

# CONSULTATION ON OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT

## CONSULTATION RESPONSES

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## **ORGANISATIONS**

### **Belfast Hills Farmers Group**

Policy and Economics Division  
Department of Agriculture and rural Development  
Room 361  
Dundonald House  
Upper Newtownards Road  
Ballymiscaw  
Belfast  
BT4 3SB

22/4/16

Dear Sir/ Madam

### **DARD CONSULTATIONS**

I have been asked to pass on the enclosed which are the considered responses of the Belfast Hills Farmers Group to the following consultations:-

Consultation A. Designation of Areas of Natural Constraint  
Consultation B. Options for future support to Areas of Natural Constraint  
Consultation C. Review of CAP Coupled Support Options.

Can I add that The Belfast Hills Farmers Group hope the attached is of use, appreciate the opportunities to have input into such important changes to local agriculture and would welcome any other opportunities to assist with such policy development.

Yours faithfully

Jim Bradley  
Partnership Manager  
Enc.

BELFAST HILLS FARMERS RESPONSE April 2016

B. Options for future support to Areas of Natural Constraint

Q1. In the Table below, please rank in order of preference (where 1=most preferred) at least your top three options  
Option

Preference (1=most preferred)

1 Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last

2a An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually 3

2b A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years

3 A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer

4 A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined

5a An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive 1

5b A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive 2

Please explain the reasons for your preferences.

5a and 5b avoids a scaleback.

Q2. Which option(s) would you strongly oppose and why?

The Option 1 Do Nothing.

Q3. If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your top three options

1 Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last

2a An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually 1

2b A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years 2

3 A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer

4 A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined 3

Q4. Are there any other options which you believe the Department should consider? If so, please give details.

No.

Q5. Any further comments that you would like to add?

There no longer is any DA ground therefore the 'red' and 'green' lines should be amalgamated as a single non-SDA region. It is our understanding that there are only two designations – SDA and Lowland. This gives an entirely different picture with SDA at the bottom of the pile rather than a misrepresentation which shows SDA as supposedly at the top. We would ask that all option graphs are redrawn and used to reflect this as soon as possible.

## **Board of the Belfast Hills Partnership**

Policy and Economics Division  
Department of Agriculture and rural Development  
Room 361  
Dundonald House  
Upper Newtownards Road  
Ballymiscaw  
Belfast  
BT4 3SB

22/4/16

Dear Sir/ Madam

### **DARD CONSULTATIONS**

Please find enclosed the considered responses of the Board of the Belfast Hills Partnership to the following consultations:-

Consultation 1. Designation of Areas of Natural Constraint  
Consultation 2 .Options for future support to Areas of Natural Constraint  
Consultation 3. Review of CAP Coupled Support Options.

Can I add that we hope the attached is of use, appreciate the opportunities to have input into such important changes to local agriculture and would welcome any other opportunities to assist with such policy development.

Yours faithfully

Jim Bradley  
Partnership Manager  
Enc.

## **Consultation 2 .Options for future support to Areas of Natural Constraint**

Our first preferred option would be 5a - An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive, our second preferred option would be 5b - A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive, and our third would be 2a - An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually.

5a and 5b are our main preferences because they do not represent a scaleback or clawback of other supporting funds.

Our least favoured option is 1 Do Nothing which would be a disaster for local farming and upland farming in particular.

If no additional national funds are available (i.e. Option 5a and 5b are not possible), then;- Our first preferred option would be 2a - An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually, our second preferred option would be 2b - A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years, and our third would be 4 - A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer.

**Council for Nature Conservation and the Countryside**

**COUNCIL FOR NATURE CONSERVATION  
AND THE COUNTRYSIDE**  
**An Advisory Council to the Department of the Environment**

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29<sup>th</sup> April 2016

VIA Email: [policy.development@dardni.gov.uk](mailto:policy.development@dardni.gov.uk)

Policy and Economics Division  
Department of Agriculture and Rural Development  
Dundonald House  
Upper Newtownards Road  
Ballymiscaw  
Belfast  
BT4 3SB

Dear Sir/Madam

Please find attached the responses of the Council for Nature Conservation and the Countryside to the following consultations

Consultation on Options for Future Support to Areas of Natural Constraint.

Consultation on Designation of ANCs.

Yours faithfully,



Dr. A.H. Kirkpatrick  
Chairman CNCC

## **Consultation on Options for Future Support to Areas of Natural Constraint: a response from the Council for Nature Conservation and the Countryside.**

CNCC would wish to make the point that the potential currently exists to develop a strategic level vision for Northern Ireland's uplands so that they can provide a greater range of services to society within the sustainable development paradigm. We are fortunate that we still retain much of the building blocks for the three pillars of sustainable development ie the environmental, social and economic bases but these are under pressure. Northern Ireland, unlike some other regions, still has people living and working in the uplands, though the farming population is getting older. The international importance of the heaths and blanket peat of our uplands is recognised in the designation of SACs and SPAs under the EU 'Habitats' and 'Birds' Directives and their landscape value in the extent of the uplands classified as AONBs. The potential of upland landscapes to contribute to the growing tourism industry here is also recognised. However, external economic forces related to world markets are impacting on traditional farming which has shaped the countryside that is so valuable as a tourist product and this poses a threat to certain habitats and species which depend on these practices. These forces also threaten the local social and cultural capital which is key to developing a sustainable economic future for these areas. We would therefore argue that it is in the wider public interest that at DEARA, or even Executive level, a strategic level vision for the uplands is developed and articulated sooner, rather than later, when this social and cultural capital has been lost. This needs to be taken forward in parallel with the development of the post 2020 CAP to secure a viable long-term future for these landscapes and communities.



**Q1.** In the Table below, please rank in order of preference (where 1=most preferred) at least your **top three options**. Please explain the reasons for your preferences.

The critical question is whether the payments under the single region model will be sufficient to maintain livestock farming in the SDA. CNCC's concern would be that habitats which require grazing to maintain their biodiversity interest might no longer be grazed. In the case of designated sites maintenance of the nature conservation value involves more than the declaration of protected area status. The system which contributes to the maintenance of that interest also has to be taken into account.

Ranking 1

2a                      An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually

Ranking 2

2b                      A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years

Ranking 3- though this choice is dependent on the Pillar 1 payments

being sufficient to maintain livestock farming. If it is not and land is abandoned it will make it more difficult to secure a positive long-term and sustainable future for the uplands via the post 2020 CAP.

- 1 Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last
  
- 3 A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer
- 4 A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined
- 5a An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive
- 5b A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded

from the NI Executive

**Q2.** Which option(s) would you strongly oppose and why?

While *strongly oppose* might be too strong a phrase we recognise that the Executive is dealing with budget constraints and realistically transferring £20 million from that budget into the ANC scheme would be very difficult to justify given all the other demands on public money. If the Executive decides it wishes to make money available to pay farmers for delivering certain public goods there may be more focused means of achieving this, whether for biodiversity goals or for activities that reduce the costs of flooding or water treatment to the public purse.

**Q3.** If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your **top three options**

**Preference (1=most preferred)**

1

Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last An ANC Scheme in Pillar I from the 2017 claim year

2a

- using 5% of the Pillar I budget annually
- 2b A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years
- 3 A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer
- 4 A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined

**Q4.** Are there any other options which you believe the Department should consider? If so, please give details.

**Q5.** Are there any further comments that you would like to add?

CNCC notes that the 2009 Review by DARD recognised a general consensus that support should continue with a more explicit set of environmental objectives. We would therefore suggest that in seeking to influence the shape of the post-2020 CAP DAERA should look for

opportunities to support farming systems that make an important contribution to achieving EU targets for biodiversity and achieving the aims of the Nature Directives. The new departmental structures should create synergies that increase the capacity to engage with these issues. The alternative could be a situation where the costs of meeting statutory obligations under these Directives becomes a cost to the Department from the domestic budget.

## **National Trust**

**Sent:** 29 April 2016 15:23

**To:** Policy Development

**Cc:** Henderson, Alistair; Irvine, Rhona; Ruddock, Diane; Davidson, Phil; Henry, Fiona

**Subject:** National Trust response to DARD consultations on Areas of Natural Constraint

Dear Sir/Madam,

Please find attached the National Trust's response to the consultations relating to Areas of Natural Constraint.

If you would like any further information on any aspect of these responses, please contact either myself or Rhona Irvine, Rural Surveyor .

Thank you

Malachy Campbell

Malachy Campbell

External Affairs Consultant

t National Trust

Northern Ireland

## **OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT**

RESPONSE FROM THE NATIONAL TRUST – April 2016

### **Introduction**

The National Trust, as a conservation charity, looks after many of Northern Ireland's most special and beautiful places and we are committed to passing these places on to the next generation for their enjoyment too. We open these special places to visitors, both local people and tourists, and our charitable income is invested in the long term care and conservation of these places.

We care for and provide access to many of the places visitors value most, for example Northern Ireland's only World Heritage Site at the Giant's Causeway; our highest mountain, Slieve Donard, the internationally important and beautiful Strangford Lough, and houses and gardens including Mount Stewart and Rowallane

in Co. Down, and Florence Court and Castle Coole in Co. Fermanagh. We contribute to maintaining Northern Ireland's local heritage, for example through care for and investment in villages such as Cushendun. Co. Antrim and Kearney, Co. Down.

The way in which much of the land in our care is farmed is crucial to passing it on in good condition to the next generation and we work closely with our farm tenants to ensure our land is good for nature and good for people.

**Q1.** In the Table below, please rank in order of preference (where 1=most preferred) at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	3
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	1
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	2
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	

Please explain the reasons for your preferences.

The National Trust understands that the ANC is income support and comes from Pillar 1. Its use is to provide support in areas where farming is difficult due to natural reasons and to avoid land abandonment.

**Q2.** Which option(s) would you strongly oppose and why?

The National Trust does not support a Pillar 1 to Pillar II transfer for ANC support as it is an income support mechanism. It would be better if the money went to fund agri-environment schemes with incentives to enable farmers to deliver a range of conservation goals and ecosystem services which are highly valued by society, in line with the principle of payment

of public funds for public goods. Such support should be accompanied by an appropriate advisory service working in partnership with farmers to ensure the best outcomes.

**Q3.** If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	3
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	1
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	2
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	

**Q4.** Are there any other options which you believe the Department should consider? If so, please give details.

DARD should transfer money from Pillar 1 to Pillar II to invest in agri-environment schemes with targeted support which enables farmers in Areas of Natural Constraint to participate, enabling more conservation friendly farming with good outcomes for high nature conservation land.

**Q5.** Any further comments that you would like to add?

The Trust has no further comments at this time.



## National Beef Association

### OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT CONSULTATION RESPONSE PROFORMA

**Q1.** In the Table below, please rank in order of preference (where 1=most preferred) at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	7
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	4
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	5
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	3
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	2
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	1
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	6

Please explain the reasons for your preferences.

The ANC s of Northern Ireland are rich in beauty and diversity, they also provide a rich source off naturally produced store cattle and sheep. We feel

pressures are going to be placed against the uplands in the name of higher output systems in the lowlands. The vast majority of upland farmers in Northern Ireland are less than 100 hectares and are mostly part time. It is better to keep these people preserving the beauty and producing than it is to allow the landscapes to become an abandoned wilderness which has happened in many other upland regions of Europe, where people have simply walked off the land.

These upland systems provide high nature value farming which needs properly financed.

**Q2.** Which option(s) would you strongly oppose and why?

Doing nothing is crazy it's sticking your head in the sand and hoping everything treacherous will go away.

It would be much better to support a long term payment in the uplands which was directed towards native hill breeds both cattle and sheep using continental terminal sires, which would allow growth rather than having a couple system which restricts growth of cow herds and sheep flocks.

**Q3.** If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	5
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	2
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	4

3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	3
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	1

**Q4.** Are there any other options which you believe the Department should consider? If so, please give details.

**Dard should consider an upland payment for all native breeds of hill livestock using continental terminal sires to encourage extensive grazing to be managed properly and also at the same time creating a lower cost store beef or sheep by-product to be sold to lowland producers to finish.**

**The problems associated in most cases in Northern Ireland in upland regions many upland farmers do not have enough lowland pasture to finish stock on.**

**These landscapes could be utilised better producing larger numbers off store cattle and sheep.**

**Which would help gowing for growth in a sustainable manner preserve the environment and help prevent both land abandonment and rural degeneration.**

**Q5.** Any further comments that you would like to add?

Many of these upland areas are being designated ASSI , SAC &SPA, the owners find themselves in a serious position of EU land management regulations with out a lot of support directed at them. Farmers in these areas have burdens placed upon these lands which are quite difficult to manage.

Most of the permanent pasture in Northern Ireland are found in these marginal landscapes, and are the main reason why the EU granted an exemption to the rest of Northern Ireland on greening.

It is something which must not be overlooked by lowland producers, that while many lowland producers think that upland regions don't produce as much as some lowland regions, these upland areas actually allow the lowland areas to produce more than what they would have been allowed to if Northern Ireland had not gotten an exemption on greening.

## **Newry Mourne and Down District Council**

**Sent:** 28 April 2016 17:01

**To:** Policy Development

**Subject:** OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT CONSULTATION RESPONSE PROFORMA

Dear Sir/Madam,

Please find attached the Consultation Response Proforma from Newry Mourne and Down District Council.

regards

Therese Hamill

Ring of Gullion AONB Officer

Crossmaglen Community Centre

O'Fiaich Square

Crossmaglen

BT35 9AA

W [www.ringofgullion.org](http://www.ringofgullion.org)

E [therese.hamill@newryandmourne.gov.uk](mailto:therese.hamill@newryandmourne.gov.uk)

### **OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT CONSULTATION RESPONSE PROFORMA**

**Q1.** In the Table below, please rank in order of preference (where 1=most preferred) at least your **top three options**

<b>Option</b>		<b>Preference (1=most preferred)</b>
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar	3

	I budget across the respective years	
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	2
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	1

Please explain the reasons for your preferences.

**The Council have put in 5a as option 2 only if the ANC Scheme is funded by the NI Executive. The Council wouldn't support this option if the funding came from a recasting of the current funding within the RDP envelope especially from the Agri-Environment Scheme.**

**Q2.** Which option(s) would you strongly oppose and why?

1

**Q3.** If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your **top three options**

	Option	Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	1
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC	2

	Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	
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**Q4.** Are there any other options which you believe the Department should consider? If so, please give details.

**Q5.** Any further comments that you would like to add?

This funding is payment is a vital support to farm income in this council area.  
 It recognises the natural handicap that farmers face.  
 Maintains farming in areas under threat.  
 Avoids land abandonment and helping sustain rural communities.  
 Ensures maintenance of the environment.  
 Offers vital income support leading to continued land use and production.  
 Payments made to farmers has a spin-off effect in wider rural economy.

## **Northern Ireland Agricultural Producers Association**

**Sent:** 29 April 2016 11:56

**To:** Policy Development

**Subject:** Response to ANC consultation

Please find attached the response from NIAPA

Many thanks

Jim Carmichael

It is a fact that the majority of sectors in NI agriculture are experiencing severe financial difficulties, yet, if we wish to retain necessary financial support to farmers in the SDA and our Executive fail to find sufficient funds from within their budget, then the only alternative is to reduce payments to all producers and create a fund for an ANC payment.

Brussels is insisting that we re-map our SDA boundaries by 2018, an acceptance by them that there are still agricultural areas facing disadvantage.

Our organisation is a producers association where members actively contribute to society by the production of food and protection of the environment.

The added difficulties in the SDA are that there is no scope to have a variance in livestock production from cattle and sheep and in some areas the breeds have to be hardy and less productive to survive and in fact it is only such livestock which can maintain the environment and prevent land abandonment.

Statistics show that without any support from LFA, farm incomes in SDA for suckler and sheep per ha has averaged only 50% of lowland farmers over the past five years.

We believe that agriculture collectively requires additional financial support at this time but we also believe that ANC support should not be reduced or withdrawn from the SDA.

One difficulty is that the ANC is being discussed in isolation as part of the new RDP which has finite funding. We have long been advocates of an environmentally positive programme linked to livestock for SDA, yet, we know nothing of any future proposals which would



benefit both the environment and farmers working in severely disadvantaged areas. It is for this reason that we believe there is sufficient evidence to support a fully funded ANC scheme.

We also believe that the NI Executive must assume responsibility for supporting Agricultural infrastructure, communities and the environment and find a means of funding the ANC scheme. Recycling of funding from all NI farmers is not an option we could support as the only source of revenue for a future scheme. At present throughout all the options presented it has been either regional funding or all farmers funding it themselves.

There is discussion of a transfer of money from lowland to SDA through CAP but this is a long term measure as a sudden withdrawal of £20 million would have a devastating effect on SDA.

We do not wish to set farmer against farmer as most alternative options would do, let it be a 3% or 5% or other overall reduction.

Our MLAs must co-operate to find a means to fund an ANC or at least present a matched funding proposal as we have severe difficulties supporting any scheme fully funded by farmers, particularly in the present economic conditions.

Michael Clarke

Chairman

## **National Sheep Association**

**Sent:** 29 April 2016 00:19

**To:** Policy Development

**Subject:** Options for Areas of Natural Constraint

**N. I. Region NSA** welcome the opportunity to respond to this consultation. Please see attached.

Regards

Edward Adamson

N. I. Region NSA

### **OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT CONSULTATION RESPONSE PROFORMA**

**Q1.** In the Table below, please rank in order of preference (where 1=most preferred) at least your **top three options**

<b>Option</b>		<b>Preference (1=most preferred)</b>
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	3
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	1
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	2

Please explain the reasons for your preferences.

**NSA prefer not to syphon monies from producers payments if at all possible.**

**Q2.** Which option(s) would you strongly oppose and why?

**NSA oppose Options 3 & 4 as we can see no real benefit from these options.**

**Q3.** If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	3
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	2
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	1
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	

**Q4.** Are there any other options which you believe the Department should consider? If so, please give details.

**NSA preferred option and first option in answer to questions 1 & 3 would be to use unused monies allocated to other schemes but not used because of lack of support or delays in delivery.**

**Q5.** Any further comments that you would like to add?

## **Royal Society for the Protection of Birds Northern Ireland**

**Sent:** 26 April 2016 11:09

**To:** Policy Development

**Subject:** ANC and Coupled Support Consultation

Dear Sir / Madame,

Please find consultations responses from the RSPB on Coupled Support and ANC Designations.

Please acknowledge receipt of this email.

Regards;

**John Martin**

Senior Conservation Officer

**Northern Ireland Headquarters** Belvoir Park Forest, Belfast, BT8 7QT

[rspb.org.uk](http://rspb.org.uk)



giving  
nature  
a home

OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT

*Response from RSPB Northern Ireland, April 2016*

*The RSPB's vision for agriculture is a profitable farming sector that provides a sustainable supply of safe healthy food, in turn providing society with a range of public goods such as thriving biodiversity, clean water supplies, adaptation to climate change and resilience to local land use pressures such as flooding. Our long term view is that Pillar 1 subsidies should be phased out, with farmers instead delivering 'public money for public goods' through a sustainable land use model that protects and enhances priority wildlife habitats, conserves populations of priority biodiversity species as well as ensuring designated wildlife sites are in good condition.*

**Q1. In the Table below, please rank in order of preference (where 1=most preferred) at least your top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	3
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	1
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	2
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	N/A
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	N/A
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	N/A
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	N/A

**Please explain the reasons for your preferences.**

The RSPB believes that an ANC scheme (as currently defined) is appropriately based within Pillar I because it has been deemed as income support by both the European Commission and internationally by the World Trade Organisation. There does not seem to be an opportunity within this reform period (2014-2020) to improve the sustainability of the wider countryside through the delivery of the ANC mechanism, other than continuing payments with the aim of maintaining farming in marginal areas to prevent abandonment.

**Q2. Which option(s) would you strongly oppose and why?**

The RSPB would strongly oppose a Pillar I to Pillar II transfer for ANC because we believe these funds would be better placed within Agri-environment schemes which can deliver on the principles of public money for public goods. Within the RSPB response to the LFA review in 2008/2009, we called for LFA funds to be redirected into the agri-environment programme, but to ensure previous LFA recipients received an enhanced score within their AES application. The funding is then

reframed into something which is incentivised and measurable, as opposed to an income support measure.

The RSPB also believes any transfer from the NI Executive to ANC is inappropriate for the same reasons. The NI Executive by default decided not to transfer any funds from Pillar I to pillar II missing a vital opportunity to boost Rural Development Funds. As a result, agri-environment has essentially realised a 50% cut within the current programme (2014-2020) in comparison with the last (2007-2013). Any additional funding for Rural Development must be redirected to Agri-environment to help society meet the challenges of biodiversity decline, water quality and climate change.

**Q3. If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	3
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	1
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	2
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	N/A
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	N/A

**Q4. Are there any other options which you believe the Department should consider? If so, please give details.**

The department should consider a transfer of funds from Pillar I to Pillar II in support of agri-environment, with enhanced scores for farmers within the ANC boundary to ensure entry into the new Environmental Farming Scheme (EFS) to encourage High Nature Value Farming.

**Q5. Any further comments that you would like to add?**

No further comments at this time.

## **Severely Disadvantaged Area Group**

**Sent:** 29 April 2016 15:46

**To:** Policy Development

**Subject:** Consultation responses

Find attached responses from the SDA group.

Regards

Peter Gallagher

### **OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT CONSULTATION RESPONSE PROFORMA**

**Q1.** In the Table below, please rank in order of preference (where 1=most preferred) at least your **top three options**

	<b>Option</b>	<b>Preference (1=most preferred)</b>
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	2
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	1
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	3



Please explain the reasons for your preferences.

The 3 options selected ensure the same level of funding is retained which in turn will help ensure that SDA farmers continue to actively produce and manage the land as they have done in the past.

With EU targets to reduce carbon footprints and water nitrates directive becoming ever more important it is essential that production is encouraged throughout NI and not just forced into small pockets of the most productive land therefore creating excessive nitrates etc with the subsequent knock on effects of pollution etc. The preferred option is that any monies required for this comes from a source which does not impact on the SFP at its current level.

With margins becoming ever tighter in the wider agricultural sector any removal of funding is worrying.

But especially a removal of support from the SDA Region which is limited largely to either suckler cow or Ewe production would be devastating to these areas and the wider NI economy through a reduction in reduced processing raw material.

While some of the evidence presented by DARD suggests that there is no longer a financial need for this support we would strongly contest this and would suggest that if the analysis is done after the redefining of the ANC area that a truer reflection of the high level of deprivation within the communities of SDA will be clearly identified.

**Q2.** Which option(s) would you strongly oppose and why?

Option 1 -

There is a continued requirement for support for Producers in the SDA region, which is home to 47% of Suckler cows and 58% of breeding ewes which provide the raw material for the Lowland finishers. If this funding was withdrawn the SDA farmers would significantly reduce their stocking rates which in turn would lead to a reduction of both weanlings and lambs for the finishing units on lowland and DA farms which in turn would have extreme consequences for all of Northern Ireland by way of a reduced through put of processing.

The further impact of the removal and grazing of these animals in the most challenging environments would have serious environmental impacts in terms of Biodiversity and habitat management, most of which are in the upland areas, with the inevitable knock on to the tourism industry.

**Q3.** If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	2
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	3
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	1

**Q4.** Are there any other options which you believe the Department should consider? If so, please give details.

Pillar II RDP Budget which in essence is funding for sustaining farm families and promoting and developing wider rural economies should be the source of the funding for the ANC's. The vast majority of the SDA Land is in a socio economic deprived areas and therefore any funding to these areas will easily fit the requirements of the RDP.

With NI losing up to £30m through environmental payments and a possible loss of £20m further, and where legacy schemes of the ANC contributed to active environmental management by primary production is there a case for a de minimis payment in the interim period whilst a viable long term solution is established?

**Q5.** Any further comments that you would like to add?

## Ulster Farmers Union



### **FROM THE PRESIDENT**

Policy and Economics Division  
Department of Agriculture and Rural Development  
Room 361A  
Dundonald House  
Upper Newtownards Road Belfast BT4 3SB

22nd April 2016

Dear Sir/Madam

### **DARD Consultations**

Thank you for the opportunity to comment on the DARD consultations; Options for Future Support to Areas of Natural Constraint and the Designation of Areas of Natural Constraint. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,500 farming families. We have taken the time to carefully consider the information presented in the consultations and we would ask that you carefully take into consideration the following views:

#### **Options for Future Support to Areas of Natural Constraint**

Support payments in Northern Ireland for severely disadvantaged land have been in place for a considerable period of time and have traditionally been recognised as an important mechanism to address natural disadvantages, whether that be in relation to the regional climate, soil or landscape. While the ANC scheme may now be considered by the Commission as purely an income support measure, the reality is this scheme represents more than just economic support and has more in common with its predecessor, the LFACA scheme, which objectives focused on the three pillars of sustainability. The economy, the environment and maintaining a healthy rural society.

In terms of income, this support has undoubtedly been invaluable in helping to address the natural constraints which have been demonstrated to have a significant economic impact on farms in severely disadvantaged areas. The statistics in the consultation document clearly highlight this with severely disadvantaged farms being on average £114/ha worse off in their farm business income compared with the lowland. And while the statistics DARD has presented demonstrate that in the period to 2021, direct support targeted towards severely disadvantaged areas will increase, for many farms who have historically been productive, the

likelihood is they will face a considerable drop in their income when faced with losses to basic payments, ANC payments and agri-environment payments.

While supporting low income has always been a priority for schemes targeting severely disadvantaged land, it is also important that we acknowledge that most farms in these areas have little or no alternative as regards the enterprise they choose. This is reflected by the fact that primary beef and sheep production is heavily concentrated in these areas. Given that low income from beef and sheep production could at this stage be considered almost an occurrence, while alternative enterprise options are limited, this sets a solid base for arguing that additional support to areas of natural constraint must continue.

The environmental benefits of schemes targeted towards severely disadvantaged areas, whether that be LFACA or ANC, cannot be dismissed either. The Commission may at this stage argue that the ANC scheme is strictly to support income, but the reality is both the last two schemes in Northern Ireland are broadly similar and both have had a positive impact on the environment. The importance of grazing livestock and land management by farmers in these areas cannot be underestimated. Numerous studies have demonstrated that grazing livestock in hill areas has a positive influence on biodiversity and the landscape while also reducing the prevalence of invasive species. This is ably assisted by ensuring that monies from these schemes are targeted to those that are actively farming and managing livestock. Without these schemes and the minimum stocking rates, it would be our concern that land abandonment would increase, particularly in the more isolated areas of Northern Ireland. This certainly would not be advantageous to Northern Ireland's environmental objectives, nor to our growing tourist industry which is heavily dependent on the land management skills of local farmers.

Coupled with this is our concern that there has been a significant reduction in funding targeted towards agri-environment schemes. Where in previous years we would have seen in excess of £30m per annum targeted towards agri-environment schemes, this will reduce to £10.7m in 2016/17 and £2.9m the following year, before funds will expire for the current schemes by 2020. DARD may argue that this funding is not income support, rather cost incurred and income foregone. However we would argue that this was annual income for many farms across all land types and the removal of this has been sorely missed. The extent of this is highlighted in our attached graph, which if taken back to the peak years of 2012/13 of agri-environment participation we suspect would show even greater losses to local farms. DARD must formally recognise this in any bid for future funds.

Taking all of this into account the Ulster Farmers' Union views the continuation of an ANC Scheme as an important element in maintaining primary production in severely disadvantaged areas. This support has proved invaluable in the past in helping to support sectors with low income while also demonstrating wider benefits for the environment and rural society. It has also been delivered at a low administration cost to DARD in comparison to agri-environment schemes which have become overly bureaucratic and in some cases unworkable for farmers. In the most basic terms, it represents good value for money for all involved.

We have extensively considered all of the options within the consultation. There is absolutely no desire to seek funding from Pillar 1 to continue an ANC scheme, especially at a time when the entire industry is experiencing a considerable downturn in farm income. **The only option within the consultation that we are in favour of is option 5a, 'an ANC scheme in Pillar II funded by an additional £20m per annum from the NI Executive.**

It should be noted that this consultation has not been straightforward, especially with limited detail on the proposed Environmental Farming Scheme. The reluctance of DARD to speak to

stakeholders about this agri-environment scheme is something our members find deeply concerning, especially as it was perceived almost 2 years ago that there was good progress being made in drawing up a new scheme. It is important that DARD informs stakeholders of the latest proposals with the Environmental Farming Scheme as soon as possible.

## Ulster Gaelic Athletic Association

**Sent:** 29 April 2016 10:08

**To:** Policy Development

**Subject:** Consultation Response

Please find responses attached.

Maura

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Is mise le meas

**Máire Ní Cheallaigh**

Oifigeach taighde is forbartha deonach

**Maura Kelly**

Club and Community Development Officer

### OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT

#### CONSULTATION RESPONSE PROFORMA

**Q1.** In the Table below, please rank in order of preference (where 1=most preferred) at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	3
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the	

	latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	1
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	2

Please explain the reasons for your preferences.

Agriculture needs all the support it can get and particularly ANC, given the more challenging nature of farming ANC. However, where possible the extra support to ANC should not be taken from either Pillar I or Pillar II.

Where £20million additional budget cannot be found from the NI Executive, it is preferable that 5% of Pillar I would be used annually to support farming in ANC.

This is necessary to enable the most rural farm families to make farming ANC feasible, underpinning rural communities, the rural way of life, and maintaining healthy and sustainable rural communities.

**Q2.** Which option(s) would you strongly oppose and why?

Ulster GAA strongly opposes Option 1 as this would see further decimation of our rural communities. Many farm families already must subsidise their farming income with additional incomes, and the ANC payment is a very necessary payment in order to make farming ANC feasible, albeit still a very difficult business. ANC farm families need continued and increased support in order to manage the rural environment, and sustain rural communities.

The alternative of not providing additional support to ANC farming (i.e. Option 1) would result in greater expense for the NI Executive in the long-run, through expensive countryside management undertaken by statutory agencies, and increased costs of unemployment; ill-health, particularly mental ill-health for rural farm families.

**Q3.** If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your **top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	1
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	2
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	3

**Q4.** Are there any other options which you believe the Department should consider? If so, please give details.

n/a

**Q5.** Any further comments that you would like to add?

Rural GAA clubs are often one of few other resources within rural communities. Rural areas are being depopulated as the population increasingly move to urban centres. Emigration has been particularly prevalent in rural areas, particularly among young adults as their employment options are extremely limited; and farming the most severely disadvantaged areas is not a feasible option to sustain a family across generations. As such rural communities have been decimated and are struggling to hold onto the low level of services which remain, such as schools, post offices, libraries, shops, businesses and so on. This is already having serious knock-on negative effects on physical and mental health of people living in these areas. The removal of the payment to support farm families in ANC would further remove the purpose and motivation of farm families to remain in the rural area, and to farm land which is particularly difficult.

Ulster GAA feels strongly that rural farmers, particularly small rural farmers need additional support in order to continue to protect the rural environment, develop rural



communities, and to improve competitiveness of agriculture particularly in the rural area.

GAA clubs increase the social capacity of their communities, but depopulation of rural areas and emigration have seen many rural GAA clubs struggle to field teams at all levels. Club amalgamations, particularly in rural areas, are inevitable as a result, and this will be to the detriment of rural communities. Ulster GAA believes strongly that additional support to farm families in ANC is vital to maintain and protect the rural way of life, and to empower rural communities.

## **Ulster Unionist Party**

**Sent:** 02 May 2016 00:35

**To:** Policy Development

**Subject:** UUP Responses to DARD's ANC and Coupled Support Consultations

To whom it may concern,

Please find attached the Ulster Unionist Party's responses to DARD's consultations on;

- Designation of Areas of Natural Constraint,
- Review of CAP Coupled Support Options,
- and Options for Future Support to Areas of Natural Constraint.

Should you require any further information please do not hesitate to contact me.

Enjoy the bank holiday!

Kind regards,

**Rodney Corrigan**

Assistant to Jim Nicholson MEP

[www.jim-nicholson.eu](http://www.jim-nicholson.eu)

Ulster Unionist Party, Strandtown Hall, 2-4 Belmont Road, Belfast, BT4 2AN



### **Consultation on Options for future support to Areas of Natural Constraint**

#### **Ulster Unionist Party Response**

The Ulster Unionist Party welcomes the opportunity to respond to this consultation on options for future support to Areas of Natural Constraint. All sectors of agriculture have been facing considerable challenges in recent months, factors such as market

volatility, the weak euro and the Russian trade embargo have had an impact on prices and cashflow throughout the industry. Northern Ireland's farmers and growers have also had to contend with the implementation of a complex new CAP which has itself involved a number of challenges - not least the continuing transition to a flat rate basic payment.

We recognise the impact of the on-going transition on individual farm businesses, such as SDA beef farmers who previously received relatively high levels of support per hectare in the old system, the Ulster Unionist Party does not however support continuing an ANC scheme if it is to be funded from Pillar I directly, or through a transfer from Pillar I to Pillar II, or through a hybrid involving Pillar I and Pillar II (options; 2a, 2b, 3 and 4) as ultimately these options all involve the untargeted redistribution of funds from Pillar I and away from farmers' basic payments.

If additional funds do become available from the NI Executive, and depending on the level of funding, options 5a, 5b plus other phase out pathways must all be considered and weighed up at that time - our support would also require getting the Areas of Natural Constraint designation right so that the mapping process accurately reflects the situation on the ground.

It is imperative that all other available avenues and options available to support the agricultural industry in its entirety and those sectors and farms most affected by the transition to the flat rate in particular are explored and utilised by the new Department, DAERA. In particular the 2014-2020 RDP must have more of a focus on supporting the long term sustainability and profitability of farms than the previous RDP.

## **Young Farmers' Clubs of Ulster**

**Sent:** 04 May 2016 11:47

**To:** Policy Development

**Subject:** Consultation response

Good Morning,

With regards to the following consultations:

Options for Future Support to Areas of Natural Constraint

Designation of Areas of Natural Constraint

Review of CAP Coupled Support Options

The Young Farmers' Clubs of Ulster agree with the response made by the Ulster Farmers' Union.

If you have any questions please do not hesitate to contact me.

Many Thanks

Heather

## INDIVIDUALS

### Vincent McAlinden

**Sent:** 29 April 2016 16:08

**To:** Policy Development

**Subject:** ANC and coupled support responses from Vincent Mc Alinden

Good afternoon,

please find responses attached.

Many thanks for this opportunity

Vincent Mc Alinden

## OPTIONS FOR FUTURE SUPPORT TO AREAS OF NATURAL CONSTRAINT

*Response from Vincent Mc Alinden*

**Q1. In the Table below, please rank in order of preference (where 1=most preferred) at least your top three options**

Option		Preference (1=most preferred)
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	3
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	1
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	2
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	N/A
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	N/A
5a	An ANC Scheme in Pillar II funded by an additional £20 million per annum from the NI Executive	N/A
5b	A transitional ANC Scheme in Pillar II for the 2017 and 2018 claim years funded from the NI Executive	N/A

**Please explain the reasons for your preferences.**

The ANC scheme is appropriately based within Pillar I because it has been deemed as income support by the European Commission. The reality is this form of ANC payments is just a redistribution of basic payments based on (in my opinion) quite a crude instrument which will, only by accident, hopefully reduce the number of loss making farm enterprises in marginal areas and prevent abandonment of land.

**Q2. Which option(s) would you strongly oppose and why?**

The Pillar I to Pillar II transfer for ANC because this would likely remove funds for a properly resourced and actioned HNV / public goods scheme.

**Q3. If no additional national funds are available (i.e. Option 5a and 5b are not possible), please rank in order of preference (where 1=most preferred) in the table below at least your top three options**

<b>Option</b>		<b>Preference (1=most preferred)</b>
1	Do nothing - the ANC claim made in 2016 and paid in 2017 would be the last	<b>3</b>
2a	An ANC Scheme in Pillar I from the 2017 claim year using 5% of the Pillar I budget annually	<b>1</b>
2b	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years using 5% and 3% of the Pillar I budget across the respective years	<b>2</b>
3	A Pillar II ANC Scheme for the claim years 2019 and 2020 funded by a Pillar I to Pillar II budget transfer	<b>N/A</b>
4	A transitional ANC Scheme in Pillar I for the 2017 and 2018 claim years, followed by a Pillar II ANC Scheme for the claim years 2019 and 2020, the latter funded by a Pillar I to Pillar II budget transfer. This option is, in effect, Option 2b and Option 3 combined	<b>N/A</b>

**Q4. Are there any other options which you believe the Department should consider? If so, please give details.**

A movement of funds from Pillar I to Pillar II in support of agri-environment objectives with outcomes agreed across agri-environment stakeholders. And also to enhance the scores for farmers within the ANC boundary to ensure entry into the new Environmental Farming Scheme (EFS).

**Q5. Any further comments that you would like to add?**

No further comments at this time.

**Thomas Moorhead**

**Sent:** 28 April 2016 23:40

**To:** Agnew, Rosemary

**Subject:** anc

The anc support is not going to the wrong people in many cases

Land owners can now hold tenants to ransom as they know the amount that can be got from claiming anc and demand this in addition to rent

It is neither an effective environment or income support measure

Thomas Moorhead



