

# 2014 – 2020 RURAL DEVELOPMENT PROGRAMME – CONSULTATION RESPONSES

## OTHER

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# 154. Big Lottery Fund



RDP Management Branch  
Department of Agriculture and Rural Development  
Room 407, Dundonald House  
Upper Newtownards Road  
Ballymiscaw  
Belfast  
BT4 3SB

21 October 2013

**Re: Consultation on the Rural Development Programme  
2014 - 2020**

Dear Sir/Madam

The Big Lottery Fund welcomes the opportunity to comment on the Rural Development Programme 2014-2020 published by the Department of Agriculture and Rural Development.

Our mission is to bring real improvements to communities and the lives of people most in need.

We aim to be an intelligent funder, not simply distributing funding but helping to maximise the positive impact of our grant making. Our funding is designed and developed in consultation with stakeholders to reflect local needs and priorities and decisions on our programmes are made by our Northern Ireland Committee.

We would like to use this opportunity to share details of some of our funding initiatives, which are delivering projects particularly relevant to Priority 6 under the programme - *'Promoting social inclusion, poverty reduction and economic development in rural areas'*:

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We are committed to bringing real improvements to communities and to the lives of people most in need



INVESTOR IN PEOPLE



- Reaching Out: Connecting Older People, launched in June 2010, has a number of projects being delivered in rural areas. The aim of the programme is to support older people in Northern Ireland who are at risk of exclusion or isolation. We have invested £25 million in over 60 projects which promote wellbeing, provide support or contribute towards independence and active citizenship; such as social support activities like volunteering, advice provision, community safety, and intergenerational work. One example is the Rural Area Partnership in Derry (RAPID) project, the Healthy Ageing Network in Derry (HAND). This project will establish a social economy cluster, which older people will be encouraged to run, consisting of allotments, garden centres, a health and wellbeing centre and a rural kitchen.
- Community Planning, one of the pilot projects supported under this initiative was led by the Rural Development Council who worked in collaboration with Fermanagh and Omagh District Councils, the voluntary and community sector and other stakeholders to prepare for the introduction of community planning to Northern Ireland. Although pilots funded through the initiative ended in January/February 2012, a toolkit of good practice produced for wider use will continue to be updated until summer 2014.
- Village SOS Active - this UK wide programme supported 17 rural communities in Northern Ireland in 2012 to develop plans for enterprising projects including community-run shops and pubs, energy and



transport schemes, craft and food projects and business and community centres.

We are currently beginning to think about our future funding plans. There will be a phase of consultation at the end of 2013 / early 2014 to identify priority areas for future funding programmes and initiatives. During programme development, we want to build upon existing strategies, good practice and relevant initiatives.

If you would like to discuss this submission or would like further information on any aspect of our work, please do not hesitate to contact me on 02890 551442 or by email [norrie.breslin@biglotteryfund.org.uk](mailto:norrie.breslin@biglotteryfund.org.uk).

Yours sincerely,

A handwritten signature in black ink that reads "Norrie Breslin".

Norrie Breslin  
Head of Policy and Learning (NI)

## 155. British Veterinary Association NI



### **DARDNI CONSULTATION ON RURAL DEVELOPMENT PLAN 2014-2020 BVA / NORTHERN IRELAND BRANCH RESPONSE**

- 1) The BVA is the national representative body for the veterinary profession in the United Kingdom and has over 13,500 members. Its primary aim is to protect and promote the interests of the veterinary profession in this country, and it therefore takes a keen interest in all issues affecting the veterinary profession, be they animal health, animal welfare, public health, regulatory issues or employment concerns.
- 2) The BVA's Northern Ireland Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.
- 3) BVA and Northern Ireland Branch were pleased to have been given the opportunity to contribute to DARD's consultation on the Rural Development Programme 2014-2020. We understand that there are six rural development priorities which set the context for the European Agricultural Fund for Rural Development (EAFRD) and that the actions DARD chooses to form part of the next Rural Development Plan (RDP) will have to fit within this structure of priorities. We are broadly in agreement with the strategy detailed in the consultation document but wish to make some suggestions for additions and clarifications, detailed below.
- 4) Our comments relate primarily to the proposals detailed under the first three priorities of the proposed RDP as follows:

#### **Fostering knowledge transfer and innovation**

- We fully support the proposed formation of European Innovation Partnership (EIP) Operational Groups detailed in the consultation document. We believe that the veterinary profession already makes a significant contribution to fostering knowledge transfer and innovation and could play an important role on EIPs relating to disease control and improving animal welfare.
- We are supportive of the principle of demonstration farms as they can play an important role in knowledge transfer. Consideration could be given to programmes which combine traditional on-farm demonstrations and online interactive material, which could also incorporate contributions from academia. There is a need to further develop the role of demonstration farms as examples of best practice and species specific excellence.
- Regarding the Farm Family Key Skills Scheme, we support the proposal for training in areas such as health and safety awareness and believe that vets could play a role in this, as well as other elements such as animal health and welfare, disease reduction, biosecurity and land and feed management.

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

- We support proposals designed to improve the profitability and efficiency of businesses but believe that animal health and welfare must be a prominent feature in any proposal aimed at increasing farm viability and sustainability.



The economic benefits of good animal health and welfare must be at the heart of support measures made available to farmers as high standards of health and welfare are crucial to the development and maintenance of a sustainable and competitive industry. Industry and Government must work together in a coordinated manner to deliver outcome based disease priorities such as those highlighted by AHWNI. The role of the veterinarian in delivery programmes must be paramount and it is essential that a consistent message is delivered. The successful implementation of BVD or Johnes control and eradication programmes will be dependent on a clear delivery structure with coordinated messages and common approach. This approach will also facilitate the achievement of the targets set in the agri-food strategy, "Going for Growth".

- We also support the aims of the Business Investment Scheme (BIS), in particular the provision of funding for upgrading equipment to provide better nutrient management, biosecurity, disease prevention and improved animal welfare conditions. We would also like to see funding made available for the upgrade/modernisation of animal handling facilities on-farm in order to improve health and safety for both farmer and veterinarian.

#### **Promoting food chain organisation and risk management in agriculture**

- Regarding food chain organisation and risk management, we believe that the veterinary profession is yet to realise its full potential contribution – a recent example would be the adverse weather conditions in Northern Ireland earlier this year where it became clear that there was a need for farms to have plans in place to cope with such extremes in order to protect the health and welfare of their livestock. The aim for the future should be to increase the farming sector's resilience to such conditions and the veterinary profession will be the key player in generating a realistic, bespoke health plan, with contingency built in, and monitoring performance against the plan for health and production. An essential component of such a plan should include veterinary interpretation of food chain information. There is a need for further readily available IT based disease models that can be adjusted for each farm, in order to clearly illustrate the production benefit of disease risk reduction methods such as improved biosecurity and purchase policies built into the farm health plan.
- We agree with proposals to provide support for cooperation between primary producers, food processors and retailers and believe that the veterinary profession could play a role in assurance aspects, with veterinary input at various points in the supply chain adding value and additional credibility to a product. This is essential to ensure comprehensive access to the global market.
- We would also like to take this opportunity to highlight the importance of the role of the veterinary profession in the implementation of the Agri-Food Strategy Board's action plan in support of the agri-food industry in Northern Ireland 'Going for Growth'. Vets must be at the heart of current initiatives to significantly expand the local food sector and we are pleased to see that the key recommendations of 'Going for Growth' include the need to eliminate animal disease, to double the drawdown of European funding for agri-food innovation, and to promote the USP of improved animal health, welfare and biosecurity.

# 156. Citizens Advice

Citizens Advice  
Consultation on the Rural Development Programme 2014-2020

## CITIZENS ADVICE - OVERVIEW

- Citizens Advice is the largest advice charity in Northern Ireland working against poverty. In 2011-12, our offices handled 305, 337 issues and dealt with 84, 456 clients directly while in the same period there were 122, 109 instances of the public downloading information documents from our website.
- Citizens Advice has promoted services in Northern Ireland since 1984 and has unmatched brand awareness among the public here, with 98% of people aware of Citizens Advice (MORI Omnibus Survey Northern Ireland, June 2011).
- The increasingly complex nature of work undertaken reflects the effects of welfare changes, squeezing of household budgets and reductions in working hours on our clients during the current economic crisis.
- The service is delivered through an unrivalled network of 28 local offices and 100 other outlets. We have a physical presence in 22 council areas around Northern Ireland.
- Online services have increasingly become a major priority for the organisation, as we seek to meet the changing needs of clients and growing demand for such advice and information.
- The largest single increase in advice demand over the past 3 years is to our online self-help advice service - Adviceguide.
- In 2011-12, Adviceguide had 180,273 separate users who accessed a total of 542, 458 Northern Ireland specific advice items. This represents a high growth rate over the past three years, with respective increases of 55% and 51%.
- Citizens Advice works in partnership with a number of statutory, voluntary and community bodies on a range of programmes and projects. Some of our major partnerships include:
  - The 'Beat the Recession' project funded by Big Lottery
  - The Royal British Legion/RAFBF Benefits and Money Advice service
  - Macmillan CAB Welfare Advice Service

- These are in addition to a range of local initiatives undertaken by our member bureaux. This extensive service is delivered within a budget of £6 million. It is in part funded by our social economy arm, Citizens Advice Services Ltd.
- Citizens Advice Northern Ireland has formal links to Citizens Advice in England and Wales and a close working relationship with Citizens Advice Scotland (CAS). Together the three associations constitute the largest advice network in Europe, with over 60 years experience of providing advice and information to the public.
- Citizens Advice also works in partnership with the Citizens Information Board in the Republic of Ireland to provide cross border advice and information.
- The CAB network is tuned to targeting social need with regional spread, modern integrated IT infrastructure and skilled staff. We provide an efficient and cost effective channel for the delivery of information and advice to the most socially vulnerable people in Northern Ireland.

## **Introduction**

Citizens Advice welcomes the opportunity to respond to Department of Agriculture and Rural Development's consultation on the Rural Development Programme 2014-2020.



## 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

Citizens Advice wishes to comment on the Combating Poverty and Social Inclusion- Basic Services Scheme.

The Strategy states as a strategic commitment to “bring forward a package of measures to tackle rural poverty and social isolation.... to identify actions that will provide basic services and improve the quality of life for those living in rural area”. The three priority areas are identified as

- Access Poverty- a focus on access to statutory services, advice on benefits, health and social care, education and training and public transport
- Financial Poverty- a focus on maximising income for vulnerable rural dwellers, maximising benefit takeup, tackling fuel poverty and addressing the additional costs faced by rural dwellers
- Social Isolation- a focus on addressing different types of isolation experienced by different vulnerable groups

However none of the proposed schemes within the Strategy to address Priority 6 include actions which Citizens Advice considers sufficiently targeted to address the three priority areas of **Access Poverty**, **Financial Poverty** and **Social Isolation**. The potential benefits of a targeted scheme towards delivering accessible advice in benefits and financial capability to rural dwellers have been omitted from the strategy and Citizens Advice urge that these are included in the strategy in a transparent and adequately resourced way.

The recent NICVA report “The Impact of Welfare Reform in Northern Ireland” states that Welfare Reform will take £750 million out of the Northern Ireland economy - an average of £650 per head of the working age population. Citizens Advice, on extracting figures from this report pertaining

to the three main non-rural council areas (Derry, Belfast, Castlereagh) highlights that Welfare Reform will take an estimated £500 million out of the economy of Northern Ireland outside the main cities.

This will have an enormous negative impact on a struggling rural economy, an impact that demands proactive measures within a new Rural Development Programme- Citizens Advice are disappointed that no such proactive measures appear to be included in the proposed strategy.

### 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

The Combating Poverty and Social Inclusion- Basic Services Scheme should be extended to include proactive measures across the below activity areas:-

- i) Approaches to maximise income to disadvantaged rural families through increased take-up of benefits. Millions of pounds are being lost to the NI Rural Economy each year through non claiming of benefit.
- ii) Approaches to tackle poverty amongst rural dwellers through benefit maximisation, through supports for managing and resolving debt issues and through supports for enhanced financial capability.
- iii) Approaches that offer a range of supports for rural dwellers that will address their social isolation issues (outreach services, home services, capacity building supports for community groups, and improving digital inclusion through training and access for rural dwellers).

### 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 All Island Co-Operation Scheme should be more flexible to facilitate both cross border co-operation between service providers but also to promote and facilitate mobility of residents on both sides of the border to access relevant services across the border.

Citizens Advice particularly encourage programmes that increase access and capacity of rural dwellers to utilise digital technology.

### 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

Citizens Advice considers that schemes to address deprivation and disadvantage through North/South cooperation should not be limited to the border corridor *per se*. However, there is a strong case that any such schemes should be constituted in such a way as:

- (i) Maximises the potential advantages of North/South approaches, which will often have most effect in border areas
- (ii) Maximise efficiencies of scale, which will benefit the border area and areas further away through more efficient use of resources and sharing
- (iii) Be evidence based and
- (iv) Include in its remit addressing the particular additional challenges and deprivation which rural areas closer to the border face as a result of their geographical positioning and social and economic effects of the border.

## 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

Citizens Advice contend that schemes that tackle Poverty, Deprivation and Isolation should receive priority funding support (ie Priority 6)

### 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

Citizens Advice feel that the Combating Poverty and Social Isolation- Basic Services Scheme should be the highest priority as rural dwellers experiencing poverty and isolation should be supported in order to reduce the socio economic gap between these citizens and the rest of the rural population.

## **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**

Citizens Advice are concerned that despite being stated as an objective of Priority 6 of the Strategy “*to seek to minimise, where it exists, disadvantage, poverty, social exclusion and inequality amongst those living in rural areas and in particular amongst vulnerable groups to enhance their quality of life*” the proposed schemes under Priority 6 make no mention of

- supporting citizens to take up benefits entitled to
- supporting citizens to tackle fuel poverty nor of
- supporting residents to tackle debt problems/to enhance financial capability.

Rural dwellers in recent years have been identified as an ‘at risk’ group in terms of suicide, with caused being attributed to rural isolation and financial pressures.

Citizens Advice strongly urges DARD to include positive actions to support the provision of advice services in welfare support and in debt and money management to the Rural Development Strategy for 2014-2020. Without such supports, the Strategy’s commitment to tackling rural disadvantage, poverty and social exclusion cannot be fully delivered.



## 157. Consumer Council NI

### Introduction

The Consumer Council welcomes the opportunity to respond to this consultation.

The Consumer Council is an independent consumer organisation, working to bring about change to benefit Northern Ireland (NI) consumers. Our aim is to make the consumer voice heard and make it count.

We have a statutory remit to *promote and safeguard the interests of* consumers in NI and we have specific functions in relation to energy, water, transport and food (the Consumer Council and the Food Standards Agency (FSA) have a memorandum of understanding and the Council's strategic focus on food is primarily in relation to food prices and customer experience). These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers.

The Consumer Council is also a designated body for the purposes of supercomplaints, which means that we can refer any consumer affairs goods and services issue to the Office of Fair Trading, where we feel that the market may be harming consumers' best interests.

In taking forward our broad statutory remit we are informed by and representative of consumers in NI. We work to bring about change to benefit consumers by making their voice heard and making it count. To represent consumers in the best way we can, we listen to them and produce robust evidence to put their priorities at the heart of all we do.

## Energy

Householders in Northern Ireland face higher energy costs than the rest of the UK – spending £348 more per year on average<sup>1</sup>. The increased expenditure is mainly due to our reliance on home heating oil; 68 per cent of homes overall and 82 per cent in rural areas<sup>2</sup>. The price of home heating oil remains a serious issue for many fuel poor households. Consumers in rural areas also face a reduced choice in terms of the number of oil suppliers.

Energy costs make a considerable contribution to the effects of rural poverty and isolation. Northern Ireland has the highest level of fuel poverty in the UK and fuel poverty is at its worst in rural areas of Northern Ireland where 44 per cent of homes are living with the effects of fuel poverty. The highest rate of fuel poverty is found in households living in isolated rural areas (50 per cent)<sup>2</sup>.

The Department of Agriculture and Rural Development (DARD) should actively engage or where it is already doing so, continue to engage with the Consumer Council, the Cross Sectorial Fuel Poverty Partnership, District Councils, Health Action Zones and with other government departments through the Inter Departmental Fuel Poverty Advisory Group (IDFPAG), to assess how it will contribute to existing and potential schemes that aim to tackle rural fuel poverty. In making this recommendation we acknowledge the work, and success, of the MARA project which is run in partnership with PHA. The project addresses a range of issues that affect rural communities including advice on energy issues and the types of grants/schemes available.

The Consumer Council supports the proposals in priority 5 of the consultation in relation to energy efficiency and greenhouse gas reduction, in particular the focus areas:

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<sup>1</sup> [http://www.niassembly.gov.uk/Documents/Social-Dev/Fuel-Poverty/briefing\\_paper.pdf](http://www.niassembly.gov.uk/Documents/Social-Dev/Fuel-Poverty/briefing_paper.pdf)

<sup>2</sup> Northern Ireland House Condition Survey 2011 (NIHE)



- 5B - Increasing efficiency in energy use in agriculture and food processing; and
- 5C - Facilitating the supply and use of renewable sources of energy, of by-products, wastes, residues and other non food raw material for purposes of bio-economy.

The primary means of tackling fuel poverty in NI is the Department for Social Development (DSD) funded 'Warm Homes Scheme' (WHS). A report by the Northern Ireland Audit Office<sup>3</sup> shows that of homes in fuel poverty, the 'hardest to treat' are typically in rural areas and that the WHS has not addressed this issue adequately. While it is accepted that most 'Hard to Treat' (HTT)<sup>4</sup> homes are in rural areas, a clear evidence base or a HTT index is required to identify them.

The Department of Enterprise, Trade and Investment (DETI) has already consulted on its 'Energy Bill' which will create an obligation on the energy industry to deliver energy efficiency interventions to consumers. However, an opportunity still exists to influence the obligation to target the rural fuel poor. Furthermore, DARD must engage with DSD to ensure that the WHS and other Energy Efficiency interventions actively target the rural fuel poor.

The Consumer Council recognises that an extension of the natural gas network into rural areas could contribute to tackling fuel poverty and reduce the energy costs and carbon emissions for the agri food sector. The NI Assembly has agreed a government subvention of up to £32m to enable an extended gas network to the west to be financially viable and deliver a cost benefit to consumers. We would like to see DARD actively engage in the public debate on the extension of the gas network and consider whether it should contribute to the project.

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<sup>3</sup> Warm Homes: Tackling Fuel Poverty, NIAO, June 2008.

<sup>4</sup> 'Harder to treat' homes are often inhabited by fuel poor families. They may include homes with solid walls, homes with no loft space, older housing stock, homes without a network connection to a low cost fuel i.e. gas and homes where, for technical or practical reasons, basic energy efficiency measures cannot be installed. High heating bills are often linked with HTT homes. Families who would otherwise cope relatively well in a more energy efficient home could find themselves in fuel poverty.

The Consumer Council recognises that research shows that NI has some of the best renewable energy resources in Europe and that they are currently under-utilised. The Consumer Council acknowledges that technologies such as combined heat and power, anaerobic digestion, geo-thermal heat and wind power can bring lower energy prices and promote the economy in rural areas. Renewable and community based energy options or district community heating schemes have the potential to benefit rural consumers by providing low carbon and low cost sources of energy. Financial incentives for farms to use excess bio-mass and waste to create energy could potentially benefit the local and global environment as well as providing farmers with additional income. We would seek clarity from DARD as to what consideration has been given to how these initiatives will fit in with the second phase of the Renewable Heat Incentive (RHI) and if consumers will be able to avail of both initiatives.

However, we also recognise the environmental impact renewable energy, particularly wind, could have in rural areas and the need to engage with rural consumers on this issue. DARD should undertake such engagement with consumers and work with DETI and the Department of the Environment (DOE) (planning) to ensure that rural consumers benefit from the development of renewable energy in rural NI.

We would ask DARD to clarify how it plans to improve energy efficiency in rural areas. Education and advice on energy efficiency can in many instances be as effective as practical measures to improve energy efficiency. We would ask DARD to consider funding the delivery of education measures or improving access to, and awareness of, resources such Bryson and the Energy Saving Trust.

Furthermore, we would ask DARD to examine the findings and recommendations included in our upcoming<sup>5</sup> report looking at domestic

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<sup>5</sup> Energy Efficiency Report due for publication by November 2013.

energy efficiency government schemes in NI and consumers' views in the context of fuel poverty policy.

## **Water**

The Consumer Council's role in representing water and sewerage consumers in matters connected with the supply of water and the provision of sewerage services encompasses a wide range of water related topics and working with a variety of stakeholders.

The Rural Development Programme (RDP) and the draft Long-Term Water Strategy (LTWS) being developed by the Department for Regional Development (DRD) share many high level aims in the areas of water and land management, environmental protection and enhancement, increasing resource efficiency and adapting to climate change.

Consumers are concerned about pollution to the water environment. Consumers know that many different factors contribute to the condition of our water environment and understand that shared and integrated solutions are needed. The catchment based approach to water management proposed in the draft LTWS links directly with the RDP's Priority 4. While the LTWS will not reassess actions of other strategies, policies or framework documents alignment between it and the RDP will deliver benefits to rural businesses and households.

Specific mention is made of increasing efficiency in water use by agriculture (focus area 5A). Recent research found that 45 per cent of businesses surveyed have limited knowledge of how to use water more efficiently and 75 per cent of households identifying that improvement is required to encourage consumers to be more water efficient<sup>6</sup>. The Consumer Council has developed entry level water efficiency advice for all agricultural users and we

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<sup>6</sup> Consumer Council research to inform DRD Ministerial Social and Environmental Guidance for Water and Sewerage Services and NI Water's Price Control 2015 planning. To be published November 2013.

welcome the focus to be brought under Priority 5 but struggle to see how this will be delivered under the four proposed schemes. The Consumer Council would be happy to work with DARD and other stakeholders to develop policies in respect of water efficiency measures in rural homes and businesses.

## **Transport**

The Consumer Council welcomes the recognition in the consultation of the important role transport has to play in addressing poverty and social isolation. Consumer Council research with consumers who use the rural Dial a Lift service found that for many it was their main source of transport and essential to their social interaction<sup>7</sup>.

In relation to Priority 6, Proposed Scheme 4, the Consumer Council would welcome more information on how the '*Access to Basic Services scheme*' will provide financial support to provide '*access to transport in rural areas*'.

The Consumer Council would also welcome any additional information on how DARD intends to work in partnership with other Departments to deliver transport services.

## **Money Affairs**

DETI is currently developing a Financial Capability Strategy for Northern Ireland, as set out in the Programme for Government 2011-14.

One of the key areas highlighted for action is addressing rural financial inclusion. Around 45 per cent of the NI population is defined as living in rural areas. Although the overall picture of financial capability is similar in both rural and urban communities, there are unique accessibility issues faced by rural populations. Limited access to banking facilities, free use of ATMs, and

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<sup>7</sup> <http://www.consumercouncil.org.uk/publications/?id=1039>

access to the internet can be obstacles to financial capability more prevalent in rural areas. It is thought that more research is needed on issues affecting this group, to provide better guidance and support to rural populations.

With 53 branches of local banks closing in NI over the last two years, rural consumers risk long and expensive journeys to more distant banks, even if they are able to switch provider.

It is vital that the high level commitment by Departments and other stakeholders across all sectors to the Strategy must be turned into practical measures through the Action Plans.

### **Conclusion**

The Consumer Council welcomes the overall priorities set in the Rural Development Programme 2014 - 2020. In particular, the priority of social inclusion, poverty reduction and economic development in rural areas chimes with our own work in protecting the vulnerable, with particular regard to low income or rural consumers. The Consumer Council is ready to work with DARD to deliver these policy goals and maximise the benefits of rural development.



## 158. Equine Council for Northern Ireland

### 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

Yes

Areas for targeting:-

- Equine Health & Safety (for individuals and businesses)
- Equine handling & production
- Equine breeding & foaling systems
- Equine veterinary
- Equine tourism
- ICT and business management training
- Sales & marketing opportunities for the sector

CAFRE Enniskillen provide a good network of training & teaching for both higher, further and industry sectors and this should be built on and expanded in conjunction with the sector's needs as identified in the ECNI Equine Strategy documents.

There is also a need to provide knowledge transfer of the latest research in the equine sector on a vocational basis at all levels in Northern Ireland.

##### Question 2

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

##### Comment

**Role of Innovation Broker:-** (Very positive & important role in the RDP equine sector)

- Communication link between RDP and sector
- Ensure process for developing EIP Operational Group and progressing with a project to completion is carried out
- Works to maximise and build on established frameworks and strategies

**Skill Sets**

- Understanding of industry/equine sector (and the context of NI within



- an all-island industry)
- Understanding of RDP structures policies
- Desire to develop the sector
- Strong research and evidence based reporting experience

## 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

There should be a case for supporting young farmers (and those in the equine sector) especially in terms of providing them with all of the educational and training tools required to establish and develop their business. While the findings of existing research are noted, it is also important to note the ageing population in farming and equine businesses and the need to support the succession process.

Both the BIS and BDKT are positive schemes and consideration should be given to ensuring the equine sector is included in such programmes.

Recognition and support must also be given to those of all ages who are fully committed to starting or developing and modernising enterprises on a full time (or significant part time) basis. It is vital that those who derive all (or a significant part) or their income from a viable equine business should be supported to ensure expansion, job creation and the stabilisation of their enterprise. The support of these enterprises, by both significant investment and training measures, should play an important part of any RDP. While support of smaller enterprises is also important, relatively larger rural businesses (and those trying to expand) are in need of continued and a proportionally higher level of support.

#### 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

It is vital that the equine sector can avail of this funding and is important that the term 'Registered Farm Business' should not be used as a mechanism to exclude equine enterprises. While the structure of farm registrations is noted, the equine sector (especially the breeding sector) plays a vital part in the rural economy and should be recognised as such.

Minimum limit- satisfactory

Funding levels at each tier – satisfactory

Maximum limits – increase the max. limit in Tier 2 to £150k

### Question 5

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

Comment

The criteria are satisfactory, however, the equine sector should not be excluded under the use of the 'Registered Farm Business' term and should be able to join a suitable register for this purpose. The sector is in support of transparency and registration and should be eligible for all relevant funding and support.

### 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 areas of funding are appropriate however the equine sector should be included in these.

Renewables- Yes, include in the farm business development grant to enable the simplification of applications and the adoption of renewable technology.

### Question 7

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

Comment

Members should be reimbursed to a high degree. This is a key part of improving performance and plays an integral role in the overall success of the RDP. As many barriers to collating and disseminating the data should be removed as far as possible. This data is not only useful to the individual group member but also to the entire group and wider community. Lack of time and skills are the two aspects which need to be addressed and measures must be put in place to ensure that neither of these are a barrier to project completion.

Equine producers have shown a high level of interest in such schemes and need to be given the opportunity to avail of this aspect of the RDP.

## Question 8

How should participants in development groups be selected?

### Comment

While this should be on an open application process and the benefits of such a group should be demonstrated to potential members, it is vital that the group structure should reflect the following:-

- Stage of development
- Type of enterprise
- Identification of common targets (eg. Production based, innovation based)
- Geographical location (if relevant)

## 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

The inclusion of the 'Markets' section in PIDGS should be widened to include the improvement of existing facilities for equines at sales and to encourage the development of a dedicated equine sales facility, either as part of an existing premises or the development of a new one if required.

In particular, the area of marketing and equine health and welfare should be noted and initiatives included in the scheme.

The lack of an equine slaughter facility in NI (following the closure of the only plant in early 2013) is a significant problem for the sector as equine animals eligible for the food chain need to travel to other parts of the UK or Ireland. As there is a level of demand for such a plant here, consideration should be given to including an equine facility in this scheme.

## Question 11

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

### Comment

Additional areas of expenditure:-

- Provision on equine slaughter facility (as described in answer to Q.9)
- Inclusion of a marketing cooperation scheme for the overseas marketing of NI produced horses/ponies

- Inclusion of an option for buying groups within the equine sector
- Inclusion of producer groups within the equine sector based on the type of horses/ponies produced to encourage and develop sales strategies and targeted marketing.

## **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 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**

Enhancements to existing or new forestry plantings should be considered not only for their merit as commercial or environmental ventures but also for their use as equine and mixed amenity access.

This is applicable for both private plantings under this scheme and also state woodland and forestry facilities. Although there are some existing arrangements for equine access, generally this is limited and not actively encouraged. In line with the Strategy for the Equine Industry in NI, the potential for both domestic and agri-tourism development should be explored.

## **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 the structure of the 6 proposed schemes cover a wide range of the issues involved, it is important to note that the area of equine development has not been mentioned in this section. The benefits of both riding and contact with horses has long been used by many sectors of society to promote physical and mental wellbeing in people of all ages and abilities. The equine sector is only of the only industries which operate in an environment of complete cross-community and non-discrimination based on

race, religion, gender or social inclusivity. It also operates on an all-island basis and Ireland is one of the leading exporters of quality bloodstock and sport horses worldwide.

In specific terms, the Rural Business Scheme will provide vital support to both new and existing enterprises. Traditionally, uptake within the equine sector has been low for such schemes. This is due to a lack of targeted information available for the sector which was addressed in 2012 by ECNI when the booklet "Opportunities for the Equine Sector in Northern Ireland" (<http://www.equinecouncilni.com/rural-development-programme>) was published as a stop-gap to aid the sector and provide information. Such targeted information should be regularly produced as part of the RDP and aimed at specific sectors. It is also worth noting at this point that accessing the opening and closing dates for funding programmes in the various regions has been an onerous task under the last RDP. A simple one-stop source of information on all measures in all areas should be considered regardless of the structure of the measures/LAGs/ programmes. (ie simple webpage with concise details of dates and measures/schemes)

From an equine point of view, it is vital that the sector has access to significant funding under all of the areas of this social inclusion section. In particular, the Rural Business Investment Scheme and the Rural Tourism Scheme are relevant to the sector. The benefits of equine tourism, with investment at a moderate level have largely been un-tapped and have the potential to generate much needed income and development particularly in traditionally less developed 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

The effectiveness of these schemes needs to be examined on both the value of a scheme in meeting the needs of the rural society and in the level of uptake by those targeted by the scheme. While the relevance of these proposed schemes would meet the needs of the equine sector, clear guidance must be made available on which programmes are accessible to them. Although the sector itself has a major role to play in ensuring uptake and developing programmes, the core RDP information must be made available directly from government.

The dissemination of targeted information for those who are not familiar with in-depth policy documents or the terminology commonly used in these papers is of vital importance. Full versions of the guidance documentation will of course be necessary but simplified, concise versions targeted at specific sectors, including equine, must also be produced to enable potential applicants to decide which, if any, measure or scheme is applicable to them.

### 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

Equine issues for All Island Co-operation:-

- Development of sustainable equine tourism networks. Partnership opportunities exist for successfully working with other outdoor pursuits and tourism groups.
- Animal Health & Welfare provision schemes occurring as a result of rural poverty and social exclusion
- Programmes to address mental health and disability issues on an all-island basis through the use of existing and new social farming and equine therapy schemes.

### 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

It should cover all rural areas in the north.

- North/South Co-operation programmes should be developed on a subject related theme rather than simply a location (eg. Addressing mental health issues through an equine therapy programme)
- While there are areas more affected than others, rural poverty and isolation are widespread through the entire island of Ireland and not limited to border regions.

## DELIVERY MECHANISMS

### Question 35

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

#### Comment

In reference to the equine sector in the RDP 2014-2020, the Leader approach has not historically proven to be successful for the sector. Specifically, the operation of the LAG system does not lend itself to serving the sector satisfactorily and a Sector/Industry based approach with a number of sector-specific bodies replacing the LAGs for the following reasons:-

- Sector specific (eg Equine focused, Tourism focused, Community focused) groups would allow those advising individuals to be knowledgeable and up to date with relevant information for each



sector rather than spreading the expertise across a number of local groups.

- Allows closer working relationship with the sectors and would cross-cut the entire RDP (where relevant) allowing uptake to be maximised
- Ensures information dissemination within industry or community sectors and allows a central point of contact for each sector.

### Question 36

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

Comment

(See above)

### Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

- Following on from comments in question 35, the issue should be ensuring that all sectors of the rural community are catered for and the maximum benefit is derived from the RDP.
- The entire area of delivery should be looked at from the end user/applicants view point to simplify the system. An applicant simply wants to develop their project for the benefit of their business/community/social group and the delivery mechanism should reflect this. Applicant should not need to have a complete understanding of government funding or background in Rural Development Policy to be able to access information.
- Consideration should be given to a central data bank for the entire RDP which would allow applicants to answer a series of simple questions to enable them to ascertain if their proposed project matches and area of funding, if it is currently open or available and who they should contact to apply for the funding (eg DARD/LAG/etc)
- The delivery body for a particular set of measures or scheme should be decided on according to them having the necessary set of skills to deliver.

### Question 38

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

Comment

In reference to Q 37, the delivery of a measure should be carried out by a body with existing competencies in a particular area and a satisfactory level of delivery experience. In terms of other bodies, Local Councils and industry governing bodies should be considered for specific measures (or part of these measures) such as social projects, tourism projects or

recreation projects.

Industry based governing bodies should be considered where relevant, particularly for recreation based measures.

## 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

No, preference should be given to those schemes deemed to have the most potential to improve the rural economy and community

### 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

- Schemes which provide the most potential to develop the rural economy and therefore increase employment and local development should be given priority. (eg BDKT and BIS to include the equine sector) By encouraging rural agri-business development, the entire rural economy can be strengthened
- Community based projects are also important, and although at a much lower financial level, funding should be ensured for a set-level of rural based community projects. Preference should however, be given to land based projects.

## 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

It should be noted that despite the importance of the sector and the publication of ECNI's publication on the current RDP ("Opportunities for the Equine Sector in Northern Ireland" (<http://www.equinecouncilni.com/rural-development-programme> ) it is disappointing to note that no reference was made to the equine sector in the consultation paper or in the notes on the proposed measures and schemes.

While the sector fully appreciates the differences between farm businesses and equine operations, there are more similarities than differences and the equine sector should be given the opportunity to avail of relevant agri-

funding measures under RDP. To this end, it would have been remiss not to mention the equine sector in the relevant sections of this consultation document, even though these restrictions are noted. The sector provides not only employment and the generation of significant rural spending but has a key role to play in rural communities and mental and physical health for all involved. The sector is diverse and made up of breeding, competition, leisure, veterinary and ancillary sectors in its broadest classifications. It also covers both thoroughbred (racing) and sports horse (competitive and leisure) aspects of the industry.

### **Information on ECNI**

The Equine Council for Northern Ireland (ECNI) is a representative organisation serving the equine industry in Northern Ireland. The Council's main objective is to provide a voice for the sector as a whole and to represent the interests of horses, owners and the related equine businesses at all levels. The council covers both the Sport Horse and Thoroughbred Sectors in addition to Education, Leisure and Ancillary Services.

**Background-** In 2003 an 'Equine Sub-Group' (ESG) of the Rural Stakeholder Forum was established by DARD as part of its Vision for the Future of the Agri-Food Industry'. This comprised twenty-one members, including representatives from the thoroughbred and sport horse sectors, from those involved in the equestrian aspects of education, health and safety, leisure and tourism, and from providers of ancillary services.

The aim of the ESG was to:-

- Act as an advisory body to government on issues which are deemed to affect the equine sector
- To assist with research into the equine sector
- To create and implement a strategy to develop the equine industry.

Following research into the Equine Sector and a period of consultation with the industry, the Strategy for the Equine Industry in Northern Ireland was produced. The Strategy was compiled in conjunction with BDO Stoy Hayward and supported by DARD. A copy of the report is available to view in the document section of the ECNI website at [www.equinecouncilni.com](http://www.equinecouncilni.com).

### **Sports Horse Sector**

A study published by University College Dublin in 2012 (Economic Contribution of the Sports Horse Industry to the Irish Economy) clearly demonstrates both the value and scope of the sector and highlights its importance to the Irish economy. Although much of the financial data gathered in this study does not include Northern Irish figures, there is an inevitable degree of crossover due to the integration of the sector on an all island basis. The key findings are as follows:-

1. The contribution of the Irish Sport Horse industry to the Irish economy is in excess of €708 million per annum.
2. There are 12,512 full-time job equivalents in the Irish Sport Horse industry, of which 11,417 are directly employed.
3. There are 47,096 people involved in the Sport Horse sector and it

was estimated that involvement with sport horses contributes to the household income of 29,295 people.

4. The current Sport Horse population is estimated at 124,000 animals in Ireland.
5. Expenditure specifically on goods and services has increased to €454 million in 2012 from €400 million estimated in the Profile of the Industry Report in 2007.
6. Breeding is the largest sector and accounts for a total expenditure of €226 million (32%) within the economy and there are 15,110 active breeders in the Irish Sport Horse sector.
7. The competition sector accounted for €135 million expenditure in the Sport Horse sector.
8. A total of €119 million is spent within the affiliated leisure sector, of which €35 million is expenditure on showing and country shows.
9. A total of 6,599 sport horses to the value of €26,100,062 were exported in 2011, with net exports amounting to €15.9 million.
10. There are 11,900 equine classes held at national country shows each year, helping to attract over 270,000 spectators of which 5% attend from overseas.

It should also be noted that the Northern Irish Sports Horse sector makes a sizeable contribution to these figures, especially in light of the fact that there are no public sales facilities in Northern Ireland and therefore the €26,100,062 export value includes animals from Northern Ireland.

In his executive summary of the report, Dr Alan Fahey (UCD) commented that “The findings of this report show that the Sport Horse industry provides a major contribution in excess of €708 million to the Irish economy and provides 12,512 jobs in the sport horse breeding, competition and leisure sectors. This has been achieved with a relatively low level of investment of €3 million per annum from the Government. In order to grow the Irish Sport Horse industry in both domestic and global markets, an increase in financial investment from the Government is essential. In a time of economic recession the Sport Horse industry provides the Government with an excellent opportunity to yield a high return for their investment and increase employment in rural Ireland.”

### **Thoroughbred Sector**

The thoroughbred sector in Northern Ireland has historically had great strength in both numbers and the quality of stock produced. While there are still a number of breeders producing top class flat and national hunt horses, in general the numbers have dropped to a critical level and are continuing to decline. The NI brood mare band has fallen from 766 in 2005 to 447 in 2011 and is likely to continue this unfortunate trend.

While the general trend in bloodstock in Ireland has mirrored the economic situation it should be noted that the industry has maintained its position as the premier location worldwide to produce, sell and train thoroughbreds and continues to make a significant contribution to the economy on all levels. Indeed, while the Gross Value Added (GVA) of Irish agriculture declined

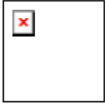
from the mid to late 1990's, the value of Irish horses was increasing according to the 2012 Indecon Report which also states that "...furthermore, in comparison to the value of all livestock in Ireland, the value of Irish horses has exceeded that of cattle, pigs and poultry since 2000."

Over 4,000 people are directly employed in the sector<sup>1</sup> (over 20,000 including racing and betting) and exports are in the region of €150m per annum which clearly demonstrates that this is an important part of the economy in Ireland. While it could be argued that these figures relate to the Republic of Ireland, it should be noted, as is the case for the Sports Horse sector, that there are no public sales in Northern Ireland which means that consignors must sell through the public sales in ROI or England and indeed both the breeding racing sectors operate successfully on an all island basis in terms of administration covering most aspects of the industry.

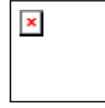
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<sup>1</sup> Review of Certain Aspects of the Irish Horse Racing Industry; (Report for Dept of Agriculture, Food and the Marine Indecon: 2012

## 159. Glens Vintage Club



### Glens Vintage Club Ltd



**Chairman**

Noel Elliott  
Mob. 07703211766

**Treasurer**

Brian Duffin  
Mob. 07980051065

**Secretary**

Susan McLaughlin  
Old School House  
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Hello

- The Rural Development Programme is vitally important to the future sustainability of rural communities including farmers and those who have no connection to farming.
- We strongly support the priority to promote social inclusion poverty reduction and economic development in rural areas, especially in the current economic climate.
- The schemes proposed under this priority, namely, combating poverty and social isolation/basic services scheme, village renewal scheme, support for community development and capacity building, strategic services and the local community grant fund are absolutely vital to the sustainability of rural communities and need to be funded in event of a shortfall in the expected overall budget for the NIRDP 2014-2020.
- The Leader approach is valuable in responding to local need and LAGs should continue to distribute approximately 20% of the overall NIRDP budget.

Regards

Susan McLaughlin  
Glens Vintage Club



# 160. Irish League of Credit Unions

## 1. Introduction

- 1.1 The Irish League of Credit Unions (“the League”) welcomes the opportunity to make a submission on the Consultation on the Rural Development Programme 2014-2020. Our submission is focused on Priority 6 – Promoting social inclusion poverty reduction and economic development in rural areas.
- 1.2 The Irish League of Credit Unions is the principal trade and representative association for credit unions in Ireland both North and South. There are 99 credit unions in Northern Ireland affiliated to the League with approximately members.
- 1.3 The most recently available statistics from year end 2012 which are based on annual returns made to the League by credit unions indicate the following approximate figures in respect of the League’s member credit unions:

Total savings	£900 million
Total loans	£450 million
Total assets	£1,050 million

- 1.4 The credit union movement in Northern Ireland dates back to 1960. It has had a beneficial impact socially and economically in enhancing the wellbeing of its members and in turn the wider community. The credit union movement is stable and well established. The strength of the credit union movement is evidenced by the penetration rate of credit union membership.
- 1.5 Credit unions function within a framework of Operating Principles (copy attached at Appendix 1). In accordance with these Principles, particularly in relation to social responsibility and our shared vision of social justice extending to both individual members and the larger community in which we all reside, we believe that credit unions

in Ireland have a key role to play in promoting social inclusion, poverty reduction and economic development in rural areas. Credit unions can play a major role in this regard by providing those in rural areas (and indeed urban areas) with a safe place to save but in particular delivering access to affordable credit.

**2.1** The League and its affiliated credit unions are fully supportive of any efforts to combat social and financial exclusion. In essence our views on social inclusion can be summarised as follows:

(a) any attempts to address social inclusion and poverty reduction must include some efforts to address financial inclusion by providing people with access to financial services in rural areas

(b) credit unions are ideally placed to assist in this regard due to presence on the ground right across Northern Ireland and their appetite to help their members

**2.2** Financial exclusion is defined by the European Commission as “a process whereby people encounter difficulties accessing and/or using financial services or products in the mainstream market that are appropriate to their needs and enable them to lead a normal social life in the society in which they belong”. Given the links that individual members have with their credit unions, it is likely that the majority of them would feel comfortable dealing with their credit union. The League therefore believes it is essential that credit unions are included in the final strategy which emerges from this consultation.

### **What are the consequences of financial exclusion?**

Financial exclusion has a number of important adverse consequences for the individuals affected, for society as a whole, and for the wider economy.

#### **Consequences for Individuals**

Without access to a current/transaction account, credit and basic financial transactions such as payment of bills can cost more. It is difficult to avail of the lower prices of goods and services that can be obtained through the use of a payment card and internet services. The lack of a bank account creates additional difficulties as it has obvious security and

personal safety implications for holding and storing money, and gives rise to logistical difficulties in making payments.

Financial exclusion also makes it more difficult to manage limited household resources, and more difficult to deal with unforeseen events. These consequences are exacerbated by the fact that the majority of the financially excluded are likely to be on low incomes and can ill afford to incur the aforementioned extra costs. In particular, use of non-mainstream forms of credit such as moneylenders can contribute to over indebtedness.

### **Consequences for Society**

At a societal level, the issue of financial inclusion is closely linked to the wider issue of social exclusion. Empowering those on low incomes to manage their financial affairs in a user-friendly, accessible and cost-effective manner has frequently been identified as being a vital and worthwhile step in addressing social exclusion. Financial inclusion must also form part of a wider societal agenda to promote greater social inclusion and social cohesion, and to prevent and reduce poverty.

## **2.3 Benefits of Financial Inclusion**

A successful reduction of financial exclusion should yield significant benefits, in the first instance for the financially excluded themselves. It is evident that those experiencing financial exclusion are currently incurring costs – financial and non-financial – on account of their inability to access mainstream financial services. For example, without a bank account credit and basic financial transactions such as payment of bills can give rise to increased costs. Research conducted by the UK Treasury in 2007 estimated the total cost borne by low-income families as a result of financial exclusion could amount to more than £1,000 in the course of a year.

## 2.4 Basic Payment Account

In addressing financial exclusion, access to banking - and in particular to transaction banking (i.e. ability to make lodgements and payments through a variety of mechanisms) – is routinely identified as being a primary priority because it is a key to accessing other financial services.

This is often done by devising a Basic Payment Account (BPA) i.e. a transaction account which has been designed to meet the needs of the financially excluded. The provision of such an account is a logical first step in addressing the issue of financial exclusion. Other financial services required to secure full financial inclusion such as responsible credit, savings and insurance are predicated on the availability and effective use of transaction banking services.

To this end the League has been authorised by its member credit unions to set up a Payments organisation to support credit unions in the provision of electronic funds transfers and debit cards. Approval is expected to be received from the regulatory authorities shortly and the target date for the League's Credit Union Service Organisation for payments (CUSOP) to start processing transactions in Northern Ireland is 2014.

### 3. Further Information

The League will be happy to provide additional information if required. Contact details for the purposes of this submission are:

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Research & Development,  
Irish League of Credit Unions,  
33-41 Lower Mount Street,  
Dublin 2.

Email: [jknox@creditunion.ie](mailto:jknox@creditunion.ie)

Tel: 00 353 1 6146700

## **Credit Union Operating Principles**

### **1. Open and voluntary membership**

Membership in a credit union is voluntary and open to all within the accepted common bond of association that can make use of its services and are willing to accept the corresponding responsibilities.

### **2. Democratic control**

Credit union members enjoy equal right to vote (one member, one vote) and participate in decisions affecting the credit union, without regard to the amount of savings or deposits or the volume of business. The credit union is autonomous, within the framework of law and regulation, recognising the credit union as a co-operative enterprise serving and controlled by its members. Credit union elected officers are voluntary in nature and incumbents should not receive a salary for fulfilling the duties for which they were elected. However, credit unions may reimburse legitimate expenses incurred by elected officials.

### **3. Limited dividends on equity capital**

Permanent equity capital where it exists in the credit union receives limited dividends.

### **4. Return on savings and deposits**

To encourage thrift through savings and thus to provide loans and other member services, a fair rate of interest is paid on savings and deposits, within the capability of the credit union.

### **5. Return of surplus to members**



The surplus arising out of the operations of the credit union after ensuring appropriate reserve levels and after payment of dividends belongs to and benefits all members with no member or group of members benefiting to the detriment of others. This surplus may be distributed among members in proportion to their transactions with the credit union (interest or patronage refunds) or directed to improved or additional services required by the members. Expenditure in credit unions should be for the benefit of all members with no member or group of members benefiting to the detriment of others.

#### **6. Non -discrimination in race, religion and politics.**

Credit unions are non-discriminatory in relation to race, nationality, sex, religion and politics within the limits of their legal common bond. Operating decisions and the conduct of business are based on member needs, economic factors and sound management principles. While credit unions are apolitical and will not become aligned with partisan political interests, this does not prevent or restrict them from making such political representations as are necessary to defend and promote the collective interests of credit unions and their members.

#### **7. Services to members.**

Credit union services are directed towards improving the economic and social well being of all members, whose needs shall be a permanent and paramount consideration, rather than towards the maximising of surpluses.

#### **8. On-going education**

Credit unions actively promote the education of their members, officers and employees along with the public in general, in the economic, social, democratic and mutual self-help principles of credit unions. The promotion of thrift and the wise use of credit, as well as education on the rights and responsibilities of members are essential to the dual social and economic character of credit unions in serving member needs.

## **9. Co-operation among co-operatives**

In keeping with their philosophy and the pooling practices of co-operatives, credit unions within their capability actively co-operate with other associations at local, national and international levels in order to best serve the interests of their members and their community. This inter-co-operation fosters the development of the co-operative sector in society.

## **10. Social responsibility**

Continuing the ideals and beliefs of co-operative pioneers, credit unions seek to bring about human and social development. Their vision of social justice extends both to the individual members and to the larger community in which they work and reside. The credit union ideal is to extend service to all who need and can use it. Every person is either a member or a potential member and appropriately part of the credit union sphere of interest and concern. Decisions should be taken with full regard for the interests of the broader community within which the credit union and its members reside.

## 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

It is difficult estimate or assess the future success of these various schemes but the adoption of a strategic multi-agency approach is to be welcomed.

#### 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

We would welcome the inclusion of credit unions in the proposed solution. Credit unions are well placed to play a key role in this area particularly Combating Poverty and Social Isolation.

In essence our views on social inclusion can be summarised as follows:

(a) any attempts to address social inclusion and poverty reduction must include some efforts to address financial inclusion by providing people with access to financial services in rural areas

(b) credit unions are ideally placed to assist in this regard due to presence on the ground right across Northern Ireland and their appetite to help their members

### **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 League and its affiliated credit unions are fully supportive of any efforts to combat social and financial exclusion. In essence our views on social inclusion can be summarised as follows:

(a) any attempts to address social inclusion and poverty reduction must include some efforts to address financial inclusion by providing people with access to financial services in rural areas

(b) credit unions are ideally placed to assist in this regard due to presence on the ground right across Northern Ireland and their appetite to help their members

**2.2** Financial exclusion is defined by the European Commission as “a process whereby people encounter difficulties accessing and/or using financial services or products in the mainstream market that are appropriate to their needs and enable them to lead a normal social life in the society in which they belong”. Given the links that individual members have with their credit unions, it is likely that the majority of them would feel comfortable dealing with their credit union. The League therefore believes it is essential that credit unions are included in the final strategy which emerges from this consultation.

### **What are the consequences of financial exclusion?**

Financial exclusion has a number of important adverse consequences for the individuals affected, for society as a whole, and for the wider economy.

#### **Consequences for Individuals**

Without access to a current/transaction account, credit and basic financial transactions such as payment of bills can cost more. It is difficult to avail of the lower prices of goods and services that can be obtained through the use of a payment card and internet services. The lack of a bank account creates additional difficulties as it has obvious security and personal safety implications for holding and storing money, and gives rise to logistical difficulties in making payments.

Financial exclusion also makes it more difficult to manage limited household resources, and more difficult to deal with unforeseen events. These consequences are exacerbated by the fact that the majority of the financially excluded are likely to be on low incomes and can ill afford to incur the aforementioned extra costs. In particular, use of non-mainstream forms of credit such as moneylenders can contribute to over indebtedness.

### **Consequences for Society**

At a societal level, the issue of financial inclusion is closely linked to the wider issue of social exclusion. Empowering those on low incomes to manage their financial affairs in a user-friendly, accessible and cost-effective manner has frequently been identified as being a vital and worthwhile step in addressing social exclusion. Financial inclusion must also form part of a wider societal agenda to promote greater social inclusion and social cohesion, and to prevent and reduce poverty.

## **2.3 Benefits of Financial Inclusion**

A successful reduction of financial exclusion should yield significant benefits, in the first instance for the financially excluded themselves. It is evident that those experiencing financial exclusion are currently incurring costs – financial and non-financial – on account of their inability to access mainstream financial services. For example, without a bank account credit and basic financial transactions such as payment of bills can give rise to increased costs. Research conducted by the UK Treasury in 2007 estimated the total cost borne by low-income families as a result of financial exclusion could amount to more than £1,000 in the course of a year.

## **2.4 Basic Payment Account**

In addressing financial exclusion, access to banking - and in particular to transaction banking (i.e. ability to make lodgements and payments through a variety of mechanisms) – is routinely identified as being a primary priority because it is a key to accessing other financial services.

This is often done by devising a Basic Payment Account (BPA) i.e. a transaction account which has been designed to meet the needs of the financially excluded. The provision of such an account is a logical first step

in addressing the issue of financial exclusion. Other financial services required to secure full financial inclusion such as responsible credit, savings and insurance are predicated on the availability and effective use of transaction banking services.

To this end the League has been authorised by its member credit unions to set up a Payments organisation to support credit unions in the provision of electronic funds transfers and debit cards. Approval is expected to be received from the regulatory authorities shortly and the target date for the League's Credit Union Service Organisation for payments (CUSOP) to start processing transactions in Northern Ireland is 2014.



## **161. John Duff**

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**Response to the Consultation on the Rural Development Programme 2014 – 2020.**

**This covering letter should be read in conjunction with the Response Form. The two documents together represent this response to the RDP 2014-20 consultation.**

### **1. Personal Context.**

These comments are made on the basis of –

- almost 40 years involvement with the agri-food industry while working in the public sector in research, teaching, business development and administration;
- over 10 years participation in the delivery of Rural Development and Peace programmes;
- experience as a small part-time farmer; and
- a lifetime living in a rural area.

I therefore feel I have a wide understanding of the issues relating to most aspects of the administration, delivery and impact of schemes such as the proposed Rural Development Programme 2014 – 2020. These comments are offered in this context and in the hope that they may assist in developing a programme which will make maximum use of the limited funds available.

## **2. General Overview.**

2.1. It is clear that DARD, in developing these proposals has had to integrate the content with a multitude of other policies and strategic priorities both nationally and within the EU. This is obviously a very difficult task and those involved are to be commended for making the progress they have, within a developing and changing political environment.

2.2. One of the key requirements is “complementarity with other funds”, which I am sure everyone can support. There is however an additional unstated requirement that the fund must provide additionality to existing national programmes and not be taken over by Departments as a means of delivering their own ongoing programmes at a time of national public spending constraints. This funding must be protected to be “new money” targeted at delivery of the Rural Development Objectives and Priorities as set out in Sections 3.8 and 3.9 of the Consultation Document.

2.3. I note that a draft programme has to be submitted to the Commission by the end of December 2013, while the consultation only closes on 21 October. This is a very tight deadline and raises alarm bells that it will lead to a repetition of the same mistakes as made in previous Rural Development Programmes, where schemes are loosely worded and are not (fully) thought through prior to submission and agreement by the EC. Then when it comes to implementation the delivering agents, both inside and outside Government, find that the scope and constraints enshrined in the approved schemes severely limit the effectiveness of delivery and / or have to spend a long time sorting out what is possible / intended before the delivery can get off the ground. The delays in delivery of previous programmes are well known. What may be less apparent is the extent of the wasted time and scarce RDP funding required to make them workable in practice. The proposed schemes need to be worked through by those experienced in delivery at a very early stage, before they

are agreed and when they can still be adapted; rather than after EU approval when it is too late.

2.4. The RPD Objectives and Priorities set out in Section 3 of the Consultation document are appropriate and presumably have received widespread support. Personally I would have like to have seen the Priorities more outcome orientated than activity focused. i.e Fostering knowledge transfer and innovation is an activity not an outcome. It would have been much better to state - “Deliver increased knowledge transfer and achieve innovation adoption in agriculture”. The achievement of change is what is important, not the generation of activity.

2.5. The Design Principles set out by the Programme Board are again sensible and will receive widespread support. However I wish to expand on two of the subheads in this section.

i) Make maximum use of ICT in delivery. Of course ICT should be used where this is the most efficient delivery mechanism, but for small programmes and particular target groups, this may not be the most cost effective mechanism. Also we are now approaching the stage where ICT is a given and not an option. Again, I believe that the emphasis should be on the outcome – ie. delivering efficiency by the adoption of appropriate systems ( including ICT where appropriate) not a blind advocacy of a particular tool.

ii) I am delighted to note the subhead “Reduce Complexity in Delivery (particularly in relation to audit, control and monitoring)”. Having experience the process from both management and delivery of programmes, I am regularly appalled at the colossal waste and inefficiency caused by the excesses of the audit process imposed on RDP schemes. This is not the place to provide specific examples, of which there are many, but to suggest improvements by adopting the following principles.

a) Audit / monitoring should be based on the principles of value for money and risk analysis. Examples of where the blind imposition of procedures cost far more than the actual expenditure, let along the risk of loss inherent in the expenditure, are everywhere. The usual defence offered is “these are the EU audit rules”.

This is the “easy road” opt out. A rational case showing the waste involved must, if pursued with sufficient vigour and senior staff backing, be accepted.

b). A fundamental driver of this inefficiency is a failure to effectively manage contracts delivered by NGOs and External Agencies. The current approach is for Government to micromanage delivery contracts – thus duplicating the administration costs. I realise that the public sector officials carry the responsibility if something goes wrong and so naturally tend to be very cautious, but a way has to be found to avoid this serious waste of scarce funds. We now have a slight pause between schemes and it is an appropriate time to i) review and improve procedures, and ii) train staff in the cost effective administration and management of contracts.

2.6. The Key targets for the 2014 – 2020 RDP and indeed Europe 2020 and the Agri-Food Strategy Board all emphasise the need to achieve business growth. However, there does appear to be a mismatch between this and the Business Investment Scheme (BIS) in Priority 2 which seems to scrupulously avoid the words growth / increase output, talking instead of upgrading, improving quality etc. Such mixed message only serve to confuse and erode confidence that investment support for growth and delivery of economies of scale within individual businesses, will be forthcoming. It also seems to contravene the first bullet point (Clarity of Purpose) on the Project Board’s “Design Principles”.

2.7. There is much mention throughout the document of stimulating and fostering “innovation”. I note innovation is defined in the Glossary simply as “Introducing something new”. This begs the question as to what is new?

The Targets for the 2014-2020 Programme state clearly that the desire is to improve competitiveness through – *“Improving the skills and knowledge, and stimulating innovation, needed for business continuity and growth”*.

This places the interpretation of “new” squarely in the context of the business. This is, in my view, a vitally important qualification which must govern how this is interpreted and applied in practice.

There will undoubtedly be a school of opinion amongst scientists and technical agriculturalists that “new” means cutting edge and hot from the scientific journals and

research stations. However this is not always what is right for the much larger cohort of second tier farm businesses which needs to walk before it tries to run.

In short, the concept of innovation must be linked to the business at whatever level of development it is working, and must not be the prerogative of the top echelon of the industry who are in an advanced stage of development and who, of their own volition, already seek out and implement innovative business methods.

There is also the temptation to think of innovation as purely technical/ technological, but it may be appropriate to adopt new business structures or marketing / purchasing arrangements which are not technical but are also of importance to the development of that business or group of businesses.

**The remaining comments are linked to the priority areas identified in the Consultation document.**

### **3. Priority 1. Fostering Knowledge Transfer and Innovation.**

i) The overall objective of this priority seems to be based on the assumption that the research results are already available and relevant. In my experience the DARD Evidence and Innovation consultation process, while helpful, still requires the industry to work with researchers to refine its needs and take active steps to specify and communicate these to funders in order to get the work done.

ii) In addition, the identification of need for industry sectors is not, as the Operational Group proposal appears to indicate, a one off / one project activity, rather it is an ongoing requirement. The DARD Evidence and Innovation consultation and call for research happens every year. Any proposal for funding Operational Groups needs to provide for sustained and not just one-off activity.

iii) In addition, the needs of minority sectors such as arable and horticulture can not always be satisfied by local or in many cases even one-country research. The proposal needs to provide for trans-national/ multi regional groups to be formed to promote and fund research work on a more cost effective basis. It is not apparent how this proposal, as drafted, would satisfy that requirement.

iv) The Consultation document states that where research needs are identified as part of a Business Plan or Strategy then under Article 36 these can be funded in total? It is however not clear how this would be delivered under the proposed Co-operation Groups. How does work progress from one type of Group to the other when the Co-operation support is only available to new groups, or groups with a new function? Can this Group then continue to function as an EIP although the heading clearly states that the co-operation funding only relates to Groups “other than EIPs”?

In general the EIP Operational Group concept has much to commend it but the proposal as drafted will need to be refined and expanded to be effective in meeting the generality of needs in ensuring that growers/farmers can influence and if necessary fund the research undertaken.

v) The Cooperation Group scheme seems to cover most of the requirements of the existing Supply Chain programme but with a much wider scope. It does not however, allow the cost of running Producer Organisations (POs) to be met, thus reducing the encouragement for professional management to be engaged. In my view this is essential to overcome the failing of previous attempts to introduce POs in Northern Ireland where inadequate management of the PO process led to early failures.

vi) Innovation and Technology Evaluation and Demonstration Scheme is an excellent concept – similar to the very useful Experimental Farm Buildings scheme of many years ago. The scheme must be open to all providers, not just Government Services. For example why should an NGO or commercial organisation not receive support for demonstrating new technologies. The sign of a mature developed industry and therefore success in the development process, is where the sector assumes increasing responsibility for its ongoing development and is less dependent on Government Agencies to do this for them.

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

##### **i) Business Development Groups.**

These have been used successfully in various forms for over 50 years in Northern Ireland and the Teagasc model provides much useful guidance to help with their



reinvigorated adoption here. Their refinement and more widespread adoption is to be commended and encouraged.

The requirement to make businesses benchmark their performance against other similar businesses and adopt best practices is of course desirable. However this needs to be applied with flexibility rather than aggressively imposed, if it is to be embraced with enthusiasm. Use of benchmarking needs to develop because it is perceived to be of value rather than “to keep DARD happy” or to tap into other funding. The objective is to persuade participants of the benefit so that this tool and other innovations are used in the future not just in the short term to “get the grant”.

There are many examples of just such initiatives failing in the past ( Farm Management Accounts etc) for these reasons. It may well be that a less sophisticated or rigorous methodology suits the group and the imposition of the CAFRE systems will be counterproductive. Persuasion and encouragement, not mandatory application of an external system must be the rule.

## **ii) Business Investment Scheme.**

This is a very welcome addition and in is in line with the recommendations within the AgriFood Strategy Report, Horticulture and Arable Development Strategies. Most points are covered in the specific consultation questions but again we come up against the concept of interpretation of phrases such as “new technologies and/or processes / upgrading of services” and how the scheme can support growth.

The statements of scope are confused by restating the same things *but slightly differently* on pages 42 and again on page 43. One clear list would be much more helpful since interpretation is of critical importance in determining the potential eligibility. To take a few examples –

a) Does the application to renewable energy technologies extend to a technology which is in receipt of other support (ROCS / RHI payments)? There are reports that SRC willow planting is not eligible for support because this is supported through the RHI incentives – but surely this also applies to forest biomass and to electrical supply through ROCS?

b) Installation of a grain cleaner in an existing store / handling system to meet increased quality standards. The technology is not new but the application to that farm is.

c) Farm to farm grain sales reduce greenhouse gas production due to lower transport energy use and drying fuel demand. Will sealed stores be classed as a new building?

d) Is the erection of additional store volume eligible – to achieve increased efficiency through delivering economies of scale.

e) What is the position re. erecting a new production glasshouse / plastic tunnel for specialist horticulture cropping – a critically important growth sector as identified in the Horticulture Forum's development strategy. Such investment must be supported

The interpretation of these definitions is critically important to the industry and should be clarified at this stage not when the schemes come to be applied, when it is too late to make adjustments.

**iii) Capital Investment Schemes.** I note the requirement for independent economic analysis by a technical agent for renewable energy schemes but not for others. Why are renewables being singled out for especially rigorous analysis, when a proportionate business case is already being provided?

### **5. Priority 3. Promoting food chain organisation and risk management in agriculture.**

This priority, while obviously very important and worthy of enthusiastic support, does perpetuate the view that food is good and worthy of more generous support than other non-food land based products such as amenity horticulture crops, energy crops and breeding livestock / seed potatoes, for which Northern Ireland has skills, experience and climatic /geographic advantages.

In terms of a sustainable and secure local economy and overcoming social deprivation it can be argued that energy is more important than food. In Northern

Ireland 44% of people live in fuel poverty and 61% are overweight , while 99% of fuel is imported and 60% of food is exported!

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

The introduction of a priority of this nature is to be commended and supported. The text does however contain an outdated fixation with renewable energy for the production of electricity. DETI evaluations however show that Northern Ireland is currently only producing under 3% of the total heat demand from renewable sources. This needs to be set against the NI target of 10% or 1.3 TWh renewable heat by 2020, so the need to produce and utilise renewable heat is a major challenge to the country and can not be met by using this heat on farms – it must also be exported as fuel.

The text recognises the importance of effective utilisation of nutrients in livestock manures but then concentrates on the measures to improve effectiveness of the use of liquid manures while ignoring the traditional and much less energy intensive use of solid manures from the intensive sectors.

The Focus Area 5B mentioned in the first paragraph specifically mentions efficiency in energy use but the programme contains no measures to specifically address that part of the Priority, although this is widely recognised as a fruitful and cost effective area for action.

## **7. Priority 6. Promoting social inclusion, poverty reduction and economic development in rural areas.**

The agri-food and energy businesses provide the core of rural economic and local social activity. The best way to ensure a vibrant rural society is ensure that these businesses are competitive and sustainable.

## **8. Section 7. Delivery Framework.**

The criteria set out in section 18 page 86 provide a very useful guide by which the optimum delivery agents can be selected. The first criterion ( effectiveness) is absolutely critical and there is ample evidence of delivery success or otherwise from the 2009 – 2-013 programme on which to make informed judgements.

These delivery requirements are similar if not identical to those which were important to delivery of the 2009 – 13 programmes, which again points to using, as a starting point, delivery effectiveness of these programmes as an indicator to inform the delivery methods for the 2014 – 20 programme.

It is also worth pointing out that delivery of the new programmes will be more successful if based on the experience and skills developed in delivery of earlier programmes. Much time, energy and funding will be wasted by new agencies having to start again and develop the skills and systems from a clean sheet.

An element of this criterion of relevance to delivery by central Government Departments and Agencies is their ability to resource such delivery over a 7 year period of continued funding constraint, without placing other services in jeopardy.

In relation to the Leader model it is helpful to return to the design principles set out by the Programme Board and two in particular are particularly relevant – “Promote integrated approaches” and “Be attractive to the customer (simple)”. The thought of 11 different delivery agents is a concern and will require careful system design and effective management if wasteful duplication and confusion are to be avoided.

Where a single delivery agent or Government Agency delivered uniformly across the country in 2009 – 13, this was well received and welcomed by those seeking support as it was easily understood, accessible and fair.

## **9. Section 8. Finance and Resources.**

This is a complex area which will be influenced by major political decisions at both local and national levels. It is therefore a difficult area in which to make specific recommendations as an outsider.

There must be an inherent need in a fair society to support the vulnerable in society and so the small amount of funding for combating poverty and social isolation should be maintained.

After that the priority should be to fund actions which deliver successful rural businesses which generate the income to sustain the rural communities. Capital investment schemes have the added advantage that they leverage in additional private sector investment ( typically 60% of the investment) and so should get a high priority.

The industry led Agri-Food Strategy Board has identified growth potential and this should be the road map which prioritises the required investment areas.

In all cases support must deliver the three cross-cutting RDP themes of the environment, climate change and innovation.

**J W Duff      21 October 2013**

## 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

#### **Farm Family Key Skills.**

Increased competence is of course a key driver for rural development, although as we know from the 2007 – 13 Programme, this is crowded area with many existing providers delivering a wide range of courses. There are also anomalies in delivery where some training inputs are delivered free, while others are charged for.

The concept of the scheme appears to be that these are additional courses tailored specifically at the rural community. Delivery of training by practitioners such as PVPs is very sound idea and is to be welcomed. It does however raise lots of issues about who designs and accredits and who delivers the programmes, as well as how this will be cost effectively administered. It could also encourage the development of specific “tailored” courses just to trigger funding, when other suitable generic courses are already available.

Having a defined list of programmes as included in the Consultation document will constrain innovation and the ability to satisfy needs which may emerge later in the delivery period.

For example with one of the RCD priorities being managing the “shift to a low carbon and a climate resilient economy” there is a case for courses on efficient machine operation. Why can manufacturers / dealers not be supported to run machine-specific courses on operating efficiently; or precision farming.

I suggest leaving the subject areas open but setting criteria which have to be met by providers seeking funding. e.g. need to set clear learning



objectives, provide teaching plans and evaluation methodologies for new programmes, which must be linked to the RDD Objectives. The Department should be stimulating and managing the process not second guessing needs several years hence.

The heading is Farm Family Skills, so the scope should extend to non agriculture topics such as rural tourism / family budgeting / community leadership.

Courses in woodland management and commercial horticulture are immediate areas where coverage could be enhanced.

**Farm Exchange Visits**, with defined learning outcomes and report preparation, are valuable learning methods for some and are to be welcomed. However, the scheme as drafted is too narrow and could be unnecessarily expensive. Experience with the Supply Chain Programme indicates that, in many cases, small farmers are too involved with the day to day management of the business or family commitments to be away from base for long periods. The scheme needs to provide for inward visits by farmers or experts from elsewhere who can share experience and relate this to what he/she finds on the ground here. The same learning outcome / reporting provisions should however apply to ensure that the local participants consolidate the learning outcomes and can communicate these to others.

## Question 2

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

### Comment

The key skill sets of any Innovation Broker should be –

- Ability to facilitate Groups
- Knowledge of the industry and its needs.
- Understanding of the research and technology transfer processes.
- Report preparation and case presentation.

A fundamental issue will be that of freedom from any “Conflict of Interest”. Experience from other programmes indicates that the “scheme” will invariably be used by commercial organisations and opportunists to further their commercial interests by promoting their own innovation. It needs to be remembered that much innovation comes from commercial companies and not always from academic research. I can envisage interest from software companies, feed additive suppliers, machinery manufacturers and many more.

Any Innovation Broker scheme must be driven by the needs of the industry not the researcher or the commercial developer. Much care will be required in developing any Innovation Broker scheme to ensure that this is achieved.

## **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**

Agreed. The definition is not appropriate to the Northern Ireland family farm situation, however it is important to encourage and support young people entering the industry and to develop their management skills through enterprise management responsibility within the family farm unit.

Enhanced rates of capital grant etc. should be provided where young people are genuinely responsible for all or part of an enterprise.

Their personal efforts made to develop their technical knowledge / competence should be recognised and rewarded e.g. through priority or enhanced funding. This may require some simple form of competence credit system through which accumulated levels of competence can be rewarded

#### **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

- i) Yes a lower limit is essential to avoid trivial claims and very expensive administration relative to the development achieved.
  
- ii) The lower limit may be administratively helpful but in practice is too high at £5000 for some simple items of major safety benefit on small farms. A limit of £1,000 claim (£2,500 expenditure) would be more appropriate in these circumstances. Many of the health and safety investments are of low cost e.g. calving gates / cattle crushes / bag lifters, but are critically important to occupational health and safety. See Tranche 3 list of Farm Modernisation Scheme. Other threshold levels are appropriate.
  
- iii) Why is it necessary to include a series of examples for the lower level investment, but not for others? Such lists inevitably end up constraining the scope of support in this part of the scheme. If a list must be used then base it on an improved version of the priority areas in the Farm Modernisation Grant.
  
- iv) It is interesting to note that “lease purchase” is permitted under Process Investment Development Scheme but not mentioned under this BIS scheme. This appears to be an unjustified anomaly which will hinder and discriminate against investment in production as compared to processing. It is very difficult for businesses to fund large investments from reserves or bank borrowing, so phased delivery or payments of some sort should be facilitated.
  
- v) Tier 1 and 2 should have priority but with the facility to target Tier 3 funds on particular sectors with a strategic development priority identified by proven market opportunities. e.g Orchard planting and replacement of temporary structures subject to weather damage with more permanent structures ( glasshouses).

## Question 5

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

## Comment

The availability of a grant encourages expenditure, some of which is less than prudent in terms of business priorities. No support should be provided without some simple pro-forma risk analysis or business justification.

It is widely accepted that Business Plans beyond 3 years are pretty fictitious. Also the requirement for a business plan will lead to excessively elaborate examples being provided at great cost. I suggest that for the intermediate level £30 - £100k support, the Business Plan should be based on a pro-forma structured application with all the essentials of a business plan – as was used successfully for the EBIDS Rural Development programme.

Preparation of Business Plans is a key skill and CAFRE should provide workshops and training in their preparation.

## 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

There are in fact no “proposed areas of expenditure” in the document – just objectives and examples. The inclusion of scope definitions would be helpful to allow informed responses to this question. Assuming the examples to be just that – i.e. indicative not definitive, the following comments are based on the higher level objectives.

As we all know the trend for many years is towards concentration and specialisation as farm get bigger and enterprises grow on the developing units. This trend will continue and funding needs to support this to achieve efficiencies and sustainable businesses. Thirty percent of potatoes now come from just 13 farms and the equivalent figure for cereals is just 143 farms. Similar figures can be produced for the horticulture and dairy sectors. Funding “growth” on individual units must therefore be permitted.

Objective 1 is a major concern since it is poorly worded. As written, the only items which can be funded are those which can be delivered “through restructuring of farm assets or operations”, while the actions also includes “assistance of development”. Also does it really mean to “implement ... market performance”. Improvements in market performance perhaps?

Objective 2 is equally loosely worded since renewable energy is surely being supported to reduce greenhouse gas emissions, so why state both. Also energy efficiency must be a major education and investment priority so should be specifically mentioned. As extreme weather events become more common investment in improved drainage should receive a high priority, and it is good to see it specifically mentioned.

Objective 3. Good to see the horticulture industry specifically recognised but why only horticulture crop storage and not crop storage for other sectors – crops and energy crops? Also why not support investment in new production buildings for horticulture crops – cut flowers / pak choi etc.

Objective 4. Must also extend to *plant health* and biosecurity. Recent plant disease threats have shown the need for improved plant health biosecurity.

Objective 5. Health and Safety is obviously important for the industry and rural communities but needs careful definition. Its application to non fixed equipment has endless opportunities for conflict. e.g large 4wd tractor or powered axles on trailers to improve safety on slopes?

There is however proven scientific evidence that bubbler systems reduce the release of dangerous gases from slurry tanks. These systems should be very highly promoted and financially supported as they prevent the problem at source – rather than look for methods to minimise the risk once the problem has been created.

In any event, objectives should be outcome not activity focused. In my view the table on page 44 actually confuses rather than clarifies the issues. It

would be much better to go back to basics with something like –

Objective 1. To improve the competitiveness of farm, forestry and horticulture businesses by supporting investments which deliver “Sustainable Intensification” through–

- a) enhanced business management efficiency. e.g. improved information systems.
- b) enhanced production efficiency. e.g. improved production equipment and buildings.
- c) improved market performance. e.g. improved storage and quality assurance ( grain cleaners etc.)
- d) enhanced animal and plant biosecurity.

Objective 2. To improve resource efficiency of farm, forestry and horticulture businesses by supporting investments which -

- a) Improve the use of energy inputs e.g. energy efficiency measures.
- b) Improve nutrient use through advanced manure storage and spreading equipment.
- c) Improve field drainage
- d) Increase the application of renewable energy technologies.

Objective 3. To improve the occupational health and safety on farm, forestry and horticulture businesses by –

- a) supporting investment in infrastructure which reduces risk to the health and safety of workers and farm families.
- b) linking the investment to business led risk management and workforce training.

### **Question 7**

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

#### **Comment**

Limited support should be provided for items which support the group activities and facilitate the collection, collation and sharing of information. Overly generous support will deliver headline grabbing short term targets

but long term success will only be achieved through self motivated investment of time and resources. History is littered with examples where adoption has ceased once too generous incentives are removed.

Careful reflection is needed on the impact of payment to groups for recording information while businesses already benchmarking though CAFRE receive no such reward.

### **Question 8**

How should participants in development groups be selected?

Comment

Success depends on open and effective group participation, so this and willingness to learn / change must be the selection priority and not current business performance. This openness is an inherent personality trait and as with all such traits evidence of past performance is the best indicator of future performance.

Ultimately success will come from self selection based on awareness of the benefits through good publicity of the opportunities and examples of the success of other similar groups. Good use should be made of farmer led examples illustrating the benefits for those in the Teagasc scheme.

The building of groups by external agencies will take great skill. Such groups will take longer to gel and have a higher risk of failure than groups started by those who know each other and who share the same objectives.

## **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

The heading “ types of expenditure” suggest that these are examples but in



practice this may become a definitive list, so it needs to be carefully thought through at this stage.

The “horticulture” *example* does not make it clear whether packing and integration / collation of supplies of products such as nursery stock / cut flowers / energy crops would be eligible – they are agricultural products but not food. If not included, then these significant enterprises with recognised growth potential are being disadvantaged which then raises the question -- where do these enterprises find investment support?

Similar arguments apply to breeding livestock and seed potatoes, which are not food but appear to be excluded. If the answer is that they can obtain support through Invest NI, then so can food processors; which questions the need for this “exclusive” grant scheme.

To ensure the schemes can embrace all supply chains the title and scope should be changed to read – Promoting Supply Chain Organisation etc.

The term “cereals” is used in the heading but not in the subsequent list of types of investment. Clearly cereals are important for human food (porridge oats etc) and should be included but why are they included while crops such as Oil Seed Rape and protein crops are not? There is a recognition that oilseeds have potential both for niche oil products and for animal feed, while the AgriFood Strategy Board has identified that NI is hugely deficient in protein and the possibility of protein production should be the subject of long term research.

Cereal processing for human consumption must therefore be included and the possibility of funding “processing” of other crops must not be excluded by omission.

The inclusion of livestock markets is an interesting interpretation of “processing”. It is to be hoped that a similar liberal interpretation can be applied to storage and supply chain collation facilities for cereals, energy,

horticulture crops etc.

I question why Tier 2 (Large Scale Food Processors), which are effectively industrial processors, should be funded through the Rural Development Programme. Their importance is not in question but funding would be more appropriately drawn down from DETI funds.

#### **Question 10**

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

Comment

Levels appear to be appropriate but the larger (Tier 2) off-farm processing investment should be supported through DETI.

#### **Question 11**

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

Comment

I welcome this support being carried through to build on the existing successful Supply Chain Development programme, with its focus on marketing. The more comprehensive range of funding being provided is welcomed. The increased ability to support market promotion will help deliver real tangible commercial outcomes for cooperative groups.

There are however two significant omissions which need to be rectified.

- i) Energy producer / supply groups need to be eligible for support.
- ii) Evidence from past experience of Producer Organisations and similar group marketing activity illustrates that many fail because of the failure in the early stages to employ high quality staff to deliver the complex management and administration processes involved. This appears to be an omission from the proposal which will have a serious effect on the changes of success. Such support needs to be available – if only for a “pump priming” initial period to get the group processes established and bedded down.

The inclusion of the term “buying group” is the cause of some confusion. This would be very welcome as a means of reducing costs and increasing farm viability; but I am not sure if this is intended to come within the scope of this AFPCS scheme with its focus on marketing. The same would hold true of shared ownership schemes or groups to reduce costs through sharing machines etc.

There is also the need to provide support for groups which come together to obtain and share market information. This a positive step, even through members continue in the initial stages to market independently. It may increase trust and lead to cooperative marketing as this trust develops and market needs become clear.

## **European Union - Priority 4**

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

#### **Question 14**

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

#### **Comment**

Funding support carries an obligation for effective stewardship of that investment of public funds and so training or an assessment of competence in the scheme requirements should be mandatory.

Associated training in the skills required to implement the scheme should remain optional to encourage personal responsibility and avoid wasting resources training those who are already competent.

The key issue is competence not training – you can have one without the other!

#### **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

Seems to be logical development with common watercourses and the benefit of wildlife corridors etc.

Careful thought is required on how failures to comply or implement scheme requirements by one member will impact on the others.

#### 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

Since the payments under Pillar 1 are based on assurances that all land is being managed in an environmentally sensitive manner there appears to be no justification to use public funds for a payment of this type. The decision to continue with organic farming will be one of commercial opportunity or ideological commitment by the individual business.

#### 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

In my personal opinion the barriers include –

1. Inadequate financial incentives – especially on land which is productive for agriculture.
  - i) Inherent perception that the use of land for food production must be the priority.(food good – energy bad).
  - ii) Lack of an obvious and vigorous demand for rental of woodland.  
Much of the conacre land is let by retired owners or those with other interests / occupations without the time or knowledge to manage woodland, so need confidence that land can be let “easily”.

- iii) Concern at the cost / ability of re-instatement to agricultural production.
- iv) Forestry is not compatible with conacre agreements and change will only come through long term reform of the tenancy law and associated taxation regime to encourage long term leasing.
- v) Lack of skills in woodland management amongst rural communities.

### 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

Not sufficiently aware of implications to comment knowledgeably, but concern about possible future entitlements will obviously be an issue.

### 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

I assume this should refer to the "Business Investment Scheme" rather than or as well as the Business Development Scheme since energy cropping is an agricultural not a diversification activity? Anyway, my instinctive reaction is to say yes to this question since any farm business is effectively harvesting energy and there is no difference in harvesting it for conversion to food, heat or electricity.

However it must be recognised that the use of many renewable technologies is already incentivised through schemes such as the Renewable Heat Incentives (RHI) scheme and ROCNI / Feed-in payments. There will therefore need to be strong justification for providing agriculture / food processing with incentives in excess of other industries for the "use" of renewable energy. In general the RDP funds should only be used for this purpose where no other funding is available.

There is a fundamental flaw in the calculation of the RHI rates in Northern Ireland which places many agricultural users of renewable heat here at a disadvantage to their counterparts in GB.

The conversion incentive here is based on a comparison with the cost of kerosene heating oil while in GB the comparison was with gas – due to the more widespread availability of gas in GB. However the farm in GB is by definition in a rural area where access to piped gas is very unlikely, yet they benefit from a much ( up to 50% ) higher incentives than the equivalent business in NI. This places NI farms at a disadvantage and ensures that NI will remain a high energy cost region for agricultural production. A similar difference exists for domestic properties in rural areas which have a high fuel poverty potential.

There is therefore justification for providing top-up payments to users of renewable heat in rural areas.

## **Question 22**

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

### **Comment**

Those producing biomass for heating e.g. SRC willow chip, will because of the lower RHI incentives in Northern Ireland struggle to earn a viable return for the investment in planting biomass crops. There therefore remains a strong justification for retaining the planting grant for this crop, or at least providing support on a par with that provided for conventional forestry, which also produces biomass fuel. The absence of this planting grant will effectively mean the ends of SRC willow energy production in Northern Ireland.

There is also a case for supporting stores and equipment which facilitate the development of supply chain groups which provide secure sources of biomass energy, from farm and forest, of guaranteed quality and sustainability standards.

## **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

Funding should only be provided from RDP where funding from other sources is not available.

Priority should be given to installations which reduce farm energy costs, increase energy efficiency or reduce greenhouse gas emissions on farm.

Installations where the energy is used on the farm of production should be given priority.

#### 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

The scheme currently focuses on a very narrow range of equipment for handling liquid manures. In future it must extend to a wider range of technologies and cover solid as well as liquid manures, including stores for the storage of solid manures such as broiler litter. Equipment which improves the accuracy of spreading of inorganic fertiliser and adjusts this according to crop requirements (such as that used in precision farming techniques) should be supported as it will deliver the same result of increased efficiency of nutrient use.

The separation of solids from slurry provides components which are more easily handled, and there are advantages of the timeliness of application of liquid fractions on grazing land, thus ensuring more effective utilisation of



the nutrients. The process does however require relatively expensive equipment and additional storage tanks – if not an increase in overall capacity. On the grounds of additional cost and improved utilisation efficiency there appears to be a case for financially supporting the introduction of this technology.

Mobile separators have been produced but this increases the cost and biosecurity issues, so generally the units will be restricted to large farms utilising intensive grassland management practices. In the circumstances the demand is likely to be relatively low.

Since tractor mounted trailing shoe applicators are now eligible for support under METS there is a case for supporting the associated umbilical and pumps to complete the system. The logic is the same as funding the tankers for use with the applicators, as already provided under METS and indeed the ability of such umbilical units to apply slurry at the optimum time and with reduced soil compaction and sward damage is an additional advantage over tanker based systems

## **Question 26**

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

### **Comment**

The feedback from users has been very positive, so demand for their use will continue to grow. The difficulty is the size and expense of the machines which restricts them to contractors, large farms and farm groups. There is no contractors association in Northern Ireland but the last active association had something like 100 members – a similar number to that identified by trade directories at present.

Allowing for the number of large dairy farms using spreading contractors and assuming the extension to umbilical systems, there should be scope to double the number of spreading systems in use by 2020.

As mentioned in the answer to Q25 the scheme needs to be broadened in

scope to cover solid manure storage and spreading as well as equipment for the precise distribution of inorganic fertilisers.

### 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

I am not convinced that the validity of the figures produced would warrant the effort or the increase in the bureaucratic burden, so suggest a limited but validated survey would be more useful.

### Question 28

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

#### Comment

Arable farmers make regular and widespread use of soil testing services as part of good crop production practice. They therefore are convinced of its value as a tool in maximising production and efficient nutrient utilisation.

The service is widely available through DARD and commercial companies at reasonable rates. Although the time taken for sampling may be an impediment, this service is also available commercially at nominal cost.

The impediment to uptake is not the sampling or analysis but the conversion of this information into action with a tangible benefit to the farmer. The problem is particularly acute in grassland farms where output is harder to measure and quantify than on arable farms and horticulture units.

In my opinion therefore the declared objective of “optimising the use of the nutrients contained in manures and chemical fertilisers to reduce environmental impact and improve business efficiency” can best be met by a scheme based on –

Payment not for soil sampling alone but for an on-farm mentoring session by a qualified advisor (as defined by holding a BASIS Fertiliser Advisers Certificate or equivalent). This must be based on soil sample information and extend to delivery of a simple Nutrient Management Plan for the farm. This ensures that the soil sample results are interpreted for the particular

farm situation – which is the key to delivery of practical benefits to the business and the environment.

There is growing concern about deteriorating soil pH levels on farms in Northern Ireland and as this is a fundamental issue linked to the efficient use of nutrient, I would wish to see this as a major focus of any Nutrient Efficiency Scheme. All possible means should be used to encourage the measurement of pH and the application of lime when appropriate as a cost effective first step in delivering efficient nutrient use.

### **Question 29**

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

Comment

Yes – provided this is not mandatory and the group is convinced of its value. Groups need to set their own agenda and grow to be self sustaining.

### **Question 30**

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

Comment

See my answer to Question 28 and recommendations for use of FAC qualified advisors and the importance of ph / lime use on farms.

The arable sector can effectively utilise organic manures (liquid and solid) and reduce nutrient pressures on livestock farms. This effective redistribution of nutrient between livestock and arable farms must be an important component of any Nutrient Efficiency 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

The loss of rural amenities is unfortunate but in many cases is inevitable. There is more to be gained by stimulating and supporting progress based on the future (internet access, use of e banking and e services), than attempting to sustain non-viable amenities and structures based on rose tinted memories of days gone by. I make those comments as a member of a rural family business which provided such services but was forced to face the inevitability of changed circumstances and move on

## **DELIVERY MECHANISMS**

### **Question 35**

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

Comment

The high administration cost of the Leader programmes means that in the context of a much reduced Rural Development budget, the allocation to Leader deliver should be kept at or close to the 5% minimum set by the EU Commission.

### **Question 36**

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

Comment

The strength of the Leader methodology is its ability to achieve local engagement and tailor delivery to local needs. It is however relatively administratively expensive (25%) and so as a guiding principle should only be applied where these strengths are essential. This means primarily the schemes within Priority 6. A number of these schemes also have commonality with the economic roles of Central Governments Agencies and local Councils which may provide opportunity for cooperation and

simplification to avoid overlap and confusion.

### **Question 37**

Which measures/schemes should DARD deliver itself and why?

Comment

Using the criteria of existing proven competence the general area of land based schemes including AES and Forestry should continue to be delivered by DARD. In other cases DARD should deliver those elements of the programme for which it has the credibility and technical skills, or where the impartiality which they assure, is essential.

DARD delivery should only be assumed where the staffing levels can be sustained through to 2020, in order to ensure adequate levels of service delivery.

### **Question 38**

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

Comment

The arms length partnership has a proven competence in delivering funding schemes and education / training to tight deadlines and providing flexibility to meet fluctuating demands while fully satisfy DARD and EU audit requirements and in compliance with high administrative system compliance (ISO 901 / 27001). Applying the same principle of proven competence this approach should be adopted where these qualities will be of value, including the delivery of bespoke training, group facilitation, organisation of training programmes and events, and delivery of high volume capital grant schemes.

## **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

No. Priorities must be identified and programmes dropped . These will not always be the low budget programmes.

#### **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**

The priority should be to fund actions which deliver successful rural businesses which generate the income to sustain the rural communities. Capital investment schemes have the added advantage that they leverage in additional private sector funding ( typically 60% of the investment) and so should get a high priority. Industry development priorities have been established by the AgriFood Strategy Board and should form the basis of funding priorities.

#### **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**

Should funding be transferred to Pillar 2 then this must be reserved for businesses which are contributing to the delivery of the AFSB "Going for Growth".

#### **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**

All other comments are contained in my covering letter.

## 162. Killyleagh Football Club

To: Rural Policy Branch  
Subject: Village renewal and Basic services.

Dear sir/madam.

My name is Valerie Heron and I am treasurer of Killyleagh Football Club, a cross community amateur football club providing football for girls and boys, ladies and men.

Earlier this year we applied for planning permission for a 3g all weather training pitch, not knowing where we could get funding from.

On reading my husband's farming life newspaper I found out about the grants available through DARD.

We met with Francis from the Rural network support team and after great advice and further meetings with our Village Renewal Support Officer, Mura, we filled in our form and have been successful with securing Grant assistance.

Our project is now on hold while we become a limited co. and then we have to reg. with DARD to get our no., while this has been a progression of form filling we realize that a grant of 75% is vital for a small voluntary club like ours.

If we could have claimed the planning costs back it would have been very welcome, I feel the new Rural Dev. Program should allow for this and also other arch. fees.

More funding should be allocated to rural community groups with the basic services and village renewal schemes being extended.

While we got match funding from our local council this was because we were last given money 10 years ago., so if we were to apply to the council in the future we would probably not be given any. I feel the council's should work closer with DARD as the finished projects are of benefit to all the community.

Personally I feel all the support networks that are in place should stay as these support officers now are experienced in working with groups like ours and without their help and advice we would have struggled to secure our Grant., they are only a phone call away and their help is vital.

Yours sincerely,  
Valerie Heron.



## 163. Landscape Institute

### 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

Yes LINI (Landscape Institute Northern Ireland) believe that education and training should be at the core of the new RDP. In addition, as Agri-Environment Schemes (AES) are the only mandatory element of the RDP, adequate resources need to be provided to ensure appropriate, education, training and advice is directed towards the delivery of AES.

LINI believe that training / advice for farmers and landowners should aim further than the current legislative baseline by addressing areas such as :

Landscape Planning, Management & Protection  
Management of Priority Habitats and Species,  
Sustainable Soil Management  
Invasive Species Awareness,  
Tree and Plant Disease Awareness  
Green Infrastructure Delivery / Benefit

We believe that advice and training for farmers should introduce principles of progressive landscape stewardship (i.e Guiding landscape change through appropriate management, protection and planning) This would be achieved by embracing the achievable principles set within the European Landscape Convention (as ratified by both the UK and Ireland) and through utilisation of the National Landscape Character Assessment as an evidence baseline.

In addition understanding principles of Ecosystem Services and Green Infrastructure should be prioritised within any training as these offer excellent opportunities to deliver both public good and economic benefit.

LINI also believe that DARD should utilise the expertise within NIEA, Environmental NGOs and The Landscape Institute to design and deliver training and advice. Central to this would be the Landscape Institutes wide access to current best practice nationally and internationally which could be of significant value not only to farmers and landowners, but the Department.

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) to other EU members States to witness case studies first hand and learn from experiences elsewhere.

The Landscape Institute would also take this opportunity to urge DARD to consider the value which experienced Chartered Landscape Architects could add to the NI Forestry Service and DARD generally – For example The Forestry Commissions for Scotland, Wales and England all currently employ directly and/or engage Chartered Landscape Architects to advise on design and implementation matters at local and strategic level relating to woodlands and forests for public good, green infrastructure and 'fit' in relation to particular landscape typologies.

## 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 environmental issues to guide farmers and landowners in a progressive manner. Brokers need to be aware of all expert advice available to them and should have a guidance / checklist which they can refer. This could also provide referenced case study scenarios and examples of best practice elsewhere.

Ultimately brokers should be able to access expertise within NIEA, environmental NGOs, The Landscape Institute and others to adequately fulfil their role.

In addition they should where possible be working with local organisations (such as LINI and NIEL) capable of assisting with the design and delivery of

good practice guidance, casestudies and study visits on good environmental and landscape management.

## 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

To address an aging profile of NI farming community, LINI would support that young farmers should be incentivised to remain or enter into the industry – however appropriate education, training and awareness as described in answer to Question 1 above, needs to be central to any incentives offered.

#### Question 5

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

#### Comment

LINI understand the business need for farmers and landowners to consider introduction of renewables and other diversification, however would urge that Environmental Impact Assessment (including Landscape & Visual Impact and in particular Cumulative Impact Assessment) form part of these development applications, thus ensuring no unintended environmental affects are generated (including wider land use changes to maintain AD plants at optimum capacity).

Additional considerations should reward joint applications where multiple farmers and landowners are working collaboratively to deliver proposals which offer wider benefit (should encourage longer term planning / visions for lands)

## 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

Whilst LINI appreciate renewables form an important and established part of the energy mix – we would have reservations with any proposal which could result in further incentives and subsidisation without caveats. Should the Department determine that additional incentives would be beneficial, LINI believe it appropriate that any offer of grant support should include caveats that Environmental Impact Assessment (including Landscape & Visual Impact and in particular Cumulative Impact Assessment) should accompany any development application which the grant applies.

Caution should be exercised, as it is considered inappropriate for the Department to set out funding mechanisms for ventures with potential to cause direct or indirect (and cumulative) negative environmental impact.

## 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

There is need for intervention to direct food production systems to be more sustainable, more dependant on natural renewable systems than on fossil fuels, eg fixing nitrogen through integrated crop management rather than relying on nitrates from natural gas.

## Question 11

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

### Comment

Collaborative (cooperative) management plans should be encouraged and rewarded, in particular those farmers and landowners preparing strategic long term proposals responding appropriately to existing natural systems and catchments such as River Basins and Landscape Character Areas. LINI would particularly welcome proposals incorporating Green Infrastructure objectives for public and environmental good, which could in turn be applicable for additional European funding streams.

## 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

LINI is generally supportive of the broad principles outlined within the structure of the AES, however more detail of the structure would be welcome before full support could be given.

Given the reduced budget for the new RDP, LINI 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 and landscape architects 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

LINI support the core principle of the European Landscape Convention (ratified by both UK and Ireland) which emphasis that 'All landscapes matter'.

Therefore whilst it is important that our designated sites (including designated landscapes) are adequately protected and appropriately managed. There is a danger that simply prioritising designated sites could result in isolation, fragmentation and disconnection with the wider countryside.

It is therefore essential that 'All' our landscapes are appropriately managed

and planned with connectivity prioritised and rewarded.

As stated previously LINI would particularly welcome proposals responding to objectives and recommendations within particular Landscape Character Areas and or natural based system

LINI believe that the National Landscape Character Assessment for Northern Ireland (which we understand is currently being reviewed and updated by NIEA) is the appropriate tool to provide a 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, education and advice must be central and a compulsory element of the scheme. The department should utilise the expertise within NIEA, environmental NGOs, the Landscape Institute and Other appropriate organisations/ charities to design and deliver appropriate training and advice.

As detailed aspects of landscape protection, management and planning can be a complex area; farmers and landowners require 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 in turn deliver better value for the investment of public money. Further funding streams may present from Europe as a result of Green Infrastructure initiatives.

#### 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?

Yes – LINI is very supportive of this proposal.

In addition to River catchment areas, we would also as highlight previously strongly encourage the utilisation of NIEAs National Landscape Character Assessment as a potential baseline and vehicle for delivery of appropriate co-operative management.

There are 130 Landscape Character Areas (LCAs) in Northern Ireland, each with its own particular characteristics, pressures, sensitive's and opportunities.

LINI consider that this would be a finer grained mechanism than for example river basin management.

In addition LCAs are generally smaller in terms of area than full river catchment areas, therefore it is more feasible that a higher percentage of farmer and landowner participation could be achieved.



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. 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 eNGO's, Charities, Trusts) 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, LINI believes that given the recent well documented concerns regarding the decline in pollinators (and the link to neonicotinoids) support for organic farming should be retained given its ability to deliver for biodiversity through the adoption of more environmentally friendly agricultural management practices. We believe DARD should investigate the barriers that landowners are facing that currently limits 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

Northern Ireland has the lowest percentage of woodland cover of any part of the British Isles (UK and Ireland). Whilst historic and cultural landownership and patterns have a part to play in this fact, a major barrier to landowners planting new 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 as not to be susceptible to damage by livestock (free range hens, etc) or managing woodlands using foraging animals.

In principle LINI are supportive of woodland expansion across Northern Ireland, however we would be keen that a considered and strategic approach is taken to any uptake. As mentioned previously utilisation of National Landscape Character Assessment as an evidence baseline could offer a workable mechanism for strategic woodland prioritisation. This would in turn also provide potential coordinated delivery of wider Green Infrastructure objectives whilst avoiding erosion of land types or habitat of environmental value / priority.

### 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

Northern Ireland has one of the lowest percentage woodland cover in Europe and is failing to reach preset targets, therefore income forgone

payments could be a beneficial mechanism to secure increased woodland cover. However as previous, we would strongly encourage a strategic approach to implementation of woodland in favour of the current system which results in random uptake across the province.

There should be basic prioritisation approach adopted. As previous, (the soon to be updated) National Landscape Character Assessment could provide a valuable and workable tool to support this.

Weighted recognition and reward should also be considered for cooperative initiatives which would deliver Green infrastructure for public and environmental.

### 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

LINI agree 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 as farming practices that have negative impacts upon soil and water quality and the general aesthetic qualities and characteristics of the landscape. While an income support measure, LINI believes that public money should deliver public good through positive environmental outcomes.

This should include consideration of Green Infrastructure in all its forms.

## **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**

In general LINI maintain that there is need for food production systems to be more sustainable, more dependant on natural renewable systems than on fossil fuels, eg fixing nitrogen through integrated crop management rather than relying on nitrates from natural gas.

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 issues if unintended consequences. The noise, water, odour and traffic impacts as well as landscape & visual impacts are potentially problematic issues with renewable energy technologies.

Of particular concern for LINI is the cumulative visual impact of one off structures of an industrial nature across the landscape. For example, one off wind turbines are becoming an increasing feature. Planning applications often only consider each application in isolation, therefore the cumulative build-up has potential to be detrimental to other sectors ( i.e Tourism, inward investment etc).

Another example is the number of applications for on-farm anaerobic digesters which could rise significantly through the provision of grant support as proposed through the Business Investment Scheme.

As outlined previously the National Landscape Character Assessment should be referenced as an evidence baseline to determine appropriateness ( including adaptive recommendations) for development within particular landscape character areas and types.

A strategic approach, with a clear vision of what wind and AD is intended to achieve in terms of contributions to renewable energy across Northern Ireland, is required to limit the cumulative build-up of structures and building across the countryside and prevent wide scale negative changes in the landscape and land management.

### **Question 22**

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

#### **Comment**

LINI are 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?

#### **Comment**

Agree that this may be a beneficial mechanism and could discourage or at least not support the external venture capitalist approach which is currently providing little benefit to farming communities locally.

### **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**

LINI agree that the scope should provide support for larger new woodlands which provide enhancement of biodiversity and local community benefit of visual amenity and public access?



However there should be a National Woodland Strategy which prioritises suitable locations for woodlands, rewarded with funding mechanisms that would minimise inappropriate planting in areas which are not considered priority.

Introduction of woodlands and forests should respond to recommendations and objectives located within the National Landscape Character Assessment.

Woodlands should be designed to 'Fit' their host environment and a collaborative approach between farmer and landowners should also be encouraged to achieve meaningful large scale woodlands.

Professional advice should be encouraged and rewarded with new woodlands designed to enhance or protect priority species as well as deliver wider ecosystem services including recreation and rural tourism.

### Question 28

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

#### Comment

Soil is the foundation of agriculture, LINI believe that the industries approach to soil management needs to be transformed to achieve greater and more sustainable land cover typologies and crop production. Further, soils offer a direct and valuable mechanism to assist carbon sequestration, it is therefore essential that appropriate management and practice be applied to maximise this potential.

Barriers include a lack of understand of the wider value of soils to meet Climate change objectives. Education is considered key to this.

### 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 government interventions.

### Question 30

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

Comment

LINI 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 has much to contribute to Northern Ireland's rural 'nature' tourism potential.

Sustainable Development should be the only type supported in rural areas. Development which is not considered sustainable (i.e Does not meet the 3 pillars of sustainable development – economic, environmental and social) should be disregarded.

#### 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, LINI believe 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.

### 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 and landscape character areas could provide significant environmental benefits, boost the rural economy and help alleviate deprivation and isolation on both sides of the border.

It is essential that policy and actions on either side of the legislative boundaries work together and to not diverge in a self serving manner to the detriment of the wider landscape, economy and population.

### 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 (in particular those within the visual catchment of the border).

For information LINI are actively promoting the preparation of a Landscape Strategy for Northern Ireland, similar to that already drafted in the Republic of Ireland.

Further we consider it essential that these strategies be prepared with a joint focus to avoid policy polarisation which could negatively impact landscape management of for example designated lands North and South.

As stated previously LINI would reinforce the achievable messages from the ratified European Landscape Convention that 'All Landscapes Matter'. Therefore cooperation North / South is also encouraged on a European level to minimise regional impacts to the wider landscape and provide benefit to all of Europe's citizens.

Finally a cooperative approach will help to deliver cross border wildlife corridors, green infrastructure, tourist routes / and other economically beneficial initiatives etc.

LINI agree it may be practical to focus funding in border regions to achieve real results.

### **Question 37**

Which measures/schemes should DARD deliver itself and why?

#### **Comment**

LINI have no comments, however would simply encourage DARD to continue to coordinate and collaborate closely with the other Departments to avoid 'siloed' governance  
(In particular NIEA – specialists including Landscape Branch) should be consulted to ensure appropriate response to emerging strategies.

## **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**

LINI believes that as Agri-environment is the only compulsory element within the RDP it should be prioritised and funding should be directed towards landscape management, planning and protection.

This should aim to avoid loss of the positive characteristics of our limited and unique environments which are being rapidly eroded. It should halt biodiversity loss, encourage habitat and species conservation/management, 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, green infrastructure and positive landscape character utilising the National Landscape Character Assessment as an essential evidence baseline.



## 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, LINI 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. LINI 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 LINI to provide definite responses to many of the questions in the document. We would like however to make the following additional points:

#### General Comments:

- The UK and Government (including Northern Ireland) made a commitment when it ratified the European Landscape Convention, that the primary objectives of the Convention would be reinforced through policy. The ELC defines landscape as: "An area as perceived by people, whose character is the result of the action and interaction of natural and/or human factors". (Council of Europe 2000) It highlights the importance of developing landscape policies dedicated to the protection, management and creation of landscapes and establishing procedures for the general public and other stakeholders to participate in policy creation and implementation. LINI believe that it is essential that the RPD includes this commitment and simply recognise that 'All Landscape Matter' and that farming and rural development have an essential role to play in this objective.

- The relationship between the environmental ingredients of the RDP and the Greening aspects of Pillar 1 need greater clarity and with such a significant portion of the budget directed towards 'greening' a clear vision and mechanism for delivery is essential.
- LINI believe that The National Landscape Character Assessment for Northern Ireland could form a workable and realistic evidence baseline mechanism for future evolution of our lands. It offers a framework for all public intervention systems into agricultural land management – Vision setting, advice, incentives, regulation and enforcement.
- Support for Green Infrastructure and ecosystems services needs to

be central to the new RDP and a coordinated approach applied.

- Farmers and landowners should be rewarded for providing public good in relation to ecosystem services and environmental improvement.
- Reward for positive cooperative approaches to land management.
- 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
- DARD should work with NIEA, Environmental NGOs and The Landscape Institute 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

- In general LINI maintain that there is need for food production systems to be more sustainable, more dependant on natural renewable systems than on fossil fuels, eg fixing nitrogen through integrated crop management rather than relying on nitrates from natural gas.

Soil is the foundation of agriculture, LINI believe that the industries approach to soil management needs to be transformed to achieve greater and more sustainable land cover typologies and crop production. Further, soils offer a direct and valuable mechanism to assist carbon sequestration, it is therefore essential that appropriate management and practice be applied to maximise this potential.

## 164. Law Society NI

THE LAW SOCIETY  
OF NORTHERN IRELAND



Our Ref:

Your Ref:

21 October 2013

RDP Management Branch  
Department of Agriculture and Rural Development  
Room 407  
Dundonald House  
Upper Newtownards Road  
Ballymiscaw  
Belfast BT4 3SB

Dear Sirs

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

The Society thanks the Department of Agriculture and Rural Development for the opportunity to respond to the consultation in respect of the above matter.

Having considered the proposals, the Society has no comment to make at this time concerning any issues raised therein.

Yours faithfully

Frank Geddis  
Legal Policy & Research Officer

## **165. Northern Ireland Catholic Council on Social Affairs**

### ***Response to Consultation on the Rural Development Programme, 2014-2020, from the Northern Ireland Catholic Council on Social Affairs***

***October 2013***

The Northern Ireland Catholic Council on Social Affairs is the Northern Ireland committee of the Council for Justice and Peace of the Irish Bishops' Conference. With a membership of mostly lay Catholics with relevant experience and expertise, NICCOSA provides advice and support to the Catholic Bishops of Northern Ireland on social, legal and political issues. The Council is chaired by Cardinal Seán Brady, Archbishop of Armagh and President of the Irish Bishops' Conference, assisted by Most Rev Noel Treanor, Bishop of Down and Connor.

NICCOSA welcomes the opportunity for consultation on the Rural Development Programme from the Department of Agriculture and Rural Development. The Programme represents a comprehensive attempt to provide a strategic plan for rural development from 2014 to 2020 and it will therefore play an important role in shaping the lives and livelihoods of rural families and communities. The Minister and her department are to be thanked and congratulated for their efforts to strategically support rural communities in this context.

As an organisation dealing with social affairs, NICCOSA is not qualified to comment in detail on many of the technical questions included in the consultation process. It has three main interests in this document:

- to determine the degree to which government is aware of the social and economic problems in rural societies at a personal, family and community level;
- to seek assurance that rural families and communities will have the opportunity to develop social and economically within their current environments;
- to find evidence that government resources will be deployed fairly in pursuit of that objective.

In pursuit of the above interests NICCOSA offers answers to the following questions:

**Q 31:** The rationale behind the Rural Business Development Scheme is worthy of support and is a welcome initiative. The challenge in new-start businesses in rural areas lies mainly in balancing expertise in practical skills with a knowledge and understanding of how to best present those skills in a business context. It would, however, be helpful to understand the proposed demarcation of responsibilities between DARD and, for example, Invest NI and other public bodies with similar functions.

The Rural Business Investment Scheme is similarly welcome, but this proposal would need to take cognisance of the fact that investing in businesses of a similar nature, which may be in competition with each other, is not the best deployment of scarce investment resources. While it is understood that DARD cannot go so far as to provide a planned economic model, it must take account of the spatial and sectoral distributions of its investment activity. It would also be helpful for DARD to indicate its priorities in terms of investment support so that potential applicants might have some initial guidance on what is likely to receive financial support.

Rural tourism is an area of economic potential, but the difficulty is that there already appears to be a surplus of tourist promotion agencies, which are not always in harmony with each other. While DARD has an important role to play in this area, it would be helpful to outline how its activities would complement existing promotional initiatives organised by, for example, local councils. In view of the current reform of local government, DARD might helpfully expand on its proposal in this area, to avoid duplication of support for rural tourism.

Combatting poverty and social isolation is a key proposal in this document and one which NICCOSA warmly welcomes. While the Local Community Grant fund represents an innovative approach to the huge challenge of combatting rural poverty, the main difficulty in this area is the co-ordination of services across more than one government department. For example, area planning for rural schools means that some will close in the near future. This will have a huge impact on rural communities and on individual parents and children. It is unclear how DARD might have sufficient influence to shape government policy in another department and NICCOSA would seek more information on how cross-departmental policies would work within the current model of Stormont administration. The concept is a worthy one, but the reality will present significant challenges.

The Village Renewal Scheme is welcome, but it would be helpful to have a definition of a village. Some villages are more dispersed than others. Many rural communities have nothing more than a post office, school and church without a clearly identifiable village nucleus, but they should not be excluded from this scheme.

Rural communities in border areas are at a particular disadvantage. For this reason the All-island Co-operation Scheme is welcome, but it will be effective only if there is a similar scheme on the other side of the border - an all-Ireland scheme cannot be planned solely from one side of the border.

**Q 32:** NICCOSA does not represent a "sector". Its interests lie in addressing the problems of rural society, such as deprivation, poverty and isolation, which can lead to devastating personal outcomes such as suicide and addiction. The way to improve the schemes listed in Question 32 is to ensure that their ownership is placed firmly in rural communities and that the various proposals are not implemented on a "top-down" basis. The opportunity for consultation is a welcome step in recognising this principle.

**Q 33:** The answer to this question lies in a joint proposal from the governments in Belfast and Dublin, which must recognise that deprivation and disadvantage do not differ markedly on both sides of the border. It might be helpful to therefore develop all-Ireland policies in relation to rural poverty, suicide prevention, addiction and community isolation.

**Q34:** Ideally the scheme should be on an all-Ireland basis with specific reference to border areas. In this way the border areas can be seen as part of a wider problem, rather than as a function of an international boundary.

**Q 39:** The answer to this question depends on the circumstances at the time of expenditure. In principle, cuts in funding should be spread equitably across all the proposed schemes.

**Q 40:** The highest priorities in rural areas lie in protecting and promoting human dignity as an integral and essential part of community cohesion and development.

## **Conclusion**

As previously stated, NICCOSA welcomes the focus on social deprivation and isolation in rural areas which underpins this consultation. We wish to emphasise the critical role of the community and voluntary sector in addressing these issues. Churches and faith based organisations also provide a vital point of social contact for many people at risk of poverty and social exclusion. Dialogue with those already working in these areas, such as the Society of St. Vincent de Paul, is critical if government proposals are to reach those most at risk and complement the important work that is already been done in these communities.

NICCOSA would welcome the opportunity to discuss the issues highlighted above in a meeting with representatives of the Department.

# 166. Northern Ireland Public Service Alliance (NIPSA)



## Department of Agriculture and Rural Development Departmental Committee

Departmental Secretary:.....**Mary Keys**  
Assistant Departmental Secretary:.....**Michael Herron**  
Assistant Departmental Secretary:.....**John McKeever**  
Assistant Departmental Secretary:.....**Alison Wise**

*This matter is being dealt with by:*

Your ref:..... Our ref:.....

Rural Policy Branch  
DARD  
Dundonald House  
Belfast

17 October 2013

Dear colleagues

I am responding to the consultation document on the Rural Development Programme 2014 – 2020 on behalf of The Northern Ireland Public Service Alliance (NIPSA). NIPSA represents over 45,000 members of which around 21,000 are non-industrial civil servants including those working in the Department of Agriculture and Rural Development (DARD). The main focus of our response relates to the impact of the proposed Programme on our members having responsibilities in Rural development functions. However some comments may relate to the high quality service provided to rural and farming communities across Northern Ireland and the importance of such responsibilities resting with the Department.

Section 5 – Stakeholder/Partners:- At the stakeholders meeting we attended it was noted that stakeholders such as farmers did not know how to go about getting help with filling in forms, what grants they could receive and who to turn to for assistance i.e. other stakeholders such as Rural Community Groups. We would suggest that DARD have an information section on their website and for those who don't have computers then maybe another method could be sought.

Priority 2:- Enhancing competitiveness of all types of agriculture and enhancing farm viability – Young Farmers – It is essential that this is looked at for what can be done for young farmers, as this is the next generation to farm. If we have no farmers, then we have no DARD. Farming no matter what age you are to enter into is one of the biggest factors of Northern Ireland's (NI) economy. Maybe because there is no help or scheme for young people in their late teens or early twenty's to avail off is a factor also, has any scheme been thought off for this situation? The criteria or skills required for schemes should also be looked at and consideration given to those with learning disabilities. Has this been factored in anywhere?

Proposed Schemes through Priority 2; 3) Forestry Competiveness Scheme (FCS) – We welcome this scheme as Forestry is a large part of NI industry. We would encourage the Department to advertise to the public what support is there for them by our members and how to avail of the help in regard to tree, plant health, or for small business who wish to take up forestry. This was raised at the Stakeholders meeting also in regard to a person taking on Forestry but not knowing where the help was, it is the Departments responsibility to guide the Public.

Priority 3 – Promoting food chain organisation and risk management in agriculture – TUS welcome all innovations to help the local food sector in NI in the growth of their business, small or large. To make it more known to businesses the help and resources that are available within DARD, i.e. our facilities' in

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## Department of Agriculture and Rural Development Departmental Committee

Departmental Secretary:.....**Mary Keys**  
Assistant Departmental Secretary:.....**Michael Herron**  
Assistant Departmental Secretary:.....**John McKeever**  
Assistant Departmental Secretary:.....**Alison Wise**

This matter is being dealt with by:

.....

Your ref:..... Our ref:.....

Greenmount or Loughry. TUS understand that this will be a major project for DARD to undertake to deliver this programme and we welcome jobs which will come out of it both in the public sector and private sector.

Priority 6 – Promoting social inclusion poverty reduction and economic development in rural areas – NIPSA has an Anti Poverty Policy and we welcome anything which will help to eliminate this within our society. Therefore we would be supporting any schemes which would help within rural areas to promote small business, communities or tourism.

Section 7 – Delivery Framework – Some other stakeholders may feel they are better placed to deliver some of these programmes of work, TUS would not agree. We feel that DARD has the skills of people who are efficient, knowledgeable, who are already trained in the aspects of the capital grant schemes. If another unit was to deliver the schemes this would cost money as this would have to be paid for by the Department out of the CAP funding, whereas if it is kept in-house there is no additional cost. In some work areas currently in DARD, work may be coming to an end, we have the staff both that are technical and admin who can deliver this work though our DARD Direct offices and the Department must look at this situation.

Section 8 – Finance and Resources – TUS needs to be fully consulted in regard to budgets which would impact on our members working in DARD, i.e. if the budget is to go to an outside industry this would impact on our members, or if work is to go to an outside body and this would impact on jobs, consultation must take place.

Section 9 – strategic Environmental Assessment and Equality Impact Assessment – TUS support EQIA’s to be undertaken and how DARD is to mitigate the outcome from the EQIA’s. How does DARD plan to inform stakeholders of their plans to resolve the concerns raised by them? This is the most important part of this programme as rural areas have many difficulties in regard to then nine equality categories which this covers.

Section 10 – Consultation questions – Whilst TUS have provided a response to this very detailed consultation paper, we would request that we would see the final draft paper prior to it being sent to the EU Commission for consideration, and this will enable us to review the document so that it does not have an adverse impact on our members.

We would also like to comment on our concerns for the mental health of both farmers and our members in DARD. At the meeting we attended it was commented in regard to the hardship and fear that farmers are currently facing under the current financial difficulties. They felt there was nowhere for them to turn to such circumstances. In regard to our members, DARD staff, we advise them to turn to Carecall and Welfare however when farmers call in and speak about their mental health, there is nowhere for our members to direct the farmers too in such circumstances, is it possible to have something on the DARD site or to advise staff of societies which would be able to help/advice in such circumstances.

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Department of Agriculture and Rural Development  
Departmental Committee

Departmental Secretary: .....**Mary Keys**  
Assistant Departmental Secretary:.....**Michael Herron**  
Assistant Departmental Secretary:.....**John McKeever**  
Assistant Departmental Secretary:.....**Alison Wise**

This matter is being dealt with by:  
.....

Your ref:..... Our ref:.....

We also think that DARD must look at the communication of information that goes out to the public, regarding help, advise or grants etc, that they may be entitled too. The Department seem to believe that everyone must have a computer in their home; this is not quite true as many homes in rural areas do not have access to broadband, therefore they cannot access this information, also people with leaning difficulties need to be accommodated.

TUS is happy to discuss anything in this report.

Regards

Mary Keys  
Departmental Secretary

## 168. Playboard NI

### 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 Scheme**

PlayBoard welcome the consultation document's acknowledgement that if rural businesses with a relatively low economic impact are not supported to evolve and maintain their viability and presence, their socio-economic contribution to the fabric of rural areas will be lost.

Since the establishment of the Play Care initiative in 1995, PlayBoard have played a lead role in the development of play based, School Age Childcare services across Northern Ireland, including many rural areas. School Aged Childcare (SAC) Services provide a caring and safe childcare environment which offers a range of active and stimulating play based activities for children aged between 4 and 14. By providing play based, informal learning opportunities SAC providers contribute to a range of developmental areas including health and well-being, social and personal development and personal resilience.

From a purely economic perspective the impact of SAC services has been significant within many rural communities generating local employment and providing parents and carers with the childcare they need to allow them to remain actively engaged within the workforce, education or vocational training.

Recent research carried out by PlayBoard ('State of the School Age Childcare Sector' report, 2012) has highlighted that within many rural areas there remains a significant level of need for SAC services. PlayBoard believe that a focus on the development of play based SAC services has the potential to significantly enhance the economic fabric of rural areas.

PlayBoard welcomes the Department's intended strategic approach of involving other Departments and Agencies in an advisory capacity to businesses. Within this regard, PlayBoard would draw attention to the recent publication by OFMDFM of the Bright Start Strategic Framework which includes a focus on growing rural SAC services. Under Bright Start the opportunity exists to establish a further 2,000 rural SAC places and PlayBoard would suggest that the Rural Business Development Scheme could assist the process by providing information and support on the

development of effective business plans and by signposting training and mentoring.

With regards to training and mentoring, PlayBoard agrees with the Department that resource funding sit better with other agencies. For example given its role as the lead play agency in Northern Ireland providing for both training and developmental support for SAC and other groups, PlayBoard have a unique skills base which could be utilised in order to enhance development within rural areas.

PlayBoard agree that farmers and farm families seeking to diversify or individuals intending to start up a new business should be supported to access appropriate expertise and assistance to develop and realise their idea. Access to the right information, resources and support is important and it is crucial they are signposted to those Agencies (both statutory and voluntary) that can provide that help at an early stage.

### **Rural Business Investment Scheme**

PlayBoard welcome the stated intention of the Rural Business Investment Scheme to provide investment support on a localised basis to business projects that complement the areas local development strategy and are focused on need. To achieve true effectiveness PlayBoard would urge the Department to pay particular attention to the focus on need.

PlayBoard welcomes the consultation documents identification of the Multiple Deprivation Measure as a means of helping to target those in most need. Given the often isolated nature of rural areas we would highlight the importance of the 'proximity to services' measure which links need to the provision and accessibility of basic services. The 'proximity to services' indicator identifies a particular problem facing rural dwellers which can potentially have adverse impacts on vulnerable groups such as low income households including children and young people, and those with disabilities.

For many children and young people, the often sparse nature of the population base within rural areas coupled with often poor public transport infrastructure can leave children and young people isolated. This is a particular problem when it comes to play and leisure opportunities. Public play and leisure provision tends to be very limited within rural areas while intensive agriculture can leave some areas with little access or opportunity for informal play.

Such isolation can cause significant barriers, particularly for those families on lower incomes. In areas where there are few other children or young people living nearby, it can prove difficult for parents to keep their children's play experiences fresh and stimulating without travelling long distances.

For many children and young people, particularly as they grow older and seek to expand social connections, rural locations can feel deserted, boring and far away from play and leisure opportunities.

At a local level, research conducted by the Northern Ireland Commissioner for

Children and Young People (NICCY) highlighted the negative impact that rural isolation and lack of public transport can have on the ability of children and young people to access play and recreation facilities.

The importance of children and young people's play and leisure within rural areas was recognised in the NI Executives Play and Leisure policy statement and implementation plan. Amongst a number of key issues identified, the policy recognised the limiting nature of public transport as a key impediment to the fulfilment of children and young people's play and leisure needs.

As part of the UK's obligations under the United Nations Convention on the Rights of the Child (UNCRC), the Department has a responsibility to ensure that it meets the needs of children and young people with regards to play and recreation. Article 31 of the convention states:

1. *States Parties recognize the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.*
2. *States Parties shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity.*

Recently the UN Committee on the Rights of the Child published General Comment 17 which clarifies the meaning of article 31 and provides an overview of government obligations in delivering against it.

PlayBoard would urge the Department to place article 31 (and the guidance provided in General Comment 17) at the heart of its future planning and investment processes thus ensuring that the child's right of the child to rest, leisure, play, recreational activities, cultural life and the arts is fulfilled within rural areas.

### **Rural Tourism Scheme**

The development of play opportunities within rural locations has the potential not only to improve the lives of resident children and young people, but to provide destination play points with the capacity to enhance the tourist potential of rural areas. As such PlayBoard would urge the department to both recognise the importance of play to resident populations within rural areas, and to further recognise play as a potential vehicle for driving a growth in rural tourism.

The 3 key principles contained within the Tourism Priorities for Growth (2012) outline the need to ensure that experiences are globally unique, authentically local and interactive. The Priorities for Growth acknowledge that Northern Ireland has a unique and stunning natural package of coasts, beaches and mountains combined with a unique history. Northern Ireland has 'uniqueness in scale' which enables the visitor to connect with so many offerings within a short timeframe and provides the opportunity to package a range and depth of experiences that are unique to NI and which cannot be mirrored by many other locations – if any.

Tourism Priorities for Growth refers to the need for 'visitors to enliven their senses and to smell, touch, hear and see something that they can't experience elsewhere ... to make the experience a truly memorable occasion and increase the potential for future repeat business'. Ensuring that there are imaginative play opportunities which connect to the natural environment in rural areas has the potential to go some way towards supporting the achievement of the truly memorable experience referred to above.

Further, PlayBoard would draw attention to the largely untapped potential which exists to enhance both rural play provision and tourist attraction within forests and wooded areas across Northern Ireland.

Since 2006 the Forestry Commission in England, Scotland and Wales have focused on the development of natural play experiences within forests and wooded areas.

By way of example, the Forest Commission Scotland states<sup>2</sup>:

*"Natural play sites provide places where children can play, be physically active, use their imagination and be exposed to a controlled level of risk that is not present with standard play equipment. Not only does this bring health benefits but it also helps to create confidence about being outdoors, enabling children to make positive connections with the wood – that being in a wood is fun."* [p.9]

They also provide specific Natural Play areas within many of their forests<sup>3</sup>:

*"We provide places for children of all ages to play... We are also exploring the potential to pilot 'natural play' sites. These use landscape features such as mounds and dips, trees and bushes, logs for climbing and boulders for balancing, and safe sand surfaces. It is about getting back to basics and enabling children to play and have fun in natural outdoor settings while learning to value greenspace and woodland for themselves."* [p.6]

Forestry Commission in England explicitly includes Natural Play in their forests as their objectives<sup>4</sup> state they will:

*- Further develop the Forestry Commission's role as a provider of high-quality recreation, natural play and leisure experiences to a wide audience for the benefit of their health, wellbeing and personal development.*

*- Work with other education providers to offer a broad range of enjoyable and accessible woodland-based education and learning opportunities, particularly for children and young people. [p.32]*

Progress has been much slower in Northern Ireland and we would encourage DARD to explore the potential of the existing forestry estate to deliver enhanced play experiences for local children and young people, and to enhance the tourist

<sup>2</sup> Forest Commission Scotland: *Woods for Learning Strategy*. Accessed online 2.09.13 from [http://www.forestry.gov.uk/pdf/woodsforlearning09.pdf/\\$FILE/woodsforlearning09.pdf](http://www.forestry.gov.uk/pdf/woodsforlearning09.pdf/$FILE/woodsforlearning09.pdf)

<sup>3</sup> Forest Commission Scotland: *Forests for People: Access, recreation & tourism on the national forest estate*. Accessed online 2.09.13 from [http://www.forestry.gov.uk/pdf/fcfc114.pdf/\\$FILE/fcfc114.pdf](http://www.forestry.gov.uk/pdf/fcfc114.pdf/$FILE/fcfc114.pdf)

<sup>4</sup> Delivery Plan 2008-2012: England's Trees, Woods and Forests. Accessed online 2.09.13 from [http://www.forestry.gov.uk/pdf/eng-etwf-delivery-plan.pdf/\\$FILE/eng-etwf-delivery-plan.pdf](http://www.forestry.gov.uk/pdf/eng-etwf-delivery-plan.pdf/$FILE/eng-etwf-delivery-plan.pdf)



experience within woodlands.

### **Combating Poverty and Social Isolation – Basic Services Scheme**

PlayBoard warmly welcomes the intention of the Rural Development Programme to focus on Basic Services and to provide financial support to a range of measures aimed at tackling rural poverty, social isolation, the focus on innovative health solutions for the rural population and childcare.

There is a growing body of evidence highlighting the benefits which are derived from access to play for both individual children, young people and for wider communities.

At an individual level, the ability to engage freely in both indoor and outdoor play opportunities from an early age has been shown to:

- Support the development of brain capacity in early years;
- Encourage a connection between children and young people and the wider social and natural environment;
- Support broad holistic development incorporating areas such as physical literacy, cognitive skills and creativity;
- Improve both physical and mental health and tackle obesity amongst children;
- Provide opportunities for children and young people to assess and manage risk.

At a wider societal level, the opportunity for children to play openly and visibly within their own community has been shown to support the development of more cohesive communities; support social bonding between peers; encourage active citizenship; enhance understanding between generations; tackle anti-social behaviour and break down community barriers and divisions.

As previously referenced, for many children and young people the often sparse nature of the population base within rural areas coupled with poor public transport infrastructure can leave children and young people isolated. This is a particular problem when it comes to play and leisure opportunities.

Such isolation can cause significant barriers, particularly for those families on lower incomes. In areas where there are few other children or young people living nearby, or there are a lack of public play facilities it can prove difficult for children to access stimulating play experience which support their development and growth.

PlayBoard warmly welcomes the intention through the sub measure Strategic Services – to partnership working with other Departments and Agencies to deliver services such as innovative (/preventative) health solutions and childcare.

PlayBoard also welcomes the Local Community Grant fund, which aims to provide support grants of up to £10,000 to help rural communities address need in line with local area plans. PlayBoard would suggest that funding innovative play provision should be a high priority under this scheme.

### **Village Renewal Scheme**

Again PlayBoard welcomes the intention of The Village Renewal Scheme to provide financial support for the renewal of rural villages in the form of support to relocate activities or convert buildings or facilities which are close to villages to improve the quality of life of the village community. A focus on play provision is likely to make the Village Renewal Scheme even more effective.



## 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

### **Rural Business Development Scheme**

The Rural Business Development Scheme will focus on the performance, efficiency and sustainability of existing and new rural business. PlayBoard would urge the Department to recognise the importance of play to children, young people and communities. As previously referenced, a demand exists within many rural areas for the extension of existing, or the development of new play based school aged childcare services. We would urge the department to recognise the importance of such provision both economically and in terms of child development.

Recent announcements by OFMDFM regarding an investment in play based School Age Childcare provision and a further £1.6 million investment in support of the Executives Play and Leisure Policy highlights the opportunities which exist to transform the play landscape across rural Northern Ireland.

### **Rural Business Investment Scheme**

PlayBoard welcomes the Department's key goal to strengthen the social and economic infrastructure of rural areas. We would highlight that the percentage of people under sixteen years of age is higher in less accessible rural areas compared to other areas of Northern Ireland and as such services need to be directed accordingly.

PlayBoard urge the Department to pay particular attention to the obligations set out in the recently adopted General Comment 17 on the right of the child to rest, leisure, play, recreational activities, cultural life and the arts (Article 31) of the United Nations Convention on the Rights of the Child. General Comment 17 refers on a number of occasions to the provisions required for children and young people from rural communities and children with disabilities. The general comment is very clear about the obligations of the States regarding municipal planning.

"States are obliged to ... **Municipal planning:** Local municipalities should assess provision of play and recreation facilities to guarantee equality of access by all groups of children, including through child-impact assessments. Consistent with the obligations under article 31, public planning must place a priority on the creation of environments which promote the well-being of the child. In order to achieve the necessary child-friendly urban and rural environments, consideration should be given to, inter alia:

- Availability of inclusive parks, community centres, sports and playgrounds that are safe and accessible to all children;
- Creation of a safe living environment for free play, including design of zones in which players, pedestrians and bikers have priority;
- Public safety measures to protect areas for play and recreation from individuals or groups who threaten children's safety;
- Provision of access to landscaped green areas, large open spaces and nature for play and recreation, with safe, affordable and accessible transport;
- Road traffic measures, including speed limits, levels of pollution, school crossings, traffic lights, and calming measures to ensure the rights of children to play safely within their local communities;
- Provision of clubs, sports facilities, organized games and activities for both girls and boys of all ages and from all communities;
- Dedicated and affordable cultural activities for children of all ages and from all communities, including theatre, dance, music, art exhibitions, libraries and cinema. Such provision should comprise opportunities for children to produce and create their own cultural forms as well as exposure to activities produced by adults for children;
- Review of all cultural policies, programmes and institutions to ensure their accessibility and relevance for all children and to ensure that they take into account the needs and aspirations of children and support their emerging cultural practices"

(United Nations, 2013, para. 57(f))

### **Rural Tourism Scheme**

PlayBoard would argue that the development of appropriate play opportunities has the potential to support the development and growth of rural tourism.

For many parents and families the presence of appropriate play and leisure opportunities for children and young people is a key consideration when planning day trips or longer duration holidays.

PlayBoard would urge the Department to encourage, promote and support the development of greater play provision under the Rural Tourism Scheme. PlayBoard would suggest the Department widen the types of activity to be supported to include:

- Improvements to play facilities to encourage tourism;
- Improving and developing small scale play infrastructure to encourage tourism;
- Promotion and marketing of play activities;
- Strategic tourism product development of natural and cultural heritage tourism to enhance opportunities for children and young people to play.

### **Combating Poverty and Social Isolation – Basic Services Scheme**

The consultation document refers to the commitment contained in the Programme to bring forward a package of measures to tackle rural poverty and social isolation; and to provide a firm foundation on which to identify actions that will provide basic services and improve the quality of life for those living in rural areas.

The 3 key priority areas identified in the consultation document are: access poverty; financial poverty; and social isolation.

PlayBoard would urge the Department (under the sub measure of community development and capacity building) to recognise the importance of play and support the development of existing community play infrastructure as a way of improving access to local services. Such a focus would support the tackling of play deprivation and its negative impact on physical health, mental health and social development/social isolation.

Although welcoming the Local Community Grant fund, PlayBoard would urge the local area plans to encourage addressing play as a priority, thus increasing the likelihood of applicants seeking to increase play provision within rural areas through the funding provided under this scheme.

### **Village Renewal Scheme**

PlayBoard would urge the Department to promote play provision as a means of reinvigorating villages and the quality of life of citizens.

## **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

### **All Island Co-operation Scheme**

The consultation document acknowledges that communities on both sides of the border are characterised with a range of social problems that result from the presence of the border. The document further recognises that deprivation and disadvantage can be intensified because of the border and the depletion of human capital and lack of opportunities.

PlayBoard welcomes the intention of the All Island Co-operation Scheme to provide opportunities for co-operation between Government / Councils/ other public funded bodies on a North/South basis aimed at tackling poverty and isolation e.g. as part of local community planning. PlayBoard would urge the Department to promote and support the important role of play in the lives of children and young people. It is worth remembering how Peter Townsend (1979) articulated poverty:

Individuals, families and groups in the population can be said to be in poverty when they lack the resources to obtain the types of diet, participate in the activities, and have the living conditions and amenities which are customary, or at least widely encouraged or approved, in the societies to which they belong. Their resources are so seriously below those commanded by the average individual or family that they are, in effect, excluded from ordinary patterns, customs and activities.

Given the consultation document's recognition of deprivation and disadvantage being intensified because of the border as well as the depletion of human capital and lack of opportunities PlayBoard urges the Department to promote play opportunities to enable border communities to be able to 'participate in the activities, and have the living conditions and amenities which are customary, or at least widely encouraged or approved, in the societies to which they belong' (Townsend, 1979)

Social isolation is a theme that emerges throughout Priority 6 of the consultation on the Rural Development Programme. PlayBoard would urge the Department to promote how the complementary support schemes of the All Island Co-operation Scheme could be developed on a North/South basis to target funding towards the development of play in forests, innovative play provision with a view to promoting tourism opportunities to combat relative rural poverty and in particular social isolation.

### **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

PlayBoard would suggest the Department consider extending the All Island Co-operation Scheme to address deprivation in all rural areas in the North that meet set criteria like the NIMDM 'proximity to services'. For example it is clear from census figures that there are pockets of rural deprivation throughout Northern Ireland. See:

[http://www.ninis2.nisra.gov.uk/InteractiveMaps/Deprivation/Deprivation%202010/SOA\\_Deprivation\\_Map/atlas.html](http://www.ninis2.nisra.gov.uk/InteractiveMaps/Deprivation/Deprivation%202010/SOA_Deprivation_Map/atlas.html)

# 169. Sport NI

## 1. INTRODUCTION

- 1.1 This paper provides Sport Northern Ireland's (SNI) response to the consultation on the Rural Development Programme issued by the Department of the Agriculture and Rural Development in 2013
- 1.2 SNI welcomes the opportunity to comment on this consultation as Sport Matters: The Northern Ireland Strategy for Sport 2009 – 19 (hereafter Sport Matters) has outlined the importance of outdoor recreation for increasing levels of participation in Northern Ireland. In particular, Sport Matters has outlined the need for public policy frameworks that increase and improve access to the natural environment for recreation and the new rural development programme could have the potential to support this. The countryside in Northern Ireland is extensively used for sport and physical recreation and recreational users recognise the value and importance of protecting this asset and supporting the rural communities who often manage it.

## 2. BACKGROUND TO SPORT NORTHERN IRELAND

- 2.1 SNI is a Non-Departmental Public Body (NDPB) of the Department for Culture, Arts and Leisure (DCAL) and is charged with the development of sport in Northern Ireland.

The DCAL mission is:

***To promote social and economic equality, and to tackle poverty and social exclusion, through systematically promoting a sustainable economic model and proactively targeting meaningful resources at sectors of greatest inequality, within areas of greatest objective need, in the wider context of effectively developing tangible opportunities and measurable outcomes for securing excellence and equality across culture, arts and leisure, and a confident, creative, informed and healthy society in this part of Ireland.***

2.2 SNI's vision is embedded in DCAL's vision:

***A culture of lifelong enjoyment and success in sport which contributes to a healthy, fair and prosperous society.***

In practice, this means SNI designing and implementing programmes and partnerships that will contribute to the following strategic objectives:

- increased participation in sport and physical recreation;
- improved sporting performances; and
- improved efficiency and effectiveness in the administration of sport.

2.3 SNI's business and the development of sport and physical recreation in Northern Ireland is dependent on an infrastructure of people, organisations and facilities, all of which need to be grown and sustained in the longer term.

### **3. GENERAL COMMENTS**

3.1 The Programme for Government 2008-11 "Building a Better Future" in Northern Ireland has highlighted five key strategic and interdependent priorities as follows:

- growing a dynamic, innovative economy
- promote tolerance, inclusion and health and well-being
- protect and enhance our environment and natural resources
- invest to build our infrastructure
- deliver modern high quality and efficient public services

3.2 The Rural Development Programme represents a significant opportunity to contribute to these priorities in rural communities.

3.3 SNI welcomes the new round of regional development funding and the opportunities that exist for it to contribute to the implementation of Sport Matters potential developments, opportunities and projects in rural locations.

3.4 SNI would note that outdoor and countryside recreation activities can



be a significant contributor to the health and well-being of both rural and urban communities. Sheffield Hallam University has also just completed research into the economic benefit of outdoor recreation on behalf of SNI, the Northern Ireland Environment Agency (NIEA) and the Northern Ireland Tourist Board (NITB). This research highlights that outdoor recreation across Northern Ireland contributes in excess of £103m of Gross Value Added (sum of profits and wages). It also highlighted that outdoor recreation generates more than 3,600 full time equivalent posts across Northern Ireland. Much of this is in rural areas. The new Rural Development Programme outlines a number of measures that will help to develop greater economic benefit and target social exclusion in rural areas through provision of services and tourism development.

3.5

SNI would note that access to the countryside and natural environment in Northern Ireland is significantly more restricted than is the case in any other part of the UK due to limiting access legislation and a very limited rights of way network. The rural development programme presents an opportunity to help to rectify this situation in ways that benefit farmers and land-owners as well as local communities

3.6

Therefore SNI would recommend that strong consideration is given to requirements to provide public access as a condition of certain aspects of agri-environment funding, but also to build into the funding support for insurance for landowners.

3.7

SNI would note that in previous rounds of RDP funding, grants were provided to new and existing adventure activity operators and providers in rural areas. SNI is supportive of this approach which can help to grow the rural economy. In Great Britain such providers must hold a license to operate – but the same legislation does not apply in Northern Ireland. Therefore, SNI would advise that, in conjunction with DCAL, Adventuremark is being implemented and supported as a suitable non statutory accreditation scheme for businesses and providers in this sector. SNI would recommend that DARD take into account the need for 3<sup>rd</sup> party independent inspection of safety systems, as a condition of award in this sector. Adventuremark provides the ideal mechanism for this. SNI is very willing to discuss this further with officials if required.

- 3.8 SNI, in partnership with NIEA, NITB and DCAL, has developed a new outdoor recreation action plan for Northern Ireland. The new Rural development Programme funding will be a very positive mechanism for supporting the delivery of a number of actions. One of the actions to be developed in 2014 is the establishment of a new strategic inter-agency group on outdoor recreation that will seek to ensure that the key actions outlined are being fulfilled. SNI would encourage DARD to nominate a representative to attend and contribute to this group once established.

#### **4. SNI SPECIFIC RESPONSES TO CONSULTATION**

All specific responses are provided on the consultation form

#### **5. CONTACT DETAILS**

- 5.1 For further information contact:

Mike McClure  
Outdoor Recreation Development Officer  
c/o Tollymore National Outdoor Centre  
Hilltown Road  
Bryansford  
CO. Down  
BT33 0PZ

Tel: 028 90383855  
[mikemcclure@sportni.net](mailto:mikemcclure@sportni.net)

## **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**

SNI welcomes the proposal to provide broader vocational training in the agri-food and forestry sectors. Farm diversification particularly in upland areas can provide new opportunities for sport and recreation through the provision of campsites, parking, toilets, café's and farm shops. These facilities can be shown to provide a good return for the land owner as well.

Providing opportunities to showcase existing developments and to carry out exchange visits would be helpful to develop innovation in this regard.

## **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**

Yes, SNI is supportive of this structure

### Question 13

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

#### Comment

Yes – given that only 44% of the Natura 2000 sites are in favourable condition this would be a logical approach.

Sport NI is very encouraged by the statements in 3. Woodland Environment Grant about improving the public amenity of woodlands while preserving high value forest eco-systems.

The 1983 Access to the Countryside (NI) Order is recognised by many as being the weakest access legislation across the UK and even Europe. The opportunity for the public to enjoy the benefits of the NI countryside is very low and the level of protection for farmers and landowners is also weak.

Sport NI believes that there should be measures that ensure that when grants are provided under the agri-environment scheme there should be provision for public access but also provision for a national insurance / indemnity scheme for land owners.

### Question 14

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

#### Comment

Yes

### 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 – the development of corridors for wildlife, or overall river management plans that could also be used for public amenity would be very beneficial.

Further, developing corridors of woodland under the agri-environment scheme rather than blocks would provide real added value where trails and paths could be incorporated into these. Creating longer distance paths or

paths/trails that connect rural communities and villages would be a genuine benefit of this programme. However, unless an additional incentive for co-operative working between landowners is developed then this is likely to be a lost opportunity.

SNI would therefore very strongly encourage this approach.

## 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 SNI is concerned that if the focus of the Forestry Plantation Scheme is to support larger new planting projects to deliver wood production, there will be little incentive to plant broadleaf deciduous native woodland. Northern Ireland has the lowest percentage of woodland in Europe and much of the forestry that does exist is non-native spruce species that provides poor habitats for biodiversity and also is unattractive for recreation and sport compared to native woodland.

SNI would very strongly encourage expanding the new programme to provide support for larger new native woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access.

## 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

SNI is supportive of the proposed 6 schemes to promote greater social inclusion, poverty reduction and economic development. SNI notes that one of the measures is to provide innovative health solutions.

Access to sport and physical recreation facilities in rural areas is of great importance with respect to health and well-being. The proposed capital infrastructural investment in rural based facilities is therefore a positive step to combat issues associated with rural deprivation.



### 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

There is no mention of the value of sport and recreation facilities with priority 6 of the document – although public access for amenity is alluded to in other sections.

SNI would like to see explicit mention made in any guidance documents of the value that sport and recreation has for rural communities and it could therefore be built into the following:

1. The rural tourism scheme (the development of mountain biking in Down is a good example of this)
2. The basic services scheme for combating poverty and social isolation through the development of locally based sport and recreation facilities particularly for outdoor recreation.
3. The Village renewal scheme through the provision of community path networks that connect people with essential services in ways that may not require vehicular transport.

## **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**

SNI would note that in previous rounds of RDP funding, grants were provided to new and existing adventure activity operators and providers in rural areas. SNI is supportive of this approach which can help to grow the rural economy. In Great Britain such providers must hold a license to operate – but the same legislation does not apply in Northern Ireland. Therefore, SNI would advise that, in conjunction with DCAL, Adventuremark is being implemented and supported as a suitable non statutory accreditation scheme for businesses and providers in this sector. SNI would recommend that DARD take into account the need for 3<sup>rd</sup> party independent inspection of safety systems, as a condition of award in this sector. Adventuremark provides the ideal mechanism for this.

SNI is very willing to discuss this further with officials if required.

SNI in partnership with NIEA, NITB and DCAL has developed a new outdoor recreation action plan for Northern Ireland. The new Rural

development Programme funding will be a very positive mechanism for supporting the delivery of a number of actions.

One of the actions to be developed in 2014 is the establishment of a new strategic inter-agency group on outdoor recreation that will seek to ensure that the key actions outlined are being fulfilled. SNI would encourage DARD to nominate a representative to attend and contribute to this group once established.



## 170. St Mary's GAC Rasharkin

**To:** Rural Policy Branch  
**Subject:** RDP Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To whom it may concern,

I am writing on behalf of St Mary's GAC Rasharkin to let our views be known on the Rural Development Plan. Although we as a voluntary organisation have so far been unsuccessful in attaining funding through DARD we still feel it is important to make the following points:

1. The Rural Development Programme is vitally important to the future sustainability of our rural communities including farmers and those who have no connection with farming.
2. We strongly support the priority to promote social inclusion, poverty reduction, and economic development in rural areas especially in the current economic climate.
3. The schemes proposed under Priority 6 namely, combating poverty and social inclusion/basic services scheme, village renewal scheme, support for community development and capacity building, strategic services and the local community grant fund are absolutely vital for our rural areas.
4. The LEADER approach is valuable in responding to local need and Local Action Groups should continue to distribute approximately 20% of the overall RDP budget.
5. DARD need to take on board the recommendations that will be made in the "Community Asset Transfer Report" which allows for communities to escape from programmes and services which are grant dependent to strong viable retention of services in rural areas. The new Rural Development Programme should contribute in Partnership with other Government and Statutory agencies to support the process of Asset Transfer to communities by whatever means to ensure that rural community development is sustained.
6. With the new super councils embracing community planning and probably encouraging new mechanisms for more localised service delivery it is also important that DARD fund moveable equipment which is not the case at the minute even that there is tight restrictions as to where the equipment is stored and evidence of insurance.

We are still endeavouring to develop our facilities at Townhill Road, Rasharkin for the good of the rural community of the Rasharkin area and will no doubt keep in communication with DARD in the hope that some funding will be made available to us in the future.

Regards,  
Michael Hardy  
Club Chairman

# **171. Ulster Angling Federation**

## **Ulster Angling Federation**

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

**29/08/2013**

#### **Abbreviations used in the text:**

UAF	Ulster Angling Federation
NGO	Non Government Organisation
DARD	Department of Agriculture and Rural Development

The Ulster Angling Federation is the representative body for game angling associations in Northern Ireland. We have a membership of some 60 associations with a total individual membership of some 7,000 anglers. The Federation represents anglers in discussions with Public Bodies, Government and other NGO's and has been in existence since 1930. We are represented on a wide range of committees to ensure the concerns of anglers are heard.

It is important that the natural integrity of rivers is protected to allow continuation of the natural ecology of the stream, and to allow existing fish populations to prosper.

The Pricewaterhouse Coopers Report of July 2007 for DCAL on the social and economic value of angling in NI, states that all forms of angling in NI support some 780 full time equivalent jobs, and are worth some £40m p.a. to the NI economy, mostly from game angling. If this jobs/economic benefit is to be maintained and enhanced, the provision of good water quality and satisfactory fish stocks are absolutely vital for our fisheries and tourism. The following comments are made in that light.

The UAF welcome the opportunity to make comment on the Rural Development Programme in relation to the Priority 4 "Preserving and enhancing ecosystems dependent on agriculture and forestry".

Whilst the reasons for good water quality have been highlighted it is worth remembering that 80% of land farmed and the agriculture practices used can affect water quality.

Under the five schemes proposed it is unclear what options are available. The wording used in the consultation is "A suite of options which are designed to provide financial support for specific habitat / species management on designated sites or targeted areas". Also "A suite of more general options designed to provide financial

support for habitat/species and water management to deliver benefits across the wider countryside”.

There is no clear indication to what these statements mean. Whilst any proposal to improve water quality is welcomed the UAF would prefer to see a suite of clearly defined options, such as. Dedicated in stream drinking areas, buffer strips along river banks, planned tree planting to stop erosion, payments to farmers for not spreading slurry on fields adjacent to water courses and other like initiatives. In addition these initiatives must be targeted on the worst affected areas in term of water quality to make any real difference.

DARD goes to considerable lengths to advise the public in the consultation that it engaged directly with stakeholders. The UAF represent 7,000 stakeholders who have a vested interest in water quality and something they look upon very seriously. However the Department failed to engage with us. Surely given our membership base we should have been considered a major stakeholder?

One of the key goals is to strengthen the social and economic infrastructure of rural areas. As previously detailed in this submission angling supports some 780 full time equivalent jobs mostly in rural areas. We believe DARD have missed an opportunity to expand on this through the Rural Development Programme and further consideration should be given to this option.

R F Marshall  
Development Officer  
Ulster Angling Federation

## 172. YARA International ASA

**To:** Rural Policy Branch  
**Subject:** Public consultation on Rural development Programmes: input from Yara International  
**Attachments:** 2013-10\_Yara International\_rdp\_2014-20\_consultation\_response\_form.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam,

I hereby send you Yara Internationals input to the public consultation on the Rural Development Programmes (RDP) 2014-2020. Yara International is the largest producer of mineral fertilisers in Europe and a strong advocator of an environmentally responsible agricultural sector. Yara strongly supports DARDNIs proposal to include a Nutrient Efficiency Scheme (NES) under priority number five in the Rural Development Programmes for 2014-2020. Correct fertiliser use is integral to sustainable yet intensive agricultural production, and nutrient management is an example of how greening does not have to mean a compromise between sustainability and productivity, and should be part of the RDPs in all EU member states for the period 2014-2020.

Yaras input to the public consultation on the RDPs 2014-2020 focus on the questions posed under priority number five on Resource Efficiency, question no 28, 29, and 30. The comments include practical examples on how to better incentivise farmers to do regular soils analysis, underline the importance of inviting fertiliser manufacturers to the farmer discussion groups, and agrees to the measures included under the proposed Nutrient Efficiency Scheme.

As a long-standing industry actor, we know from first-hand experience that there exists a great potential to enhance Europes nutrient use efficiency if theright incentives are put in place. Do not hesitate to contact us should you require more information about the points we raise in the comments to the public consultation, or about nutrient management and fertilisers in general.

Kind regards,  
Anna Brunzell

--  
Anna Brunzell  
Account manager

**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 28**

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

Comment

The introduction of the Nitrates and the Phosphate Directives have increased soil testing in Northern Ireland, but farmers need stronger financial incentives to enforce more regular soil tests. Soil testing is the building block for plant nutrient advice, and consequently for on-farm nutrient planning. The key to incentivize farmers lies in giving them financial encouragement to undertake both soil testing and nutrient plans.

Yara International propose that the Rural Development Scheme for Nutrient Efficiency should include **a requirement and/or predefined expectation for a certain number of soil samples per year, to be demonstrated on a yearly basis by each farm receiving funding under the Nutrient Efficiency Scheme**. In practice this would mean that each farms single payment is linked to the requirement to carry out this predefined number of soil samples per year.

**Question 29**

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

Comment

Yara agrees that government authorities should establish more in-depth discussions with local stakeholder organisations such as AIC Ulster farmers Union, Ulster Grassland Society, Ulster Arable Society, University and College researches.

**In addition to farmer discussion groups, the local government should invite local fertilizer manufacturers to partake in the discussion groups.** Fertilizer manufacturers are part of the supply chain in Northern Ireland and can add value in the knowledge transfer chains as well as give first hand experience from new technology.

**Question 30**

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

Comment

Yara consider these measures reasonable and agree that they should be included in the Nutrient Efficiency Scheme (NES).