



2012 Draft Response to the Common Agricultural Policy proposals 2014-20

The Department of Agriculture and Rural Development (DARD) published a consultation document on CAP reform post 2013 on 8th November 2011, seeking views on the legislative proposals published by the EU Commission, in order to inform the Northern Ireland position in preparation for the negotiations ahead. A response is required by **7th February 2012**.

This draft response was drafted further to discussions with the NILGA Agriculture and Rural Development Working Group, councils and other stakeholder organisations, including the Irish Farmers' Union. This response is submitted in draft form and will be considered by the NILGA Executive Committee at their meeting of 10th February 2011, after which time a final response will be submitted.

For further information or to discuss any of the issues highlighted, please contact Karine McGuckin at the NILGA Offices: Email: k.smyth@nilga.org Tel: 028 9079 8972

**Derek McCallan
Chief Executive
1st February 2012**

INTRODUCTION

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of local authorities and is supported by all the main political parties. The recent Common Agricultural Policy (CAP) proposals are a key issue for local government due to the huge impact it has on the shaping of local communities, the economy, and sustainable rural development. NILGA trusts that our comments will be taken into account when developing the final proposals. NILGA acknowledges that these proposals are at a very early stage and hopes that further consultation will be carried out when the proposals are more developed. The Association welcomes the announcement to hold road shows and requests that subsequent to these events DARD representatives meet with NILGA's Agriculture and Rural Development Working Group.

This response has been developed in liaison with the district councils.

For further details on this response, please contact Karine McGuckin at the NILGA Offices. k.mcguckin@nilga.org (028) 90798972.

KEY ISSUES

1. Rural Development Proposals:

Councils are mainly concerned with the Northern Ireland Rural Development Programme (NIRDP) which forms part of the CAP proposals. Councils have had experience of this programme for a number of years however substantial difficulties have become apparent, particularly during the current 2007-2013 programme.

The current management of the clusters is being made difficult by the bureaucracy involved, particularly the amount of administration and auditing. It is strongly felt by local authorities that the present process and programme design should not be replicated in the next round of funding but amended to ensure that councils **manage** the programme, not merely administer it. This reflects the work now being developed in regard to wider reform of Structural Funds and NILGA would welcome a discussion directly with DARD Policy officials as soon as possible, since such transformation discussions are occurring purposefully with counterpart government bodies in England, Scotland and Wales.

In order to improve the next NI Rural Development Programme, **NILGA asserts that:**

- NIRDP should have a 'bottom-up' approach, with Community Plans being produced by councils and communities in order to address their needs and retaining their primacy throughout the Programme.
- There should be additional capacity building offered to communities to enable them to produce high quality applications and to manage the implementation of their projects – specialist advice services, akin to Welsh Government and Welsh Councils approach 2007-13.
- It is important that the programme strikes the right balance between the provisions of services to rural areas versus the urban area.
- Councils are best placed to manage, coordinate, deliver and account for the programme on behalf of their communities. They should be coordinators of the programme, regardless of the progress of the local government reform programme and resultant council numbers. The LEADER approach is required.
- Technical assistance should be allowed to Councils to manage the funds and they should also be responsible and in control of audits in order to streamline the management of the programme. There are currently too many audit requirements in the programme, leading to a slow spend of the money.
- The new NIRDP programme should not be articulated around meetings and heavy structures and should focus on developing rural villages and towns.
- Provision of "in-kind" support should be recognised within the programme so that time spent on projects by communities can be accounted for, and to reduce the amount of financial commitment currently required from projects.
- The amount of administration particularly linked to procurement processes should be alleviated, as these are considered too complicated and cumbersome by communities.
- The application process should be simplified, so that communities are not daunted by the process or deterred from applying.

2. Food Security issues:

- Currently Northern Ireland has no food security policy, and this is something that needs to be addressed in the next CAP programme. If DARD is considering the development of such a policy as a separate issue, there must be integration with CAP policy and programmes.
- DARD is setting up a Food Strategy Board, but this seems to be designed to focus on economic development and supporting businesses, rather than on food security.
- The current Northern Ireland agriculture, food and drinks industry is geared towards export - Northern Ireland export 65% of its food with some sub-sectors such as the Bramley apples exporting 97% of its entire production, and imports 92% of the food retailed in the province. This factor, combined with the continued reliance on large supermarkets and their extended use of 'just in time' supply practices, leaves Northern Ireland vulnerable to food shortages.

NILGA asserts that this current lack of planning for food security may result in supply failure in the short term, for example as a result of a period of extended severe weather or in the longer term for example due to increased energy costs or climate change issues. This policy gap must be addressed as a matter of urgency.

3. Direct payments

Further to dialogue with the farming community, NILGA is aware of material concerns that the current CAP proposals could complicate farming processes and increase administration linked to direct payments. Simplification is needed in terms of the implementation of the schemes. If greening measures are included in Pillar I, farmers believe that it will make it more difficult to claim funding.

In addition, there is a view that the greening measures proposed under Pillar I of this programme could have a very significant impact on a small region such as Northern Ireland, given that the farming community is made up of small holding with limited acreage.

There are three main themes for the greening measures:

- 1. Ecological focused areas*
- 2. Permanent Grassland*
- 3. Crop rotations*

- The CAP proposals advocate the need for farmers to move towards more restorative agriculture, and this may prove particularly difficult for farmers in Northern Ireland, given the small size of the farms involved, and the current culture of focusing on a single crop. Many farmers have one main field and would find it difficult to divide it for many crops. The requirement for three crops may not be achievable for the smaller NI farmers and may require collaborative working.
- Crops are weather dependant and some grown presently may not be suitable in the longer term due to climate change. Northern Ireland farmers may have to consider crops that they previously did not consider, and will need support to develop new systems.
- Permanent grassland could have a negative impact on production and pricing. Although it is essential to retain carbon in the soil, reduction of production could impact on farm viability.
- NILGA is aware that many farmers feel that greening measures should be voluntary. There is a need to clearly define if the greening measures will be compulsory, as proposed.

- Farmers have expressed concern regarding the classification of 7% of the farm being used for greening purposes. Clarity is required on what is classified as an 'Ecological Focused Area' and what could potentially be included in this 7%, in the Northern Ireland context.
- More focus is needed on the measures at national and regional level. A one-size-fits-all programme is not appropriate given e.g. the climate variations within the European Union.
- According to IFU, the island of Ireland has the lowest carbon footprint in Europe. If so, the new programme could be tailored to reflect this.
- There seems to be a lack of integration between the different DGs in Brussels causing a lack of policy clarity at member state level. There are also differences in interpretation of legislative intent at member state level, with an eventual impact on individual communities and farms.
- The farming community has expressed concern regarding the capping of the direct payments and the fact that there seems to be a move towards an overall reduction of payments to farmers.
- There is a need for a better definition of "active farmer" and flexibility around the age of "young farmers". It is further felt by the farming community that the £6.4 million fund aimed at assisting young farmers is not substantial enough and that more funding should be injected into the future of the industry by supporting farmers taking over the family business.
- Given the fact that other regions such as the Republic of Ireland and Scotland have various grant capital and resources programmes for farmers through CAP in addition to the single farm payments, NILGA would encourage DARD to explore options with local farmers and seeks to work with DARD in this context.

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European Officer

App: Chief Executive