

Department of Agriculture and Rural Development Consultation on the Review of Support Arrangements for Less Favoured Areas in Northern Ireland: A response on behalf of the Ulster wildlife Trust.

The Ulster Wildlife Trust is a nature conservation charity with over 7,000 members which works to achieve an environment rich in wildlife and valued by all. While in this response we have confined our comments to our core business concerns, we would like to acknowledge the important role farming in the Less Favoured Areas plays in the maintenance of social cohesion.

The Ulster Wildlife Trust would like to begin by thanking the Department of Agriculture and Rural Development for the opportunity to contribute to this review and by acknowledging the considerable amount of work that has gone into the production of the Department's consultation document.

In responding to this document our key goals are:-

To ensure the continuation of livestock grazing on land where the habitats and nature conservation value present are the result of centuries of livestock management and which require continued grazing management to maintain that interest.

To ensure that stocking densities are truly sustainable in that whether in numbers, or timing of grazing, the system operates within the biophysical limits of the land.

Q1. Are you content that all of the relevant issues have been captured and adequately explored?

Common Land

We would have liked the document to have given some more consideration to common grazing. While we recognise that most policy formulation will naturally focus on land with a single owner common grazing is likely to coincide with semi-natural habitats and possibly with designated sites and thus could deliver important public goods despite not being the most common form of landholding. Some consideration of how the system currently operates and to what extent the current governance systems can deliver would have been a useful addition.

Farming and the provision of specific public goods.

The department's report recognises that there are further questions about the links between farming and provision of specific public goods and the Trust would agree that further work needs to be done to quantify public goods produced by particular farming systems. While farming practices have co-evolved with the environment over a

substantial period of time we should not under-estimate the power of market signals and policy decisions either in the very recent or the more distant past.

Q2. Are you content with the conclusions that have been reached within the evidence chapters?

The Ulster Wildlife Trust believes that the LFA scheme has the potential to play an important role in maintaining multifunctional cultural landscapes. While continuation of livestock grazing is often required to maintain habitats we would stress that the need is for appropriate grazing patterns, not just the continuation of grazing. It may well be that the grazing regimes of the *very recent* past will not deliver on the aim of sustainable land management. 1985 is often used as a base-line within the evidence chapters yet between 1974 and 1985 there was an increase of nearly 70% in the total Northern Ireland sheep flock. There needs to be a clearer justification of the use of this particular base-line. The scheme also needs to ensure that the rewards to farmers are sufficient for them to regard grazing livestock as economically sustainable from the point of view of the farm business.

Chapter 5: final conclusion.

We would welcome further clarification as to exactly why there must be no duplicate funding.

Chapter 9: farm business analysis.

At one point the analysis assumes a livestock diet of grazed grass, silage and concentrates and the role of semi-natural vegetation such as heather moorland is unclear, yet grazing on such habitats would be desirable in terms of delivering biodiversity as a public good.

The representative farm models were created based on the status quo yet that status quo has evolved in response to the Common Agricultural Policy.

While we recognise there are inevitable time constraints within any modelling exercise carried out to underpin a consultation it would be useful for this work to be carried on by the scientists and economists involved with the opportunity for some exploration of the underlying assumptions and exploration of how low-input low output systems might work.

Q3. Do you agree with option 1?

No.

Q4. Do you agree with option 2?

No.

Questions 5 and 6.

Theoretically there is the potential for public goods in relation to biodiversity to be delivered by either of these options and the extent to which the public goods could be delivered would depend on the way in which any such scheme was designed. Given the time-scales involved the arguments against option 3 are largely pragmatic ones, including the need to reassess and adjust the recently launched new CMS. Option 4 therefore looks as though it is most practicable for the immediate future (ie up to 2013) given the time constraints but planning for the post 2013 period should explore the possibility of other solutions to align with future changes in the CAP. Agri-environment schemes were designed to offset effects (in costs or income forgone) when a farmer has to change agricultural practices. Those agricultural practices however, were being driven by both the historic CAP and market demands. Long term planning for a situation where agricultural support could become increasingly aligned with provision of public good is desirable.

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