

Options on Basic Payment Scheme Entitlement Unit Values Post 2019: Stakeholder Engagement

Stakeholder Responses

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Agricultural Consultants Association (Northern Ireland)

From: D RANKIN

Sent: 30 September 2019 14:54

To: DAERA NI Future Agri Policy <NIFutureAgriPolicy@daera-ni.gov.uk>

Subject: Options for Basic Payment Scheme Entitlement Unit Values Post 2019

The Agricultural Consultants Association (Northern Ireland) discussed the Stakeholder Engagement on Basic Payment Scheme Entitlement Unit Values Post 2019 at length during our AGM on the 24 September 2019 and the unanimous decision was to respond as thus:

We, the Agricultural Consultants Association (Northern Ireland) cover all areas of Northern Ireland, completing Single Application Forms for a wide cross-section of agricultural businesses, as well as giving advice in relation to entitlements.

We felt that there would be winners and losers with the two potential options and we did not want to be seen as supporting one section of farmers versus another section.

I hope you understand our position.

David

David Rankin

Chairman ACA (NI)

Belfast Hills Partnership

From: Jim Bradley

Sent: 19 September 2019 10:30

To: DAERA NI Future Agri Policy <NIFutureAgriPolicy@daera-ni.gov.uk>

Subject: Options for Basic Payment - Belfast Hills Farmers Response

I have been asked by the Belfast Hills Farmers to submit the following response to the DAERA consultation on Options for Basic Payment Scheme Entitlement Unit Values Post 2019. In answer to your questions posed regarding this, the Belfast Hills Farmers have a specific response to Question 2 only:-

2. What is your preferred option and why?

“Our preferred option is to continue towards the Flat Rate by 2021 i.e Option 1 as this represents the best way to mitigate for the loss of ANC payments for SDA farmers. Option 1 is vital for the SDA farmers who are key primary producers of beef and lamb for the rest of the industry. This will maintain farming in these areas as a key part of landscape and environmental management and also the specialist irreplaceable knowledge of these SDA farmers.”

Please confirm receipt of this response

Kind regards

Jim

Dr. Jim Bradley
Partnership Manager

Belfast Hills Partnership

John Blaney

From: John Blaney

Sent: 30 September 2019 08:16

To: DAERA NI Future Agri Policy <NIFutureAgriPolicy@daera-ni.gov.uk>

Subject: Options For BPS Entitlement Unit Values Post 2019

Hi

My name is John Blaney and my email address is [REDACTED] and I am responding on behalf of my farm business.

My preferred option is Option 1 i.e. 'Continue the transition towards a flat rate payment by 2021'. In 2015 when the decision was taken to implement a 7 year transition period land in the disadvantage areas had additional support through ANC payments in recognition of the restraints in farming in these areas.

That additional support has been removed and in doing so negated any increased financial support given by 2 transitional steps in BPS and in some cases more than 2 transition steps.

Most of the other countries in the British Isles will have completed the transition to flat rate payments by 2019.

John Blaney

Allan Chambers

Options for Basic Payment Scheme Entitlement Unit Values Post 2019: Stakeholder Engagement Questions

1. What are your views on the two potential options presented in this engagement paper?

Given that almost the whole industry supports the retention of entitlements for the foreseeable future, then the two potential options are the only possible ones available to the claimants of BPS and greening.

2. What is your preferred option and why?

My preferred option is to freeze the current rates at the 2019 value. I hold the view that the current transition to a "flat rate" across the total land area of NI is wrong. It cannot be sensible that a 500 hectare hill farm is funded at the same rate per hectare as a 100 hectare productive lowland farm (assuming both are farmed to their productive capacity). England got it close to right with different payments attached to three differing land types.

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

None

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

None

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

DAERA need to tighten up the current rules around claimant eligibility. There are still far too many "sham" agreements between farmers and landowners whereby the landowner still picks up the S F P by devious means. A campaign should be mounted appealing for "whistle blowers" to come forward and accountants should have to sign off claims stating that their clients, who claim this payment, are the MAJOR risk takers and decision takers in all the income and expenditure involved in farming the claimed land.

6. Are there any other comments you wish to make or evidence you wish to present to the Department?

DAERA must use the years 2020 & 2021 to redefine the definition of farmland which is in "good agricultural condition" Organisations such as CAFRE, AFBI, the UFU and NIAPA, should be tasked with arriving at an agreed definition for the afore. Currently any field which is growing any type of grass/crop, irrespective of its ability to produce anything, seems to satisfy the criteria to qualify for receipt of SPF on the field in question.

DAERA have stated that, despite European Funding, the productivity of NI land based farms has not improved. Why? The answer is simple. When over one third of the land area is rented out under the "conacre" system, by "wealth retaining" landlords who, in the main, have no understanding of how to care for farmland, and the other two thirds of the area being farmed by owner occupiers, many of whom do not understand how to bring their soils up to productive capacity then improving productivity is simply not possible.(Recent soil analysis surveys back up this statement.)

DAERA can immediately show its determination to change the way future farm support is obtainable by upping the standards required to meet "good agricultural condition" to a level that requires high land management skills. A good start would be to enforce the "Noxious Weed Act" to ensure no further funding goes to those who blatantly ignore the law.

New thinking is needed if NI farming is to survive whether in or out of the European Union.

Democratic Unionist Party

Options for Basic Payment Scheme Entitlement Unit Values Post 2019: Stakeholder Engagement Questions

1. What are your views on the two potential options presented in this engagement paper?

As a matter of principle the DUP has not been supportive of moving to a land based payment because it does not recognise fully the need to support our farmers. We want an agriculture policy which supports profitability, productivity and sustainable production and unfortunately the current CAP does not meet these needs. This can be evidenced when I voted against the current CAP and my opposition to moving to a flat rate land based payment across Europe.

The DUP recognise the need for direct support to farmers and without this many family farms would not survive. For this reason the DUP ensured that in the current scheme NI farmers did not move to a flat rate payment over night which would have been detrimental to many family farms.

There is an opportunity to design a more effective agriculture policy for delivering direct support through the UKs Agriculture Bill including flexibility for devolved regions. We will continue to lobby for the interests of all our farmers in this matter.

Therefore, neither of the two options outlined are ideal. However, on balance and given the potential uncertainty within the sector and the difficulties facing beef farmers in particular we would be in favour of freezing the unit value of entitlements.

However, the DUP regrets that a devolved Government is not in place in Northern Ireland to make this important decision.

2. What is your preferred option and why?

The DUPs preferred option would be to freeze the unit value of the entitlements at the end of 2019.

Brexit affords the opportunity for Northern Ireland to design a scheme which is tailored to the needs of our family farms and this is a task we should all be focused upon. Therefore, given the need for a new scheme this is an appropriate juncture to freeze payments at 2019 levels. It will also provide farmers with additional certainty going forward.

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

None

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

None

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

None

6. Are there any other comments you wish to make or evidence you wish to present to the Department?

W Donaldson

Re Stakeholders Views on Transition

Firstly I note the legal position on further transition but do nevertheless agree with seeking stakeholders views.

My overall view is that prior 2005 EU concluded that the administrative costs of subsidy payments was so financially demanding that payment based on history was a better option. That was sound judgement despite it leading to winners and losers – fraud being a different matter. At that time family farms were getting a living from their holdings – both intensive farmers on small holdings and hill or marginal land holders on large acreage.

That was basically a level playing field derived over generations i.e. one with supporting a family on 25-30 Ha while the other was doing likewise on 100-150 Ha on hill land. Larger estates/farms justly get higher levels of payment as does larger business as opposed to smaller ones.

Latest figures from DAERA show that currently hill famers are by far the higher recipients of Basic Payments even though their receipts per Ha can be far in excess of throughput. How can that be right?

To freeze Payments is clearly my favourite option. My thinking on that can be deduced from my assessment as above. To do otherwise turns rationalisation on it's head. To continue Transition through to 2020 would be absolute travesty of justice and fairness.

Reference has been made by DAERA to small medium and large farmers. In the interests of benchmarking I would welcome the Department's definitions on same e.g. how is a horticulturist or mushroom grower turning over millions on 2-5 Ha compare with an expansive hill farmer turning over £20,000 exclusive of subsidies. Furthermore, does the number and value of entitlements come into the reckoning?

W Donaldson

Alistair Henry

From: alistair.henry

Sent: 22 July 2019 00:48

To: DAERA NI Future Agri Policy <NIFutureAgriPolicy@daera-ni.gov.uk>

Subject: Basic payment scheme options

Hello, here is my responses to the questions about the future basic payment scheme 2019 survey

Q1 the two options presented are both fairly sensible, both will benefit some farmers and both will disadvantage some farmers, you cant have it pleasing everyone

Q2 I would prefer to see the payments keep going until everyone is getting the same flat rate, ie everyone will be on a level playing field because at the minute there are smart farmers getting far too much payment and small simple farmers not getting enough. It is very de meaning to anyone when they are working [REDACTED] and their neighbours entitlements are far far more than their own. Everyone should be treated the same.

Q3 nothing to comment on about this question

Q4 nothing to comment on about this question

Q5 nothing to comment on about this question

Q6 I would like DAERA to actually start working for the farmer, not against him with unworkable rules coming from the E.U. STAND UP FOR ONCE AGAINST THE E.U AND SUPPORT THE FARMER ! If it wasn't for all us farmers, no DAERA staff would be in a job, remember that every time you have breakfast, dinner or tea.

Alistair Henry.

Glenn Kilkey

From: Glenn Kilkey

Sent: 18 September 2019 21:18

To: DAERA NI Future Agri Policy <NIFutureAgriPolicy@daera-ni.gov.uk>

Subject: View on BPS as per your advert in Farming Life 3/8/19

Hi,

I am a beef farmer and my family farm has been in operation for many generations.

I support the move to a transition towards the flat rate as already planned and communicated to the farming community over the past number of years.

I have used the previous communication on this matter to plan my business for the future so am unsure why this is now considered something that can be changed.

Can you advise why you are now seeking views on this matter and what the constitutional basis is for this request.

I also notice that the farming community have had digital communication on other matters of importance and targeted communications but not on this occasion. Can you confirm that DAERA have specifically communicated to individual farm businesses that are likely to loose out based on the outcome of this engagement exercise?

It is no longer acceptable to just place an advert in a newspaper and expect that farm business will see it, the technology and market intelligence is available to DAERA and you have a duty to inform businesses of the consequences.

I look forward to hearing from you on these matters and confirmation of receipt of this e mail.

Regards

Glenn Kilkey

Northern Ireland Agricultural Producers' Association

We find that this stakeholder engagement is purely academic, the information regarding legal issues contained in the document would seem to mitigate against any change.

This document is based on Regulation EU No 1307/13 Article 25 (8) which at present applies, yet we are discussing the situation post 2019 when continuation of the transition is not deliverable under the current legislative framework.

Even if we leave the EU if we do not have revised domestic legislation then the unit value would have to be frozen at 2019 rates for future years.

With regard to DAERA and legal vires and in the absence of a Minister it is presumed that the powers of Permanent Secretary are limited and decisions could fall into the realm of ultra vires.

At present we have no executive; no minister; turmoil in Westminster; an agricultural bill in limbo and therefore it would seem no choice but to maintain the status quo.

We do however have an industry in dire straits facing an uncertain future with livelihoods of farm families at stake.

We have had ANC payments withdrawn from our upland areas which have to be maintained.

We have a crisis in our beef industry with a negative impact on our suckler production which is reducing daily.

We have milk prices which will not sustain businesses never mind development of businesses.

Likewise with lamb.

We do not know the potential format of future single farm payments/or entitlements and seem to be presented with a fait accompli therefore if we cannot legally have change we cannot comment further until we have clarity on future prospects.

Ross Patterson

From: Karen Patterson

Sent: 10 July 2019 21:13

To: DAERA NI Future Agri Policy <NIFutureAgriPolicy@daera-ni.gov.uk>

Subject: Consultation

I would prefer option of freezing BPS entitlement values. Taking support from more intensive farms which generally provide more employment to local area than extensive sheep farms in the mountainous areas is neither fair nor sensible.

Ross Patterson

Sinn Fein

September 2019

Sinn Fein Submission to Options for Basic Payment Scheme Entitlement Unit Values Post 2019: Stakeholder Engagement

Introduction

Sinn Féin welcomes the opportunity to respond to the consultation on Options for Basic Payment Scheme Entitlement Unit Values Post 2019. Sinn Fein have worked hard to ensure that economic and social needs of people living in rural areas feature prominently within government policy giving a voice to the almost 40% of people in the north living in rural areas.

Farm payments are a recognition of the role played by farmers in the management of the environment, creation of employment and the development of communities in rural areas across the island of Ireland. It is important farm payments address need, tackle inequality in the system and ultimately develop the agricultural sector and rural communities.

Support for transition to flat rate payments

The north of Ireland is a major beneficiary of the European Union's Common Agricultural Policy (CAP) funding. CAP funding is worth in excess of £2.3 billion (2014-2020) and accounts for 87% of annual farm incomes. CAP payments are vital to the viability of agriculture in the north, and to the industry on the island of Ireland as a whole.

Sinn Fein have consistently supported full convergence of CAP farm payments to a flat rate payment per hectare. We strongly support the continued transition towards a flat rate payment by 2021 in the north of Ireland [Option 1].

Sinn Féin Minister for Agriculture and Rural Development Michelle O'Neill introduced reform to CAP payments in the north of Ireland in 2014. This set out the move to a flat-rate payment per hectare over a seven year transition period starting in 2015 to be completed in 2021. The 7 year transition period provided a reasonable time for the industry to adjust to the changes whilst moving towards a support regime that is fair, and which addresses inequality in funding which disadvantaged smaller, family based farms and those in severely disadvantaged areas (SDAs).

Sinn Fein believe that moving to a flat-rate is more beneficial to local economies as ensuring the survival of small family farms has a knock on effect for local agri businesses like co-ops, vets, marts and agri-contractors. It will also benefit the local economy and communities more generally helping maintain the population in rural areas to keep schools, shops, restaurants etc. open.

Furthermore, greater support for small farms has more environmental benefits than supporting large intensive farming practices, especially in SDA's where land management and biodiversity are very important.

Sinn Fein opposes the option to freeze the unit value of the entitlements at the end of 2019 as it would be unfair, and would allow the remaining inequality in payments

to persist by delaying full convergence to a flat-rate payment per hectare for all farms.

Sinn Féin believe that deviating from the transition to a flat rate would create further uncertainty for farming families and businesses, particularly in severely disadvantaged areas (SDAs), at a time of unprecedented turbulence within the industry in the context of Brexit.

Areas of Natural Constraint

Full convergence, or transition, to a flat rate payment is an important move in addressing inequality in the agricultural sector and as such, it must be achieved within the 7 year timeframe set out by Sinn Féin Minister Michelle O'Neill and endorsed by the Executive in 2014. However, transition to a flat-rate payment does not by itself address the difficulties facing farmers in severely disadvantaged areas who face constraints relating to the quality, topography and/or location of their land.

Sinn Féin Minister Michelle O'Neill, in addition to introducing a transition to a flat-rate of farm payments, initiated the Areas of Natural Constraint (ANC) Scheme in 2016 as a support mechanism for farms in disadvantaged areas, such as hill farms. The ANC scheme was a clear recognition of the need for a bespoke response – in addition to the move to a flat-rate payment – to inequalities in the system. Such inequalities are recognised in the south of Ireland and Scotland, both of whom have ANC schemes, which they have committed to continuing.

Sinn Féin appreciate that farmers in severely disadvantage areas are 'restricted' and face additional challenges due to the limitations placed on them by their geography and environment, however, they are an important element of a highly integrated farming system. For example, it is common practise for dairy farmers to buy hill-reared lambs to graze their land during the winter season. Also, beef farmers in the ANC areas raise calves and sell them on at 'suck sales' to farmers in the lowland areas to fatten and finish.

Sinn Féin opposes the decision taken by the DUP Minister for Agriculture Michelle McIlveen to end the ANC scheme payment with the consequence of recreating inequalities and resulting in the loss of £20 million a year to farmers in severely disadvantaged areas.

Sinn Féin disagree strongly with DAERA's analysis in its February 2016 consultation on "options for Future Support to Areas of Natural Constraint" that the 'redistribution of pillar 1 support in favour of SDA is a 'hugely significant mitigation'. We also disagree with DAERA's view that redistribution of Pillar 1 would 'contribute significantly towards compensating SDA farmers for the cessation of the ANC Scheme'. Flat-rate payments will not address the geographical and topographical challenges facing severely disadvantaged areas or sufficiently fill the gap created by the ending of the ANC scheme.

Section 75

The department have identified no impacts on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories.

However the department have outlined on page 12 of their consultation document that *“over 80% of the redistribution of direct payments that would have occurred in moving to a flat rate payment from the initial position in 2015 will have taken place by the end of 2019”*.

Can the department provide:

- Provide a breakdown of those who will not have reached the flat-rate payment by 2019 under the nine S75 equality groups?
- Provide the number of farmers in Areas of Natural Constraint who will not have reached the flat rate payment by 2019?
- Provide the number of farmers living in non-ANC areas who will not have reached the flat rate payment by 2019?
- Outline what mitigation measures have been put in place for those farmers who will not reach full flat rate payment by 2019?
- identify what impact there will be, if any, on young farmers (who have joined the scheme this year) not reaching the flat rate by 2019?

What mechanisms has DAERA employed in determining no impact on the nine equality groups in assessing Equality of opportunity?

How has DAERA used the Brown Principles (ANNEX 1) in assessing whether due regard' has been given in conducting an equality screening assessment on the equality groups who may be impacted by the option of freezing the unit value of the entitlements at the end of 2019?

Rural Needs Act

It must be recognised and taken into account when developing policy the exceptional adverse challenges of farming in ANC areas and the importance of the department fulfilling its statutory obligation under the Rural Needs Act to pay 'due regard' to this and introduce mitigating measures such as the full transition towards a flat rate and the restoration of the ANC annual payment.

Can the department outline in detail how the Brown Principles (ANNEX 1) were utilised in providing a basis of assessing whether the obligation to have 'due regard' has been met in conducting a Rural Needs Assessment?

Conclusion

Sinn Féin strongly support the continued transition towards a flat rate payment by 2021 in the north of Ireland [Option 1]. This is important in providing equality of payments for farmers in the north of Ireland and delivers a fairer system which will be

economically and environmentally more beneficial and sustainable. Further support, in addition to the transition to a flat-rate payment, is required to address the challenges facing farmers in severely disadvantaged areas and Sinn Féin are calling for the re-instatement of the ANC Scheme payment.

Sinn Féin recommends that the department initiate a study of the economic benefits for local communities as a consequence of the subsidies local farmers receive. The study should also consider the consequences for communities of local farmers going out of business.

ANNEX 1

The Brown Principles established in case law could be summarised as follows:

- **Knowledge** - Decision makers should be aware of the implications of the duty when making decisions about their policies and practices;
- **Timeliness** - due regard must be paid before and at the time that a particular decision is being considered, not later. Attempts to justify a decision as being consistent with the exercise of the duty when it was not, in fact, considered before the decision, are not sufficient to discharge the duty;
- **Analysis must be rigorous** - must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision. Not a box ticking exercise;
- **Non-delegable** – will always remain the responsibility of the body subject to the duty;
- **Continuing duty** – ongoing and must be revisited;
- **Record keeping** - encourages transparency and provides evidence of duty being fulfilled.

Sustainable Food Trust

Daera Consultation Options for Basic Payment Scheme Entitlement Unit Values Post 2019 Sustainable Food Trust Response

August 2019

Introduction

- The Sustainable Food Trust welcomes the opportunity to provide a written response to Daera's consultation into basic payments and would be pleased to provide further information, or to elaborate on any points.

- The Sustainable Food Trust (SFT) is a small UK based organisation, established in 2011, that works in the UK and internationally to accelerate the transition to more sustainable food systems. We focus our work in three main areas:
 - Leadership and Collaboration: Influencing leaders and policy makers
 - Research and Policy: Enabling policy change based on sound science
 - Communications: Acting as a source of information, sharing ideas and empowering citizens

Questions

1. What are your views on the two potential options presented in this engagement paper?

No response

2. What is your preferred option and why?

No response

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

No response

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

No response

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

Basic Payment Scheme (BPS), which make up Pillar I funding under the EU's Common Agriculture Policy (CAP), have come in for widespread criticism in recent years. Most of the money has gone to large landowners, and the payments have been available to all farms regardless of their production methods. While the Sustainable Food Trust (SFT) accepts that the mechanism of area-based payments under CAP is flawed, we believe that there is value in maintaining a system of area-based payments, since a sustainable food system would be most effectively delivered through a support package based on land area; whether that is field-by-field, hectare-by-hectare or whole farm scale.

The SFT believes that it is essential to bring about a systemic shift towards more environmentally-sustainable farming methods, rather than piecemeal approach to environmental stewardship. Our concern is that BPS does not acknowledge the environmental impacts that different farming methods have on the landscape, and instead reward all farmers regardless of the damage they cause. While we recognise that there is a social security element that exists within the current BPS that needs to be maintained to support rural economies, we would suggest that Daera only provide Basic Payments to farmers who are managing their land in a way that is environmentally sensitive and does not damage the local ecosystem. Farmers whose method of production is environmentally damaging (i.e. using excessive quantities of synthetic fertiliser or spraying pesticides) or violates basic animal welfare standards should be exempt from BPS.

We believe that, in order to eligible for the receipt of public money (including basic payments), farmers should be required to complete a sustainability assessment (based on a harmonised framework of indicators and metrics) each year in order to demonstrate how their farming methods are impacting the local environment, whether positively or negatively. The benefit of the assessment would be that it would allow

Daera to have a better understanding of the situation in Northern Ireland for each specific public good, such as biodiversity and net carbon emissions. This data would then allow for more targeted interventions to help to meet the stated goal. Additionally, farmers could benchmark themselves to show that they are delivering on their commitments. For the assessment to be comprehensive, there needs to be a blend of specific targets, proxies and hard data collection methods. These would include (but not limited to) monitoring:

- Soil organic carbon levels and microbial life
- Air and water quality
- Levels of on-farm biodiversity
- Energy and resource use efficiency
- High welfare management of livestock
- Climate change mitigation
- Social and cultural benefits

6. Are there any other comments you wish to make or evidence you wish to present to the Department?

No response

Ulster Farmers' Union



475 Antrim Road
Belfast
BT153DA

T: 02890370222
F: 02890371231
E: info@ufuhq.com
W: www.ufuni.org

Dear Rosemary,

Ref: - Options for Basic Payment Scheme Entitlement Unit Values Post 2019

Thank you for the opportunity to respond to the above consultation.

The UFU have considered the consultation in great detail within its committee structure. Given the position that DAERA do not have the legal vires to implement any change in the unit value of entitlements in the 2020 Scheme Year in the absence of a minister, the UFU do not feel that there is any reason to respond at this time. We would ask DAERA to contact the UFU as and when it is appropriate for them legally to make this decision.

The UFU would like to highlight that members in the severely disadvantaged areas (SDA) will financially lose out while the entitlements are frozen in 2019. Almost 50% of Northern Ireland's suckler cows and 60% of our ewe population reside on these farms. This breeding population produces a significant quantity of livestock that are then used for further breeding or finishing on lowland farms. Production in hill areas is therefore of huge strategic importance in the context of supporting the red meat industry in Northern Ireland. The UFU continues to argue for the reinstatement of the Area of Natural Constraint (ANC) scheme. Worth £20 million to hill farming businesses and providing a vital support mechanism for SDA areas, a decision to reinstate the ANC scheme would make an invaluable contribution to Northern Ireland's red meat industry, our economy, the environment and our rural communities.

We look forward to engaging with DAERA in the future on this matter.

Yours sincerely

A handwritten signature in black ink that reads 'Ivor Ferguson'.

Ivor Ferguson
President, Ulster Farmers' Union