

# CONSULTATION

## Response Document



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### Submission on the

## Agricultural Policy Framework for Northern Ireland

to

Department of Agriculture, Environment and Rural Affairs,

10 October 2018

# Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), being the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to participate in this consultation process.

CIEEM was established in 1991 and has more than 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

Amongst others, CIEEM is a member of:

- National Biodiversity Forum (Ireland)
- Irish Forum on Natural Capital (working group member)
- The Environmental Science Association of Ireland
- Europarc Federation
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- The UK All Party Parliamentary Group on Biodiversity
- The UK Environmental Policy Forum
- Greener UK

CIEEM has approximately 250 members in Ireland (North and South) who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers whose work involves sustainably managing habitats - terrestrial and aquatic habitats (marine and freshwater) - and species.

# Comments from CIEEM

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CIEEM welcomes the opportunity to participate in the consultation process in respect of Northern Ireland Future Agricultural Policy Framework.

This review has been undertaken by the CIEEM Ireland Policy Working Group. The Policy Group comprises experienced, Irish-based, practitioners and specialists with a wide breadth of knowledge across the ecological and environmental management spectrum throughout the island of Ireland.

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In addition to our response to the specifically-posed questions in the consultation documents, CIEEM would like to make a number of general and specific comments on the consultation document, as follows:

## GENERAL COMMENTS FROM CIEEM

### 1. Introduction

CIEEM welcomes the Northern Ireland Future Agricultural Policy Framework document. The implementation of the CAP in the UK has resulted in outcomes that have had a negative effect on the environment and we believe that Northern Ireland has an opportunity to design a system that drives forward sustainable food production, facilitates a mass restoration of ecosystems, improves public health and promotes public enjoyment of the countryside.

We have been encouraged by the UK Government’s manifesto commitment to leave the environment in a better state than they found it. The primacy of environmental protection must be the key principle of future agricultural policy.

### 2. Agri- environment

We strongly support the principle of rewarding farmers with public money for the delivery of environmental public goods and services. We believe that Government should incentivise methods of farming that create new habitats for wildlife, increase biodiversity, reduce flood risk, better mitigate climate change and improve air quality. We consider, however, that some highly desirable outcomes such as soil health, good air and water quality, and animal welfare can and should be delivered through regulation and enforcement rather than incentivisation. We should be moving towards an agri-environment system that rewards farmers for delivering strategic environmental enhancement and avoid a system that rewards farmers for not damaging the environment.

We believe that a new agri-environment system should:

- Be based on the protection and enhancement of natural capital to maximise ecosystem services;
- Operate at a strategic, landscape scale;
- Be based on long term contracts;
- Accommodate a range of interrelated outcomes – food production, wildlife conservation, amenity value, health and well-being;
- Include cultural as well as natural heritage; and
- Be underpinned by effective strategic planning such as provided by existing initiatives.

Examples of farming systems that CIEEM proposes could secure the highest payments would include:

- High nature value farming over large areas;
- Extensification areas – potentially some form of managed ‘rewilding’ in appropriate locations;
- Areas with high landscape and environmental diversity;
- Areas focussing on the function of habitats such as wetlands, helping society to be more resilient to the impacts of extreme weather events;
- Areas providing clean water (but note comment re regulation above);
- Areas where chemical inputs are significantly reduced;
- Diverse cropping regimes that build habitats for farmland birds, bees and other pollinators and diverse flora;
- Broadleaved woodlands at scale, that add biodiversity and aesthetic value and lock up carbon;
- Seasonally inundated floodplain grasslands;
- Coastal and floodplain grazing marsh and salt marsh;
- Wet woodland, fen, raised and blanket bog;
- Farms which restore peatland to safeguard historic carbon and facilitate sequestration of new carbon.

Areas that become more attractive to visitors as a result of richer wildlife and ecosystems create a diversification of possible income streams supporting jobs both inside and outside of the farming sector. In the USA, for example, the restoration economy is worth \$9 billion per annum and supports 129,000 rural jobs.

### 3. Biodiversity Net Gain

CIEEM is a strong proponent of Biodiversity Net Gain, an approach gaining traction within development and construction projects. There are even more valuable benefits if this approach is extended to the land managed for agricultural use. If agri-environment funding was contingent on delivering biodiversity net gain we could halt biodiversity loss and restore habitats and species, with all the attendant benefits, as a pace and scale not previously envisaged. Farmers and landowners, working in cooperatively at a landscape / catchment level (for example, through farm clusters), would be set clear environment net gain targets for their land based on a transparent calculation approved by all stakeholders and according to a strategic plan such as a biodiversity action plan.

## 4. Proposed framework principles

Whilst environment is a devolved competence in the UK, CIEEM believes that a common approach to environmental protection and enhancement is needed between the devolved administrations, and proposes the following 12 principles as a framework to ensure that the environment is considered as a central organising principle of government policy post – Brexit.

### **1. Active participation in international treaties and conventions**

*Restoring global biodiversity and ecosystem functioning is a global imperative. We will strengthen or actively participate in international conventions and treaties, seeking opportunities to lead in areas where we have particular expertise. To deliver this, we will gather robust evidence through well-funded scientific research that leads to effective policy and practice.*

### **2. Collaboration and knowledge sharing**

*The natural environment does not recognise national boundaries therefore we will collaborate, sharing knowledge and best practice, with each other and with our neighbours regarding all areas of environmental management, protection and enhancement.*

*We will establish and appropriately resource world leading data-sharing, monitoring and reporting mechanisms to provide public and stakeholder accountability. We will produce mandatory periodic 'State of the Environment' and UK Global Environment Footprint' reports which clearly identify priorities for action.*

### **3. Environmental principles enshrined in law**

*There are some fundamental principles that underpin effective protection of the environment and these will be the basis of relevant legislation and enforcement.*

- a. Preventative principle: using legislative and other means to avoid or restrict activities, policies and plans that risk harm to the natural environment.*
- b. Precautionary principle: where there is evidence that an activity may cause harm to the environment, a precautionary approach to decision -making will be taken even if some cause and effect relationships are not fully established scientifically.*
- c. Polluter pays principle: those whose activities risk or result in harm to the natural environment will pay the costs of managing and /or restoring / remediating the damage.*

### **4. Deliver biodiversity net gain across all policy areas**

*We will use legislative and policy approaches to reverse the loss of biodiversity and restore habitats and species to healthy, ecological functionality. We will set a strong, common regulatory floor to protect and enhance our natural capital and ecosystem services, including a requirement in legislation for local authorities and statutory agencies to deliver biodiversity net gain in all terrestrial and marine management.*

### **5. Sustainable funding mechanisms**

*We will establish a new system of environmental funding mechanisms that demonstrate both direct capital savings and wider societal benefits such as biodiversity net gain, flood management, reduction in greenhouse gas levels, carbon sequestration, and stewardship of natural capital.*

### **6. Deliver a coherent network of more, bigger and joined up protected sites**

*We will establish a system of protected international, national and local areas and sites of natural importance that collectively create an ecologically coherent, resilient, and spatially-linked network, including cross-border sites and the marine environment out to 200 nm.*

### **7. Maintain healthy species populations**

*We will maintain and develop a system of protection and permitting for protected and priority species of international, national and local concern that delivers the conservation of viable, healthy populations. The common approach will be based on defining and maintaining Favourable Conservation Status (FCS) for each species.*

### **8. Biosecurity**

*We will implement stringent measures to maintain biosecurity, restrict the spread of non-native invasive species and manage the use/spread of genetically modified species.*

### **9. Reconnect people with nature**

*We will invest in mechanisms to facilitate greater access and engagement with the natural environment across all sectors of society, especially young people, minority groups, those most socially deprived, and urban populations.*

### **10. Shared environmental standards**

*High common standards which will facilitate high value, high quality goods and services for the UK market and elsewhere will be applied to all proposed developments, including housing, transport infrastructure and renewable energy provision.*

### **11 Scrutiny**

*In order to provide public accountability, the UK governments will establish and independent scrutiny and enforcement body to hold all UK governments and competent authorities to account.*

### **12. Invest in raising standards**

*We will ensure that advice and recommendations regarding activities likely to impact on the environment are made by competent professional. To deliver this, governments will facilitate investment in developing skills and standards for professional ecologists and environmental managers. We will also ensure that competent authorities charged with making decisions that impact on the environment and the achievement of national and international targets must demonstrate that they are employing or accessing competent professional advice in order to do so effectively.*

## SPECIFIC RESPONSES TO QUESTIONS POSED (1 TO 40)

No.	RESPONSE
1	<ul style="list-style-type: none"><li>• There are some issues with the current entitlements, in particular, the current approach to heather cutting that, in some cases, has resulted in cutting of significant areas of suitable bird breeding habitat within the breeding season.</li><li>• Any continuation of this needs to be assessed in terms of its benefit for biodiversity and appropriately targeted / timed.</li></ul>
2	<ul style="list-style-type: none"><li>• The paper describes that these measures are high on administrative costs and proposes to abolish them. It would be important that before such a step was taken there was some assessment of how effective these measures were, what the impact of their loss will be, and how effectively they can might be implemented through other payments.</li><li>• Any financial gains from the dropping of greening requirements must be put into environmental measures that add value, and not into Basic Payment entitlement values</li></ul>
3	<ul style="list-style-type: none"><li>• The ploughing ban on environmentally sensitive permanent grassland should be retained and this could be done by means of a requirement through a 'change of use' application policy for permanent grassland.</li><li>• In the event that changes have to be made to any measures, there should be an evaluation of how effective they are and the implications from conservation/ecological perspective of any change.</li></ul>
4	No views
5	No views
6	No views
7	<ul style="list-style-type: none"><li>• Land eligibility rules should be reviewed.</li><li>• To achieve true environmental benefits, value may sometimes need to be given to land that is not 'actively managed'.</li><li>• The current approach can result in unnecessary management of peatland in particular and other areas, that are not actively managed, being seen as useless, and used as dumping grounds / development etc.</li></ul>
8	No views
9	No views
10	<ul style="list-style-type: none"><li>• Agree with greater policy emphasis and investment in education and knowledge transfer.</li><li>• Agricultural education is important and must include a greater emphasis on environmental issues and opportunities. It must ensure that the conservation of biodiversity, ecosystem services and actions for climate change are key components of any such educational programme.</li></ul>
11	No views
12	No views
13	<ul style="list-style-type: none"><li>• Investment in targeted innovation can be important in reducing environmental impact in particular.</li><li>• This has been shown by approaches such as slurry injection in sensitive areas. Investment in such areas should continue.</li></ul>
14	No views
15	No views
16	No views

- 17 No views
- 18
- We support the idea that a resilience payment should be coupled with an environmental gain.
  - For example, less productive /marginal land should be alternatively managed for biodiversity, flooding relief etc.
- 19 No views
- 20 No views
- 21 No views
- 22 No views
- 23 No views
- 24 No views
- 25 No views
- 26 No views
- 27
- An overwhelming message in the document is the emphasis on productivity. To ensure this goal is compatible with environmental sustainability it will require very strong and clear principles.
  - The suggested environmental principles are quite broad and general, are very much from the agriculture perspective and perhaps lacking some additional principles that should also be present (e.g. need for environmentally sustainable agri-development to be underpinned by science and research).
  - While the principles are sound as far as they go, positive behavioural change is not only driven by correct information, but also needs to be driven by real penalties for environmental damage.
  - Waste dumping, drainage, loss of permanent grassland, cutting of vegetation during the bird breeding season, slurry run-off and other issues are a real concern and will not necessarily be addressed just by positive encouragement.
  - One point to note is iv. where the need for a collaborative approach in developing policy proposals is described, 'recognising that farmers and land managers have a unique perspective and understanding of what has worked well and not so well....' but the experience of planning advisors, scientists, ecologists and the expertise they have gained in agri-environment policy must also be relevant and worth highlighting in any collaborative approach.

In this context we should draw your attention to the 12 proposed framework principles set out in General Comments above, at 4 on pages 5 and 6 of this submission.

- 28 Strongly agree.
- Research, education and monitoring are needed to effectively implement conservation management.
  - There is a continued need for investment in research and education targeted on environmental and conservation management in the agricultural sector, notably at the entry level of farming. Such investment to underpin sustainable agricultural policy development is positive. How this will fare compared with investment in other elements of policy implementation will be important.
  - If environmental sustainability is a "twin objective" of productivity (page 21) then investment to underpin the implementation of sustainable agri measures should be considerable.
  - A mentality of lack of concern about the environment appears to persist in the agricultural sector and is worrying. We support anything that could be done to circumvent /alleviate this.
  - Input and collaboration from both ecologists and agricultural professionals would provide for a balanced approach.

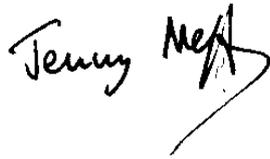
- 29
  - We support the environmental principles of outcome-based schemes developed in consultation with farmers and other stakeholders
  - It will be useful to look at the growing development of locally led results-based schemes where payment is related to quality of output, e.g. High Nature Value Farming <http://www.high-nature-value-farmland.ie/>, RBAPs <https://rbaps.eu/>, Pearl Mussel Project <http://www.pearlmusselproject.ie/project-team.html>, Burren Life Project.
  - Areas of NI would be particularly suitable for such schemes and the principles of these schemes may be useful to consider in the context of wider agri-environment policy and its development alongside environmental sustainability.
  - Although we support these schemes we see the following as essential to their success:
    - Use of the significant amount of research that has been done in terms of outcome or results based environmental measures for agriculture.
    - The necessary resources need to be allocated for monitoring adherence to regulation and monitoring of the success of outcome-based schemes.
    - In order to move forward appropriately there will be a significant need for training of agricultural professionals in order to assess such end results properly and to be sure that the land has been classified correctly to allow the correct application of expected outcomes.
- 30
  - In the context of payment approaches, the aforementioned agri-environment schemes provide useful examples which can inform future sustainable and workable agricultural policy in Northern Ireland, both at a broad level and where appropriate (e.g. high nature value areas) at a local level.
- 31 No views
- 32
  - An example would be at the landscape/catchment level where collaboration between statutory agencies and non-statutory bodies is essential to promote and maintain sustainable farming while meeting stringent water quality requirements.
- 33 No views
- 34 No views
- 35 No views
- 36 No views
- 37 No views
- 38 No views
- 39 No views
- 40 No views

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CIEEM members are knowledgeable about the natural heritage of the island of Ireland and, as a professional body representing practicing ecologists and environmental managers, CIEEM is well placed to advise on specific areas of biodiversity now and in the future.

We believe that the details of this new agricultural framework will be very complex to develop. CIEEM will be pleased to offer our support and advice in the future development of this Framework which has the potential to make an enormous difference to the health and

resilience of our countryside and would welcome the opportunity to assist and /or review any future draft of the Policy Framework as it becomes available.

A handwritten signature in black ink that reads "Jenny Neff". The signature is written in a cursive style with a large, sweeping flourish at the end.

**Jenny Neff BSc(Hons) MSc(Ecol) CEcol CEnv FCIEEM**

**CIEEM Ireland Policy Working Group Chair**

**Vice-President (Ireland) of the Chartered Institute of Ecology and Environmental Management (CIEEM)**