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Protein Crops Payment Scheme Consultation  
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**RE: Protein Crop Consultation**

The Ulster Farmers' Union (UFU) welcome the consultation on a proposed Protein Crop Payment Scheme. The UFU have lobbied long and hard for a combinable protein crop scheme and see many economic and environment advantages upon delivery. One immediate observation is the limiting factor for the pilot window of one year and with many crop rotations already made and now the further seed complexities with Brexit we ask you allow this pilot to roll over two years and include 2022.

This submission is being made on behalf of the Ulster Farmers' Union, the largest farming body representing some 11,500 members here in Northern Ireland.

UFU have a strong well informed professional Seeds & Cereals Policy Committee who welcomed this consultation. We also consulted the UFU Vegetable and Potato Policy Committees as they also practice crop rotation and value the importance of break crops in their planting rotations. UFU continually liaise also with both the Ulster Arable Society and N Ireland Grain Trade Association on many cross-cutting policy issues. This protein pilot is welcomed and has the potential to deliver both economic and environmental benefits.

**Response – based on the questions posed in the Consultation Document.**

- 1 Please outline your views on whether or not support for protein crops should be introduced for 2021 and give your reasons.**

The Ulster Farmers' Union have been strong advocates lobbying for a protein payment in recent years. With our nearest competitors in Rol benefiting from a similar initiative we support the proposed pilot encouraging the establishment of protein crops, striving longer term to reduce the livestock sectors dependence on imported protein.

Locally produced proteins will deliver many environmental benefits and help reduce the carbon footprint along the supply chain. As mentioned above we do however believe this should be a two-year pilot taking into account the timing and availability of inputs.

**2 What are your views on eligible crops being those in crop codes NF1 – NF5 as outlined above?**

On reflection the UFU are accepting of the eligible crops listed, we would also highlight that experience would suggest only spring beans may be taken up. UFU are content with the scope as defined in codes NF1 – NF 5 where land type and weather conditions allow.

**3 Do you agree that the payment rate should be set at £330/ha? If not please state your preferred payment rate and why?**

UFU welcome and agree with the proposed £330 per hectare figure for the pilot, which is based on the RoI scheme. Longer term a provision must be made to review and revise this figure accordingly and agree with the growers.

**4 Do you agree that the budget for this scheme for 2021 should be capped at £330,000? If not, please state an alternative cap alongside reasons.**

UFU accept the £330k cap for this pilot trial for one year. With potential economic and environmental benefits longer term and increased potential uptake the budget would need to be reviewed and reflect nothing less than £330 / Ha longer term, index linked with other associated costs and benefits.

We acknowledge the intention to implement a 'scale-back' system should the 1000 ha / £330k budget be exceeded, for the pilot. It is the view of the UFU Seeds & Cereals Policy Committee due to the lateness of the consultation they do not see this as an immediate concern in the short term for this pilot.

How-ever it is also the view of UFU that the protein payment should not be scaled down/back from £330 / Ha longer term.

**5 What are your views on the equality, rural needs implications and regulatory impact of the scheme?**

It is the view of the UFU no obvious negative implications or regulatory impacts should arise from this pilot. This project has the potential to deliver much needed local protein and deliver excellent biodiversity within N Ireland.

**Contd./**

**6 Do you have any other comments you wish to make on support for protein crops?**

In preparation for discussing this consultation the UFU Seeds & Cereals Policy committee have reviewed some AFBI work and reports on the inclusion of protein. It is our opinion that more work is needed in this area to help maximize the uptake and benefits within the supply chain by both AFBI and CAFRE. For this to be totally successful the UFU ask that DAERA liaise with the NI Grain Trade Association and seek also their support and encourage the use of homegrown protein in feed rations.

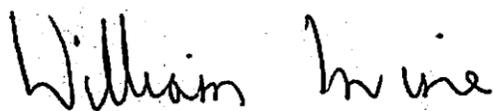
Producing the protein is an integral part of the wider supply chain and for this initiative to be successful it will require greater co-ordinated efforts by AFBI and CAFRE with those producing the protein and the livestock end user. Training and shared learning opportunities need to be made available for both the grower and end user, CAFRE BDG groups could be a possible structure to assist with this delivery.

We are in agreement that harvest may not be commenced before 31<sup>st</sup> July, as stated, but may be harvested as a “single grown crop” after that date for Whole crop. We do not wish it to be grown either with a companion crop or made into crop silage with 2 or more species being sown.

To encourage professional production and an integrated supply chain a successful pilot and meaningful scheme longer term must be promoted, supported and valued by the agriculture industry, wider rural dwellers and public. This project delivers not just a protein but many environmental benefits. It will promote soil health, Integrated Pest Management (IPM), carbon footprint, wildlife and reduction in the use of plant protection product to mention a few.

We hope you find our response useful and will take our views into consideration when reaching your decisions on policy and delivery. Should you wish to discuss further or seek clarity on our response please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "William Irvine". The signature is written in a cursive, slightly slanted style.

William Irvine  
UFU Deputy President