to improve competitiveness and business development, within Priority 2 and feel both the level of funding and the entry criteria are appropriate.

***Priority 4 – Preserving and enhancing ecosystems dependent on agriculture and forestry***

CAI supports measures aimed at improving Northern Ireland's diverse environment, and protecting it for future generations. Improving water management, soil management and biodiversity in all areas, not only designated sites, should be beneficial.

The structure of the proposed schemes seems appropriate within both the specific management on designated sites and the more general habitat and water management.

We believe that the training and support elements within the scheme are hugely important. The figures outlined within the document show how important farming is to the Northern Irish economy. In addition, farmers play a key role in protecting the countryside and Northern Ireland's rural heritage.

With the EU directives to consider and a younger generation coming through into farming, support is vital. Appropriate and accessible training will aid the development and improvement of farming in Northern Ireland.

***Priority 6 – Promoting social inclusion poverty reduction and economic development in rural areas***

CAI is pleased to find social inclusion, poverty reduction and economic development in rural areas as a priority. CAI has long since campaigned for the rights of rural dwellers and the need for equality and accessibility to goods and services. The need for equality and accessibility must encompass all relevant personnel, groups and organisations.

Engagement with key stakeholders in disadvantaged and under-represented groups is vital to ensure they support the proposed schemes and take ownership to assist in the implementation and ultimately, towards the success of the programme.

CAI responded to the draft Rural White Paper Action Plan and many of the issues are similar and indeed, still very relevant. For example:

Affordable housing – a key reason as to why younger people migrate to the towns and cities.

An improved transport network – increased fuel costs and the costs associated with owning one's own transport make it prohibitive to many people – especially the younger generation.

Proposed schemes with the Rural Development Programme should complement the actions set out in the Rural White Paper Action Plan.

DARD must consider both disadvantaged areas and specific rural issues. However, these must be on a case by case basis and should start with specific rural issues that have been identified in particular areas.

CAI supports the proposed schemes within Priority 6. In a small country such as Northern Ireland, rural communities are the backbone of our heritage, and deserve to be afforded protection and help in these difficult times.

Countryside Alliance Ireland looks forward to learning how such ideas as outlined in the consultation document are to be implemented.

It is always worth noting the valuable contribution that country sports make economically, socially and environmentally to Northern Ireland. For these reasons, any programme that concerns our environment and rural communities must be sympathetic to Ireland's rural traditions and heritage.

If the Department would like further information of the country sports benefits to our communities and environment, please do not hesitate to contact us.

## 57. Envision

### Rural Development Programme 2014-2020

Consultation submission

#### **ENVISION community heritage project**

October 2013

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Programme 2014-2020

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## **Rural Development Programme 2014-2020**

ENVISION – community heritage project Page 3

## **1. Introduction**

The Envision community heritage project welcomes the opportunity to present this submission to DARD's consultation process on the Rural Development Programme 2014-2020. Envision is a collaborative community-based project run by **Carntogher Community Association** and the **Friends of Ballynahone Bog**, and is funded by the Heritage Lottery Fund, SWARD and Entrust (through Ulster Wildlife).

The Envision project looks at our heritage and landscape in order that the rural community of South Derry can better gain an understanding of the inter-relatedness of actions within the countryside upon other sectors of society within the modern and future landscape within which we live and work, and upon which we depend.

We envisage a future in which we carry forward our heritage and capitalise upon its assets for the benefit of our socio-economic health and wealth as a society facing many issues in a modern world with powerful tools, machinery, chemical materials and technologies at our disposal.

## **2. Envision project – rural community with Pillar I and Pillar II experience**

The Envision project, especially through its key stakeholders, Carntogher Community Association (CCA) and the Friends of Ballynahone Bog, has first-hand experience of how Pillar I and the current RDP have affected farmers and local community on the ground with grass roots evidence. As a community organisation, CCA provided advice and support to those in the local community to uptake RDP measures under the current programme. The general area around Carntogher has thus one of the highest uptakes in the north of Ireland. CCA also advises on other aspects of rural development through its development subcommittee.

## **3. Layout of document and cross-over with Single Farm Payment consultation**

This document is laid out in short sections outlining major areas that need to be considered within RDP. Decisions made within RDP do not impact upon farmers and landowners alone as beneficiaries of the grants available. They impact upon ALL people in society. They also impact upon ALL sectors in society:

- ☒ Social Development,
- ☒ Health (physical and mental),
- ☒ Leisure,
- ☒ Tourism,
- ☒ Natural Heritage,
- ☒ Built Heritage,
- ☒ Business Opportunities (and Losses),
- ☒ Climate Change (with impacts locally and globally),

## **Rural Development Programme 2014-2020**

ENVISION – community heritage project Page 4

- ☒ Insurance Premiums (flood risk insurance and poverty through high premiums),
- ☒ Human Safety (Flood Risk and Chemicals in the food-chain and environment), and
- ☒ Protection of Property (Flood risk).

To analyse RDP in isolation as a purely agricultural (or even solely rural) issue, would be naïve and disingenuous to the rest of society. The public is more and more intent on joint-up thinking within and between government departments, and is very much aware that the actions of one government department aimed at aiding one sector of society may adversely impact upon and pass on risk, financial burden and wasted resources to other departments and people, thus often creating a nett loss to society as a whole. Therefore, where appropriate we analyse themes in relation to the rest of society.

Also, as RDP and the actions that emanate out of it, have often been in remediation of other actions allowed or induced under Single Farm Payment, we cross-over and mention Pillar I of CAP where necessary in this document.

#### **4. Basic principles**

We believe that the following basic principles should be at the heart of CAP, both Pillar I and Pillar II:

1. Public money (directed at farmers through CAP) only for public good (for all society)
2. No direct or indirect financial loss, opportunity loss, or physical risk to others
3. Freedom to farm
4. Honouring of agreements between farmers and on-the-ground officials
5. Reduction of bureaucracy and tripping points in grant claim procedures and audits
6. Payment for positive results for society; ability to gain multiple financial recognition for multiple positive results
7. Reduction in payment for areas damaged or altered that have an adverse impact on society overall through damage to carbon sequestration or other ecosystem services.

#### **5. Honouring financial assurances given to farmers**

There are many reports and experiences of farmers discussing and agreeing what is eligible spend with officials administering RDP grants prior to purchase of materials and plant; only for the 'eligible spend' to be deemed 'ineligible' when invoices are submitted for reimbursement. This often appears to happen when the 'review' of expenditure moves up a level. It is not acceptable that after making expenditure in good faith, that farmers find that grant claims are disallowed afterwards and are told to shoulder the financial burden, due to a differing / shifting level of interpretation of what is eligible between staff in DARD / EU. Many farmers have made investments only because of the incentive of input from RDP. Failure to honour agreed expenditure incurred places many in debt and hardship (both financial and mental).

This is unacceptable and leads to distrust. Staff on the ground need to be given the authority to rubber stamp a decision and to have that authority honoured throughout the system, otherwise

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they are undermined in their role. If they do not have the authority, then those who make the final decision must rubber stamp directly with the farmer before any expenditure is made. Any decision should be rubber stamped prior to spend and then should be honoured.

A level of flexibility also needs to be available. Reports of grants for gates and gate posts being disallowed because they are a number of inches out, if true, smacks of bureaucracy and pedanticism, irrelevant of any need to ensure value for money to the taxpayer. Reports of hedging grants only being paid if permanent fencing is installed to protect from livestock, when electric fencing is more suitable for hedge management, also smacks of inflexibility in practical management on the ground. Such inflexibility can mean less efficient application of the action to be implemented and a failure to achieve the benefits desired. Such immaterial variances from the letter of the law, pale into insignificance in comparison with nett adverse impacts from poorly analysed and integrated actions that are outlined below, e.g. aggravated flood risk; destruction of hedgerows and scrub that provide agricultural and ecological benefit. Common sense must be allowed to prevail – irrelevant of draconian audit analysis. Audit analysis, whilst important to discourage fraud and seek value for money, should not be allowed to impede the spirit of the law / the spirit of CAP.

## **6. The basic tenet of public money for public good**

It is imperative that we realise that the money within the CAP is **public money** and therefore that it should only be spent in **the best interests of overall society**, even though the primary recipient and beneficiary is the farmer (as should be the case).

It must be realised and factored into the programme that the farmer does not work in isolation, i.e. that actions taken upon a farm can increase flood risk to life and property elsewhere; can damage spawning grounds for economically important salmonid fisheries; can fragment important habitats for wildlife that provide ecological services, e.g. pollinating insects; can reduce the aesthetic nature of the landscape; and so forth. This raises also issues about **commercial responsibility** of the farming community and the meaning of the mantra of '**farmers as custodians of the environment**'.

Funding that induces or incentivises activities and actions by farmers under Pillar I, which have a nett detrimental impact upon others in society, must be realised and reduced or eliminated wherever possible, and ideally prevented from occurring before they ever happen. This should not be taken as an *ad hoc* analysis of risk, but should be a key component of understanding our landscape on a farm by farm and a catchment by catchment basis. **Hence, our mentioning of Mapping later within this document and working within NIEA habitat / species classifications.**

## **7. The basic tenet of ecosystem services being vital in supporting society**

Our agriculture, forestry and fisheries (inland and marine) are **DEPENDENT upon functioning natural ecosystems** and the ecological services that these provide. Our wider society, as well as being dependent upon ecosystem services for food, is equally dependent upon ecological services for

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clean water, air, and recreation. Our agriculture, forestry and fisheries can only be sustainably and economically viable going into the future if we maintain healthy and well-functioning ecosystems and their associated ecological services.

Various habitats and species of our biodiversity are key players in maintenance of these ecosystems and ecological services upon which we depend for life, health and wealth. Abuse of these in decades past, especially since World War II, is threatening the viability of the ecosystems that sustain our agriculture, forestry, fisheries and wider society going into the future.

**Healthy ecosystems need to be key within RDP (and SFP),** because they are key to society. If they do not function well, agriculture and society does not function well. Any spend within CAP that does not have this as key, would be a mis-spend of public money. Indeed it would only be a spend to heap up greater and more costly issues to resolve in the future.

## **8. Impact of farming action outside the farm unit – protecting society from farming activities**

Farmland that benefits from canalising water, e.g. through levees, which then increases flood risk to others in society downstream, should not receive money for increasing risk, both physical and financial, to others. The financial gain by a farmer in such an area must be compared to the potential loss to human life, increased insurance costs to others (especially low-income families struggling to survive and businesses) in wider society, and the loss in natural ecosystem services of flood alleviation and biodiversity. Additional reductions in line with the disparity of impact to wider society should be considered on the overall RDP payments and Single Farm Payments to farms with such structures. Public money for public benefit. Public money should not reward structures which greatly and adversely impact many in society, with only a minimal benefit to a few.

## **9. Throwing good money after bad: Pillar 2 remediating damage supported by Pillar 1**

Often it appears that Single Farm Payments supplements many activities and actions which degrade the countryside for all, with RDP options then attempting to remediate (to a very small degree) the damage caused. For example, farmers are desperately trying to constrain the growth of trees and hedgerows to maintain the eligible area of their Single Farm Payments, whereas RDP is trying to encourage the growth of woodland habitat. Hedgerows are remnant woodland that provide a service to farmers, and can be a resource to farmers. However, effectively farmers are being paid under SFP to poorly manage and often damage hedges severely – degrading the countryside – as they try to maintain as large an area as possible for SFP. They are then often paid again under RDP to try to restore some of the damage somewhere else on the farm. This is the worst value for money, and the worst result for our society and for our ecosystem services. **Rural Development**

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Such illogical actions should not be encouraged, whereby SFP encourages a damaging action, but RDP tries to repair part of the damage. (Eligible area is discussed as an issue on its own later in this document.)

## **10. Flat rate versus historical reference / coupling**

Flat rate payments in Pillar I are more important than coupling, as they recognise the ecosystem services of less agriculturally productive areas to society for which the farmer receives no market return. Therefore, flat rate should remediate the unrecognised value that farmers in less favourable areas provide through maintaining, in good condition, the ecosystem services which support society as a whole, e.g. blanket bogs alleviating flood risk, purifying water, providing habitat to wildlife, and amenity to the public.

## **11. Soil**

The understanding of our soil and the services it provides is very scarce to non-existent within Europe at present. This is not just within the farming community, but in the rural community and in wider society.

We need to recognise the consequences of farming and other activities on our soils. The applications of chemicals and slurry / manure have a mixture of impacts – both positive and negative. To concentrate on only the positive short-term consequences is fool-hardy, and can generate complacency about the sustainability of soil.

The impact of machinery on soils in terms of compaction; and the impact of ploughing and drainage in terms of release of sequestered carbon also need to be realised and factored into the sustainable development of our society.

Sustainability of our soil for future generations, and possibly its sustainability within the lifetime of this generation, **due to issues surrounding the price and availability of crude oil and its derivatives**, as well as **physical and biological damage through current methods**, needs to be taken seriously. It is very difficult to replace soil lost to erosion, and it is difficult to replenish the physical and biological components that make soil optimal for agriculture once these have been damaged. Currently the application of chemical fertilisers and pesticides reduces the health of our soil, but also masks the true state of our soil's health and its innate ability to support agriculture and forestry. To look past current gain with petrochemical input, and to compare it against potential detrimental scenarios should current petrochemical chemicals become unattainable (e.g. through pricing or politics) and what this means for future agriculture, is imperative. We need to have an understanding of soil health as a contingency should current petrochemicals supplies fail us or future generations.

We need to be aware that not all soils can yield the same amount of produce, irrespective of the technologies we have developed, and that in trying to do so we are creating loss overall, even if a farmer of this generation gains temporally under the current economic conditions of CAP. **Rural**

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**Soils are important for climate change control.** Soils sequester carbon, especially in our damp and cool climate in NW Europe. This is not only the case of our peatlands, fens and bogs, but also of our permanent pastures and wet grasslands. These soils store more carbon than woodlands and forests could, and this needs to be recognised in RDP and SFP. The current RDP consultation seems to place woodlands to the fore as the key method of tackling climate change. However, ensuring that our peatlands, fens, bogs, wetlands and meadows are protected from future destruction, and that our pastures hold onto as much carbon as possible, especially our wet pastures, is more important in terms of climate change.

The gains made to agriculture in terms of a small increase in profit by draining land, may be minuscule in comparison of the loss of ecosystem services provided in terms of climate change resource and flood alleviation to society. That is to say, a farmer may gain a few extra quid, but society may have to pick up the tab many times over for decades, if not longer, in certain areas if carbon sequestration through drainage is not considered as important within RDP and indeed within SFP through GAEC (standards of Good Agricultural and Environmental Condition).

RDP funds should be available for the protection and re-instatement of damaged and lost peatlands, fens, bogs and wetlands.

## **12. Flood Risk**

Flood risk is a major concern for many families and businesses, with increased and more frequent flood risk occurring due to climate change and changes in the physical and biological structure of the landscape. Removal of bogs and fens which slow run-off into waterways, increases flood risk.

Removal of woodland, anywhere in a catchment increases the rate of run-off and therefore the risk of bigger flashier floods. Drainage of land with too many sheughs and drains, especially free flowing sheughs and channels, increases flood risk as well as increasing the loss of carbon storage from the soil. Additionally, compaction of soil by machinery and by unsuitable stocking levels, increases run-off to generate worse floods.

**Photograph 1 & 2. Flood damage to a property due to a flashy tributary of the Moyola River**

Is the increased damage to other people's safety and property more important than the gain made to individual farmers? It is reasonable to believe that most would agree that the increased threat to life and property, the increased costs in paying out for insurance, and the additional costs expended by other public bodies to try to manage flood risk by hard engineering structures, makes the small gain by farmers in food production insignificant by comparison.

Farmers should be incentivised to plant buffer strips of wet woodland along rivers and streams to aid in flood alleviation and to maintain and reconstruct flood meadows which store excess water from heavy floods away from the river and release it back after the peak of the flood. These have all been cited as best soft engineering by experts in Britain who attended a DARD hydrology day of works in 2013.

Farmers should also be incentivised to restore and enhance natural wetlands and implement SuDS (Sustainable Drainage Systems) on their land, and also to protect river banks from poaching by livestock with resultant bank erosion. **Rural Development Programme 2014-2020**  
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Photograph 3 & 4. Cattle poaching and bank erosion that can have detrimental impact upon river ecology

Photograph 5. Fencing at drinking site to protect the integrity of the river

### **13. Forestry and coppicing as an alternative to turf cutting – peatland has more value for carbon sequestration than forestry**

As peatlands and bogs provide such vital ecosystem services to society as a whole, it is imperative that RDP, DARD and the EU recognise this. There is a need to offer an alternative to the communities which currently benefit from peat extraction – as extraction is at the expense of wider society in terms of flood risk, climate change and loss of biodiversity. Grants for woodlands for coppicing to provide a continual and beneficial alternative should be incentivised. Coppicing and woodland use as a culture in Ireland is weak since the loss of our woodlands during and since the people ‘plantations’ into Ireland of the 16<sup>th</sup> and 17<sup>th</sup> centuries and the loss of the native Gaelic eco-Rural

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agricultural management system of land. Good woodland management for personal and commercial use should be incentivised to become more prominent again.

CAP, both RDP and SFP, could still recognise traditional harvesting of turf for those who continue with traditional spade cutting. However, damage caused by mechanical harvesting (i.e. overharvesting and digger cutting from the side of bogs) should be clearly recognised in reduction of payments to landowners involved as it represents hydrological, ecological and aesthetic costs to society. Mechanical extraction and mining of peat should not be recognised as a 'tradition' in the countryside. Additional RDP funding should be available to wean people from the 'tradition' – which is not a tradition with machinery – to coppicing, as a sustainable landscape management practice and fuel production method. Of course, such woodlands should not be placed on peatlands, bogs, or high nature value rush-pasture or meadows, which sequester carbon for society and hold back rain deluges.

**Photograph 6 & 7. Mechanical extraction from raised bog and damage of system (from Friends of the Irish Environment, May 2011) Rural Development Programme 2014-2020**  
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Photograph 8, 9 & 10. Peat extraction near Rasharkin. Short-term profit for a few, long-term damage and hidden financial costs to society as a whole due to increased flood risk, departmental flood risk management, insurance premium hikes, i.e. personal finance and tax-payer picking up the tab indirectly due to damaged ecosystem services.

#### **14. Forestry in the right place – good trees from good land**

As a society we have forgotten that trees are not organisms of ‘marginal lands’ only.

*Note that the concept of ‘marginal land’ needs to be re-examined through education programmes of RDP. So-called ‘marginal land’ has great economic, social and welfare value, despite not being recognised in market valuations – as it is taken (foolhardily) for granted. ‘Marginal land’ provides us with our vital ecosystem services.*

The best quality timber is grown on good quality land. Traditionally we have grown Sitka Spruce, Norway Spruce and Lodgepole Pine in our non-agricultural lands. However, these species and more

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valuable timber species should be grown on the lower lands to add value to the timber produced and to increase our woodland cover.

Of course, there is a need to keep good land that is suitable for agriculture, under agricultural use. However, in areas where buffers are required, e.g. along the edges of rivers, streams and lakes, then strip-zones of timber stands could be grown, including wet woodland – where lack of buffer could mean adverse agricultural impact upon others in society. Buffer zones to protect our waterways could then also produce a crop and thus a profit for the farmer.

Native trees of local provenance (i.e. north of the island of Ireland, and not from Western Scotland or south of the island of Ireland) should only be supported by grant. Trees of non-local provenance represent a risk to our landscape and economy. They can introduce disease. Their genetic internal clocks are different and so they are not attuned to our climate and with our biodiversity. Use of non-local provenance trees should incur a reduction on payments received and certainly no grant should be paid for such trees, as it represents a risk to society at large through adverse impacts on ecosystem services and biodiversity.

### **15. Education about Forestry**

There needs to be education around forestry and how it provides income. The view of many is that wood is a non-profit producer for many, many decades. However, experience in other jurisdictions, including the Republic, demonstrate farmers harvesting stock from planted woodlands every 5 or so years as trees are thinned to add value to longer growing specimens.

Some farmers in the South Ireland have developed woodlands for their personal pension schemes. It is worth investigating this and educating farmers in the north about it.

Tree crops can also be grown in fields to create ‘parkland’ with two or more crops – trees, silage, livestock. AFBI research has been investigating the logistics of this, and education is needed for the wider community.

### **16. Forestry can grow naturally from scrub**

It should be recognised that forestry can grow naturally from scrub (natural re-wilding), or by aiding forest regeneration from scrub by inter planting. This should be recognised as an important transitional habitat that will aid in various elements of biodiversity to maintain a foothold, including some species of bird and invertebrate.

This is especially important in lands next to native and ancient woodland. It would allow the native stock and biodiversity which has evolved to our landscape over millennia, to expand its range and provide further ecosystem services. This could be done by fencing off areas contiguous to native and ancient woodlands and allowing natural succession to follow with little expense and no need for action from the farmer, except fence maintenance. This has been done in Wales to great advantage.

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## 17. Not all abandonment is bad

Abandonment of agricultural land is not all bad – as it is purported by EU and the consultations. This follows on from the previous point, because in certain areas abandonment can provide space for intermediate habitats in their development to a natural climax habitat through succession. In certain areas this will allow the natural regrowth of woodlands in areas that would otherwise not regenerate trees in the landscape due to grazing by sheep – which would otherwise only be vast open landscapes, which are a function of agriculture as opposed to a natural climax scenario. Thus, a percentage of abandonment could lead to pockets of natural climax habitat (perhaps assisted) especially in upland areas, where they will have positive ecological impacts. For example, Boorin Wood in the Tyrone Sperrins – this is a perfect example of an important and ecologically interesting habitat providing ecosystem services in an otherwise open and windswept landscape.

## 18. Disease / Invasive Species Risk – nursery business opportunities

The continuing uncertainty about the outcome of Ash Die-Back – along with the threat to other tree species – opens a plethora of questions and queries.

Should farms be given payment if they use trees of non-local provenance as otherwise we risk disease? ***(N.B. the difference between native species and native species of local provenance must be recognised – Scottish trees are not native trees of local provenance.)*** Even trees from GB have a risk of disease not posed by using Irish trees.

Why are there not enough farms producing native tree stock of local provenance? Why are our local provenance trees shipped to the Netherlands for growing on to re-import with the risk of disease from the European Mainland? Why are we exporting our cash to pay for our own trees to be grown on in the Netherlands? This money, the jobs and the wealth of this industry should be kept within the country if possible. It is a missed business opportunity and an outflow of wealth.

Farms with native stock of local provenance on their land already (in ancient woodland and in hedgerow trees) should receive recognition and payment for supplying seed for the local provenance tree market.

Non-local provenance trees and other flora imports should be placed in quarantine for long enough periods (> 1 year) to ensure that they do not demonstrate symptoms showing they have disease within that period (e.g. Ash Die Back), and the external supplier should pick up the cost of this to prevent disease spread to Ireland – this needs a coordinated approach with the southern jurisdiction. This should be done not only to protect against tree diseases, but also for other

stowaways in the soil or in the foliage, e.g. invasive flatworms, slugs, snails, worms. **Rural**

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## **19. Recognition of hedgerows, tree-lines and patches of scrub as farm assets**

Hedgerows, treelines and scrub need to be viewed as agricultural assets, as well as ecological assets, and desirable landscape features. They provide a wide range of ecosystem services too.

Hedgerows provide wind breaks that encourage the better growth of crops (including grass) far into the field, therefore increasing yield. Hedgerows, treelines and scrub all also provide shelter to livestock, especially young stock, reducing heat loss, and thus promoting weight gain and resistance to cold stress and thus disease. They also support the pollinating insects that are vital to many sectors of agriculture in this region of Ireland.

These vegetative features should be valued for the agricultural and ecological services they provide – and be promoted in the right areas under SFP and RDP.

## **20. Area of Eligibility - no penalisation for hedge / scrub assets**

In light of the positive agricultural benefits of hedgerows, scrub and trees lines, farmers must not be penalised for maintaining healthy and well-functioning hedgerows, treelines and areas of scrub.

The Impact of not recognising the importance of these in CAP, is that currently hedgerows are cut to within an inch of the functional life of the hedge, creating mushroom hedges, that are gappy at the bottom and with a dense but thin layer of growth on the top. Such hedges are not fit for purpose, either as livestock barriers, as wind breaks for crop or livestock, as wildlife corridors, or as functional habitats for biodiversity. Such hedges are an aesthetic blight in the countryside, and add to the barren and bleak look of much of the countryside that currently greets the rural community, commuters and tourists alike. Hedges and treelines are also now cut to within inches of the field boundaries for fear that DARD's use of aerial photos to designate eligible land will rob the farmers of land to receive payment under SFP.

DARD and the EU need to recognise this damage and danger, and not penalise the farmer for hedges and treelines. The field boundary should not be dependent upon the width of the hedge, scrub or treeline. These should be recognised as part of the functioning farm and be included as land eligible for payment because they provide a service in helping to produce the crops and livestock in the field.

**They take up some physical space, but their added value more than makes up for that. Farmers should receive payment for the area of hedge, scrub and tree cover as part of the field in question.**

At present, hedges in the north of Ireland are undergoing a slow death to extinction and are increasingly being replaced with barbed wire with little agricultural and ecological services attached to it.

Farmers who manage hedges properly in the healthy A-shape, and especially those who lay their hedges, should be given a higher score for RDP and SFP entitlement. **Rural Development**

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## **21. Hedgerows and treelines as business opportunities**

Support should be given to local businesses that:

1. Manage hedgerows for farmers to add value to them by producing:
  - a. Fire-wood as a cheap local fuel and to combat climate change
  - b. Green furniture industry
  - c. Wood for garden centre products
2. Manage hedgerows to collect native seed to grow on as trees of local provenance
3. Manage treelines to grow standard trees in hedgerows for good timber in the future

## **22. Adverse impact of hedge management**

Contractors who, after flailing and cutting hedgerows, leave chopped pieces of hedge and thorns on roads to pierce car and bicycle tyres of locals, commuters and tourists, should not receive grant through RDP, and should specifically be mentioned within SFP as poor standards under GEAC for the farmers who utilise such contractors, due to the direct adverse impact on others in society.

Innovation brokers (as outlined in the RDP consultation paper and refer to the schemes proposed to deliver Priority 1: Knowledge and Innovation) who can solve this issue whilst also making hedges a sustainable resource for local business and crafts should be encouraged through RDP.

## **23. Slurry as a resource – energy and fertiliser**

The use of slurry and manure is a well-known means of fertilising fields. However, we are missing an opportunity by not using this resource as an energy supply, as well as a fertiliser. The use of slurry as a source of biogas, and then as fertiliser should help reduce energy costs for the local farming community, reduce our dependence upon fossil fuels to supply electricity, and reduce the amount of pollutants in the soil and rivers.

Perhaps it is too difficult to produce biogas on each and every farm concerned; but if small collectives of farms grouped together, then this could be managed in local areas; feed into the local electricity grid, so that the farmers get a cut of the profit; and then retrieve the remaining nutrients for spreading on the land.

This could be one of the collectives for cooperation as suggested within CAP. Innovators could be the catalyst for this.

This would also reduce the impact of storing wet slurry in tanks around the country on individual farms. The process would reduce the space required to store the resultant fertiliser pellets, and also reduce the risks associated with slurry, including drowning and pollution, as dry pellets would be easier to store (much as artificial fertiliser).

In terms of climate change, this would reduce the demand of fossil fuels. **Rural**

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## **24. Education requirement for Grant receipt**

The poor level of education within the agricultural community as described within DARD's RDP consultation document is not an endorsement of the success of our education system North Ireland. If we have one of the 'best education systems' as is often recently touted, then it has failed the agricultural community – the community that stays in the region.

This needs to be resolved so that all people who remain in the country have a decent level of education when they leave school. If we can't achieve that, then our education system leaves much to be desired, and perhaps is not one to be emulated by regions outside this jurisdiction if they wish to increase education levels for everyone.

In terms of providing education to those in receipt of public funds through CAP, we agree that this should be a condition of payment (both for RDP and SFP), especially in terms of understanding the basics of systems so that farmers understand soil, impact of on-farm actions to others outside their farms, commercial responsibility, the role of biodiversity to society, and the cycling on nutrients and energy.

Farmers should also be educated as to the concepts of primary producers and secondary producers and the loss of energy as a move is made up the trophic levels, and thus the difference in the food / energy-producing capacity per area in terms of feeding the population between the two. Many, it would appear, believe that we can meet increased food demand by turning more grass over to cattle (secondary producers / primary consumers) when we should be concentrating more on the primary producers (grain and vegetables). Whilst this is a basic primary-school ecology lesson, failure to recognise this in society at large, in politics and policy, produces basic and damaging fallacies in our agricultural understanding and in our concepts of how to feed the human population, especially when land pressure globally (though not regionally) is currently as great as it ever was.

It must be realised, however, that livestock (primarily suckler herds and ideally native breeds) are key in the management of many of our semi natural habitats, often with extensive grazing to avoid under-grazing of certain species-rich grasslands.

It is imperative that the education provided meets the needs of those learning. There is little point in putting learning materials online if access to learning materials is restrictive in terms of low broad-band speeds or lack of IT literacy amongst the farming community. Farmers need to be given advice from renowned soil scientists, ecosystem scientists, hydrologists, fisheries scientists. Scientific facts should be presented in a non-technical manner, but with the availability and signposting to

applicable more detailed references for more capable and interested farmers. **Rural**

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## **25. The Burren LIFE Model**

The Burren Life Project in Co. Clare is seen by many as an exciting new blue-print for fairly engaging farmers with the environment to gain sustainable and realistic farming practices for that particular area. The main principles are: freedom to farm, payment on performance, and little bureaucracy. It is quoted that:

‘A key component of the popularity of the scheme amongst farmers is the freedom given to farmers to carry out the actions they deem most appropriate (i.e. farmers are allowed to ‘opt-in’) as well as the output-based payment system which farmers feel is ‘tough but fair’.

(Guidance on managing farmland in Natura 2000, Case Study: Managing priority grassland habitats reliant on grazing. Creating a model of sustainable agriculture in Ireland.)

This has seen farmers elect themselves to implement landscape and environmental actions based upon their ability to score higher on their individual fields and to receive the appropriate payment for the scores attained. Likewise the farmer can elect to implement none of the landscape or environmental actions and receive no payment should he so wish, or implement a proportion of them for a proportion of the total available to him.

This blue-print should be rolled out here and be an integral part of both SFP and RDP. A financial hand-out (i.e. SFP) without such aims is a lost opportunity and fails to engage the farming community to understand the value that they provide to society at large out with food production.

**Performance and implementation should be measured, and we should work towards being able to engage on a farm by farm level as well as by a river catchment by river catchment basis.**

## **26. Access – rural physical and mental health, and tourism**

One of the major obstacles to safe and healthy enjoyment of the wider countryside is the lack of access to paths and land in the countryside. Access within forest parks and nature reserves aside, access to the countryside in Ireland, both north and south, is extremely poor. This is especially the case for people who live in rural communities, who often need to commute to parks and reserves to gain safe places to walk, run, cycle and horse-ride.

Keeping fit in the countryside can be a very dangerous activity, especially with modern traffic and lack of roadside verges. Of course, lack of safe access to enjoy the countryside also impacts upon the economy in terms of tourism and the opportunities for tourists to enjoy the countryside safely. But it is the rural community who is often most constrained and impacted in terms of physical and mental health.

It is ironic that urban dwellers often have more access to safe places to take physical exercise outdoors and mental relaxation than rural dwellers.

Efforts should be made to remedy this issue by: **Rural Development Programme**

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1. opening of old rights of way;
2. creating new permissive passes to archaeological sites;
3. creating new permissive passes to connect other walks and areas of recreation within the countryside;
4. creating riverside walks;
5. creating new bridle ways through the countryside.

## **27. Access – unfair, illogical and immoral liability of landowners for actions of others on their land**

One of the major obstacles to permitting access to the countryside by goodwill from the agricultural community is liability. It is widely recognised as unfair, illogical and immoral that a landowner should be held liable for anyone hurting themselves on his land, when the fault is that of the person who hurts themselves. Farmers are even liable when the person is not invited onto the land.

This liability must be removed in order to:

1. reduce risk to landowners
2. increase goodwill of access
3. open the door for CAP RDP payments for access creation
4. reduce the inordinate insurance premiums which appear to continuously spiral upwards, increasing poverty.

## **28. Access – no loss of payment on areas forgone to social benefit**

In cases where farmers allow access to their land, including through fenced off paths to keep visitors separate from livestock, it should be recognised that the farmer is providing a social and economic good for society at large. Thus, should a farmer allow an access path, for example up to an archaeological site, to permit access; then it is imperative that this area of land lost is recognised as lost opportunity for farming due to public good, and the area involved should be recognised as a part of the original eligible area for SFP and RDP grant, and the farmer should receive payment accordingly.

Failure to permit this, leads to less access in the countryside for the health and prosperity of both tourists and local people alike. Goodwill by farmers must be recognised, and he should not lose out financially for providing public good. Indeed he should potentially receive a financial bonus.

## **29. Verges**

Our roadside verges could represent potentially the greatest wildlife reserve in Ireland, providing ecosystem services if managed correctly - i.e. cut at the appropriate time and cuttings removed. Recognition should be given to farmers who engage in ecological management of road side verges as biodiversity corridors for vital pollinators and seed banks for local provenance wild flora – **but only**

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**once wildflowers have set seed and in consultation with environmental advisors / innovation brokers.** Such farmers should be rewarded for their actions towards social benefits to society. This does not mean contract cutting for lawn-like greens – but the management of appropriate roadside verges as traditional meadows – to create potentially the greatest wildlife reserve in Ireland. Such verge cutting could be used for haylage or hay, or delivered to the new biodigester to be located at Eglinton, or any other biodigester, and the farmer receive the payment for the material delivered to the plant.

### **30. Cooperation between farmers**

Farmers who act cooperatively to allow access to the countryside, along riverbanks, to archaeological sites or to swathes of open landscape, should be given additional recognition in entitlement payments.

Farmers who form cooperatives or associations to solve a local problem, or to offer an additional advantage for the local area, e.g. to provide biogas for local energy demands and to produce fertiliser pellets out of the residue, should be given additional funding.

Research with the universities and AFBI to research various elements of such industries should be encouraged. Innovation brokers, as per the consultation's Priority 1: Knowledge and Innovation, are key here.

### **31. Pollinators – beekeeping home industry and pastime**

Beekeeping and the production of honey is a growing activity throughout Ireland. The fragmentation of natural and semi-natural habitats, and their widespread destruction means that this ancient, but resurgent, activity is under threat. With the introduction of the *Varroa* mites and the lack of pollen in the countryside, this sector of agriculture and rural life is set to see a decline if RDP and the payments through SFP do not remedy the destruction of treelines, hedgerows, scrubland, semi-natural grasslands and meadows – the sources of food for our bees.

This would be a loss to rural development and rural society, but also a lost business opportunity for many to diversify within the rural landscape and earn additional income.

### **32. Fisheries, angling, tourism**

Farming has a major impact upon fishery habitat in our rivers and lakes. The impact from agriculture comes in many forms:

1. Pollution from agrichemicals and slurry
2. Erosion of soil into waterways due to surface soil
3. Removal of bank vegetation
4. Lack of buffer strips

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5. Flashy floods followed by low flows and low oxygen due to wetland destruction, especially peatlands and fens.

Angling is a major pastime for locals and tourists alike; and therefore it is important to recognise the impact of farming on the physical and mental health of locals, as well as the revenue introduced by tourists to the area. These benefits must be protected from detrimental activities within the farming community, and farmers that recognise this and attempt to advance the benefits should be recognised with a higher score in entitlement payments.

### **33. Mapping**

It is imperative that the mapping details of farms collected by DARD for CAP and for other projects is integrated into a government- and society-wide database that NIEA, DoE, river-catchment area stakeholders, Councils, and others (e.g. angling clubs) can utilise and add to.

Environmental variables and ecosystem service data should be collated as paramount, as these will allow effective ecosystem-service audits to be completed; river-catchment plans and strategies to be developed; and the effective eradication plans of invasive plant species from riverine systems to be formulated. Within such plans and strategies, agriculture, forestry, planning and invasive species and land management are the greatest players and contributors due to their direct and indirect impacts upon the environment and landscape. Therefore, DARD mapping and OSNI base datasets and layers must be available to all taxpayers, researchers and government departments. This must be available not just as a 'view-only' format, but also as layers and information that may be analysed and downloaded independently and constructively by others in government and within the wider taxpayer-society, as taxpayers own DARD and OSNI, and thus the data and copyright.

### **34. Integration of NIEA terminology and concepts**

In order that NIEA and DARD might better integrate to achieve common aims for society as part of government departments, there is a need for DARD to recognise within its mapping and concepts, the land classification of the environment as utilised by NIEA in order to meet our regional, domestic and international objectives and targets. DARD, through its mapping and assessments for both SFP and RPD, should be contributing to international and regional objectives for Natura 2000, and also to mapping ecosystems services per farm for other government departments and services.

### **35. Invasive species**

As alluded to previously, invasive species are an issue that need to be tackled. In NIEA's recent report to Europe on Habitats Directive (Article 17), invasive species are identified as one of the four greatest drivers of bad environmental condition along with agriculture, development and nitrogen. They are a major financial threat, as well as a major ecological threat. Mapping is key. Any withholding of access to maps and data – in easily accessible, downloadable and workable format –

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greatly reduces our ability as a society to monitor and formulate plans to tackle the issues, and thus resolve the risks that threaten wealth and health, as well as biodiversity – which is also key to our future prosperity. Biodiversity gives our landscape the best possible chance for flexibility in scenarios of changing climate and landscape management, and greater robustness to survive poor landscape management where that occurs. SFP and RDP both need to tackle this issue of invasive species and seek to record it as part of their monitoring and audit.

### **36. Conclusion**

It must be stated that the consultation on CAP is difficult to penetrate and the abstract nature of issues presented within the consultation and how they will interact with Pillar I and other government objectives outside of agriculture, are difficult to visualise. It is difficult to conceptualise what vision DARD has to integrate the aims of RDP with Pillar I and with other wider government objectives, and what actions DARD will take as concrete methodologies to implement solutions to the issues mentioned in this submission. **Without gathering and analysing ecosystem services on a farm by farm basis and then on a river-catchment by river-catchment basis, we believe that it will be nigh on impossible to achieve integration in any meaningful way. DARD (in tandem with other government bodies) must strive for such ecosystem analyses on the farm and then river catchment resolution.** Such data needs to be integrated with data from fisheries and the environment agency as well as data from public service providers (e.g. NI Water) and NGOs. DARD needs to recognise NIEA terminology, classifications and concepts in its approach to the landscape and aim to support actively our society's environmental duties. NIEA and DARD are of the same executive.

Again we reiterate that the following basic principles should be aimed for:

1. Public money (directed at farmers through CAP) only for public good (for all society)
2. No direct or indirect financial loss, opportunity loss, or physical risk to others
3. Freedom to farm
4. Honouring of agreements between farmers and on-the-ground officials
5. Reduction of bureaucracy and tripping points in grant claim procedures and audits
6. Payment for positive results for society; ability to gain multiple financial recognition for multiple positive results
7. Reduction in payment for areas damaged or altered that have an adverse impact on society overall through damage to carbon sequestration or other ecosystem services.

Our farming community has a much wider role than food production, and their capacity to be incentivised to create benefit to ALL society must be prioritised. RDP must recognise this. RDP must not be seen as the poor relation of Pillar I. Pillar I must incorporate fully the aims of RDP and not act against those aims, **so that we do not throw good money after bad.** Transfer of the maximum

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amount of money from Pillar I to Pillar II should be actioned, and transfer in the opposite direction should be prohibited.

Joint-up thinking is paramount between Pillar I and Pillar II. They should not be seen as separate entities, vying to promote independent aims and objectives. Joint-up thinking within DARD (between hydrology & forestry & agriculture & fisheries) and also between DARD and NIEA to produce outcomes on our environmental objectives and duties needs to be formally promoted. DARD has a budget many times the magnitude that of NIEA and DOE. DARD needs to fit in to help NIEA and other sections of government to function and thus to add value to the data and outputs of government as a whole. This can only result in value for money and better outcomes for our society in this region of Europe. At present, certain sections of DARD create difficulties and costs for others, and *vice versa*. Government needs to resolve such conflicts and ineffective approaches. It must be recognised that a particular section of silo-government working to optimise a specific aim, may actually cause greater damage to society overall due to knock-on detrimental effects elsewhere. Compromises on optimum output from various government departments must be recognised at times as the most beneficial scenario of society overall, e.g. a minimal reduction in land to agriculture, but which hosts a wet woodland along a river, might save tens of thousands of pounds in damage downstream, as well as potentially protecting human life. This should be a basic tenet of RDP and SFP, and of government as a whole. Silo-thinking must be overcome.

Direct and indirect impacts of farming, of DARD and of CAP, on others in society must be honestly recognised, and if the detrimental impacts outweigh the benefits, then honest and open questions must be asked and solutions found. The solutions exist already – we just need the will to implement them and overcome the challenges of silo / blinkered thinking.

## 58. Farm Animal Genetic Resources Committee

Dear colleague

### **NORTHERN IRELAND RURAL DEVELOPMENT PROGRAMME CONSULTATION 2014-2020**

I am responding to the DARD's Rural Development Programme Consultation in my capacity as Chair of the Farm Animal Genetic Resources Committee, which provides expert advice to Defra, the Devolved Administrations in Scotland, Wales and Northern Ireland and the UK livestock industry on the conservation and use of animal genetic resources.

It is important that we protect the diversity of our farm animal genetic resources (FAnGR): they are an important component of biodiversity which intrinsically deserves protection. Having diverse FAnGR – which in our terms, encompasses both 'mainstream' and 'at risk' breeds - will help us respond to new challenges, such as feeding a dramatically growing global human population and potentially developing our FAnGR to adapt to climate change. Many of our FAnGR, especially grazing animals, have a key role in managing the farmed environment and landscapes. They are of great economic, social, cultural and heritage importance and we have formal

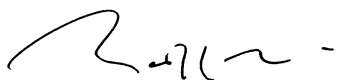
commitments to manage these resources at domestic, European and wider international levels.

International commitments include the *Convention on Biological Diversity Strategic Plan for Biodiversity 2011-2020*, which sets a specific target to develop and maintain strategies for minimizing genetic erosion and safeguarding the genetic diversity of farmed animals (Aichi Target 13: ‘*By 2020, the genetic diversity of... farmed and domesticated animals...including other socio-economically as well as culturally valuable species, is maintained, and strategies have been developed and implemented for minimizing genetic erosion and safeguarding their genetic diversity.*’). In 2011, the European Commission adopted the *EU Biodiversity Strategy to 2020*, which supports the CBD commitments. In particular, Action 10 of the Strategy says that: ‘*The Commission and Member States will encourage the uptake of agri-environmental measures to support genetic diversity in agriculture and explore the scope for developing a strategy for the conservation of genetic diversity.*’

One of the EU’s six Rural Development Priorities is ‘*restoring, preserving and enhancing ecosystems*’: I am delighted that this is recognized as a priority for Northern Ireland and Northern Ireland’s FAnGR will have a key role to play here. The existing Countryside Management Scheme provides some support to Northern Irish FAnGR (currently for keeping breeding females of Irish Moiled cattle). Given the commitments outlined above, it will be important to ensure conservation of native FAnGR breeds at risk can be protected in the future programme. Consideration should be given to grazing and non-grazing species as well as an exploration of imaginative ways to support *ex situ* FAnGR (i.e. FAnGR maintained other than in commercial farming systems, including via frozen germplasm, farm parks etc). Colleagues in the Committee would be very happy to work with you to explore how this could be applied.

The Committee would be very happy to share more detailed recommendations with you at an appropriate stage if that would be helpful.

Yours faithfully,



**Prof Geoff Simm**  
**Chair, Farm Animal Genetic Resources Committee**

# 59. Greenhouse Gas Implementation Partnership

To: DARD RDP Management Branch

The following consultation response is submitted by the sequestration sub-group of the Greenhouse Gas Implementation Partnership (GHGIP). The GHGIP is a voluntary initiative which oversees the implementation of the Agriculture and Forestry sector's GHG reduction strategy and action plan to promote and encourage the adoption of technical efficiency. Our aim is to improve farm business performance and reduce GHG emissions. A sequestration sub-group of the GHGIP was established in June 2013 with a view to quantifying the potential for carbon sequestration within local agriculture systems. The membership of this sub-group is outlined at Annex A.

The agricultural sector is unique in its ability to offset emissions from livestock wider farming activities by storing (or sequestering) carbon in its natural system ie "locking" carbon into the soil used for farming through permanent grass, hedgerows and woodland. With this in mind, the sub-group would make the following points in relation to the NIRDP consultation document issued by DARD.

## **Sequestration as a theme of the NIRDP**

Sequestration should be one of the themes running through the draft NI RDP consultation yet there is little reference to it at present. Any future Rural Development Programme should recognise the importance of maintaining and enhancing the amount of carbon which is stored in local soils. This carbon storage reduces the overall net emissions from the agriculture sector and lowers the carbon intensity of local food production.

## **Priority One**

Many of the initiatives proposed in the draft programme could be adapted to include an element relating to the practicalities of carbon sequestration. For example, sequestration should be included as a possible topic for the training programmes envisaged as part of the Farm Family Key Skills scheme proposed under priority one. Also relating to priority one, the European Innovation Partnerships could be utilised to link research on carbon sequestration, particularly through existing relationships and partnerships between AFBI and Teagasc. We would further suggest that the Innovation and Technology Evaluation and Demonstration Scheme (ITEDS) could fund on-farm demonstration of sequestration techniques.

## **Priority Two**

The Business Development through Knowledge Transfer scheme should support carbon sequestration as a potential topic for discussion groups. In particular farmers should be encouraged to share knowledge on how land can be managed and improved to enhance both productivity and carbon storage.

SMART sensors and other equipment to enhance soil analysis, soil mapping and precision agriculture should be considered for potential support in the Business Investment Scheme. This scheme should also support improved drainage which will help dry out mineral soils, greatly reducing NOx emissions while making the soils more productive and therefore increasing carbon sequestration. However safeguards to protect peatlands should be included in any drainage scheme.

## **Priority Three**

One of the management risks to successful agriculture in Northern Ireland is the changing weather patterns associated with climate change. An assessment of land management should be included in the NIRDP to increase climate resilience. DARD may wish to look at this proposal under the “farm risk management” element of Priority Three however it could also be considered a crosscutting theme. An example of this would be the on farm development of agro forestry, where appropriate, to further dry soils out, reduce livestock poaching and machinery compaction and in doing so help deliver a more resilient grazing system, during the greater frequency of wet weather or extreme weather events expected as our climate continues to change.

## **Priority Four**

Carbon sequestration should be promoted as part of an ecosystem services approach which will be integral to a future successful Agri-Environmental scheme. Trees have significant sequestration abilities and we note that a number of woodland and forestry schemes are proposed under priority four. Increasing woodland cover will have benefits for carbon sequestration however additional focus should be placed on the establishment of woodland within food production systems. Woodland is a multi-functional tool and agricultural features such as woody riparian strips, wider hedges and agro-forestry (ie sporadic tree planting within agricultural grassland) can deliver multiple benefits in relation to agricultural production, cleaner water and increased storage of carbon in our soil. In AFBI trials at Loughgall, sheep were grazed within planted trees but there was no appreciable reduction in livestock grazing capacity until the trees were about 12 years old.

## **Priority Five**

We support the inclusion of a successor to the METS scheme within the new NIRDP. Precision soil analysis and advanced slurry spreading techniques will ensure that valuable natural nutrients will be better targeted in the future. This will enhance the fertility of land, reduce the Sector’s environmental externalities, deliver better

productivity and as a direct result, enhance the rate of carbon sequestration in the soil.

### **Priority Six**

One of the means by which communities and rural dwellers can tackle fuel poverty is through the increased use of biomass for heating. Establishment of a biomass supply chain, by better processing of existing woodland and the planting additional biomass crops, for the use as fuel on a local basis, would enhance the quantity of carbon sequestration on Northern Ireland farms.

We are very grateful for your consideration of this submission and if you have any queries, please do not hesitate to get in touch for further clarification

Dr John Gilliland OBE  
Chair

Greenhouse Gas Implementation Partnership - Carbon Sequestration Sub  
Committee

### **Annex A**

Organisations represented on the Greenhouse Gas Implementation Partnership –  
Sequestration sub-group

Council for Nature Conservation and Countryside (CNCC)  
College of Agriculture, Food and Rural Enterprise (CAFRE)  
Department of Agriculture and Rural Development (DARD) – Science Advisory  
Branch  
Livestock & Meat Commission (LMC)  
Northern Ireland Environment Link (NIEL)  
Original Heating Ltd  
Premier Woodlands  
Ulster Farmers' Union (UFU)

Secretariat: DARD

# 60. Killinchy Beekeepers Association

## European Union - Priority 1

### Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

#### Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

#### Comment

There is a need to provide Killinchy Beekeepers Association members with resources to support vocational training to prepare, manage and deliver the Associations' programme of education, training and mentoring. Technical honeybee husbandry knowledge and skills..

#### Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

#### Comment

To provide guidance and support and be innovative in advising how the members can collectively and individually develop their competence in managing honeybees in small scale enterprise activities to: supply and sustain a niche market for local honeybees and hive products eg honey, and maximise the pollination and biodiversity benefits of well-managed beekeeping in the local area.

To provide support and guidance for a Co-operative purpose built facility, using environmentally friendly energy to extract and bottle honey in a "food quality" environment. A facility that can also be used as a teaching and training base for potential beekeepers and schools and as a tourist attraction, which demonstrates the history of bee keeping in Northern Ireland, how to maximise the marketing, sales and export of high quality locally produced honey and bee products.

A state of the art premise that will demonstrate the importance of the honeybee in our environment and how this industry can help, support and bring local communities together along with educating future generations on our native honey bee and the environment.



RURAL DEVELOPMENT PROGRAMME 2014 – 2020

CONSULTATION RESPONSE FORM

**Question 41**

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

**ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020**

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

The proposals refer to specific farming activities and enterprises.  
There is no reference to beekeeping and the opportunities to develop the many benefits which keeping honeybees and beekeeping contributes to the environment, economy and society.  
Benefits which include the value of bees as pollinators, the contribution of beekeeping to biodiversity and its relevance in local land management and farming practices. Opportunities to develop small scale enterprises to exploit niche markets for local high quality honey.  
Beekeeping makes a valuable contribution in supporting the environment assessment and equality of opportunity. issues referred to in the consultation document.

The proposals for farm animal health offer options which can be adapted to monitoring, controlling and improving bee health - a key aspect of improving beekeeping..

Proposals to support business development groups, benchmarking and acquisition of IT and equipment to assist sharing information and improving management of Association activities are also applicable in developing beekeeping.

Our response to the consultation is a request to have beekeeping proposals

RURAL DEVELOPMENT PROGRAMME 2014 – 2020

CONSULTATION RESPONSE FORM

from Killinchy BKA considered, included and accepted when implementing the 2014 - 2020 Rural Development programme.

# 61. Mourne Heritage

## Introduction and Structure of Response

Mourne Heritage Trust is an independent charitable company, core funded by Northern Ireland Environment Agency (NIEA), Northern Ireland Tourist Board (NITB) and three local authorities to provide visitor and environmental management services in the Mourne Area of Outstanding Natural Beauty (AONB). The Trust has been a multiple project promoter in successive rural development programmes and also acted as an Intermediary Funding body for Peace II funding under the Natural Resource Rural Tourism Initiative (NRRTI), co-ordinated by DARD, NITB and NIEA.

## Overview of Key Points

- We welcome the prospect of **enhanced flexibility** and hope this can be utilised to ensure a more strategic approach to use of RDP funds.
- While the need to enhance biodiversity is prominent in the draft programme, we feel **landscape requires greater prominence** and that broader aims and targets relating to improving our natural environment include specific mention of both biodiversity *and* landscape.
- We feel **training and advice to farmers and landowners** and other rural stakeholders can maximise the impact of funding delivered, particularly around **approaches to custodial agriculture and informing farmers of the principles of ecosystem services** and how they can deliver public good.
- We see significant need to **support farmers in Areas of Natural Constraint** and potential for ANC payments not only to supplement incomes, but to encourage and guide development of custodial agriculture and environmental stewardship practices. In other words, **farmers in these areas should have the option of receiving additional payments for maintaining and providing environmental goods and services.**
- We support the provision of **collective approaches** to allow groups of landowners to work on a wider scale not only in terms of river catchments but also **Landscape Character Areas**, where, in order to maximise benefits, consideration could be given to allowing landscape managers/

coordinators to apply for funding on behalf of landowners. In addition, such organisations have the potential to **act as coordinators/facilitators for landscape scale action**, particularly but not exclusively on commonages, and could perhaps receive RDP funding for providing this purpose (e.g. a staff member to coordinate groups along the lines that the farm advisers act in some GB protected areas).

- Agri-environment Schemes should be based on a **landscape approach rather than a whole farm approach** e.g. on common land payments should be directed at the group using/managing the land as opposed to requiring the whole farm of each user being required to be in CMS etc.
- We suggest that the scope for agri-environment schemes to provide **access related payments to landowners** should be very thoroughly explored. As we explain, we feel there is the basis of a strong special case for the RDP in NI to have a strong element that incentivises and helps landowners to provide agreed, sustainable, managed access. In addition, given that much de facto access exists in Northern Ireland, landowners should not be penalised through land being deemed ineligible for Single Farm Payment through erosion caused by walkers and other activity they have not given permission.
- We note the inclusion of **agro-forestry measures** under this priority and strongly support development and promotion of these, as distinct from commercial forestry, as a way to encourage tree planting to contribute to climate change mitigation as well as biodiversity. This would involve **including conservation approaches to planting regimes**, not just the relatively narrow interpretation of silviculture currently required under the Woodland Grant Scheme.
- In addition to forestry, we would suggest consideration of the scope to **support activities that lead to carbon sequestration through the retention/ restoration of peat bogs**, something that could also make a significant impact to both climate change mitigation and biodiversity enhancement.
- **A strategic, managed approach is required to renewable energy** to guard against adverse impacts on landscape, biodiversity and availability of land for food production.
- We suggest further consideration of whether the **absence of a specific measure for conservation and upgrading of the rural heritage** – some important aspects of which may not be catered for under tourism and

village renewal – might exclude some important rural heritage and potential projects.

- We feel that the very significant **reliance on the LEADER approach in the current programme has militated against effectiveness and strategic impact** in a number of ways. Regardless of structures, **working practices adopted are also critical and we found the current programme to be disproportionately bureaucratic** and less than optimally efficient in many of its processes. We suggest a thorough review of processes for assessment and administration of projects.
- We suggest evolving **a model for the tourism elements of the new RDP that is aligned to destinations**, drawing on the positive features of the Natural Resource Rural Tourism Initiative (Peace II) and a more strategic approach generally aligned with regional and national priorities.
- We feel that the allocation of funds should be based upon that which best provides for development towards the **broad based, sustainable rural economy** that we need in the Mournes and Northern Ireland.
- **Leverage of other funding into our rural areas** is an important aspect of non-AES aspects of RDP funding to NI. In addition, these other aspects of the programme help to complement the environmental benefits of the AES by enhancing the associated social and economic benefits that can be achieved.

## Detailed Response

### Structure

While we have not chosen to use the consultation response form provided, nor to address *all* of the questions posed, we have taken account of many of the latter, both in identifying and articulating our key points outlined below.

Our response is primarily structured around the Priorities of the Proposed Rural Development Programme (outlined in Section 6 of the consultation document) that most align with MHT's interests. We are most concerned with Priorities 4 and 6 but also offer some thoughts on Priorities 1 and 5. Our comments on these are preceded by some general points and followed by some thoughts on delivery structures.

### 1. General

*These comments relate to Sections 1 to 5 inclusive of the consultation document i.e. those preceding the Priorities of the Proposed Rural Development Programme*

We note the removal of the axis structure to improve flexibility in the proposed Programme. **We welcome the prospect of enhanced flexibility** and hope this can be utilised to ensure a more strategic approach to use of RDP funds. Our experience of the current programme has been that **larger strategic projects, notably but not exclusively in relation to rural tourism, have not been well catered for**. We hope the shift in emphasis from demarcation to complementarity of EU funds will enhance strategic thinking and benefit projects which contribute across a range of objectives and priorities. Again we have felt **in the current programme that more broad based projects which deliver across for example tourism, heritage, village renewal and biodiversity, have suffered from artificial pigeonholing**.

We also note the consolidation of existing measures into fewer broader measures around competitiveness of agriculture; sustainable management of natural resources; and balanced development of rural areas. We feel these measures provide an appropriate background for the programme to deliver the broad based programme that is required and again hope that this opportunity is taken.

We note also **the increased focus on knowledge transfer and innovation, co-operation, climate change mitigation and the environment** and welcome the fact that knowledge transfer and co-operation measures can include rural SMEs and tourism business as well as farm businesses.

Finally in relation to the chapters preceding the Priorities, we note that one of the targets identified by DARD is *'To improve our natural environment through supporting those that own and actively manage our land and woodlands to develop practices which improve our **biodiversity**'*. (Page 24)

We would urge that cognisance is given to the need to improve our natural environment through enhancing our **landscape** quality as well as a biodiversity. While there is some overlap in these areas – e.g. upland heath is a biodiversity habitat and a landscape - **biodiversity does not cover all of the special landscape features** in the Northern Ireland countryside which include stone walls, lazy beds, geodiversity etc. We do not see a rationale at this point in the document for excluding landscape other than simple omission. 20% of NI land is under AONB designation and thus we feel landscape requires prominence and that logic and best practice would dictate that broader aims and targets relating to improving our natural environment **include specific mention of both biodiversity and landscape**. This would be consistent with the Commission's approach - one of the latter's focus areas quoted later in document in relation to Priority 4, **does** recognise and mention landscape **as well as** biodiversity (Page 54)<sup>1</sup>.

## **2. Priorities of the Proposed Rural Development Programme**

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<sup>1</sup> 'The European Union priority for rural development relating to restoring, preserving and enhancing ecosystems dependent on agriculture and forestry should focus on the following areas:  
Focus Area 4A - Restoring and preserving biodiversity, including Natura 2000 areas and high nature value farming, and the state of European **landscapes**';

### ***Priority 1 - Fostering Knowledge Transfer & Innovation (crosscutting)***

The consultation document poses a question as to **whether there is a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?** We feel training and advice to farmers and landowners and other rural stakeholders can both maximise the impact of funding delivered, for example by accompanying the agri-environment scheme and, in some cases, of itself facilitate the achievement of many of the objectives of the various Priorities. For example, as we will return to, we feel from experience that attempts to encourage tree planting in NI are hampered in some cases by a simple lack of awareness that land on which trees are planted can in certain circumstances be grazed and that the trees can deliver animal welfare benefits. A particular focus of training, particularly in Areas of Natural Constraint, could be approaches to custodial agriculture and informing farmers of the principles of ecosystem services and how they can deliver public good

We would further comment that while the detail of measures outlined in the consultation document are focussed primarily on agri and forestry sectors we see great scope for improving knowledge sharing and innovation among those involved in areas like tourism and conservation management.

### ***Priority 2 - Preserving and enhancing ecosystems dependent on agriculture and forestry***

- The consultation document asks. **‘Do you agree that if Pillar II Areas of Natural Constraint (ANC) support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route?’** We would suggest that ANC support can be seen as *either or both* income support and agri-environment/Pillar II payment. While the rationale for these payments recognises the fact that it is difficult for farm enterprises on these marginal lands to be profitable, there is likely to be a strong correlation between these marginal lands and our designated areas, whether conservation designations or, in particular, AONBs. Indeed **on-going farming is absolutely vital to the future health of habitats and high value landscape areas like the Mourne** and for this reason it needs to be supported to overcome topographical, economic and structural challenges. Therefore we see great potential for **ANC payments not only to support incomes, but to support development of custodial agriculture and environmental stewardship practices** that will make enterprises in these areas sustainable in the long term. Opportunities that ANCs offer to achieve multiple complementary outcomes – including Priority 6 objectives around economic and social development - should be explored and maximised. In other words, farmers in these areas should have the option **of receiving additional payments for maintaining and providing environmental goods and services.**
- We very much support the provision of **collective approaches** to allow groups of landowners to work on a wider scale. Our understanding is that uptake of this facility in the current programme has been patchy at best but we see it as **important to consider and address barriers to uptake, perhaps drawing on models developed for commons land and other collective approaches**

**elsewhere.** To facilitate uptake agri-environment Schemes should be based on a **landscape approach rather than a whole farm approach** e.g. on common land payments should be directed at the group using/managing the land as opposed to requiring the whole farm of each user being required to be in CMS etc.

- We would also note that while collective approaches are generally talked about in terms of river catchments we would see them as being equally **applicable to Landscape Character Areas**, where, in order to maximise benefits, consideration should be given to allowing landscape managers/ coordinators, like AONB management groups, to apply for funding on behalf of landowners. In addition, **such organisations have the potential to act as coordinators/facilitators for landscape scale action**, particularly but not exclusively on commonages, and could perhaps receive RDP funding for providing this purpose (e.g. a staff member to coordinate groups along the lines that the farm advisers act in some GB protected areas).
- We note there is no mention in this section, of the **limited access in Northern Ireland for people to enjoy the special qualities of the ecosystems in the countryside** that these measures aim to enhance. This contributes, we feel, not only to a lack of appreciation of the eco-systems but also to disproportionate impact in places where access is concentrated, like the high Mournes. The flip side is that provision of sustainable, managed access can help enhance appreciation and address environmental degradation, while also providing economic and healthy lifestyle benefits for rural communities. **We suggest that the scope for agri-environment schemes to provide access related payments to landowners should be very thoroughly explored.** These could be one off grants to provide access infrastructure and/or annual payments for maintaining existing or new provision.

At the very least this should **compensate landowners** for any Single Farm Payment forgone relating to land that they make available for access, if it cannot be arranged that this land remains eligible. Funding could also **assist landowners - or management bodies working with them - to manage the pressures and impacts** of existing access on landscape, biodiversity and farming activities and make provision for the creation and management of agreed new access. In addition, given that much de facto access exists in Northern Ireland, landowners should not be penalised through land being deemed ineligible for Single Farm Payment through erosion caused by walkers and other activity they have not given permission to.

- We have previously written to DARD on behalf of the Mourne AONB Management Group, which brings together statutory and community stakeholders, on the need for this issue to be addressed. We feel that the low level of access to the countryside in NI, reflected in the existence of only a fraction of the Public Rights of Way that exist in other areas, along with the challenges to providing sustainable access posed by the landownership pattern that obtains here as a result of the Irish Lands Acts of the late 19<sup>th</sup> and early 20<sup>th</sup> century, combine with our landscape topography of mountains, hills and drumlins to make NI very different to much of Europe. Accordingly we feel this forms **the**



**basis of a strong special case for the RDP in NI to have a strong element that incentivises and helps landowners to provide sustainable, managed access.**

- The consultation document poses the question ‘Do you agree that funding should be prioritised in the first instance to support the management of designated sites? As many of our designated sites are recognised at a European level we would agree that this should be a priority and would argue that landscape designations, notably **AONBs, should be prioritised along with conservation designations.** This would help to ensure that our most scenically, as well as scientifically, important countryside is enhanced and would contribute significantly to the economic spin offs of agri-environment schemes for rural communities, notably through tourism.
- We note the conclusion in this section that ‘soil erosion is not a significant issue’. We would like to point out that while this generality may be correct, we have found that **soil erosion has been a significant issue in areas where access to the countryside is concentrated,** for example in the high Mourne. Again better management of access, in the form of robust paths for example, would help address this issue.
- We note the inclusion of **agro-forestry measures** under this priority and strongly support development and promotion of these. This should **include conservation approaches to planting regimes,** not just the relatively narrow interpretation of silviculture currently required under the Woodland Grant Scheme We have been operating a ‘*Trees for Mourne*’ project, which provides native oak for planting on farmland in the Mourne uses both **a wider spacing of trees and smaller acreages** than allowed under current forestry support measures which focus on commercial woodland spacing regimes. This allows farmers to continue to graze land. Despite being unable to offer financial assistance, simply the trees and planting free of charge, we have had significant uptake with farmers recognising both environmental and animal husbandry benefits. We feel this model, with wider application, has the potential to make a significant contribution to encouraging tree planting on farmed land in NI and would highlight its **potential contribution to achieving the objectives of climate change mitigation and animal welfare as well as biodiversity.**

#### **Priority 5 - Promoting resource efficiency and supporting the shift towards a low-carbon and climate resilient economy in the agriculture, food and forestry sectors**

- We note the comment that there is ‘*limited opportunity for the population to access open countryside other than through state forests*’. As well as welcoming the acknowledgement of **the role of state forests in providing countryside access** – something we feel investment through the Rural Development Programme will be required to capitalise upon - we would also flag up the recognition, by implication, in this statement that, as highlighted above, **access to the countryside is otherwise limited in NI.**

- We feel the proposed schemes are rather narrow in their scope, focussing on reducing energy consumption in agriculture and more proactive climate change mitigation only through forestry. We would suggest **consideration of the scope to support activities that lead to carbon sequestration through the retention/ restoration of peat bogs**, something that could also make a significant impact to biodiversity enhancement.
- The consultation document asks ‘Should renewable energy technologies be included in a farm business development grant scheme?’ In general terms we support the promotion of renewable forms of energy but would stress that a **strategic, managed approach is required** to ensure adverse impacts on landscape, biodiversity and availability of land for food production are not experienced.

### **Priority 6 - Promoting social inclusion poverty reduction and economic development in rural areas**

- We note that a difference from the current RDP is that there is no specific measure relating to **conservation and upgrading of the rural heritage** or similar. We appreciate that many built and cultural heritage projects could be pursued under village renewal and/or tourism measures. However, we are concerned that these measures *may not* provide a fit for some important aspects of our rural heritage that a) are geographically remote from or do not relate to a village - and therefore do not fall under village renewal plans and/or b) may not have a direct tourism impact but are important for their own sake. An example might be the summit towers on Donard, Commedagh and Meelmore in the high Mourne. We simply wish to flag this issue up to test any assumption that tourism and village renewal measures can cover rural heritage adequately and **prompt consideration of whether the absence of a specific measure for rural heritage would not exclude some important rural heritage and potential projects.**
- As touched on in our general comments, we feel that **the current programme has not catered well for strategic tourism projects**, being too bottom up and fragmented in its approach. This has included the **limitations of arrangements for catering for tourism projects which span LAG boundaries**, something tourism inevitably has to do. But it is not exclusively this. For example, even within individual LAG areas the upgrade of sites associated with the Mourne Coastal Route, a project endorsed by NITB, MHT and local authorities and seen very much a strategic whole, had to be split into individual projects based on individual sites. Not only did this **subvert much of the rationale for the development but it created significant additional work for project promoters and LAG staff** in terms of applications, appraisals, grant draw down etc.
- We recommend consideration of evolving **a model for the tourism elements of the new RDP that is aligned to destinations, drawing on the positive features of the Natural Resource Rural Tourism Initiative**, a special funding initiative delivered under Peace II and involving NITB, DARD and NIEA with other tourism stakeholders. As well as providing an appropriate geographic focus and

facilitating more strategic projects, the NRRTI model importantly also provided a **staff team that could specialise in tourism and build up an understanding of the key issues relevant to the destination in question** – something we feel has been lacking in the LAG model in the current programme, in which staff are expected to cover a significant breadth of types of project.

### 3. Delivery Framework & Resources

- We note the questions posed in relation to possible transfer of funds between pillars. We note that Pillar I supports area based subsidies and that Pillar II measures offer significant scope for enhancement of the competitiveness of agriculture in addition to delivering benefits to the environment and rural economy. We feel that the **allocation of funds should be based upon that which best provides for development towards the broad based, sustainable rural economy that we need in the Mournes and Northern Ireland**, supporting both a competitive agriculture sector and healthy rural environment and communities.
- The consultation document also asks for views on the extent of the use of the about the LEADER approach. As previously outlined, we feel that the very significant **reliance on the LEADER approach in the current programme has militated against effectiveness and strategic impact** in a number of ways. We think other approaches than single LAGs dealing with all Priority 6 measures in a given geographic area should be considered, **not least special arrangements for tourism and roles for statutory bodies and environmental and other NGOs.**
- We are conscious that the move to LAGs based on the new council areas will address some of the issues for projects that span LAG areas – but **there will still be some affected by new LAG boundaries and this issue needs early and proactive attention in designing structures and methods of working.** In addition, we are conscious that another side of this is the risk that in the same way that workable LAGs which had built up some degree of expertise prior to 2007 were torn up at the transition between the current programme and the previous one and we started from scratch yet again. This contributed, in our view to far too many bedding in problems and lack of experience and expertise, contributing in turn to chronic staff turnover in many LAGs.
- **Regardless of the structures working practices adopted are critical** and we found the current programme very inefficient in many of its processes. The following is **just a selection that comes easily to mind of the many miscellaneous issues**: insistence on splitting strategic projects into many separate ones; very significant time lags - up to a year - between submission of applications to quite tight open call 'windows' and subsequent assessment/ economic appraisal; three quotes being required at *appraisal* stage for very small, known value costs items, e.g. room hire; weight seemingly given in assessment process to letters of support; time delays in processes between LAGs and JCCs; no provision for contingency budgets in capital projects; a long time taken and much misconception before it was worked out what cooperation projects would

involve and how they would work. **We suggest a thorough review of processes for assessment and administration of projects**

- We are aware that **similar observations have been made on the operation of previous EU programmes in NI** and that the answer has often been given that the processes are dictated by the Commission. However we also speak to opposite numbers in high landscape value areas in other parts of the UK and mainland Europe, not to mention Commission officials, and we see marked differences in approaches. We therefore find it difficult to escape the conclusion, based on long experience with various other EU programmes as well as Rural Development, that there is a particular Northern Ireland issue with disproportionate bureaucracy driven, at least in part, by DFP's requirements.
- The consultation document asks 'if there are insufficient funds to support the proposed programme **should the available funds be distributed across all the proposed schemes?**' We note that agri-environment is the only compulsory element within the RDP. However, we feel that the other aspects are important and that funds should be distributed across the various schemes, with **priority given to those that most help achieve a competitive agriculture sector and contribute to the well-being of rural communities.** We are particularly conscious that progress in NI in many of the areas targeted by Priority 6 relies significantly on RDP funding. For example, while NITB had significant funding for the Mourne Signature Project in the current funding period, this could only be provided at 50% and much would have gone unspent - and tourism infrastructure in the Mourne undeveloped - but for match funding from the RDP. Similarly RDP funding has helped lever significant funds into the Mourne from the UK wide Heritage Lottery Fund Landscape Partnership programme. **This funding leverage is an important aspect of non-AES aspects of RDP funding to NI.** In addition, these other aspects of the programme help to **complement the environmental benefits of the AES by enhancing the associated social and economic benefits that can be achieved.**

## 62. National Trust

Response to consultation questions:

### **Priority 1 Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas**

#### **Q1 Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?**

Additional training will be essential to ensure that those involved in farming have the necessary skills to meet the increasing and sometimes competing demands of the sector. Training also needs to be tailored to reflect the broad range of scales at which farming is undertaken, from major agri-food business to part-time small family enterprise.

We have heard regular feedback that farmers would value additional support to meet their cross-compliance responsibilities and to have more confidence to participate in agri-environment schemes. With specific reference to agri-environment schemes, training should be focused on providing proactive, constructive on-farm support to secure the best possible environmental outcomes. The delivery of such training and mentoring should be clearly separate from compliance monitoring and ideally should be provided through an advisory service. External groups, including environmental NGOs, could have a key role to play.

Through the Agri-food Strategy Board there is a focus on opportunities to expand the agri-food sector in Northern Ireland, and recognition of its key role in the economy. However, as the agri-food sector grows, it is important that R&D, training and capacity building should provide a strong focus on good environmental management so that any potential negative impacts of growth in the sector can be fully understood and mitigated.

**Q2 What do you think the role of the innovation broker should be and what skill sets should they have?**

We welcome the proposals to establish European Innovation Partnership groups, co-operation networks/clusters and innovation and technology demonstration schemes. In principle all these schemes should ensure that the benefits of innovation are realised to secure a long term future for farming. Those who take on the role of innovation brokers should be individuals, or more likely organisations, with a proven track record in the sector, a broad-based understanding of the challenges and opportunities, and the necessary facilitation and leadership skills to ensure buy-in across a range of farmers/landowners. The programmes supported by innovation brokers should have a clear focus on the priority challenges to be addressed, and measurable outcomes to be achieved.

**Priority 2 Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability**

**Q3: In light of the restrictions posed by the definition of ‘young farmer’ in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?**

While we recognise that the previous New Entrants Scheme had its limitations, we would be concerned if there were no options in the forthcoming RDP to provide additional support for ‘young’ or emerging farmers. Given current demographics, we believe increasing efforts will need to be made to support those involved in farming now, probably aged 40 or below, who will be or expect to be farming for the next 20 – 30 years or more. In particular this group will need to be nurtured as the environmentally friendly farmers of the future, who understand the full range of ecosystems services their activities deliver.

**Q4 With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?**

We do not have specific comments on funding levels at this stage.

**Q5 Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?**

The criteria are appropriate. For Tier 2 and especially Tier 3 projects, in addition to a business development plan and an economic analysis, an environmental impact assessment should be required.

**Q6 Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?**

We are concerned that the focus is heavily weighted towards the intensification of production - environmental impacts must also be taken into consideration. It would be important to ensure that there is support for business development for those farmers who wish to explore options to enhance

the viability and competitiveness of smaller scale, less intensive farming methods. While there should be scope to include renewable energy technologies, this must be based on appropriate environmental impact assessment. The cumulative impact of renewable energy installations across a number of farms must be monitored. Where appropriate joint ventures should be facilitated if an enhanced environmental benefit can be demonstrated.

**Q7 To what extent should development group members be reimbursed for collating and disseminating their farm performance?**

The information being collated is likely to be required as part of the day to day business of the farm and on this basis reimbursement for disseminating this information should not be provided.

**Q8 How should participants in development groups be selected?**

Application should be open to all. Selection should be based on the proposals most likely to deliver the outcomes which the programmes are intended to achieve. There should be a broad cross section of business types represented in the development groups, rather than focusing on a particular sector or only on large scale production groups.

**Priority 3 Promoting Food Chain Organisation and Risk Management in Agriculture**

**Q9 Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?**

We support the principle promoted in Focus Area 3A of quality schemes, local market promotion and shorter supply chains, and in particular the recognition that collective approaches to environmental projects can bring more benefit than an individual business.

**Q10 What do you think of the funding levels at each tier and is the maximum limit appropriate?**

It is too early to comment on the funding approach.

**Q11 What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?**

We would strongly support the need for landscape scale projects to be included in the scope of the project. These could focus on an ecosystems services approach, or bring together collectives to address conservation management issues across a wide geographical area. This would be an ideal vehicle, for example, to enable neighbouring farmers and landowners to manage the full length of a river, to address water quality issues, or deal with invasive species in a holistic way.

**Priority 4 Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors**

**Q12 Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?**

Given the current level of information it is difficult to comment in detail on the proposed structure. In principle we support an approach which targets designated sites and a more broadly based scheme which would enable participation from a much larger group. However, we are concerned that land which is not designated but which is of high nature value (HNV) may 'slip through the net', as it would not meet the criteria for the targeted scheme, but would not be the focus for the wider scheme. This needs to be addressed by ensuring that, overall, the AE scheme is focused on the achievement of clear and measurable environmental outcomes. Detailed decisions on scheme requirements need to be based on current evidence and biological surveys, and schemes should be specific and targeted to address the identified needs – this would mean a 'one size fits all' approach would not be possible. Lessons from the current AE schemes and the outcomes of the AFBI monitoring programme need to be taken into account in the design of the successor scheme. Close co-operation with NIEA will be essential.

It would also be important that any proposed scheme for the wider countryside is distinctive and moves beyond any measures already required under cross compliance or 'greening' requirements under Pillar 1.

**Q13 Do you agree that funding should be prioritised in the first instance to support the management of designated sites?**

Yes, but this needs to be on the basis of a specific plan, agreed with NIEA, to bring the designated site back into favourable condition – i.e. outcomes focused and individually targeted for each site. It will be important to demonstrate that any AE funds committed go beyond what NIEA, as the competent authority, is required to deliver.

While designated sites should expect to have priority, there is a need to ensure that HNV sites also benefit. One possibility may be to prioritise wider countryside schemes on land adjacent to designated sites. In the event that schemes are not whole farm schemes, it should be ensured that where neighbouring farms both enter a scheme, the land entered in the scheme should be adjacent land to maximise benefit. There is also scope for targeting the wider countryside scheme options to focus on issues of greatest need – again starting with an understanding of the evidence-based need in any given area, and promoting specific measures to achieve the required outcomes.

**Q14 Do you think that an element of training should be a compulsory part of the scheme?**

Yes, training is essential to secure successful outcomes for the scheme – see response to Q1. Training should also be backed up with the provision of an advisory service which is separate from compliance.

**Q15 Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?**

Yes, we would strongly support this approach as a means to ensure the greatest possible participation. We believe that collective action must be approached in a planned and co-ordinated way from the outset. A facilitator, project manager or third party agency should be funded as part of the scheme. In addition to co-ordination that party could also take on the role of engagement with local communities and other stakeholders to secure maximum benefit.

**Q16 Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.**

We recognise that uptake of the organic option was not high in the current RDP and that some farmers are struggling to achieve a premium for their organic status. However, we believe it would be appropriate to retain some support for organic farming in the next Programme to enable those in transition to continue and allow more farmers to explore the potential benefits of organic farming. We would urge DARD to carry out an assessment to understand the barriers to uptake of the previous scheme and to identify the reasons why some land is no longer farmed organically.

**Q17 There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?**

Some of the challenges relate to the long term nature of forestry, requiring farmers to take land out of production for many years before a return on investment is achieved. The prescriptive nature of the management requirements in the current scheme (focused on fencing and non-intervention) are also a constraint. In future an approach based on a site-specific management plan would allow greater flexibility – e.g. once trees are sufficiently robust, allowing appropriate grazing. This may be a more attractive proposition for some farmers, ensuring land is not entirely out of production in the long term. The current woodland scheme generally provides less income than an conacre agreement, so this is a disincentive.

**Q18 The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?**

The inclusion of income foregone payments could provide an incentive to help NI move towards its target for woodland creation. However, if such payments were to be introduced, care would need to be taken to ensure that woodland creation is only supported in appropriate sites without detriment to priority habitats and species.

**Q19 Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?**

This is a complex issue and we do not feel that there is currently sufficient information to fully assess which is the most appropriate route. A case can clearly be made that ANC support is primarily an income support measure, given the challenges and generally low productivity of land in these areas. However, ANCs are often also areas of high nature conservation value, or contain important habitats and species. Therefore, Pillar II support to maintain the nature conservation significance of an ANC could also be argued to be appropriate. We would urge DARD to undertake further modelling to understand the likely implications and outcomes of both models. Either way, it is important that any funds provided, through either Pillar I or Pillar II, should be linked to the delivery of public goods – whether land or water management or access provision.

**Q20 Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?**

As indicated above we are extremely concerned that HNV farming will not benefit from, and may even be damaged by, a new AE scheme as currently envisaged. Much of the land in ANCs is managed through HNV farming systems which are low input. It is essential that these farming systems are supported because they provide important benefits – often creating or maintaining landscapes which are integral to Northern Ireland's tourism success and opportunity, and which are significant elements of our cultural heritage. They are also good for biodiversity and support the protection of our soils and watercourses. However, while such farms provide these public goods which are highly valued, they are often not economically viable. As the farm population gets older, these special areas are becoming increasingly vulnerable to land abandonment. We believe, therefore, it is essential that AE Scheme support has a clear focus on HNV farming. This needs to support farmers and land managers to enhance biodiversity (focused on specific identified outcomes) and deliver other ecosystem services, and/or well managed public access on their farms. Thus farmers should be rewarded for providing public goods, rather than simply being supported to remain on the land.

**Priority 5 Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors**

**Q21 Should renewable energy technologies be included in a farm business development grant scheme?**

As indicated above we support the inclusion of renewable energy technologies, but this must be within the framework of a sustainable plan for the farm business and all environmental impacts must be taken into consideration, not just for introduction of the technology but for the whole life of the scheme.

We believe it is essential that a strategic approach should be taken by DARD to ensure that cumulative impacts (visual, environmental) of a large number of individual on-farm schemes can be avoided.



**Q22 Which renewable energy technologies, if any, should be supported?**

A mix of technologies should be considered, but within clearly set out constraints. For example, biomass technology should be linked to sustainable land management, and must be located appropriately without displacing important habitats, e.g. semi natural grassland or lowland heathland.

**Q23 Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?**

It would be appropriate to give priority to such projects, subject to all the environmental conditions referred to above being taken into account.

**Q24 The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?**

We believe that the proposed Forestry Plantation Scheme must meet a full range of objectives rather than focusing solely on wood production. Multi-purpose management is the basis for modern forestry and all schemes should ensure there is provision for public access, local community benefit and enhancement of biodiversity.

As above, the location, design and scale of any proposed new scheme must take into account environmental considerations and ensure there is no negative impact on priority habitats and species. Decisions on applications to this scheme must also take into account the overall outcomes desired by the AE scheme, so that woodland creation opportunities are balanced with other objectives to enhance biodiversity and achieve improvements to targeted species and habitats.

**Q25 Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?**

We have no comment.

**Q26 What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?**

Demand for advanced systems are likely to increase as there is a greater focus on climate change impact mitigation, e.g. with a Climate Change Bill.

**Q27 Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?**

Yes.

**Q28 What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?**

This is an issue which may be addressed through provision of training, mentoring and on-farm support from independent advisers in the future.

**Q29 Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?**

This could form one element of scheme delivery.

**Q30 Are there any other measures which should be considered under the Nutrient Efficiency Scheme?**

We would advocate targeting support for the scheme in areas which are identified as priorities for action under the Water Framework Directive. DARD and the Water Management Unit of NIEA should collaborate to ensure maximum benefit from the scheme.

## **Priority 6 Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas**

**Q31 How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.**

We agree with the overall objectives for this priority and the proposed schemes appear to be in line with these. We believe it will be essential to adopt a focused approach to ensure that funds and projects within each scheme are targeted to address issues of greatest need and there is clarity about the outcomes and benefits desired. DARD will need to work closely with a wide range of agencies in the delivery of these schemes, and especially to ensure that the RDP funding adds extra value, and does not duplicate services which could be available to rural communities through other agencies. The context of transfer of a broad range of responsibilities to new local authorities in 2016 needs to be taken into consideration.

**Q32 How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.**

We believe that the Rural Tourism programme could be enhanced by ensuring there is a strong correlation with AE scheme support, particularly in areas of high nature value. Thus AE scheme support for HNV farming models will have a direct impact on NI's future tourism opportunity. There is clear evidence that tourism in Northern Ireland relies heavily on its image as a clean, green place of great natural beauty. This could be enhanced with support from RDP for appropriate marketing and business development, provided at the same time there is a focus on protecting and cherishing the special places and landscape at the heart of our rural tourism offer. Strategic product development should encourage a range of businesses/landowners/farmers to work together to focus on high value/low impact opportunities based on a quality product offer.

**Q33 On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.**

Farmers and landowners on both sides of the border could look at opportunities to get involved in landscape or catchment scale projects which could address both environmental challenges and tourism or business development opportunities. To ensure maximum impact, such schemes should be supported by a facilitator or lead agency along the lines of the European Innovation Partnership proposals identified in Priority 1.

**Q34 Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.**

It is likely that budget constraints will mean that this should focus on areas adjacent to the border.

### **DELIVERY MECHANISMS**

**Q35 How much of the programme budget should be allocated to the LEADER approach, and why?**

At this stage it is too early to comment on the proportion of budget to be allocated to specific approach.

**Q36 Which measures/schemes should be delivered through the LEADER approach, and why?**

We welcome the commitment in the consultation document to take on board the lessons learned from the review of the LEADER approach in the current and previous schemes and also to take into account the changes which will come into effect with the Review of Public Administration. These issues will inform decisions on which programmes to allocate to LEADER.

**Q37 Which measures/schemes should DARD deliver itself and why?**

We do not have any comments at this stage.

**Q38 Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?**

We do not have any comments at this stage.

**FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS**

**Q39 If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?**

It should be noted that agri-environment schemes are the only compulsory element of the programme and we believe these schemes should be given priority in the event of a budget shortfall. Opportunities to maximise the benefits of the RDP across a range of Priorities should be identified at a strategic level so that schemes which have a focus on enhancing biodiversity or supporting HNV farming for example can also deliver on objectives of other priorities such as rural tourism.

**Q40 If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?**

As noted above we believe it is essential for agri-environment schemes to have the highest priority. As well as being the only compulsory element of the programme, the AE scheme provides incentive and support for land managers to deliver essential public services – clean water, flood protection, landscape and cultural heritage protection etc – which are not currently rewarded by the market, and for which limited other funding streams are available, if any. An integrated approach to AE scheme delivery should ensure that social and economic benefits can be secured along with the good environmental outcomes which should be at the heart of the scheme.

**Q41 If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?**

The National Trust believes that Pillar 2 represents the best mechanism to deliver the environmental outcomes which are essential to meet the objectives and priorities set by the European Commission and to address well documented challenges of decline in biodiversity. Therefore we would support the transfer of funds from Pillar 1 to Pillar 2 to the maximum of 15%. Note that we do not support the proposed option which would allow Member States to undertake ‘reverse transfer’ of funds from Pillar 2 to Pillar 1. Transferring funds from Pillar 1 to Pillar 2 is in line with the principle of ensuring land managers are rewarded through public funds for delivering public goods and services.

For further information in the first instance, please contact:

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21 October 2013

# 63. NI Environment Link

## **European Union - Priority 1**

### **Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas**

#### **Question 1**

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

#### Comment

NIEL believes that training should be a core element of the new RDP. Furthermore, as Agri-Environment Schemes (AES) are the only mandatory element of the RDP, adequate resources need to be provided to ensure appropriate training and advice is directed towards the delivery of AES. Training and advice should help farmers and landowners to achieve more than the current legislative baseline and should cover a range of areas including management of priority habitats and species, greenhouse gas sequestration, farm nutrients and invasive species. We believe that advice and training should be delivered within the context of informing farmers of the principles of ecosystem services and how they can deliver public goods (such as cleaning water or flood defence) while at the same time making a living for themselves and their families.

We also believe that DARD should utilise the expertise within NIEA and environmental NGOs to design and deliver this training and advice. Central to this would be the eNGOs' ability to enthuse and inspire farmers and landowners.

Provision also needs to be made for farmers and landowners to select from a number of 'pre-determined' environmental management study visits (to ensure quality of visits, usefulness of lessons learned and local applicability) within NI, within the UK and Ireland, to other EU members States and potentially beyond to learn from experiences elsewhere. Specific training is required to help farmers deal with the implications of climate change and to recognise and respond appropriately to unforeseen circumstances (such as diseases or extreme weather).

#### **Question 2**

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

Innovation brokers need to have a wide range of skills including a good knowledge of and ability to promote good environmental work among farmers and landowners. These brokers need to utilise the expertise within NIEA and environmental NGOs in order to fulfil their role and should work with local organisations capable of assisting with the design and delivery of study visits and potential examples of good environmental management.

Innovation brokers should have a sound understanding of the ecosystem services which farmers can deliver, and be able to effectively promote farm management to deliver a range of outputs, providing both private profit and public benefits. The advantage of farmers working cooperatively in a given area or on specific themes or targets should be particularly promoted and encouraged through capacity building programmes.

## **European Union - Priority 2**

### **Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability**

#### **Question 3**

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

Given the aging profile within the farming sector, NIEL would support young farmers being incentivised to remain in, or enter, the industry. We would like to see specific support which could improve the viability of extensive farming systems including support for young farmers in these areas for wildlife friendly farming and delivery of a range of public and private benefits from a more integrated approach to farm and land management.

#### **Question 4**

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

No specific comment at this time

#### **Question 5**

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

We support the requirement for a business plan in order to secure financial support. However, in relation to proposals for developing anaerobic digestion

facilities, we suggest that each application is accompanied by a mandatory Environmental Impact Assessment to ensure no unintended environmental damage is caused including land use change to maintain these plants at optimum capacity.

#### **Question 6**

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

We would be concerned that the proposed areas of expenditure merely focus on promoting intensive farming and deliver purely private economic benefits. Any expenditure should therefore, as an absolute minimum, ensure no environmental damage is caused and that ventures which promote environmental as well as economic and social improvement are duly rewarded. This proposal would be in line with the principles of sustainable development. Also as outlined previously while we are supportive of renewable energy technologies at farm level, such proposals must be accompanied by an EIA where appropriate.

#### **Question 7**

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

If development group members are receiving tailored business and financial support for their enterprise we do not believe it should be necessary for them to receive additional support for collating and sharing their farm performance, unless this work comes at a significant additional cost to the farmer that was not anticipated during initial project design.

We would support the inclusion of conservation management across a range of habitats within the best practice demonstration farms. We would support funding for programmes that disseminate and share best practice among farmers.

#### **Question 8**

How should participants in development groups be selected?

Comment

Participation in these groups should be open to all. However, consideration should be given to gaining a wide representation by targeting farmers who through advice and business support could help address some of the habitat and species loss as highlighted by important documents such as the Article 17 report and the State of Nature and State of the Environment Reports.

### **European Union - Priority 3**

#### **Promoting Food Chain Organisation and Risk Management in Agriculture**

### **Question 9**

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

We welcome reference to '*Support for collective approaches to environmental projects and practices could help to provide greater and more consistent environmental and climate benefits than can be delivered by individual businesses*'. However, there is no further information provided in the text as to what these approaches could be. The information given on the proposed sectors for which support will be provided is limited to how investment will improve their competitiveness rather than any specific environmental and climate benefits. The wider goods of greenhouse gas sequestration, soil quality management, ecosystem service delivery and climate change adaptation are particularly relevant areas for action.

### **Question 10**

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

We have no specific comment to make at this time other than funding must not support activities leading to environmental damage and should ideally deliver environmental benefits.

### **Question 11**

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

NIEL is disappointed that the co-operation scheme proposal has not been extended to include conservation management and sustainable food production. To this end we believe that co-operation should be encouraged at a catchment or landscape scale level. Such an approach would also facilitate collective action which could reduce the problems associated with nutrient enrichment as well as help deliver improved biodiversity and water quality outcomes in line with Water Framework Directive and EU Biodiversity Strategy targets. Similarly, this approach would also enable individual farmers to contribute to an ecosystem approach to land management. It is imperative therefore that the new RDP contains a *Special Environmental Projects* type scheme which is resourced and implemented in full

## **European Union - Priority 4**

**Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors**

### **Question 12**

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

NIEL is generally supportive of the broad principles outlined within the structure of the AES. However, before full support could be forthcoming, we would need to see much more detail not only around the planned structure of the new AES but also further details as to the options within it. Given the reduced budget for the new RDP we would support the view that the AES should be prioritised to deliver the maximum environmental outcomes. We would therefore, on the limited information provided, be supportive of a targeted wider countryside element (focusing on priority species) as well as a targeted protected area element. We would, however, call for further information on the 'suite of options' under consideration and wider consultation with stakeholders around the design and intended outcomes within this Priority. As well as eNGO's, NIEA ecologists should be engaged in the design of this priority and its component parts.

### **Question 13**

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

Given that our designated sites are recognised at a European level, contain our most important habitats and species and are subject to enhanced legislative protection, it would appear logical that they receive priority funding. However, any funding should be additional to that already provided by NIEA for their upkeep and bring additional environmental benefits. Furthermore, resources need to be directed towards wider countryside targeted options if we are to develop green infrastructure, wildlife corridors and the opportunity to deliver an ecosystem services approach at a landscape scale rather than the maintenance of pockets of conservation across NI. In addition the National Landscape Character Assessment for Northern Ireland (which we understand is currently being reviewed and updated by NIEA) could be an appropriate tool to provide evidence baseline for future strategic management, planning and protection of our landscapes (be they designated or undesignated rural, peri-urban or despoiled).

### **Question 14**

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Yes – training and advice must be a compulsory element of the scheme. As mentioned earlier, we believe that DARD should utilise the expertise within NIEA and environmental NGOs to design and deliver this training and advice. As habitat and species identification, protection, management and improvement can be a complex area, farmers and landowners need to have the added support of specialist advisors in order to fully understand the requirements of the schemes and how best they can achieve the desired



outcomes. While initially seeming a costly administrative burden, mandatory advice and training are much more likely to ensure environmental outcomes are achieved and deliver better value for the investment of public money.

### **Question 15**

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

Yes – NIEL is very supportive of this proposal. When aiming to develop and deliver environmental outcomes through a catchment based approach, it is imperative that as many farmers and landowners within the catchment as possible participate. In order to secure widespread participation in collective action, higher levels of funding should be available, otherwise good environmental work by some farmers may have reduced impact due to the non-participation of neighbouring landowners, e.g. invasive species management, fragmentation of habitats etc. There is also the option of utilising NIEAs National Landscape Character Assessment as a vehicle for delivery of appropriate co-operative management. Given the general low level of experience of farmers coming together to design and submit collaborative applications to deliver environmental outcomes, NIEL suggests that DARD allow the potential for 'third-party' applications (e.g. from eNGOs) on behalf of landowners for catchment scale projects.

### **Question 16**

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

Comment

While uptake of existing support measures for organic farming is low, NIEL believes that given the recent well-documented concerns regarding the decline in pollinators (and the link to neonicotinoids) and importance of soil quality, support for organic farming should be retained, given its ability to deliver for biodiversity and landscape conservation through the adoption of more environmentally friendly agricultural management practices. We believe DARD should investigate the barriers that landowners are facing that currently limit uptake of organic farming and provide greater encouragement and promotion of this nature friendly farming given its ability to enhance ecosystem services and so deliver greater public good.

### **Question 17**

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

## Comment

We believe that a major barrier to landowners planting woodland on farms is the necessity to take this land out of agricultural production for many years and so removing flexibility from their grass-based farming system. One option may be to allow limited and pre-defined agricultural use of woodland areas after the trees are mature enough so as not to be susceptible to damage by livestock (free range hens, etc) or managing woodlands using foraging animals. It has been found that pigs can be used beneficially in various woodland management options, they are excellent at clearing brash and scrub, and can be used to manage the removal of bracken and bramble and have also been used for the removal of invasive Rhododendrons. While NIEL is supportive of woodland expansion in principle across Northern Ireland, some land that has agricultural limitations e.g. peatlands, wetlands etc. may contain priority habitats and species and be unsuitable for woodland creation.

## Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

## Comment

NIEL is content with inclusion of income foregone payments for woodland planting. Northern Ireland is currently not on track to meet its woodland creation targets therefore income forgone payments could be a significant factor in securing increased woodland cover.

## Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

## Comment

NIEL agrees that ANC support is primarily an income support measure and therefore support from Pillar 1 is a more appropriate route. However, given the already considerable reduction in Pillar 2 funds, this does not mean that monies should be moved from Pillar 2 to Pillar 1 (previously referred to as reverse modulation) in order to fund this income support. Furthermore, while we agree with support for ANC farming this support must also be on the basis of controls that would reduce the risk of environmental degradation from undergrazing/ overgrazing as well farming practices that have negative impacts upon soil and water quality. While an income support measure, NIEL believes that public money should deliver public good through positive environmental outcomes.

## Question 20

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

As High Nature Value farms are more likely to be found in ANCs, NIEL believes that these farmers should have the option of receiving additional payments for maintaining and providing environmental goods and services. NIEL supports the inclusion of a specific measure to support High Nature Value (HNV) farming which is more likely to be found in Areas of Natural Constraints (ANCs). HNV farming systems are inherently high in wildlife value, and also produce other environmental benefits including carbon storage, sources of clean water, they maintain landscapes and help wildlife adapt to climate change. Typically they are low-intensity farming systems, with a high proportion of land in, or close to, a 'semi-natural' state, such as orchards, hay-meadows and permanent pasture that are not heavily fertilised or regularly re-sown. Although HNV farming therefore provides a host of ecosystem services, biodiversity and landscape conservation benefits, by definition these farmers remain on the extreme edge of viability as these benefits are not currently rewarded in the marketplace. It is crucial that, as an absolute minimum, financial support for ANC is directed towards the economic viability and protection of HNV farming systems linked to the continuation of well-defined land management practices and the delivery of environmental public goods. Ultimately payment for areas facing natural constraints should move beyond the current approach of being paid on the basis of location to rewarding farmers for the environmental public goods they provide.

### **European Union - Priority 5**

### **Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors**

#### **Question 21**

Should renewable energy technologies be included in a farm business development grant scheme?

Comment

NIEL supports the inclusion of renewable energy technologies within the farm business grant scheme, especially where these technologies can address the on-going issue of poultry litter and other forms of food waste product. Bioenergy forms an important component of the mix of technologies required to boost our renewable energy capacity to fulfil the Northern Ireland Renewables Obligation (NIRO). However, as outlined previously, while we are supportive of renewable energy technologies at farm level, such proposals must be accompanied by an EIA where appropriate to address any environmental issues, including possible unintended consequences. The noise, water, odour and traffic impacts as well as emissions impacts are potentially problematic issues with renewable energy technologies. Of particular concern is the cumulative visual impact of buildings of an industrial nature across the countryside. For example, the number of applications for on-farm anaerobic digesters could rise significantly through the provision of grant support as proposed through the Business Investment Scheme. A

strategic approach, with a clear vision of what AD is intended to achieve in terms of contribution to renewable energy across Northern Ireland, is required to limit the build-up of AD plants in the countryside and prevent wide scale changes in land management to provide feedstock for AD plants.

### **Question 22**

Which renewable energy technologies, if any, should be supported?

Comment NIEL is content for a range or mix of renewable technologies to be considered for support. However, each proposal must be accompanied by an EIA and an assessment of the cumulative impact of these technologies as highlighted previously.

### **Question 23**

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

This proposal would seem appropriate in the short to medium term given the current deficiencies of the National Grid Infrastructure. In addition, we note that the Public Consultation document on Draft Supplementary Planning Guidance to PPS 18 'Renewable Energy' states that '*Applicants for all renewable energy development proposals should be aware that there may be significant capacity constraints in accessing certain parts of the NIE Grid network particularly in the west and north-west of NI*'.

### **Question 24**

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

NIEL agrees that scope should be provided to support larger new woodlands which provide enhancement of biodiversity. However, as with proposed renewable energy technologies, such proposals must be accompanied by an EIA to ensure of no unintended consequences. Any new proposed woodlands must be biodiversity and landscape 'proofed' i.e. designed to enhance or protect priority species as well as deliver wider ecosystem services including recreation and rural tourism.

### **Question 25**

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

NIEL endorses the views of sequestration sub-group of the Greenhouse Gas Implementation Partnership (GHGIP) and their support for the inclusion of a successor to the METS scheme within the new NIRDP. Advanced slurry spreading techniques ensure that valuable natural nutrients are properly targeted. This will enhance the fertility of land and therefore aid sequestration. Furthermore, slurry/manure processing equipment supported by the METS could also make a significant contribution to achieving our Water Framework Directive (WFD) targets.

### **Question 26**

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

Given that agriculture is the single biggest contributor to GHG emissions in Northern Ireland, and with approximately 65% support for a Northern Ireland Climate Change Bill in a recent DOE consultation, the possible introduction of such a Bill would be a significant factor in improving the uptake of the METS. The use of farm machinery rings may also aid wider uptake.

### **Question 27**

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

Comment

Yes – NIEL would not regard this as an unreasonable nor burdensome request and it would be otherwise be difficult to access behavioural change and effectiveness of the scheme. This feedback would contribute to the knowledge base around the impact of METS on water quality and ultimately aid assessment of progress towards meeting our WFD requirements.

### **Question 28**

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

It is very important for affordable information to be available to farmers to allow them to appropriately target nutrient addition by understanding their soils and what (if any) nutrients are required for their crop.

### **Question 29**

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Yes – farmers are more likely to listen to best practice and the experiences of their peers through discussion groups and farm walks than to government interventions alone.

### **Question 30**

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

NIEL believes that DARD should liaise closely with NIEA Water Management Unit in the design of additional measures. WMU could also make catchment specific recommendations based on water quality data and the ecological status of our waterbodies.

## **European Union - Priority 6**

### **Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas**

#### **Question 31**

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

While we broadly agree with the priority 6 schemes as outlined, we believe that our natural and built heritage have much to contribute to Northern Ireland's rural 'nature' tourism potential. By using agri-environment schemes to improve the condition of our land-based and aquatic habitats, the status of their flora and fauna, and our built heritage, we can build visitor numbers through enhanced development and promotion of our 'clean, green' image and wildlife tourism.

Given their precarious financial position, NIEL believes that support for HNV farmers through targeted agri-environment schemes has the potential to both help combat poverty and social isolation while also delivering significant environmental and public good.

#### **Question 32**

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

As per our answer to Question 31, NIEL believes that support will be mutually beneficial in terms of habitat, species and built heritage improvement as well as boosting the rural economy by improving our rural 'nature' tourism product through the development of wildlife tourism on less agriculturally productive land.

Similarly, financial support for HNV farmers on marginal land not only improves their viability but ensures continued delivery of the significant environmental benefits this type of farming provides.

### **Question 33**

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

We believe All Island Co-operation should focus on environmental issues of common interest that could improve our rural nature tourism potential. For example measures to deliver cross-border cooperation on designated sites or on shared river basin could provide significant environmental benefits, boost the rural economy and help alleviate deprivation and isolation on both sides of the border. Integrated management, especially of cross-border catchments or designated sites, would lead to greater environmental benefits and improved delivery of ecosystems services.

### **Question 34**

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

If we intend to boost rural tourism by improving the quality of our natural environment on both sides of the border, it would seem most appropriate to focus on those regions in the north adjacent to the border for reasons of, shared designated site management and the opportunity for development of wildlife corridors, green infrastructure etc. Furthermore it is likely that funding constraints would restrict support to areas adjacent to the border otherwise support would be too geographically dispersed to provide significant North/South benefits.

## **DELIVERY MECHANISMS**

### **Question 35**

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

NIEL has no specific comment to make at this time.

### **Question 36**

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

NIEL recognises the merit in LEADER having the potential to contribute to the proposed schemes and measures in Priorities 1-5, including the opportunity for local delivery of targeted environmental measures in line with specific local needs. The RPA will mean that Local Action Groups will be reformed in line with new Council areas. This development would also provide an opportunity for greater synergy between LAG environmental measures and the statutory requirements now placed upon local authorities in relation to the Sustainable Development and Biodiversity duties.

### **Question 37**

Which measures/schemes should DARD deliver itself and why?

Comment

NIEL has no specific comment to make other than we believe that DARD should deliver measures and schemes that clearly fall within its competence e.g. Food Chain Organisation, Resource Efficiency etc, and partner with NIEA and environmental NGOs specifically in relation to other Priorities and measures such as, but not limited to, Priority 4 – *Preserving and enhancing ecosystems dependent on agriculture and forestry*

### **Question 38**

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

NIEL has no specific comment to make at this time.

## **FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS**

### **Question 39**

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

NIEL believes that as Agri-environment is the only compulsory element within the RDP it should be prioritised and funding should be directed towards halting biodiversity loss, landscape degradation, habitat, species and landscape conservation, improvement in



water quality, promotion of natural flood management and climate change mitigation and adaptation. We believe that as RDP is funded by public monies its priority should be to provide public good in the form of ecosystems services. A 'Strength' listed within the SWOT analysis undertaken in relation to Priority 6 states that '*NI has attractive rural landscapes and unspoilt environments*'. Consideration should also be given to schemes where the RDP could provide match funding to help lever additional significant funds for sustainable tourism infrastructure especially within areas of landscape of distinctive character and special scenic value, such as AONB's.

#### **Question 40**

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

In order to achieve the European Union's Biodiversity Strategy to 2020, the European Commission asked each Member State to provide a Prioritised Action Framework (PAF) which describes the actions needed to achieve the six high level targets in the Strategy. In the event of there being insufficient funds to support the proposed programme we would therefore suggest the NI PAF sets out where funding should be directed. We also believe that additional financial support be targeted to complement the delivery of the NI RDP.

#### **Question 41**

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

In order to deliver the maximum benefits for our environment, NIEL believes that it is important to maximise the amount of funding within Pillar 2 and therefore we support the option to transfer funds from Pillar 1 to Pillar 2 to the maximum stated level of 15%. Given the disproportionate cuts to Pillar 2 as part of the Multi-annual financial Framework the potential to transfer these funds from Pillar 1 could go some way to redressing this imbalance. We would be strongly opposed therefore to any proposal to transfer funds from Pillar 2 to Pillar 1 and to do so may make it impossible for Northern Ireland to meet its environmental obligations. NIEL therefore supports the principle of maximising the public monies available to deliver public good through the new Rural Development Programme.

#### **ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020**

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

## Comments

Given the lack of detail in the proposals it is very difficult for NIEL to provide definite responses to many of the questions in the document. We would like however to make the following additional points:

### General Comments:

- Support for ecosystems services needs to be up front and central within the new RDP and a coordinated approach applied
- Farmers and landowners should be rewarded for providing public goods in relation to ecosystem services and environmental improvement
- As Agri-environment is the only compulsory element within the RDP it should be prioritised and funding should be directed towards halting biodiversity loss, habitat and species conservation, improvement in water quality, promotion of natural flood management and climate change mitigation and adaptation
- Pillar 2 Agri-environment monies should be directed towards providing targeted additional environmental benefit. This limited financial resource should not be utilised to pay for measures that should already be addressed and enforced by Pillar 1 measures such as *Cross compliance*, *Greening* and *ANC*
- Given the budgetary constraints within Pillar 2 we support the transfer of 15% funding from Pillar 1 to Pillar 2 and believe this funding should be ring-fenced for HNV farming

The fact that the proposals for the new RDP seems to closely reflect the current RDP which has failed to halt the loss of biodiversity would remain a matter of concern

- While the need to enhance biodiversity is prominent in the draft programme, we feel landscape requires greater prominence and that broader aims and targets relating to improving our natural environment include specific mention of both biodiversity and landscape
- The new AES must be designed to achieve targeted environmental outcomes. Currently there is no specific reference in the document to what DARD want to achieve
- DARD should work with NIEA and environmental NGOs in the design and delivery of the new AES
- Political expediency must be resisted in relation to over simplification of the RDP with an over-riding aim of getting the money 'spent' as opposed to the efficient and effective allocation of money to deliver environmental good

### Specific Comments:

- There is little mention of sequestration within the document yet its promotion would be key to developing an ecosystems approach and should be an underlying theme throughout the new RDP
- The recent Habitats Directive - Article 17 Third UK Report indicated that ammonia and ammonia deposition is having a significant negative impact upon NI habitats. We would therefore welcome measures to address nitrogen and ammonia deposition within the new AES
- While HNV farming is referenced within the document, no definition is provided by DARD as to what they interpret HNV farming to mean
- There is little or no reference to restoration and remediation of habitats in the current proposals. These needs to be rectified if we are to address

biodiversity loss

- DARD need to address the omission of peatlands and the value peatland restoration in relation to carbon storage and sequestration within the proposed measures
- Reference to Invasive Alien Species must be included with the plan to help meet the new European IAS Regulation and offset the financial (£46.5million per year) and environmental damage they cause
- We would like to see specific reference to measures that encourage pollinators and the management of hedgerows for the many carbon, soil and biodiversity benefits they can provide.

## 64. NI Water

### Contents:

1. Introduction
2. Sustainable Catchment Area Management Planning Northern Ireland (SCaMP NI)
3. Pesticide levels in raw water
4. High Colour and Turbidity in raw water
5. Comments on DARD Agri-Environment Schemes
6. Comments on DARD LFACA Schemes
7. Conclusion

### 1. Introduction

Northern Ireland Water welcomes the opportunity to comment on the Department of Agriculture and Rural Development proposals for the Rural Development Programme 2014 - 2020. A meeting was held between DARD and NI Water on 16/10/13 to discuss this consultation and further liaison will continue. The Rural Development Programme has proven to be very effective in supporting and sustaining the rural and agricultural economies as well as restoring, preserving and enhancing ecosystems in the agricultural sector. This programme has the potential to affect ecosystems and raw water quality for drinking water abstractions. Northern Ireland Water request that the document be reviewed to reflect our comments below.

Northern Ireland Water currently supplies approximately 563 million litres of drinking water per day to customers. This is treated at 24 Water Treatment Works (WTW's), where raw water is abstracted from approximately 34 sources, each supplied from a different catchment area. NI Water owns approximately 94km<sup>2</sup> of land in Northern Ireland and has an active interest in many times this of land within drinking water catchments that are owned by others, mainly in the agricultural industry. The public water supplies are mainly obtained from surface water

sources, with only one source, on Rathlin Island, being supplied from a borehole.

Raw water quality can vary between sources due to factors within the catchment area such as, the farming methods, soil, vegetation, and land use. The quality of raw water coming from these catchments is directly affected by the way this land is managed. The agricultural sector and DARD schemes can have a direct impact on the quality of water being abstracted from these catchments. This can have significant cost and potential drinking water quality implications for the wider community of Northern Ireland.

## **2. Sustainable Catchment Area Management Planning Northern Ireland (SCaMP NI)**

It is NI Water's aim to improve the quality and reliability of the raw water received at NI Water's raw water abstraction points through sustainable catchment based solutions that focus on protecting the natural environment through achieving favourable condition and habitat improvement. In managing its catchments and water treatment processes, NI Water has been adopting the principles of Sustainable Catchment Management Area Planning (SCaMP NI), within a large number of its catchments. The project aims to deliver the optimum quality and quantity of raw water to NI Water's water treatment works through the reduction of diffuse pollution and improved land management practices. This protects drinking water quality and sources, avoiding the requirement for more capital intensive solutions, and mitigates against increased energy usage and carbon emissions.

Key elements of SCaMP NI focus on reducing the amount of chemicals and contaminants that are found within the raw water catchments. NI Water is also seeking to use the ecosystem to provide natural water treatment "services" to reduce the contaminants which reach the WTW's abstraction point. This means less reliance on energy intensive treatment solutions to meet drinking water standards, and reduces the risk of compliance failure. SCaMP NI contributes to reducing the carbon used by NI Water by reducing treatment needs and pumping requirements. This in turn means that NI Water reduces its electricity consumption.

SCaMP NI is aligned with the objectives of the Biodiversity Strategy and The Water Framework Directive River Basin Management Plans for Northern Ireland. NI Water works with the following stakeholders:

Department of Agriculture and Rural Development  
Farming groups / Ulster Farmers Union  
Forestry Service  
Mourne Heritage Trust  
NI Fire and Rescue Service  
The Royal Society for the Protection of Birds  
The Ulster Wildlife Trust

The Woodlands Trust

A SCaMP NI steering group has been set up with representatives of all of the above stakeholders. The aim of the group is to ensure that SCaMP NI actions are aligned with best practice and the aims and objectives of all stakeholders.

The Scamp NI projects look at sustainable solutions as a way to improve land management practices within catchments to improve the quality of raw water being used for abstraction purposes. Examples of SCaMP NI work are as follows:

A tree planting project was undertaken within the catchment for Killylane WTWs  
A programme of work relating to wildfires prevention was undertaken in the Mourne catchment

A Blanket bog restoration project is underway in Dungonnell WTW's catchment  
The Water Catchment Partnership has been formed to promote the responsible use of pesticides in NI Water catchments. This group includes DARD, CAFRE, UFU, NIEA, The Voluntary Initiative and NI Water.

NI Water is continuing to work alongside other key stakeholders in identifying SCaMP solutions and additional projects are planned.

### **3. Pesticide levels in raw water**

Pesticides are a group of substances that include insecticides, herbicides, fungicides and algaecides that are commonly used as part of land management practices in catchments. These can find their way into watercourses from a variety of sources, mainly from use in agriculture or weed control. Unfortunately, on occasions, the way these products have been used and disposed of, has led to higher than normal levels of pesticides in raw water supplies. The pesticide levels in raw water supplies continue to be very expensive for NI Water to remove, both in terms of operational running costs for Water Treatment Works, and in terms of capital upgrades required for pesticide removal.

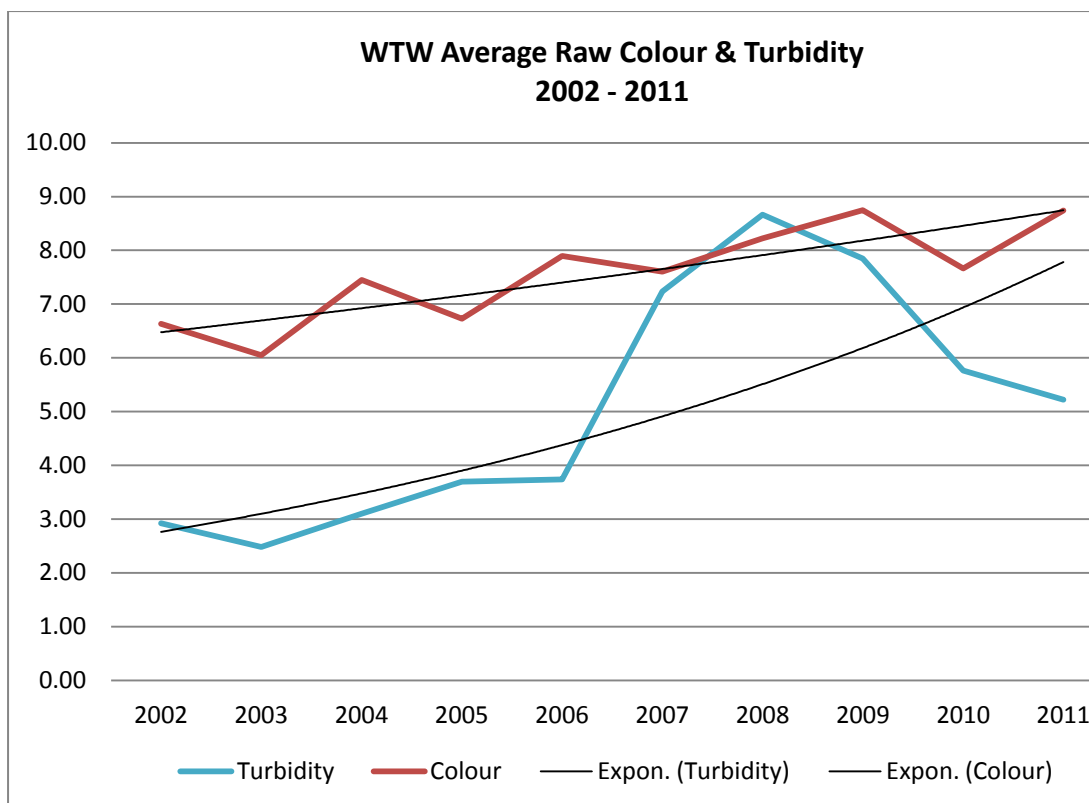
Monitoring is required to be undertaken for those pesticides, as identified through NI Water's risk assessments and NI Water require treatment barriers to be effective at achieving the regulatory standards. Although there are no public health concerns, the current high level of pesticide residuals in raw water at some catchments has attracted the attention of the Drinking Water Inspectorate. The predominant cause of this is agricultural use. The EU drinking water limit for pesticide is 0.1ug/l. During the period 2010-13 this was exceeded many times in the raw water. The catchments where this high level of pesticide was recorded were all mainly agricultural, with the main cause being MCPA, a herbicide widely used for controlling broad-leaved weeds in grass and cereal crops.

The table below shows the summary data:

Plant	Raw Water Data 2010-2013								Final Water Data 201					
	Average Raw (ug/l)				No of events >0.1ug/l				Average Final (ug/l)				No of ev	
	Linuron	MCPA	MCP (Mecoprop)	Metoxuron	Linuron	MCPA	MCP (Mecoprop)	Metoxuron	Linuron	MCPA	MCP (Mecoprop)	Metoxuron	Linuron	MCPA
Altnahinch WTW	0.00	0.00	0.00	0.00			1		0.00	0.00	0.00	0.00		2
Ballinrees WTW	0.00	0.08	0.01	0.00		9	2		0.00	0.03	0.00	0.00		
Belleek WTW	0.00	0.06	0.01	0.00		4			0.00	0.04	0.04	0.00		1
Camlough WTW	0.00	0.03	0.01	0.00					0.00	0.01	0.00	0.00		
Carmoney WTW	0.00	0.11	0.05	0.00		1	1		0.00	0.01	0.00	0.00		
Carran Hill WTW	0.00	0.08	0.02	0.00		21			0.00	0.04	0.01	0.00		16
Castor Bay WTW	0.00	0.03	0.01	0.00		4	1		0.00	0.01	0.00	0.00		
Caugh Hill WTW	0.00	0.00	0.00	0.00					0.01	0.00	0.00	0.01	1	
Clay Lake WTW	0.00	0.10	0.02	0.00		21		1	0.00	0.07	0.01	0.01		18
Derg WTW	0.00	0.10	0.00	0.00		17			0.00	0.04	0.01	0.00		7
Dorisland WTW	0.00	0.07	0.01	0.00		19			0.00	0.05	0.01	0.00		9
Drumaroad WTW	0.00	0.00	0.00	0.00					0.00	0.00	0.00	0.00		
Dungonnell WTW	0.00	0.00	0.00	0.00					0.00	0.00	0.00	0.00		
Dunore Point WTW	0.00	0.04	0.06	0.00		4	1		0.00	0.01	0.00	0.00		
Fofanny WTW	0.00	0.00	0.00	0.00					0.00	0.00	0.00	0.00		
Glenhordial WTW	0.00	0.00	0.02	0.00					0.00	0.01	0.01	0.00		
Killyhevin WTW	0.00	0.13	0.00	0.00		32			0.00	0.04	0.01	0.00		5
Killylane WTW	0.00	0.00	0.00	0.00					0.00	0.00	0.00	0.00		
Lough Bradan WTW	0.00	0.00	0.00	0.00					0.00	0.00	0.00	0.00		
Lough Fea WTW	0.00	0.03	0.00	0.00		1			0.00	0.02	0.00	0.00		1
Lough Macrory WTW	0.00	0.00	0.00	0.00					0.00	0.00	0.00	0.00		
Moyola WTW	0.00	0.03	0.01	0.00		1			0.00	0.00	0.00	0.00		
Rathlin WTW	0.00	0.01	0.01	0.00					0.00	0.00	0.00	0.00		
Seagahan WTW	0.00	0.15	0.08	0.00		13	7		0.00	0.04	0.01	0.00		7

#### 4. High Colour and Turbidity in raw water

The quality of raw water from the catchment area has a high impact on the water treatment process, chemical usage and hence costs. In recent years at many abstraction points there has been a trend of deteriorating raw water quality, as can be demonstrated in the graph below. This can be often be directly attributed to catchment land management and agricultural practices, however in some cases other factors such as rainfall or forestry activity may be a contributory factor.



## 5. Comments on DARD Agri-Environment Schemes

The current agri-environment schemes are voluntary and provide financial support to farmers for undertaking environmentally-sensitive land management practices. There is a real opportunity to utilise these schemes to reduce MCPA usage within specific catchment areas which are experiencing high levels of MCPA in the raw water. The catchment areas of particular concern are:

Carran Hill WTW  
 Clay Lake WTW  
 Derg WTW  
 Dorisland WTW  
 Killyhevlín WTW  
 Seaghan WTW  
 Balinrees WTW  
 Carmoney WTW

The proposal would be to target resources at particular water catchments where there is a clear MCPA problem in the raw water. On return for financial compensation the farmer should have an obligation to cease use of MCPA on his farm.

There is detailed data available from NI Water at raw water abstractions showing MCPA levels over many years. In addition data is available from

NIEA on MCPA levels at various sub-catchments within each catchment area. This data can be utilised to benchmark MCPA residuals. The recording of MCPA levels in each drinking water catchment will continue by NI Water and so results will be visible and clearly measurable. Detailed maps can be provided of each of these catchment areas if required. This proposal would complement the work already being undertaken by the Water Catchment Partnership.

The following initiatives could be considered within the targeted catchment areas:

1. Eliminate all MCPA use on participant farms in return for a financial incentive
2. Compulsory training on MCPA use and control for all farmers within the catchments
3. Provision and use of a dedicated sprayer washing areas for farmers within the catchments
4. Bulletins or publicity of the issues associated with MCPA to raise general awareness amongst farmers within the catchments

In addition the problems that are being experienced with high raw water colour and turbidity at NI Water abstraction points could be factored into the agri-environment schemes. If stocking density was restricted within these catchments, or parts of the catchments where poaching could occur, then this could have a beneficial impact on runoff water at abstraction points.

## **6. Comments on DARD LFACA Schemes**

The catchment areas where NI Water are experiencing high levels of MCPA in the raw water are predominately within the severely disadvantaged areas, where the LFACA schemes apply. The agri-environment schemes currently have an uptake of 42%. If there was a provision to eliminate MCPA usage within the LFACA scheme (or its replacement scheme) then the area which it applies to would be much greater and results in terms of MCPA levels at catchments are likely to be much greater.

## **7. Conclusion**

The high MCPA levels in raw water are difficult and very expensive to remove from drinking water supplies in Northern Ireland. There has been a trend of increasing MCPA residuals and raw water colours in recent years. In the Rural Development Programme 2014-2020 there is a real opportunity to address this through eliminating or reducing the use of MCPA in these sensitive drinking water catchment areas. Resources can be clearly targeted where needed and results can be benchmarked and clearly seen. There is a benefit to all in Northern Ireland that this issue be addressed in this new programme, both environmentally and from a



drinking water perspective.

## 65. Randalstown Beekeepers

AGRICULTURE AND RURAL DEVELOPMENT  
AGRI-FOOD AND RURAL DEVELOPMENT

### CONTENT OF THE PROPOSALS

#### European Union - Priority 1

#### Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

##### Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

##### Comment

There is no mention of bees and beekeeping in the consultation document. Bees and other pollinators are essential to the horticultural industry as well as central to pollination in the natural environment. Education of experienced and new beekeepers in changing circumstances is central to maintaining the beekeeping craft.

##### Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

##### Comment

Improving the knowledge of local beekeepers would require bringing in expertise from outside the province. The innovation broker or "expertise" would be teachers from universities, National Bee Unit and the bee inspectorate.

**European Union - Priority 2**

**Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability**

**Question 3**

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

**Question 4**

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

No minimum limit.

**Question 5**

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

**Question 6**

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Our apiary is isolated with no access to power. Renewable energy source would revolutionise our ability to deliver .

**Question 7**

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment



THE EUROPEAN COMMISSION, BRUSSELS, 14 FEBRUARY 2023

REGULATION (EU) 2023/1000

### **Question 11**

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

## **European Union - Priority 4**

**Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors**

### **Question 12**

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

Bees and pollinators are an intrinsic part of ecosystems both managed and natural and must be included in the structure.

**Question 13**

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

**Question 14**

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Yes, bees are under a greater pest and disease burden. Training in recognition and diagnosis of diseases is central to control.

**Question 15**

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

We want to cooperate with other associations in coordinating activities such as queen rearing and bee health. For example, rearing more queens reduces the need for queen importation and thereby reduce disease importation risk.

**Question 19**

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

**Question 20**

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

Apiculture should be included.

**European Union - Priority 5  
Promoting Resource Efficiency and Supporting the Shift towards a low Carbon  
and Climate Resilient Economy in Agriculture, Food and Forestry Sectors**

**Question 21**

Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Yes, we need energy generation at our isolated apiary and bee house.

**Question 22**

Which renewable energy technologies, if any, should be supported?

Comment

Solar.

**Question 23**

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment



**Question 24**

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Yes

**Question 25**

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

**Question 26**

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

**Question 32**

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

**Comment**

Support local honey.

**Question 33**

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

**Comment**

**Question 34**

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

**Comment**

LEADER APPROACH

LEADER APPROACH

## DELIVERY MECHANISMS

### Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

### Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

### Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

We prefer to deal with DARD as beekeeping is small scale and local.

**Question 38**

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

**FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS**

**Question 39**

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

**Question 40**

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

Education and disease recognition and control. Beekeeping is a lot harder now because of disease and the fate of the species rests heavily on the beekeeping community.

**RURAL DEVELOPMENT PROGRAMME 2014 – 2020**

**PROPOSAL FOR FINANCING 2014**

**Question 41**

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

**ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020**

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

Include apiculture.

# 66. Rivers Agency

RURAL DEVELOPMENT PROGRAMME 2013 – 2020.

Comments from J Bankhead

Section 2 – affecting policies and strategies. Not sure if this is the place, but there should be mention of the Floods Directive and WFD. If not the directives themselves, then the strategic level measures through Flood Risk Management Plans for FD and Programmes of Measures for WFD should be cited.

Maybe the directives should be referred to within Section 3, the regulation framework – not sure.

Section 3. - Within this section, I am pleased to see at point 10 (Cross Cutting Themes) reference to climate change mitigation. However, it would be preferable to see mitigation of the effects of climate change included here – the current wording suggests carbon storage only, whereas flood risk management is a likely effect of climate change, and could be partially mitigated through landuse management, and some of the measures suggested within the new CMS.

I am concerned about the wording of Article 19 of the Measures (page 20) – this suggests increased drainage and reduced connection between the river and floodplain, which is a move away from natural processes and ecosystem services.

Section 4 – page 23, again, glad to see the aspect of climate change mitigation highlighted, but again, this should include mitigation of the effects of climate change.

Key targets (page 24) – the planting of new woodlands is a strategic measure to mitigate climate change through carbon uptake. However, targeted planting of woodland has the potential to mitigate run-off, effecting both water quality and water quantity ,and reducing sediment loading into rivers. This is currently being discussed with DARD CMB.

Section 6 – priority 4, focus area 4B. Points 7, 8 and 9 talk about environmentally sensitive land management and woodland creation. I would be concerned that the slant in Article 19 towards land drainage and disconnection of the floodplain is at odds with the ethos of these three points. There is opportunity here to a look at floodplain management, from a flood risk management aspect, and also from a WFD aspect – reconnection with the floodplain is a key measure within WFD.

Page 61 – discussions have been held with DARD CMB, regarding the appreciation of Floods Directive as a driver for some of the measures included within the proposed scheme. Some of the measures which have been identified as having value in reducing pollution through stemming run-off, have similar benefits through reducing the amount of run-off into watercourses, and also in reducing the amount of sediment entering channels, where it can build up to reduce channel capacity. The woodland planting schemes suggested can play an active role in this water quality and quantity control, through targeting at vulnerable sites, which can be identified through GIS tools.

The co-operative approach cited in 30, would also have significant potential benefit for a catchment wide approach, addressing both WFD and FD criteria. Additionally, targeting Significant Flood Risk Areas through a catchment wide approach would give WFD and FD benefits.

Priority 5 – willow biomass planting in selected and assessed sites within a catchment, would provide a natural FRM measure, whilst providing farm income, and biodiversity gain.

Overall, I feel that the measures cited are valuable to farming and wildlife, but opportunities to broaden the value of such measures under Water Framework Directive and Floods Directive in particular, have not been taken.

Many measures will have benefits under both directives, with little additional input – there is a great opportunity for synergy, which would address the overall aims of biodiversity and climate change mitigation – it should be acknowledged that climate change is not just about carbon, but the impacts of climate change could and should be addressed.

1. The need to include Floods Directive(FD) and indeed WFD is entirely appropriate. In addition there is a legal imperative within FD to ensure synergy between the Directives whereby the Floods Directive objectives and measures and WFD programme of measures are seen to be supportive of each other. It is essential therefore to consider all programmes, such as the Rural Development Programme, on a catchment wide basis whereby flood risk and water quality are seen in this geographic context. There is also a reference to "flood mitigation" within WFD.

2. FD may consider land use management and indeed climate change as part of emerging Flood Risk Management Plans(FRMPs') for each of our river basin districts.

Page 7 Floods Directive quote;

"FRMP plan-may include the promotion of sustainable land use practices, improvement of water retention as well as the controlled flooding of certain areas in the case of a flood"

Such examples would include the following;

shelter belts

buffer strips,

re-forestation,

flood plain restoration and connectivity of rivers with their natural floodplains by removal/ setting back of earthen floodbanks. In this regard I fully endorse your comments re section 6 priority 4 focus area 4b.

3. The EU monitoring process is rigorous and will look for evidence that we have indeed made every attempt to include flood risk management as part of our programmes including RDP(again we must look at this on a catchment wide basis). As stated EU will look in particular at our "significant flood risk areas" of which there are 20 across NI. It will be in these 20 catchments that the EU will concentrate on.

4. In Scotland the Flood Management Regulations stipulates "natural flood management" as a core flood risk objective. When we eventually have our own Floods Bill (within the next few years!!) for NI it is likely that there will be a renewed emphasis on Natural /Sustainable flood risk management. Hence it is very timely that we should consider using RDP as a flood risk delivery mechanism.

5 A lot of research has been carried out on trial catchments in GB and EU mainland on the benefits of using "natural" techniques to mitigate flood risk. To date no such research has been carried out in NI; whilst the jury is still out on the actual positive impact of such measures for "extreme" flood events there is plenty of evidence that such "natural" measures offer significant flood mitigation in "less extreme" events (ie which occur more frequently but a lower magnitude in impact terms). Plus, such an approach would lend itself to NI because of our topography, soil type and relatively small catchment sizes when compared to the rest of the UK.

J Bankhead and J Nicholson

## 67. Royal Society for Protection of Birds

### Summary

RSPB NI welcomes this Consultation on the Rural Development Programme 2014-2020 and many of the proposals contained within it. In particular we support the inclusion for targeting agri-environment and support arrangements for training and advisory support within the agri-environment framework. We are also supportive of the potential of a collaborative/landscape scale approach to agri-environment.

Key for RSPB Northern Ireland

*Maximise funds for the programme by transferring the maximum amount (15%) from Pillar I to Pillar II. DARD must completely rule out reverse transfer from Pillar II to Pillar I*

*Prioritise environmental objectives for which there are limited other sources of funding, and dedicates funds across articles accordingly. The current RDP allocated over 70% to Agri-environment Schemes*

*(AES) and RSPB NI believes DARD should maintain or increase this proportion for the future RDP 2014-2020*

*DARD must ensure AES is as targeted as possible to deliver maximum value for public money. This must ensure AES is delivering above and beyond the regulatory baseline when deciding on intervention measures and their rate of support*

*Investing in supporting articles that will help the delivery of schemes and maximising the environmental outputs will be extremely important. A comprehensive and skilled advisory service in particular, that has the remit of maximising public benefit will be essential to the successful delivery of the next programme*

*Invest in a monitoring programme for AES to improve effectiveness of schemes*

*Collaborative working on a landscape scale should be encouraged, as well as 3rd party applications on behalf groups of farmers or community groups*

*DARD must now engage with stakeholders to develop specific options for the future AES*

### **Question 1: Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?**

RSPB Northern Ireland (RSPB NI) strongly agrees that there is a need for not only training, but an advisory service targeted towards the more effective delivery of agri-environment schemes (AES). AES is the only mandatory element of the 2014-2020 RDP and therefore the area most likely to be scrutinised by the European Commission (EC). In particular, the agri-environment-climate articles states that-



*“Member States shall endeavour to provide persons undertaking to carry out operations under this measure with the knowledge and information required to implement them, including by commitment-related expert advice and/or by making support under this measure conditional to relevant training.”*<sup>2</sup>  
2 Article 29 (4), Regulation of the European Parliament and of the Council on support for rural development by the European Agricultural Fund for Rural Development (EAFRD) (COM(2011) 627/3)  
3 FERA (2013) Evidence requirements to support the design of new agri-environment schemes. Project funded by Defra, London.

4 <http://www.relu.ac.uk/news/policy%20and%20practice%20notes/37%20Bullock/PPN37.pdf>

5 CCRI (2012) Economics of Co-ordination in Environmental Stewardship (FFG 1128, CCRI)

This requirement is supported by a significant body of evidence and experience. A recent review found that the best “...outcomes result from well-targeted action. The provision of high quality on-farm advice is essential to achieve this.”<sup>3</sup> Further studies support this contention<sup>4</sup> 5.

Our own experience in delivering training within several recovery projects has found it to be an effective way of communicating habitat management advice to a range of landowning stakeholders within a targeted area. Effective AES also produces significant public goods. The RSPB also believes there is need to provide training which will help farmers and land owners to deliver on a whole suite of environmental compliance measures such as cross compliance, farm nutrient management and water quality to name a few. RSPBNI would have preference, however, for training and advisory schemes that help farmers and landowners move beyond the legislative baseline. RSPBNI believes AES is an effective measure for achieving this outcome.

RSPB NI considers that there is scope to use both advisory and co-operation Articles under the Rural Development Regulation to improve the biodiversity condition of Northern Ireland’s native woodland remnants across ownerships; this would help meet Northern Ireland’s biodiversity objectives for priority native woodland habitats.

Grants could be introduced to facilitate collaborative approaches for native woodland restoration and management. This could include sharing costs and expertise, as well as developing shared management objectives. It could support ecological survey, woodland management planning, forest management certification, development of markets and supply chains, harvesting and extraction for environmentally appropriate types and levels of sustainable management.

**Question 2: What do you think the role of the innovation broker should be and what skill sets should they have?**

RSPB NI believe an innovation broker should be an organisation/person with a track record for delivery in the sector. This should be an individual or a group who will be able to demonstrate innovation and leadership within their area of expertise. This should span all of the six European priorities evenly with representation from each.

**Question 3: In light of the restrictions posed by the definition of ‘young farmer’ in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for specific support scheme for young farmers? If not, why? And what else should be taken into account?**

RSPB NI disagrees that there is no case for a specific young farmer scheme and asks DARD to consider this approach carefully. RSPB NI believes there is a need to support the wildlife friendly farmers of the future, and therefore believe support arrangements should be made available for those interested in this approach. Young farmers interested in this approach would be given extra incentive for entering AES and given a top-up for proactive applications to the scheme. We would, however, caution against assuming any new entrant is ‘good’ in terms of environmental criteria and believe any activities they plan to carry out and grants they apply to should undergo the same environmental scrutiny as any other land manager. Furthermore, any advice they are offered should extend to environmental as well as economic considerations.

**Question 4: With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?**

No comments at this time.

**Question 5: Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?**

RSPB NI agrees with the principle of developing a business development plan and the commitment to monitor business performance. We would however advise that environmental impact is carried out to monitor impact and at a minimum adopt a principle of no environmental harm.

**Question 6: Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?**

RSPB NI believes there is currently a disconnect between discussion, strategy and delivery for the CAP 'push' mechanisms and the market 'pull' mechanisms associated with sustainable agricultural systems and food production in NI. If farm business competitiveness is to be improved then these 'push' and 'pull' mechanisms must be better aligned. At present RSPB NI does not believe the agri-food strategy board has provided a clear way forward for the industry with preference for large agri-food business and intensification. If farm business is to be improved it is essential that expenditure is assessed in the round, including their environmental impacts, rather than focusing entirely on the likely economic benefit to 'Northern Ireland plc'. RSPB NI believes all expenditure should be assessed adopting the principle of no environmental harm as the baseline, and rewarding ventures that maximise or seek additional environmental and social as well as economic benefits, which the RSPB believes to be genuine sustainable development.

**Question 7: To what extent should development group members be reimbursed for collating and sharing their farm performance?**

Members should not be reimbursed. Development groups should be collecting this data on a daily basis for the successful running of their farm business. DARD should assess what data is collected as a matter of course and use that to measure performance. If additional data is required then a collection process could be run as a pilot before committing financial resource across the whole programme.

**Question 8: How should participants in development groups be selected?**

No comments at this stage

**Question 9: Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?**

We have no comments at this time

**Question 10: What do you think of the funding levels at each tier and is the maximum limit appropriate?**

No comments at this time.

**Question 11: What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?**

Cooperation at a landscape scale for nature conservation should be a key objective of the scheme. The RSPB was disappointed not to see this mechanism utilised within the current scheme, or even an application form written, though the potential existed through Special Environmental Projects. DARD must not make this mistake again. The RSPB also believe there is scope for cooperation groups to explore the potential of sustainable food production to improve the biodiversity condition of native woodlands to meet national biodiversity targets and to restore peatland habitats.

**Question 12: Do you think that the proposed structure of the next Agri-Environment Scheme is Appropriate?**

The RSPB remains **extremely concerned** at the lack of detail on offer regarding the structure of the next AES. Although the structure is important, more important is the detail of options contained within. In principle the RSPB supports the need for a targeted wider countryside element and a targeted protected area element. The RSPB is also pleased to note the inclusion of training and advisory support as well as support for cooperative working. However, the detail of this structure will determine the output and eventual success of AES. It is therefore vital that DARD consults stakeholders to enable this process to move to the next phase. **Figure 1** in the Annex shows a pyramid structure for the New Environmental Land Management Scheme (NELMS) as proposed by DEFRA for England. RSPB NI has interpreted the information in the DARD proposal to create a similar pyramid in **Figure 2** within the **Annex**, showing a similar structure. However, as stated previously, the detail of options contained within AES will be key to turning around the fortunes of threatened habitats and species. At present there has been no consultation with stakeholders to bring this forward.

**Targeting support for designated sites:** The RSPB supports the need for increased geographic targeting of the agri-environment programme. This will be especially important given the reality of having fewer funds for delivery. The RSPB supports funds being targeted towards protected areas for biodiversity on farmland, including to protect and enhance the biodiversity condition of Areas of Special Scientific Interest (ASSIs), EU Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) and Internationally designated Ramsar wetland sites. In England, agri-environment schemes on Sites of Special Scientific Interest (SSSI's) are by far the most important mechanism for getting sites into favourable condition. Working along side landowners to set priorities and develop outcome focused management plans will be the key to success. This will also help

government reach statutory targets under the EU Birds and Habitats Directive, helping sites move to favourable conservation status.

**Wider Countryside Targeted Options:** The evidence base suggests that targeted agri-environment interventions have been most effective. Recent analysis by the Centre for Ecology and Hydrology (CEH) supports this at the option and farm scale, finding that 80% Higher Level Stewardship (HLS) of agreements in England have the potential to deliver beneficial outcomes<sup>6</sup>, largely due to the targeted nature of the scheme. Schemes and agreements need to be focused on a defined outcome or outcomes and targeted at the appropriate geographic scale. RSPB NI has also found this to be the case for yellowhammers in Co. Down where targeted schemes and advice delivered a population increase of 79% in a defined area over 5 years. Advice is essential to the successful implementation of any approach to targeting. RSPB NI recommends that funds should be made available for the targeting of Northern Ireland Priority Species (especially breeding waders, yellowhammer and chough) and habitats (blanket bog, lowland raised bog, wet grassland) in the RDP for 2014-2020. We have outlined specific options for species and habitats in **Figure 3** within the **Annex**. However, this is not an exhaustive list and RSPB NI will submit additional information to DARD on specific options as and when requested. AES is currently described as a “whole farm scheme”, meaning that cross-compliance is an eligibility requirement; that all features have been surveyed and that features other than those being managed are expected to be retained. The scheme also operates a “no-detriment rule”, namely that measures intended to achieve certain environmental outcomes should not do so at the expense or to the detriment of other features present on a holding. There should be no intention by DARD to change this approach.

**Monitoring:** AFBI monitoring results, as well as other information and data should be used to inform the development of the next scheme. We are disappointed there is no mention of monitoring for the AES programme, or any other part of the future RDP. Within the current RDP Common Monitoring and Evaluation Framework the environmental impact indicators are important, but not all have been implemented successfully (for example that for HNV farmland). Monitoring is vital for the continued evaluation of schemes throughout their lifecycle which can help improve effectiveness. It can also provide the scheme beneficiaries with feedback on the environmental impacts of their management. DARD must therefore provide provisions for monitoring and evaluation of environmental schemes within the 2014-2020 programme.

**Question 13: Do you agree that funding should be prioritised in the first instance to support the management of designated sites?**

Funding for the management of designated wildlife sites is important, and should be a mandatory part of any agri-environment scheme. However this should build upon what is already being spent on designated sites by the competent authority, in this case NIEA. Therefore AES funding spent on these sites must be over and above what is already being delivered in this area, and not helping NIEA meet the legislative need for which they are competent. As mentioned previously, the RSPB also believes there is significant need for targeted options in the wider countryside.

**Question 14: Do you think that an element of training should be a compulsory part of the scheme?**

The RSPB strongly agrees with this approach. A training and advisory service which concentrates on how to deliver a range of options should be a compulsory measure for all AES agreement holders. Advice is critical to the successful implementation of environmental land management schemes<sup>7</sup>. Rather than an administrative cost, advice should be seen as essential to making good use of public money, taking the position that what counts is delivery that is cost-effective, not least cost. To support this assertion, more often than not, farmers welcome constructive and targeted advice. In the RSPB’s experience, advice to support the delivery of high quality environment land management is often proactively sought and welcomed by many farmers. In many instances, specialist input will be needed to support land management advice, and environmental NGOs can often play a key role in this regard.

RSPBNI believes a new training and advisory service should:

Be holistic; improving land manager understanding of, and access to, information on Pillar 1 requirements (cross compliance and greening) as well as Agri-environment options.

Include scheme and application guidance and support (not necessarily delivered face to face, could be written resources) as well as specialist advice

Be remitted with delivering best value for public money in terms of likely outcomes, rather than best deal for land managers- but with due regard to legitimate practical and business constraints

Visit and develop an understanding of sites and businesses, spending meaningful time with land managers

Be embedded into the application and assessment process potentially through mandatory production of whole farm plans or environmental maps - drawn up by advisors

Make use of the NGO resource and expertise available (recognising however that NGOs have very limited resource and should not be relied upon to provide this service in any formal way without support)

Be proactive in target locations, encouraging entry to the scheme

Develop long term relationship and re-visit sites part way into agreements to advise/adjust agreements according to experience and success i.e. provide an 'after-care' service

The current RSPB Halting Environmental Loss Project (HELP) is piloting the use of advice in breeding wader 'hot spots'. Three advisors in specific geographic areas (Lough Erne, Antrim Hills, Foyle and Lough Beg) have been working with land owners on giving habitat management advice specifically for waders. The project will complete in a years time, but as **Figure 4** shows early unpublished results are already promising. When the HELP project finishes, there will be no other advisory support for these farmers in this specific geographic area.

**Question 15: Do you think the co-operation measure should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?**

RSPBNI strongly agrees with this form of collaboration and believes it appropriate to provide higher levels of funding to farmers seeking this approach. The RSPB believes however that this collaborative approach must be planned and coordinated using project management principles to ensure one land-owners action is not at the detriment of another. Therefore collaboration must be planned from the application phase to facilitate a coordinated way forward. If this is done, the evidence suggests that co-ordinated action in a targeted area not only maximises environmental effectiveness, but "...also appears to provide the greatest efficiency gains for the government and agreement holders through economies of scale".<sup>8</sup>

The RSPB was disappointed during the current RDP programme when applications for Special Environmental Projects (SEPs) were not written to facilitate this approach. During the comprehensive spending review, money set aside for SEPs (£17m) was then cut from the programme, preventing this forward thinking scheme from delivering. The RSPB urges DARD to ensure this does not happen again.

RSPBNI have long been a proponent of a landscape scale approach<sup>9</sup> to resource protection and ecosystem service delivery. We are delivering on this approach through our Futurescapes programme in the Lough Neagh<sup>10</sup> and Lough Erne<sup>11</sup> basins through working with local communities, landowners, government agencies and other NGOs that are seeking to give nature a home in the wider countryside. RSPBNI work on a landscape scale is still developing and will need a collaborative approach to delivery if it is to succeed, involving all levels of society.

The RSPB believe it would be wise of DARD to consider the potential of third party applications for specific landscape scale projects. This would be particularly beneficial for measures undertaken that are primarily for public benefit but require actions over more than one property such as peatland restoration, natural flood management, water quality initiatives, or the conservation of native woodland. The Sustainable Catchment Management Programme (SCAMP) being taken forward by RSPB and NIW offers one possible model for this approach to delivery<sup>12</sup>. Whilst it is preferable that land managers should have ownership of actions undertaken on their land, this should not be a constraint from undertaking appropriate beneficial management for this wider public benefit. In our experience, a third party is often required to co-ordinate/facilitate landscape scale approaches and therefore it makes reasonable sense for them to also be able to submit an application on behalf of the group as long as there is a clear process for allocating funds to individuals and ensuring work is done. An additional element to this might be the development of 'collaboration' specific options. Facilitation of collaborative action for a range of environmental purposes may require options to be written to meet the following RDR Articles: additional collaborative management/project planning under Article 36(2j) and collaborative approaches under 36(2a, 2c & 2e); advisory services under proposed Article 16 and individual forest plans under proposed Article 22; as well as Natura 2000 payments (Article 31). These new 'collaboration specific' options would allow land managers an obvious route into collaborative agreements and an easily discernible financial reward for doing so. There would still be a need for coordination of applications going into these options however so this would work in conjunction with the proposal here for third parties to submit applications.

An example of how collective action through co-operation and advisory Articles under the Rural Development Regulation, combined with grants for woodland improvement and vegetation

management, could be used to further biodiversity at a landscape scale is to improve the biological condition of Northern Ireland's native woodland remnants across ownerships. Grants could be introduced to facilitate collaborative approaches for native woodland restoration and management. This could include sharing costs and expertise, as well as developing shared management objectives. It could support ecological survey, woodland management planning, forest management certification, development of markets and supply chains, harvesting and extraction for environmentally appropriate types and levels of sustainable management.

**Question 16: Should the next Agri-environment Scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.**

The RSPB sees a need for continued, but not uncritical, support for organic farming. The main benefit for biodiversity of organic production is the reduction in pressures on biodiversity through the adoption of more environmentally friendly agricultural management practices. For example, reduced use of manufactured pesticides, prohibition of inorganic fertilisers, more sympathetic management of non-cropped habitats, and greater emphasis on crop rotation and mixed farming. Bengtsson *et al* (2005) reveals that organic farms support on average 30 per cent higher species richness, with a 50 per cent mean increase in species abundance<sup>13</sup>. The RSPB believes that if support for this approach was to be removed it would make it ever more difficult for farmers to make this transition and opportunity for significant public goods delivery would be lost. DARD must ascertain why uptake in the current schemes was so low, so as to improve delivery of the next programme.

**Question 17: There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?**

RSPB NI considers that it is important that new woodland on farms must be located and designed to ensure it protects, not harms priority wildlife habitats or sites for priority wildlife species, such as semi-natural grassland, heather moorland, scrub or breeding wading birds. The environmental impact of new woodland on farms must be assessed at a site level. The cumulative environmental impacts of woodland expansion of multiple schemes must also be assessed.

New woodland on farms must be required to meet the UK Forestry Standard and its associated Forest Guidelines, including biodiversity requirements. This means this must be in scheme rules, included in eligibility and approval steps, compliance checking, enforcement and monitoring. This is a concern with the proposed Woodland Expansion Scheme as this is to be incorporated into the AES, which may not require UK Forestry Standard compliance in scheme eligibility, or implementation. RSPB NI would also recommend that the new Rural Development Plan land management grants encourage owners and managers of existing native woodland<sup>14</sup>, including on agricultural land, to maintain and enhance the biodiversity of these woods, favouring condition improvement over new woodland planting.

<sup>14</sup> To

RSPB NI notes the government's long-standing international commitments to multiple benefit forestry carried out in a sustainable manner, for example the 1993 MCPFE Helsinki Principles of Sustainable Forest Management and the UK Forest Partnership for Action at the 2002 World Summit on Sustainable Development, as well as its assorted EU and international biodiversity commitments and domestic forestry and biodiversity strategies. It is important that these commitments continue to be translated into regulation and grants, for example by the application of the UK Forestry Standard to all woodland planting, management and felling, by all owners, on all land and for all woodland types and sizes. RSPB Northern Ireland notes the statutory duty on DARD and Forest Service to ensure such sustainable forestry under Section 1 of the Forestry Act (Northern Ireland) 2010.

RSPB NI welcomes the targeting proposed for the Woodland Environment Grant to priority native woodland habitats and priority woodland species.

**Question 18: The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?**

RSPB NI supports the funding of new woodland that is appropriately located and designed that protects and enhances biodiversity, and existing woodland is managed in an environmentally sustainable manner. RSPB NI would be concerned if income foregone payments for forestry expansion were to result in woodland on important non-woodland habitats, such as moorland, semi-natural grassland and peatland, and sites for important non-woodland wildlife species, for example breeding wading birds, and the loss of scrub habitat.

It is important that the proposed Agroforestry Scheme protects existing habitats, including scrub and upland wood pasture, as well as sites for breeding wading birds, semi-natural grassland, moorland and peatland, and enhances the condition of priority native woodland habitats. If poorly targeted, or

with limited scheme rules, it is possible this scheme could result in loss or damage of non-woodland and woodland habitats, including those of a more open aspect which may have traditionally incorporated agricultural as well as woodland management. RSPB NI is also concerned that new short-rotation coppice and forestry could be poorly located, designed or managed, harming wildlife, under the agroforestry scheme.

**Question 19: Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?**

The RSPB recognises that many of the areas that may be classified as ANC are also the most valuable for a range of priority species and habitats. We also recognise that farming in these areas can be an integral part of ensuring a long term future for several key species, hence our long term support for the concept of High Nature Value farming.

However, in terms of the choice between the Pillar I and Pillar II ANC measures, or indeed using neither, we do not yet feel that there is a sufficient understanding of the agricultural and environmental impacts that these choices would lead to.

Our two overarching concerns with regard to this decision is therefore that firstly, we require a much better understanding of the environmental implications that this decision would be likely to have. Secondly, we stand by our long held belief that any public support should be conditional on the provision of environmental public goods.

Following on from this, we have long felt that there is no place for income-support within Pillar II, and the approach of shifting the ANC measure into Pillar I therefore has some potential. This should however not be seen as an opportunity to reverse transfer funds from Pillar II into Pillar I. As stated before, the RSPB believes reverse transfer of funds must be completely ruled out given the budgetary pressure already on Pillar II and the range of issues that the RDP is expected to address.

RSPBNI has been in principle broadly supportive of directing more support to upland farmers and those in more marginal areas due to the high level of overlap with High Nature Value farming areas. However, we have long had concerns over the value for money of the current Less Favored Area Compensatory Allowance (LFACA)<sup>15</sup>. Although LFACA had the regulatory basis for delivering environmental public goods, it did not deliver anything prescriptive, an approach which we believe DARD could have championed. DARD concluded at the end of the LFA review that there was a need for a scheme which did deliver environmental public goods in marginal areas but implementation of recommendations were put on hold due to CAP reform. We now urge DARD to endorse this recommendation and make sure that any use of the ANC measure contributes to this goal.

A recent report commissioned by the RSPB entitled 'Changing livestock numbers in the UK Less Favored Areas- an analysis of likely biodiversity implications'<sup>16</sup> noted a decrease in stock numbers across the UK that with the greatest decreases in Scotland and NI. The biodiversity implications of these changes in livestock numbers and grazing regimes, has been a polarisation between semi-natural areas, which have experienced a reduction in grazing pressure and a recovery of habitats, which has been broadly positive for biodiversity, and improved areas which have been more intensively used and managed with a negative impact on biodiversity. However, undergrazing and loss of vegetation structure is now occurring in some areas, with adverse impacts for some species such as golden plover and other waders. Less cattle and mixed grazing is contributing to the spread of ranker grasses, rush, scrub and bracken and hampering restoration efforts.

The RSPB believes that any new Pillar II ANC scheme offers limited scope for improvement, beyond offering the opportunity to revisit the basis for payment of the existing scheme. This is down to the limited environmental safeguards that Article 32 (Payments to Areas of Natural Constraint) – allows. Therefore, RSPBNI remains very concerned that, as per the current RDP, this article will unhelpfully soak up a significant proportion of the already limited RDP budget, delivering limited demonstrable benefit. If the ANC measure however is to be used in Pillar I, we would support DARD exploring any possibility of ensuring that there are adequate safeguards in place, for instance through the use of cross-compliance or greening measures. If DARD adopt a Pillar II ANC schemes, given budgetary constraints across the whole programme, and the need to significantly increase funding for agri-environment schemes, we believe DARD will need to look closely at the level of funding for a new ANC scheme and potentially reduce it. Any desire to maintain spending levels adds even greater weight to argument in favor of maximum transfer from Pillar 1 to Pillar 2.

**Question 20: Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?**

RSPBNI believes there is need to support farming systems that would be considered carrying out High Nature Value (HNV) farming systems and approaches. This has been acknowledged by DARD when considering the options going forward for Areas of Natural Constraint (ANC). High Nature Value (HNV) farming describes agricultural systems that provide important environmental and cultural benefits<sup>17</sup>. These low input systems support a range of threatened wildlife and maintain some of our most special landscapes. They underpin economically fragile areas by maintaining active land managing rural communities but they can also provide benefits for wider society such as reducing flood and pollution risk. Many of the services that HNV farms provide are highly valued by society but are not rewarded by the market, leaving these systems on the economic edge. Although a large proportion of HNV farms receive some public support, this is often not enough to make farms commercially viable<sup>18</sup>. Nor does it fully reflect the wider cultural presence and economic contribution that these farms play in rural communities<sup>19</sup>. For example, HNV farming in Scotland helps maintain a landscape which attracts £1.4 bn of tourism revenue<sup>20</sup>. The recent CAP reform deal is disastrous for many HNV farmers. Despite being the most economically vulnerable farms and delivering the greatest public benefit, it seems likely that none of the one billion euros that will be spent on the CAP in the UK each week will be specifically targeted to HNV farmers.

Currently, Less Favoured Area (LFA) payments cover over 70% of the Utilised Agricultural Area (UAA) and do little in terms of environmental delivery aside from keeping farmers on the land. . If DARD were to opt for the use of the ANC measure in Pillar II, but only if properly targeted. RSPB NI believes there is significant potential for this payment to achieve a lot more for biodiversity. With a clearer focus on marginal land where the climate, soil or terrain continue to limit agricultural productivity an HNV option could be beneficial for biodiversity and other ecosystem services, compared to the current LFA. In these areas farming systems are more likely to be low-input and include managed semi-natural habitats. To be cost-effective, payments should be targeted on farm types that are most economically disadvantaged and of most environmental value and can form part of a package of measures targeted at biodiversity management, including Natura 2000 and agri-environment-climate. Management advice currently given out to farmers involved in the HELP project mentioned previously would be an ideal model for an HNV intervention.

**Beyond the pyramid:** *Article 31* of the RDP regulations can help deliver compensation payments for restrictions on farmland and forest management imposed by the national implementation of environmental regulations (the Habitats, Birds and Water Framework Directives). These are part of Statutory Management Requirements (SMR) cross-compliance, and thus below the baseline for other land management payments such as agri-environment-climate. The additionality in paying for management required by legislation comes largely from incentivising continuation of environmentally beneficial agricultural or forest management in the face of economic pressures to abandon the land altogether, or change to a different land use, both of which would mean loss of biodiversity and other public goods. An important new element in the Natura part of this measure is the extension of eligible land to include other nature protection areas, outside designated Natura 2000 sites, provided that these contribute to Article 10 of the Habitats Directive<sup>21</sup>. The broadening of eligibility to 'network linking' nature conservation sites could help to improve habitat connectivity and biodiversity adaptation to climate change management plans<sup>22</sup>.

**Question 21: Should renewable energy technologies be included in a farm business development grant scheme?**

The RSPB believes any renewable energy technologies including that of biomass technology must be linked to sustainable approaches to land management, which for NI grown material must be from appropriately located, designed and managed sources that protect, not harm priority species or priority habitats. For example short rotation energy coppice must not be planted on important sites for breeding wading birds.

**Question 22: Which renewable energy technologies, if any, should be supported?**

RSPB NI believes RDP grants should only support renewable energy technologies which as a minimum do no environmental harm, are sited appropriately and have a proven track record of carbon adaptation or mitigation, depending on the objective or area. Genuine reductions in over all greenhouse gas emissions must be taken into account though the whole life cycle of the applied technology.

**Question 23: Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?**

It is important that any new renewable energy technology is located in places and carried out in a manner that does not damage important wildlife sites. This includes ensuring that semi-natural

grassland, lowland heathland, blanket and raised bogs are not afforested, and also keeping open ground sites for species such as breeding wading birds and high wildlife value flowering plants. We also have concerns about how priority non-woodland species, such as lapwing, curlew and snipe, farmland birds, as well as flowering plants are to be protected from inappropriate woodland expansion, including in relation to planting on agricultural land

**Question 24: The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?**

Enhancement of biodiversity should be included but the RSPB NI believes that the 'where' is as important as the 'what'. Any new planting scheme must consider what could be potentially lost through afforestation as well as what could be gained. We therefore would advise DARD to ensure all new planting projects carry out an Environmental Impact Assessment (EIA) and adopt the baseline principle of no environmental harm. Woodland expansion and management grants for biodiversity must be targeted to work for priority species, priority habitats as well as designated sites. They must also be required to meet governments own minimum sustainable forestry standard- the UK Forestry Standard and its associated Forest Guidelines.

RSPB NI notes the government's long-standing international commitments to multiple benefit forestry carried out in a sustainable manner, for example the 1993 MCPFE Helsinki Principles of Sustainable Forest Management and the UK Forest Partnership for Action at the 2002 World Summit on Sustainable Development, as well as its assorted EU and international biodiversity commitments and domestic forestry and biodiversity strategies. It is important that these sustainable multi-benefit forestry commitments continue to be translated into regulation and grants, for example by the application of the UK Forestry Standard to all woodland planting, management and felling, by all owners, on all land and for all woodland types and sizes. RSPB Northern Ireland notes the statutory duty on DARD and Forest Service to ensure such sustainable forestry under Section 1 of the Forestry Act (Northern Ireland) 2010

**Question 25: Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?**

No comments at this stage

**Question 26: What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?**

The potential of Climate change bill could increase the demand on this type of technology in NI as the agriculture industry is rightly asked to meet sectoral reduction targets. Advanced slurry spreading systems are also more efficient and likely to result in increased silage yields.

**Question 27: Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?**

Yes- RSPB NI believes if carried out correctly and in a targeted manor this could also contribute to Water Framework Directive (WFD) targets in key areas.

**Question 28: What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?**

No comments at this time

**Question 29: Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?**

The RSPB believes this should be one of a range of measures to help deliver this approach.

**Question 30: Are there any other measures which should be considered under the Nutrient Efficiency Scheme?**

The RSPB believes DARD and NIEA Water Management Unit could work closer together and incorporate WFD measures as a priority. From a targeting point of view, new measures could be piloted in priority Local Management Areas (LMAs) so as funds are directed to where they are needed most.

**Question 31: How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.**

The RSPB believes effectiveness will depend on DARD being able to assess the need in particular areas and deliver funds to where it is needed most.



The RSPB believes however that some already existing measures can deliver multiple benefits. Agri-environment for example can help contribute towards meeting the needs of many different policy priorities including poverty reduction. Indeed on a recent HNV farm visit attended by DARD officials local farmers stated that they would not continue farming if it was not for agri-environment- the loss of these farm business would contribute to rural poverty. Studies from elsewhere in the UK have shown that agri-environment schemes provide significant socio-economic benefits. For example, research carried out in Wales in 2000-2003 showed that a spend of £14m on schemes resulted in a total impact of £21m in the economy and the creation of 385 FTE jobs. This is particularly significant given that it is more difficult to create jobs in rural areas. More recent research carried out in England in 2010 found that for every £1 spent on agri-environment schemes this generated £1.32 in the local economy and £32 nationally.

Within Priority 6, the RSPB believes Rural 'Nature' Tourism has significant potential in NI. In an assessment of nature tourism in Scotland, Scottish Natural Heritage (SNH) found that nature based tourism was worth £1.4 billion, supported 39000 full time equivalent jobs, and accounted for 40% of all tourism spend in Scotland. One of the flagship attractions is visits to the Isle of Mull to view sea eagles contributing around £2 million a year to the local economy.<sup>23</sup> DARD and the NI Tourist Board must use the opportunity of the RDP 2014-2020 to position NI as one of Europe's leading year-round nature tourism destinations with a world famous reputation for natural heritage. This will build on DARD's ambition of supporting a 'clean green' agriculture industry.

**Question 32: How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation –Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.**

Wildlife and environmental tourism is big business in other parts of the UK but NI has not yet fully utilised the potential. The role of agri-environment is important as it will help maintain the quality of habitats and species that are unique to this part of the world. In turn, if this quality and uniqueness is maintained then others will recognise this and support it through the tourism industry. RSPB is well placed to partner with others in the sector to deliver and facilitate 'nature' tourists that visit NI. Our network of reserves and management sites receive over 30 thousand visits a year, with the West Lighthouse on Rathlin Island in particular receiving over 12 000 of those visits. An economic appraisal carried out on Rathlin Island during 2009 stated that 70% of respondents cited birds and wildlife as the main reason for their visit. The study also concluded that during 2009, 'nature' tourism contributed over £115 000 to the Rathlin economy, sustaining the equivalent of four full time jobs.

**Question 33: On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.**

RSPB NI believes part of the All Island Co-operation could focus on environmental issues of common interest, for example Natura 2000 sites that span the border.

**Question 34: Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.**

RSPB NI believes due to budget issues, this option should only be concentrated around border areas. It is worth noting that the Irish budget for RDP significantly dwarfs that of NI. The Irish AES equivalent for example was worth over €4bn. RSPB NI therefore suggest that North/South cooperation should not be confined to address deprivation and disadvantage but should extend to provide resources for cross border cooperation on environmental issues. Peat cutting issues in Slieve Beagh County Tyrone is a perfect example of how competent government departments, and local communities, can work together. RSPB NI has been working positively with our BirdLife International partner Birdwatch Ireland through the HELP project.

**Question 35: How much of the programme budget should be allocated to the LEADER approach and why?**

No comments at this time

**Question 36: Which measures/schemes should be delivered through the LEADER approach and why?**

The LEADER approach (Article 42-45 of RDP regulation) offers significant opportunity to deliver biodiversity benefits through co-operation. This measure now allows LEADER to carry out *tasks delegated to them by the Managing Authority* which opens up the possibility of local delivery of targeted environmental measures. It has been recognised in the current programming period that

capacity building is critical for the LEADER approach, and this measure now covers the cost of a LEADER start-up kit, capacity building, training and networking. The LEADER approach offers a greater degree of local autonomy and flexibility to address both environmental and socio-economic issues than is possible with the conventional 'top-down' delivery of RDP support. The new thematic structure of RDP provides greater encouragement for LEADER groups to engage with land management activities, in contrast to the current period where LEADER activity was sometimes confined to delivery of Axis 3 measures.

**Question 37: Which measures/schemes should DARD deliver itself and why?**

No comment at this time

**Question 38: Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?**

No comment at this time

**Question 39: If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?**

The RSPB believe the maximum funds must be dedicated to environmental issues and in particular biodiversity and habitat conservation. There is clear evidence of need for public money to fund positive biodiversity benefits over and above the regulatory baseline, and limited opportunities to address these issues by other means such as market mechanisms. Other environmental issues, including water quality and natural flood management and climate change mitigation and adaptation, are also important and need to be addressed through the right combination of regulation, incentives and advice. RSPB NI would also like to see the facilitation of cross funding theme projects that will deliver multiple benefits. It will be extremely important within a more integrated framework to ensure significant funds are devoted to land based environmental schemes and that the environment in terms of biodiversity, environmentally sustainable climate change adaptation, landscape and historic environment does not become lost or a subsidiary objective after carbon reduction and resource efficiency- many measures for which have substantial private as well as public benefit. Agri-environment is the only compulsory element within RDP so therefore should be prioritised. AES uses around 70% of RDP funds in the current programme, and RSPB NI believes DARD should allocate the same financial resource within the 2013-2020 programmes.

The RSPB would expect to see funds allocated via all three funding streams looking to maximise benefit across the other themes, and at a minimum adopt a principle of no environmental harm. Importantly we would like to see provision for projects that will deliver across the three funding themes. For example, a project that seeks large-scale habitat restoration of native woodland through rhododendron removal (which would likely be funded under the 'environment' theme) may also look at development of woodfuel or other products supply chains, which should legitimately draw funds from the first theme (competitiveness, innovation and jobs). The project could also include collaborative approaches to ecological survey, management planning, harvesting, marketing and forest certification, backed up by advisory support.

**Question 40: If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?**

The RSPB believes agri-environment to be the highest priority scheme within the future RDP. Agri-environment is the only compulsory element of the whole RDP, which shows the emphasis with which the European Commission has placed upon the scheme Agri-environment has also shown to deliver for the three strands of sustainable development including;

Social- underpin economically fragile areas by maintaining active land managing rural communities  
Economic- directly supports farmer income and other economic spin off, potentially including 'nature tourism'

Environmental- helps government meet domestic and national statutory targets including climate change, biodiversity water framework and floods directive.

**Question 41: If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?**

The RSPB strongly supports the transfer of funds from Pillar I into Pillar II to the maximum of 15%. Pillar two of the CAP has suffered disproportionate cuts as part of the Multi-annual Financial Framework, despite the compelling evidence that its schemes, particularly targeted environmental schemes, represent good value for taxpayers' money and support farmers to adopt more sustainable, resilient and wildlife friendly businesses. It is vital that steps are taken to mitigate this unjust financial situation and it is extremely welcome that Member States will be able to transfer up to 15% of their Pillar I allocations into Pillar 2. Far from welcome however, is the new option which allows all Member

States to transfer up to 15% (and some to transfer up to 25%) of their Pillar 2 budgets into Pillar I – this is known as ‘reverse transfer’ between the pillars.

The need to increase Pillar II funding is clear: this part of the CAP is well equipped to support farmers and land managers to address a range of environmental challenges, including biodiversity declines, resource protection and landscape conservation. However, its budgetary allocation for 2014–2020 is far too low – €85bn, roughly €12bn per year. Research suggests that the level of funding required to deliver the EU’s environmental objectives on agricultural and forested land is in the region of €50bn per year. The transfer of funds from Pillar I into Pillar II is a well established part of the CAP.

‘Compulsory modulation’ formed a key part of the 2007-2013 CAP with all Member States required to transfer a rising percentage of Pillar I funds into Pillar II– reaching 10% in 2012. This was an important reflection of the need to steadily increase the funding allocated to Pillar II. Whilst compulsory modulation will not form part of the 2014–2020 CAP, Member States will continue to be allowed to transfer funds voluntarily and it is vitally important that that these transfers take place to boost funding for Pillar II resulting in more funding for public goods.

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## 68. Ulster Beekeepers

### European Union - Priority 1

#### Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

##### Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

##### Comment

Bees & beekeeping are not mentioned in the consultation document. This is a serious omission.

Honey bees are an essential part of the fruit and flower industries as well as central to pollination in the natural environment. Education and training of both experienced and new beekeepers in the changing circumstances is important to maintaining the beekeeping craft. Improving the performance of beekeepers will include bringing in expertise from outside Northern Ireland.

##### Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

##### Comment

The innovation brokers or “expertise” would be teachers from Universities, the

National Bee Unit (at York), National Beekeeping Associations and selected professional Bee farmers.

## **European Union - Priority 2**

### **Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability**

#### **Question 4**

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

Possibly a maximum limit but not a minimum limit as there will be enterprises such as beekeeping with less heavy financial commitments or expectations.

#### **Question 6**

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Yes, many apiaries are in isolated areas. For example, use of renewable energy sources to provide power would dramatically improve efficiency

## **European Union - Priority 3**

### **Promoting Food Chain Organisation and Risk Management in Agriculture**

#### **Question 9**

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Honey quality control and labelling is currently decentralised – would benefit from enhanced organisation.

#### **Question 11**

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Apiculture products should be included within the remit of this consultation.

## **European Union - Priority 4**

### **Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors**

#### **Question 12**

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

Bees and other pollinators are not included, yet their numbers are known to be in serious decline. They are an intrinsic part of the ecosystems – both managed and natural.

#### **Question 14**

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Absolutely! Bees are under greater pest and disease burden. Recognition and diagnosis of disease conditions is central to control.

#### **Question 15**

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

Sharing equipment and coordinating activities such as queen rearing or Bee Health Officers.

#### **Question 20**

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

Apiculture should be included.

## **European Union - Priority 5**

### **Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors**

#### **Question 21**

Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Yes - small-scale energy generation at isolated apiculture centres

#### **Question 22**

Which renewable energy technologies, if any, should be supported?

Comment

Solar

#### **Question 24**

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Yes, mixed planting to enhance floral diversity.

## **European Union - Priority 6**

### **Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas**

#### **Question 32**

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

Apiculture products such as honey reflect local flora and fauna and have an unique and wholesome reputation worthy of promotion.

## **DELIVERY MECHANISMS**

### **Question 37**

Which measures/schemes should DARD deliver itself and why?

Comment

Apiculture is a decentralised activity carried out predominantly on a small scale in Northern Ireland. Therefore it seems appropriate that DARD should deliver the programme itself.

## **FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS**

### **Question 39**

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

Yes.

### **Question 40**

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

UBKA has a prioritised strategy agreed with DARD. We will produce this detail if requested but training and education is key.

## **ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020**

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

Please ensure that apiculture is included in the Rural Development Programme 2014 - 2020

# 69. Ulster Wildlife

## **Response to NIRDP 2014-2020**

Ulster Wildlife welcomes the opportunity to comment on the consultation document for the NIRDP 2014 - 2020. We are a local charity and not for profit company limited by guarantee with approximately 12,000 members across Northern Ireland. This programme potentially has a major role to play in protecting and enhancing our natural capital and facilitating the implementation of the Birds and Habitats Directive. From an environmental perspective the impact of the programme will extend far beyond the life cycle of 2014-2020 and it provides the opportunity to leave a positive legacy for the people of Northern Ireland.

Ulster Wildlife recognises the need to have a viable, sustainable and competitive agri-food industry and are supportive of this goal, however we would stress that this outcome needs to be achieved whilst safeguarding our natural capital. Environmental considerations should therefore be mainstreamed within each strand of the programme. The current focus on economic development and the growth of export markets is important for economic development and job creation however, it is equally important that the drive to produce low cost quality food for overseas markets does not adversely impact on Northern Ireland's environment and CAP will be a key driver in this regard.

Given that the 'greening of CAP' is unlikely to deliver environmental benefits in NI, we would ask that a comparable budget to the last NIRDP cycle is retained for agri-environment measures to deliver positive outcomes which will help to halt the loss of biodiversity, mitigate against climate change, reward eco-system services and high nature value farming and maintain and enhance the landscapes that underpin tourism within NI. Our view is that the successor to the NI Countryside Management Scheme needs to be carefully targeted to where the greatest environmental benefits will be achieved. We appreciate the complexities of programme design in terms of the control mechanisms required by the European Commission and the need to retain simplicity at the farmer interface, however we would stress that the management requirements need to be sophisticated enough to deliver in practice across key priority habitats and species in addition to encouraging landscape enhancement work. The expectation is that EU funds will make a significant contribution to the delivery of the EU Biodiversity Strategy at a member state level and this will no doubt be an integral part of any subsequent programme evaluation by the EU particularly following the Evaluation by the European Court of Auditors published last year.

Yours sincerely

Jennifer Fulton  
Chief Executive



## European Union - Priority 1

### Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

#### Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

#### Comment

There is a distinct need to provide vocational training on agri-environment issues to ensure environmental benefits are delivered through the NIRDP and to raise the capacity of the sector to comply with EU environment legislation inclusive of the Birds and Habitats Directives; also to further embed the issues of sustainability, biodiversity, eco-system services, climate change and landscape scale management, especially as the industry moves forward in implementing the Agri-Food Strategy.

Evidence from other EU member states has clearly demonstrated that vocational training is a critical success factor in maximising the impact of such funding. Training must be at an appropriate level and where possible should be underpinned by mentoring to improve the transfer of the learning back to a farm level. Inter-generational learning and development would be beneficial involving the extended farming family to build an understanding and appreciation of sites of environmental management and mitigate against the risk of damage when land transfers from one generation to the next.

Article 17 reporting to the European Commission earlier this year by DOENI evidences continuing environmental decline for priority habitats and species. This was also demonstrated through the State of Nature Report released in Spring 2013. It is therefore important that capacity within the agri-food sector is increased to halt the loss of biodiversity, reducing the risk of infraction for NI due to non-compliance with the Birds and Habitats Directives and underpinning NI's marketing message of 'clean & green' used for both tourism and the agri-food sectors.

Environmental training should be available to all landowners/ farmers and not confined to those undertaking agri-environment and forestry measures under NIRDP. It is important that environmental issues are effectively integrated within mainstream production systems and supply chains to promote ethical production and environmentally sensitive farming practices.

The development of a biodiversity/natural capital charter mark for industry which may be relevant to the agri-food, fisheries and tourism sectors is currently under development as a delivery action within the emerging NI Biodiversity Strategy. Training and mentoring to build capacity within the sector to achieve this (or similar) accreditations may add value as an additional marketing tool and flexibility should be retained to utilise such opportunities as they arise during the the programme life cycle.

Capacity building through bespoke training and mentoring is also particularly

important for landowners who have designated sites on their land holding. Practical experience indicates that in the majority of cases, landowners have limited knowledge of why these areas were designated or their obligations in terms of management. As non-compliance can result in court action and potentially infraction fines by the EU if movement towards 'favourable status' is not achieved over time, it is essential that appropriate advice/mentoring support is put in place for the landowners and a culture of 'value' developed for this custodial role both in terms of environmental value and financial reward for positive management linked to environmental outcomes.

## Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

### Comment

Innovation brokers normally serve as the critical connectors within a network of individuals, organisations, and bodies supporting businesses at different stages of the development process in the introduction of new technologies or management practices. They work across disciplines to ensure that a broad range of resources and expertise are accessible and strategically aligned and facilitate the adoption of innovation.

The exact role and function of innovation brokers differ in various countries, sectors and settings. A key feature is the facilitation of knowledge exchange or sharing between and among various stakeholders, This could potentially have a valuable role to play in integrating food safety, innovation and environmentally responsible production within the agri-food sector.

Experience suggests that a number of central "values" or "design requirements" are needed for the concept of an innovation broker to be effective. A key premise of the facilitation role of innovation brokers is that it is an impartial and independent position. The innovation broker must also be credible, accessible, trustworthy, have easy access to appropriate sources of knowledge and information with a skills base that complements the skills gap within the sector and a sound understanding of managing change.

Above all, for the land based sector the key skills set of innovation brokers must include pragmatism, realism and the ability to broker change at a practical level helping clients turn concepts into positive outcomes. This not only applies to business initiatives, but also to brokering change in relation to protecting and enhancing NI's natural capital e.g. facilitating cooperation measures such as common grazing, eco-system services, species and habitats based projects, catchment management.

The role of an innovation broker is primarily that of a resource investigator, change manager and mentor acting as a bridge helping to stimulate ideas, structure thought processes, provide research support, assess financial implications of change and help clients successfully plan implementation,

assisting with the resolution of any problems that may arise in the process.

## **European Union - Priority 2**

### **Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability**

#### **Question 3**

In light of the restrictions posed by the definition of ‘young farmer’ in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

#### **Comment**

Rather than a separate programme that would add to administrative costs of NIRD the needs of ‘young farmers’ could be addressed through providing an enhanced grant rate for young farmers who are head of holding or a partner in the business in the capital investment programme. Additional support could be applied through a business development plan which should also integrate the concepts of sustainability and environmentally responsible management.

#### **Question 4**

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

#### **Comment**

Given the reduction in budget for Pillar 2 and the need to deliver on a range of priorities, the ceiling in Tier 3 support seems disproportionately high and could cause distortion in the allocation of available funds. It is suggested that this tier is omitted or limited in extent and a grant rate of up to 50% applied to a ceiling of £100k for Tier 2 extending the reach of the programme.

We would highlight the need for environmental safeguards to be built into the application process underpinned by capacity building. It is important that programme funds do not cause negative environmental impacts e.g. drainage renewal work on sensitive habitats. This applies not only to the site directly associated with capital works but also where relevant the surrounding area particularly where drainage impacts on the hydrology of designated sites.

It would also be useful if biosecurity measures could be included in the capital grant programmes and consideration is given to funding for a badger vaccination programme for farms affected with bTB (outside the target areas that are part of the TVR Research Project).

### **Question 5**

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

#### **Comment**

Ulster Wildlife would ask that an Environmental Impact Assessment is completed independently as part of the entry criteria with a minimum of 'no environmental damage' as the baseline. A competitive and sustainable farm business should be capable of integrating production and environmental standards.

### **Question 6**

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

#### **Comment**

The proposed areas of expenditure seem appropriate.

Renewable energy technologies have a contribution to make in terms of sustainability and the delivery of energy efficiency for the farm business – they should therefore be included (subject to an EIA where appropriate)

### **Question 7**

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

#### **Comment**

As all group members should achieve some level of tangible benefit from benchmarking performance with other group members and participation is voluntary, it is considered that payment for this purpose is not a priority under the NIRDP programme. However, investment for experts, facilitators and study visits to identify and learn from best practice should be available.

To move the industry forward it is important that actions initiated through the NIRDP are sustainable so that its reach and impact extends beyond the life time of the programme. This 7 year cycle should be used to establish the infrastructure that can be used to effect change in the medium to long term mirroring the local business support networks that are provided for SME's in other sectors (these normally charge a membership fee which would be waived in this case as the operational costs would be covered by NIRDP).

### **Question 8**

How should participants in development groups be selected?

Comment

Given that development groups will be funded by public money, these should be open to anyone interested in the subject area and/or business development, up to the appropriate size for effective facilitation. To maximise the benefits delivered through such groups, individual mentoring should be provided to underpin the knowledge transfer process and improve the transfer of learning back to the workplace.

## **European Union - Priority 3**

### **Promoting Food Chain Organisation and Risk Management in Agriculture**

#### **Question 9**

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Many other EU countries are increasingly using sustainability and or 'green' food accreditation schemes and this would be worth considering within the context of the Agri-Food Cooperation Scheme and may have the potential to add value in terms of supporting the delivery of the agri-food strategy. This would require financial assistance for accreditation costs, training and mentoring to encourage best practice and enable participants to fulfil the requirements of any scheme.

As previously indicated, it is desirable that capacity building including environmental issues is mainstreamed within each programme strand. Specific needs will depend on market opportunity and production systems. The flexibility to cater for this should be incorporated within the programme.

#### **Question 10**

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

A tiered system should apply with a higher level of support provided to small scale food processors (50%) who are likely to have a lower level of match funding available therefore requiring a higher initial pump priming investment.

## Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

### Comment

The list of eligible items is sufficiently flexible to cover most eventualities. Cooperative measures should also fit with regional development strategies and clustering. They can also be a useful way to achieve cost efficiencies through ventures such as joint purchasing.

Support to develop Marketing capability within the sector would be particularly useful with tangible benefits such as assistance in developing cooperative brands, setting up web based trading sites, marketing schemes, use of social media as a marketing tool.

## European Union - Priority 4

### Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

## Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

### Comment

At a strategic level the strands within Priority 4 are appropriate. As indicated the priorities for the new AES need to clearly focus on delivery of tangible environmental outcomes related to designated site management, deliver on the EU Biodiversity Strategy 2020 including high nature value farmland and contribute to the enhancement of NI's landscapes.

The outcome of the 'greening measures' within CAP Reform will deliver minimal if any environmental benefit within NI and it is therefore important that the environmental challenges we face are adequately addressed through the AES. There is currently insufficient detail to make this assessment within this consultation and a more detailed consultation on scheme design is required.

For the AES programme to be successful, continuity of management is necessary for habitats, species and designated sites. Whilst a 5 year programme provides flexibility from an administrative perspective, it does not provide business continuity for the delivery of environmental outcomes especially important for areas protected under the Birds and Habitats Directives. Scheme design and administration needs to be simple at the farmer interface but sophisticated enough to deliver environmental benefits.

Ulster Wildlife, in common with the other eNGOs would like to see greater targeting of available funds to priority habitats and species to maximise the environmental benefits achieved. Wider countryside measures potentially form the building blocks of an extended ecological network and securing sufficient budget for environmental work in the wider countryside could add considerable value for the agri-food and tourism sectors. Field boundary restoration or reinstatement would be particularly beneficial both from an environmental perspective and to assist with biosecurity.

### Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

#### Comment

Designated sites are the building blocks of NI's ecological network and should therefore be prioritised in the first instance. Agri-Environment Programmes are the primary delivery mechanism for Natura 2000 sites in most member states across the EU providing compensation for costs incurred and income foregone.

It is important that farmers understand and appreciate the value of designated sites and this measure should be underpinned by an advice and mentoring service. Experience from other parts of the EU would suggest that this role may be best undertaken by an independent body to separate advisory, educational and statutory functions (similar to the design criteria for an innovation network) e.g., in many other EU countries this service is provided by eNGOs or though approved consultants.

In many other EU countries, guardians of designated sites are provided with a much greater level of support and inter-generational engagement is undertaken to reduce the risk of damage. Landowners are accorded a high level of recognition as owners of Natura sites since they manage the most important environmental assets across Europe underpinned by a support structure to help them in their custodial role.

### Question 14

Do you think that an element of training should be a compulsory part of the scheme?

#### Comment

It is essential that landowners understand their obligations under the AES and L&D will be an important part of this process. It is important that farmers and landowners understand their obligations and mandatory training for basic elements would be beneficial. Training needs to encompass the restrictions and management obligations of the various schemes but also build understanding and appreciation of priority habitats and species and the impacts (positive and negative) of farming activity.

To receive payment under priority 4, basic training to equip participants with the knowledge and skills to fulfil the conditions of their agreement would be beneficial– this will be a new programme with different requirements . In addition to reducing the risk of non-compliance, training would also help to remove any perception that the payment is for social rather than environmental goods. Barrier payments could be integrated into scheme payments to provide farm relief services whilst attending mandatory training courses.

This will require an effective infrastructure which delivers high quality training with timely consistent course content. We would suggest that budget is made available for eNGOs to assist with delivery of this training in partnership with DARD.

The experience of both Ulster Wildlife and other organisations within the eNGO sector evidence that where appropriate training and support is provided, a greater understanding of the environment results and significant biodiversity gains can be achieved.

### **Question 15**

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

#### **Comment**

Additional rewards for collective action would be beneficial in encouraging uptake, particularly for example within catchments, commonages, peatlands, and species based projects. Such initiatives will require effective facilitation and financial provision needs to be made available for this purpose through the innovation broker strand of NIRD.

Cooperative measures to facilitate effective removal of invasive species would also be very useful e.g. catchment based activity.

### **Question 16**

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

#### **Comment**

Supply and demand for organic production is more or less stable within NI and it would be difficult to justify a payment for continuation of organic farming within an economic appraisal as there is no change in farming practice that would attract a payment on the basis of income forgone and costs incurred. There would however be a case for retaining payments for conversion to organic production which would



facilitate new entrants and enable existing producers to expand.

Organic producers also provide added value through environmentally sensitive farming systems and in particular this could be beneficial in providing a safe space for pollinators which have experienced a major decline in recent years - payment for added value management practices could be rewarded through an A-E option.

### **Question 17**

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

#### **Comment**

The primary barrier will be loss of income once the land is taken out of production under woodland options. This will be a major disincentive for landowners. If no payment is made through the NIRDP. Grazed agro-forestry should be included as an option to try to increase the area of woodland cover.

One third of land in NI is managed through conacre systems and non-farming land owners could provide a useful focus of activity for agri-forestry options if an annual income incentive was provided through NIRDP. If the payments can be held at the existing level and SFP eligibility maintained, woodland creation offers a viable alternative to land owners.

The retention of entitlements would be a key factor in the decision making process particularly with the increasing emphasis on food security.

### **Question 18**

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

#### **Comment**

As above – this proposal will have a major negative impact significantly reducing the availability of land for planting. Tree planting (particularly broadleaves) will deliver an eco-system service assisting with carbon sequestration and adding biodiversity value. Income foregone payments are important incentives in terms of increasing the area of woodland in NI.

### **Question 19**

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

Many farming units within ANCs are marginal in terms of financial viability and income support is therefore required to maintain a viable sustainable farming unit and decrease the risk of abandonment. However habitat degradation/ loss, under//over grazing remain a problem in hill areas and needs to be addressed through AE measures. This will be dependent on sufficient funds being made available for AE measures within Pillar 2.

Before a final decision is made on ANCs it would be beneficial to have further analysis on the impact of moving to a flat rate basic payment on farm incomes within the ANC as this may increase the level of income directed towards such farms. If this action alone results in financial stability, a more effective policy would be to address environmental issues associated with the uplands through an agri-environment option for the uplands rather than via the ANC.

### **Question 20**

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

Priority habitat and species options need to be targeted to directly address the issues of under/over grazing, habitat degradation through the improvement of semi natural grasslands (e.g. lime/manure), grazing regimes to protect and enhance biodiversity, programmes of rush, bracken and scrub control where appropriate and field boundary restoration to maintain the landscape character of the uplands.

Cooperation payments should also assist with addressing the environmental issues associated with common grazing.

### **European Union - Priority 5**

**Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors**

### **Question 21**

Should renewable energy technologies be included in a farm business development grant scheme?

#### Comment

Renewable energy technologies should be included within the farm business development grant scheme. Bioenergy forms an important component of the mix of technologies required to improve sustainability within the sector and to meet NI's Renewables Obligation. As previously highlighted, it is important that such applications are accompanied by an EIA to address any potential environmental issues where appropriate.

#### Question 22

Which renewable energy technologies, if any, should be supported?

#### Comment

All options appropriate to the needs of the farm business should be supported subject to the underlying proviso of no environmental damage assessed through an EIA by a competent person/body.

#### Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

#### Comment

On farm use would be the first priority, however as there is the potential to feed into the National grid, this added benefit could be utilised where available to diversify income streams onto the farm.

#### Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

#### Comment

The inclusion of this option would prove beneficial providing a win:win situation delivering multiple benefits through provision of public goods and services whilst encouraging a viable business venture and delivering on biodiversity targets. Long term management objectives would however need to be built into any associated management plan as the net gains could easily be negated through inappropriate management of the woodlands.

Broadleaves and species enhancement measures should be an integral part of such applications and the principle of no environmental damage should apply e.g. avoiding planting on species rich grassland, moorland etc

We would also like to see a biodiversity project option within the new NIRDP programme related to woodland e.g. providing funding for a cooperative approach to preserving the red squirrel. This could fall under special projects providing funding for coordination, training, provision of feeders and control of grey squirrels mirroring the partnership approach currently adopted in Scotland and the North of England.

### **Question 25**

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

#### **Comment**

A METS programme would be desirable to encourage farmers to make better use of nutrients, improving profitability and reducing the risk of environmental damage. This could be incorporated as an option within the capital investment strand of NIRDP to reduce administration costs and minimise duplication of effort. Capital investment under METS should be capable of providing sustainable benefits that facilitate water quality improvement within NI. Activity within target catchments where agriculture is thought to be the main contributor to poor water quality or where the land buffers designated areas e.g. Strangford Lough/Lough Neagh should be given preferential access to this fund. Investment should also be underpinned by training in terms of management practice.

### **Question 26**

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

#### **Comment**

An increase in demand during the period of the programme is anticipated as farms modernise and seek more effective ways to meet environmental legislation adjusting to the impact of climate change whilst maintaining competitiveness.

### **Question 27**

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

#### **Comment**

Since NIRDP is financed by public money, a robust evaluation should be incorporated to determine the impact of this investment. Whilst it would be useful to capture behavioural change, environmental monitoring should be used to measure the impact of this investment (over a prolonged period since improvements in water quality take time).

### **Question 28**

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

The main barriers seem to be cost, lack of understanding of the benefits that can be achieved through soil analysis and limited understanding in some cases of how the results are integrated within nutrient management plans. The latter barrier can be reduced through advice and mentoring.

### **Question 29**

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Discussion groups would be a suitable delivery mechanism for the nutrient management scheme. In terms of learning styles, this approach caters for all variations provided the intervention is properly planned in order to effect the change required. Peer learning is normally very effective within the agricultural community and content and level can be adapted according to the mix and scale of the farm businesses participating.

### **Question 30**

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

Electric fences to facilitate buffer strips in flood plains would be worth consideration along with habitat creation options (via A-E scheme)

## **European Union - Priority 6**

### **Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas**

#### **Question 31**

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

### Comment

Rural business development/investment will be important in terms of improving the viability of many farm businesses however the uptake has been low during the last programme due to the inability of farm businesses to match fund the investment. The maximum possible grant rate should therefore apply to viable proposals under this strand of the programme and it is important that it is accompanied by reskilling support e.g. training bursaries where this links to the proposal.

Spend on rural tourism initiatives needs to be strategic and aligned with NITB development strategies rather than fragmenting investment if a positive impact is to be achieved.

Village renewal has in many cases delivered positive results for relatively modest investment and should be supported, however it is important that this is genuinely additional and money is not directed to work District Councils should be completing anyhow.

There has been significant budget dedicated to strategic projects within the current NIRDP many of which lie within the expenditure remit of other Government Departments. With the emphasis by the NI Assembly on the economic growth, it would be important that NIRDP funds are focused on promoting economic development opportunities within rural communities and improving the sustainability of the agri-food industry. This should include delivery of environmental goods a part of the marketing mix for both agri-food and tourism sectors.

### Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

### Comment

Focus on green space in village renewal settings – including semi natural areas which are beneficial for wildlife rather than manicured green space.

It would also be beneficial to have opportunities for local communities to draw down funding for biodiversity projects which could also be linked to rural tourism e.g. eco tourism.

### Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

#### Comment

The link between the natural environment and health and well being is well researched and established particularly for disadvantaged communities. Cooperative cross border management for biodiversity projects would be extremely beneficial (since wildlife recognise no borders) together with river basin action programmes.

#### Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

#### Comment

For environmental projects it should focus on regions adjacent to the border.

### DELIVERY MECHANISMS

#### Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

#### Comment

The budget allocation for the various options will determine how much of the programme budget should be allocated to the LEADER approach. It is important that delivery structures have the necessary technical expertise to deliver the relevant strands of the programme and are cost effective.

#### Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

#### Comment

Basic services, village renewal and anti-poverty measures should be delivered through the LEADER approach (with cluster areas mirroring the new RPA council areas).

#### Question 37

Which measures/schemes should DARD deliver itself and why?

#### Comment

Resource within DARD is limited and this has been a particular barrier in the past in terms of programme implementation. We would suggest that regulation of spend

and programme activities is undertaken by DARD together with delivery of agri-environment schemes with financial provision made to draw on the expertise of others when appropriate e.g. NIEA/eNGOs for advice/assistance with training.

### **Question 38**

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

#### **Comment**

Rural tourism could be delivered through NITB who could also provide on-going support for clients.

Training should be completed via a partnership approach due to the range of skills required to deliver within the programme. CAFRE could coordinate training for the different strands of NIRDP if resources were made available involving delivery partners as appropriate.

Advice and mentoring support for designated areas and priority habitats is important. Feedback from the farming community should be sought as to the most appropriate delivery mechanism as there seems to be reluctance to have government officials on their holdings in many cases. It is essential to provide a support mechanism that landowners accept and trust.

Facilitation for cooperative projects should be brokered via a call off list centrally coordinated. It is important that facilitators have the credibility and expertise to deliver the outcomes required.

## **FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS**

### **Question 39**

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

#### **Comment**

Budget allocation should be based on needs and priorities rather than distributed across all the proposed schemes. It is our view that priority should be given to strands where funding is limited from other sources e.g. there are various sources of funding for village renewal/ general anti-poverty measures through programmes such as BIG Lottery and via distribution of the Councils own funds/loan sanctions financed by rate payers as the end beneficiaries.

Cross cutting strands which deliver public benefits and underpin delivery of both agri-food and tourism in NI should be funded appropriately. We would like to see the budget for Agri-environment Schemes maintained and if possible increased to



halt the loss of biodiversity and improve water quality within NI, also delivering on climate change mitigation and adaptation.

#### **Question 40**

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

#### **Comment**

As an eNGO the delivery of environmental outcomes is the top priority for Ulster Wildlife effectively integrating with initiatives to achieve a viable and sustainable agri-food industry to avoid issues such as land abandonment that are a feature in much of the EU. It is important environmental outcomes and capacity building are integrated in each strand of the programme and adequately funded.

We would like to see funds targeted to assist the industry work in harmony with the environment to deliver a sustainable and prosperous future for NI.

#### **Question 41**

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

#### **Comment**

On the assumption that profitability of the industry should stabilise and improve with the growing emphasis on food security over the term of this NIRDP cycle along with the implementation of the agri-food strategy and the increase in export markets, our view is that 15% of Pillar 1 funds should be transferred into Pillar 2 and ring fenced for the delivery of agri-environment programmes which will be then redistributed to landowners for the delivery of 'public goods'.

### **ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020**

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

#### **Comments**

Ulster Wildlife would like to see more effective integration of environmental issues across all strands of the NIRDP 2014 – 2020. Mainstreaming the environment and integrating biodiversity, water quality, climate change and eco-system services outcomes will be important in achieving a viable sustainable agri-food industry in NI. Capacity building will be important in achieving this goal.

To protect and enhance NI's natural capital, Agri-environment schemes in the 2013-20 programme run need to be targeted to where greatest environmental benefit will be achieved e.g. designated sites, priority habitats and species, landscape scale conservation priorities such as field boundary restoration and creation, ecosystems services. Peatlands should be included within the targeted measures as an ecosystem service delivering on carbon storage and sequestration and a relatively modest investment can deliver significant benefits.

Control of invasive alien species should be included within the programme to help meet the requirements of the new EU Regulation and offset the environmental damage they cause.

The UK Article 17 Report recently indicated that ammonia and ammonia deposition is having a significant impact upon NI habitats and this issue should be addressed within the NIRDP.

Whilst we appreciate DARD's desire to keep the programme simple, the delivery of tangible environmental outcomes will be necessary for the sustainability of the RPD in the longer term particularly following the report from the European Auditors last year. We would therefore suggest that the Agri-environment programme is designed to be simple at the farmer/landowner interface but sufficiently sophisticated below the surface to deliver real environmental benefits.

All options in the programme should be underpinned by a minimum of 'zero environmental damage' particularly if options such as draining renewable are being considered.