

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

RESPONSE TO DARD CONSULTATION ON THE REVIEW OF SUPPORT ARRANGEMENTS FOR LFAs IN NORTHERN IRELAND

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

CNCC would like to congratulate DARD on a very full and detailed exploration of the numerous issues and their implications in the debate over LFAs. We would like to suggest four issues that have been alluded to but not considered in any depth and which we feel are relevant:-

1. The role of LFA farming in the context of NI agriculture as a whole. There needs to be a recognition that the LFA is an integral part of a highly-evolved stratified system of agriculture rather than a stand-alone activity on the periphery on mainstream agri-business. This is manifest in many ways :-
 - As the primary source of suckled calves for quality beef production
 - As a major source of cow beef
 - As a market for beef/dairy heifers, a by-product of the dairy industry
 - As a primary source of breeding ewes (mules and Suffolk/Cheviots) for lowland producers
 - As a producer of store lambs for fattening on dairy and arable farms
 - As a market for feedstuffs based on local arable cropsThe loss of production from LFA farming would have major impacts on the whole farming system in Northern Ireland, and we feel that this point has not been adequately recognised.
2. The threat to upland habitats from exotic species, particularly Sitka Spruce, in areas where grazing is significantly lost or reduced. Observations of areas where grazing animals have been excluded suggest that the extensive forests of non-native conifers are likely to provide vast amounts of seed which will germinate and develop in the absence of grazing pressure. This is particularly true in the more oceanic areas in the west of the province, but can be observed almost everywhere. Most of these seedlings will not survive to become mature trees because of lack of nutrients, but would have the potential to change most upland habitats significantly.
3. The importance of HNV farming. As agri-environment schemes such as the ESA Scheme and the Countryside Management Scheme become the norm a greater percentage of Northern Ireland's land will be eligible as HNV land. The EU has recognised the challenge of maintaining these farming systems and through the Kyiv Declaration on Biodiversity European Environment Ministers is committed to identifying and maintaining HNV farming areas. We see this review as an opportunity to put this commitment into practice by defining more closely the farming practices involved and targeting them for support.

4. Climate Change. This will lead to significant changes to both our agriculture and to our natural environment in terms of growing seasons, soil moisture, pests and diseases to mention but a few of the factors involved. We believe that there needs to be more work done on scenario planning, mitigation and adaptation of farming systems to take account of these changes.

In addition, while the Review was being undertaken two important pieces of research have been completed:-

- ASSI Condition Assessment Monitoring 2002-2008. This records that about 45% of upland ASSIs are in unfavourable condition, and that undergrazing has now become a more significant factor responsible for unfavourable features than overgrazing.
- Northern Ireland Countryside Survey 2007, Broad Habitat draft report, April 2009. This records a number of changes to the countryside, including an increased area of Dwarf Shrub Heath at the expense of Acid Grassland, reversing an earlier trend, and suggests that this is caused by reduced grazing pressure.

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

CNCC is generally content with the conclusions that have been reached and commends DARD for the thorough process that they have engaged in to reach these important conclusions. The issues identified above need to be addressed at some point, but we consider that the conclusions reached in the review would be substantially the same.

Q3 to Q5 Options 1, 2 and 3

CNCC does not agree with these options

Q6 Do you agree with Option 4 that there should be a future LFACA Scheme

CNCC does agree with Option 4, for the following reasons:-

- **Landscape** On a large scale we have become accustomed to, and value, the upland landscapes that we are now familiar with – open hills and mountains, with a broad mosaic of moorland and rough grassland. These are the products of centuries of grazing by domesticated animals, and the loss of this grazing would result in very different landscapes, with the spread of bracken, scrub and woodland, including non-native species. While some diversification of landscape would be welcome in some areas, there would be widespread resistance from the public to large scale changes. On this scale the important issue is the continuation of grazing.

- **Habitat Conservation** Individual upland habitats have similarly evolved in response to centuries of grazing by domesticated animals. Much of the resultant habitat is blanket bog or upland heath, both of which are priority habitats under the EU Habitats Directive and subjects of Biodiversity Action Plans. There is a close association between LFAs and High Nature Value farming, underlining the vital importance of these areas. Without the support of the LFACA Scheme it is probable that livestock numbers in the LFA will decline or disappear as suggested by the report of the Red Meat Task Force. The result will be major changes to these habitats with a very different species composition, including invasive exotic species. ASSI monitoring is already showing that undergrazing is a serious threat to the condition of the important biological features of our upland habitats. For effective habitat conservation it is crucial to ensure appropriate grazing systems for individual sites.
- **Environmental Services** The area covered by LFAs is a major contributor to the vital services that our environment contributes to the public good. Peatland is our biggest carbon store by far. It has been calculated that Northern Ireland's moors and heathland the vegetation alone contains 64,000 tonnes of carbon, and this is a tiny fraction of that held within the peat. These huge carbon stores need care to ensure that they are in good condition, and if possible, still actively growing and hence capturing more carbon. Deterioration in our peatlands could lead to catastrophic losses of carbon to the atmosphere, accelerating the rate of climate change.
- The uplands are a major source of water and need to be in good condition to ensure a steady and safe supply. It is also cheaper to produce clean water than to have to clean it up for public consumption. Upland soils, and particularly peat, have huge capacities to store water and hence reduce flood risks in lower lying areas.
There is great potential for human access to our uplands for a range of recreational activities, which also have a major impact on health and wellbeing. All of these services require some form of stewardship of the uplands, which can only realistically be provided by those already involved in the management of the land, namely the farmers.
- **Agriculture** As outlined above, the LFAs are an integral part of the agricultural business of Northern Ireland. They have a crucial role to play in the production of high quality local food. It is important to recognise that for farmers their primary role is the production of food, and the environmental benefits are a secondary by-product. If we wish to enlist the services of farmers they must be encouraged to continue to rear a valued product.

Q6a Do you agree with the broad outline for such a scheme that has been given and the reasons for this? In particular:-

- (i) CNCC agrees that the focus should be the SDA. It is important to target the resources available at the most vulnerable and important habitats which are also the least economically viable.
- (ii) CNCC agrees that the Scheme should be targeted at active land managers who are managing the bulk of the area concerned.

- (iii) CNCC believes that the primary focus must be on grazing, and that this will almost inevitably involve suckler cows and sheep. The ideal would be a combination of the two, but it is important to recognise individual differences and preferences in approach. True mountain breeds of sheep, such as Blackface and Swaledale would be preferable to those bred for grazing green hills, such as Cheviot and Lleyn. Arable and dairy farming are unlikely to be options for LFA farmers, and should not be included because the management systems generally involved would not produce the desired environmental results.
- (iv) It is important to set minimum and maximum stocking densities as a starting point for managing at a landscape level, but it is also necessary to recognise that the appropriate levels of grazing will vary according to the site. CNCC is not convinced that 1985 should stand as the baseline for stocking density as suggested on p.118. By this time stock numbers were already on the rise in response to headage payments, and we believe that numbers on most semi-natural habitats would need to be lower. The actual level should, if possible, be set according to the vegetation, soil type, aspect and altitude of the site. The tailoring of grazing systems is probably best addressed through an environmental option within the Scheme – see question (v) below.
- (v) CNCC would strongly support the use of an environmental option within the Scheme. This would give an opportunity to assess individual farms and work out appropriate and realistic grazing systems, to give optimum environmental benefit while producing quality product, in return for higher levels of support. These systems would include stocking levels, grazing periods, mix of stock and breeds of sheep. This is a chance to achieve enhancement of landscape and habitats rather than merely maintaining the status quo, with the possibility of creating more habitat diversity in a planned manner.
In addition there is scope for a more imaginative approach at a landscape level involving not merely individual farmers but groups of farmers covering significant areas, working together to provide greater benefit. This could involve management of stretches of watercourses or the linking of isolated pockets of particular habitats. Experience gained through the Special Projects provision of the NICMS would be invaluable in developing this approach.

Q7 to Q9 CNCC has no comments on these questions.