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Mr Norman Fulton
Deputy Secretary
Food and Farming Group

10 October 2018

Dear Mr Fulton

Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement

I am writing to you enclosing the UFU submission to DAERA's consultation on Northern Ireland's Future Agriculture Policy Framework, on behalf of our organisations' 11,500 plus members. This response was formulated after lengthy discussions at meetings of the UFU's 16 policy committees and ratified by the UFU's Executive. The detailed response covers a range of issues and outlines key measures that government should enact to help the farming sector thrive in the coming, potentially turbulent, years.

We now have an opportunity to work together to create a well-funded, refreshed agricultural policy that delivers for all sectors. The UFU believes it is essential for Northern Ireland to maintain at least the existing level of investment in farming. Farm businesses invest in the long-term, so an abrupt cliff-edge halt to long established policies and income streams must be avoided. We expect DAERA to provide sufficient time for a managed transition and for new policies to be agreed and implemented.

This is a once in a generation chance for the government to develop a NI specific agricultural policy that drives integration of profitable food production with high environmental and animal welfare standards. Any future policy should require that, while maintaining a range of purposes for financial support, any such assistance is linked explicitly to genuine active farmers.

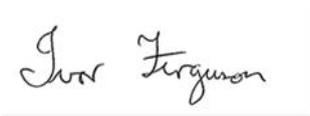
Government therefore have a strategic interest in ensuring a sufficient level of domestic food production, in a volatile world this is a critical aspect of food security. Supporting domestic agriculture to ensure food security and stability of food supply should be included in the purposes for which financial assistance can be provided under any future policy. Farm businesses also have an important role to play in other strategic priorities such as energy and water supply, so these should be further areas to which financial assistance can be provided.

The UFU and its members believe we must use this opportunity to create the conditions for a productive, resilient and sustainable agricultural sector. We need to meet the expectations of the UK

countryside and contributing to productive and robust economic growth. This consultation response therefore provides an opportunity to help meet these ambitions, and this response from the UFU provides recommendations on key measures which DAERA should enact to help ensure our farming sector thrives.

The UFU look forward to future engagement with DAERA on their views on the Northern Ireland Future Agricultural Policy Framework.

Yours faithfully,

A handwritten signature in black ink, reading "Ivor Ferguson", enclosed in a thin black rectangular border.

Ivor Ferguson
UFU President

Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement

Thank you for the opportunity to respond to this very important stakeholder engagement document. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing approximately 11,500 farming families. The UFU represents farmers from all areas of Northern Ireland and across all sectors.

The UFU has a vision of a productive, profitable and progressive farming sector. The UFU want to work in partnership with Government to achieve this with a predictable and manageable transition process.

The UFU believes that, while the importance of direct support will be related to the openness of any trade agreement reached, it is essential for Northern Ireland to: maintain at least the existing level of support for and investment in farming; to provide for a sufficient delivery implementation transition to give individual farm businesses the necessary time to adapt to a new overarching Domestic Policy for Agriculture; and for flexibility through devolution to best adapt a common policy framework to the differing regional needs of farming.

We now have an opportunity to work together to create a well-funded, refreshed agricultural policy that delivers for all sectors. The UFU believe it is essential for Northern Ireland to maintain at least the existing level of investment in farming. Farm businesses invest in the long-term, so an abrupt cliff-edge halt to long established policies and income streams must be avoided. We expect DAERA to provide sufficient time for a managed transition and for new policies to be agreed and implemented.

The UFU is actively engaged in the debate about how and why we should harness public policy and public investment to support our farm sector. The answer is clear: food and farming matter to the UK – not only because of the range of economic, social and environmental benefits it delivers, but also because of the risks that the country faces from a farming and food system that functions poorly, both in terms of food security production and the price of food for consumers. However, we recognise that Brexit provides opportunities for our sector too, and the UFU and its members believe we must use this opportunity to create the conditions for a productive, resilient and sustainable agricultural sector. We need to meet the expectations of the UK countryside and contributing to productive and robust economic growth. This consultation response therefore provides an opportunity to help meet these ambitions, and this response from the UFU provides recommendations on key measures which the Government should enact to help ensure our farming sector thrives in the potentially turbulent years to come.

As farmers we need to be equipped with the right tools in order to meet growing demand for food at home and abroad, protecting the environment as well as meeting the demands of climate change. Approximately 75 per cent of the total Northern Ireland land area of 1.35 million hectares is used for agriculture, including common rough grazing (Statistical Review of Northern Ireland Agriculture, DAERA, 2017). Approximately 44 per cent of this land is classified as Severely Disadvantaged. DAERA must ensure schemes are open to all and properly recognise and reward the environmental contributions of farmers.

Northern Ireland farmers and growers are an important part of rural economies, providing jobs and driving growth both in food production and in diversified industries such as renewable energy and tourism. NI agriculture is also a significant element of our local economy, collectively accounting for around 70,000 local jobs (based on 47,979 total farmers and workers and 23,557 food and drink processing full time and employment agency workers), and 3.25% of Northern Ireland's Gross Value Added (GVA) which equates to £1.1bn at basic prices.

The UK faces an enormous threat from a range of potential pests and diseases, as well as invasive weeds, pesticide resistance and non-native species. The UK Government should commit to a science-led approach with fit-for-purpose legislation to approve safe and effective tools, coupled with effective border controls to retain the UK's high health status.

The UFU response to the questions in the DAERA document are outlined below.

1. What are your views on the retention of entitlements as the basis of direct support until a new agricultural policy framework is agreed?

The UFU are in favour of the retention of entitlements during this transitional period as it helps to ensure as best as possible under existing rules that support is largely directed to current active farmers.

2. What are your views on the possible abolition of the greening requirements of crop diversification, ecological focus area and retention of permanent grassland and the incorporation of the greening payment into the BPS entitlement values?

The view would be to retain separate greening requirements and a separate greening payment at this stage. Post 2021 there is a need for in-depth discussions with DAERA to develop a workable and sustainable environmental policy based on strong scientific evidence.

3. What are your views on the retention of the current ploughing ban on environmentally sensitive permanent grassland (i.e. within Special Protection Areas and Special Areas of Conservation) and how this could be achieved?

The UFU in principle supports the retention of the current ploughing ban on environmentally sensitive permanent grassland. However, a more pragmatic implementation approach must be taken in that this should only apply to a clearly defined designated area and not the entire field in which the designated area is located.

4. What are your views on those accepted into the YFP up to and including 2019 continuing to receive payment for as long as they are eligible to do so?

We support the continued payment for YFP participants as long as they remain eligible. An agreement entered into must be honored until the participant's eligibility period ends.

5. What are your views on whether to allow further applications to the YFP and the Regional Reserve after 2019?

The UFU in principle support the encouragement of young farmers in to the industry. As such, the UFU is also supportive of the current scheme being retained for a further 2 years during a transitional period until 2021.

In advance of 2021, a review of both the Young Farmer Payment and Regional Reserve Schemes should be undertaken to consider a more targeted and outcomes based approach for generational renewal beyond this date.

6 What are your views on the most effective means of encouraging and facilitating generational renewal on farm businesses?

Farm profitability is ultimately the key to achieving generational renewal. However, additional measures can be introduced to help facilitate this process. The UFU would support the introduction of fiscal measures for both generational renewal and also longer term land tenure similar to that in ROI. Support should also be introduced in particular to encourage and develop farms where two or more generations of farmers are working together.

7 What are your views on whether the elements of the current direct payments discussed in Section 2.7 could remain in 2020 and 2021?

Active Farmer – The current definition of an active farmer should be retained for a transitional period until 2021 to provide stability in the medium term. Alternative arrangements should however be explored to target genuine active farmers on a longer time frame post 2021.

Land Eligibility – Support the principle but rules and mechanism for inspection and penalties need reviewed.

Cross Compliance – Support in principle however proportionate penalties must be introduced along with a ‘Yellow Card’ for minor offences with a chance to resolve the issue in question.

Key Dates – Date of payment and the application process are well established and should be retained during the transitional period.

Penalty Regime – Proportionality is the key issue that must be addressed and there must also be a review on limits for maximum penalties.

Simplification is also necessary with the use of the ‘yellow card’ approach.

Retrospective Recoveries – UFU are opposed to retrospective recoveries. There must be recognition of the principle of proportionate effort in the recovery of small sums.

Inspection Regime – The system should be reviewed and made more efficient. Earned recognition and a more effective risk based inspection system along with being more efficient.

8. Have you any specific suggestions for simplifying other aspects of the current direct payment in 2020 and 2021 which are not mentioned here? If so, please explain your rationale for suggesting these.

As mentioned in question seven, rules and mechanism for inspection and penalties require amending. Proportionate penalties must be introduced and ‘Yellow Card’ for minor offences with an opportunity to repair/fix the problem. There must be no further tightening of the rules and all should be reviewed to ensure they are appropriate for Northern Ireland.

9. What are your views on a “Productivity Grand Challenge” approach to delivering a step change in the rate of advance in science and innovation?

The UFU are broadly in favour of a “Productivity Grand Challenge”. This must however also be supported by a more joined up collaborative platform approach to Research and Development, Knowledge Exchange and Policy Development. In particular, there must be a key focus on farm profitability with realistic outcomes to meet any future challenges that farming may face. Funding for the implementation of a ‘PGC Model’ must be provided from other Departmental sources and must not come out of the existing farm support budget.

10. What are your views on the principle of placing greater policy emphasis and investment in agricultural education and knowledge transfer as means of driving better industry outcomes?

The UFU recognise agricultural education and knowledge transfer are important however we are opposed that it should be compulsory. The Union is opposed to making level 3 a requirement and there is a need to take into account other qualifications other than those linked to agriculture e.g. Economics /Accountancy etc., as outlined in the UFU response to the DAERA Knowledge Framework consultation. Furthermore, life time experience in Agriculture also needs to be taken into account and valued.

11. What are your views on linking qualification attainment with a broader range of policy interventions as a means of incentivising farmer engagement with formal training initiatives?

The UFU are supportive of farmers gaining qualification attainment and undertaking formal training. However, this should not be linked to other policy interventions. A lack of formal qualifications should not be used as a barrier and could be perceived as discriminatory.

12. What are your views on continuous professional development (CPD) as a policy intervention and the possible investment of public funds to incentivise CPD?

The UFU support the need for CPD however it should not be compulsory. CPD must be beneficial for the farmer and not a ‘tick box’ exercise. It must be targeted at genuine active farmers and should be funded from other public sources.

13. What are your views on the provision of investment that is specifically targeted on innovation and new technology uptake and that is aligned to other strategic objectives, notably environmental performance?

The UFU are supportive of investment that is directed towards innovation and new technology uptake however this should not just be limited to environmental performance.

Productivity has also been identified as one of the key priorities for the Policy Framework and innovation will help deliver this. However, the delivery mechanisms and rules must be appropriate

14. What are your views on the provision of investment incentives other than capital grant (such as loans, loan guarantees, interest rate subsidies etc.)?

The UFU are supportive of a maximum range of options as possible. All options must be explored and made available when appropriate.

15. What other initiatives by government and/or industry should be pursued to facilitate restructuring and investment and drive productivity?

There must be a stronger focus on longer term land tenure in particular the need for generational renewal.

Government must look to other and closer to home at the action taken in ROI where they have already delivered useful land tenure and succession restructuring changes through legislative and tax changes.

16. What are your views on the provision of a basic farm resilience support measure?

The UFU in principle support a basic farm resilience payment. This payment must be based on productivity, efficiency and linked to inflation. Before the UFU can comment further however, more clarity/progress is needed on future trading arrangements in particular. However, any future support measure should be simple, realistic, attainable and targeted towards genuine active farmers.

It is a matter of national interest to ensure that our country can feed itself, and a high level of domestic production capacity in a volatile world is a critical aspect of food security, therefore a basic farm resilience support measure can help in preserving this. Furthermore, without a lack of meaningful basic resilience support payment this could lead to a reduction in domestic production which subsequently means a greater reliance on imports from other parts of the world, where we have no control over production standards, so effectively exporting and likely increasing our environmental footprint and impact on animal welfare.

17. What are your views on an appropriate mechanism to establish the level of payment under a farm resilience support measure?

The UFU in principle support a basic farm resilience payment. This payment must be based on productivity, efficiency and linked to inflation. Before the UFU can comment further however, more clarity/progress is needed on future trading arrangements. However, any future support measure should be simple, realistic, attainable and targeted towards genuine active farmers.

18. What are your views on the targeting of a basic farm resilience support payment to take account of issues such as natural disadvantage?

In addition to the UFU's support for a general basic farm resilience payment, we also fully recognise the need for an additional support payment to be made for natural disadvantage. While the format of such support does not need to be finalised at this stage, it is essential that the Northern Ireland direct agri support budget is set at an appropriate level to incorporate support payments for naturally disadvantaged land.

19. What are your views on linking a farm resilience support measure with cross compliance obligations?

The UFU support the principle of cross compliance. However, penalties and inspections must be proportionate and a 'yellow card' system must be implemented with prior farmer stakeholder agreement.

20. What are your views on the content of cross compliance/good farming practice associated with this provision?

In response to question 19, if this is to be implemented, the minimal amount of cross compliance rules and regulations should be included with details and measures to be developed at a later date.

21. What issues would an appropriate cross compliance regime seek to encompass?

The UFU recognises the current (GAEC) Good Agriculture Environmental Conditions requirements however this will need reviewed.

Obligations need to be carefully defined and must allow productive agriculture to co-exist with environmental stewardship. Measures to improve the productive capacity of all land types should be considered

22. What are your views on the tiering or capping of a basic farm resilience support payment, or the establishment of an eligibility threshold?

The UFU are totally opposed to capping and tiering of payments but recognise the requirement for a minimum threshold subject to a caveat for the horticulture sector.

23. What are your views on the introduction of anti-cyclical/insurance type measures to help address volatility?

The UFU would be generally opposed to the introduction of these measures however we would need more detail/progress on future trading arrangements before giving this issue further consideration.

24. Should anti-cyclical/insurance type measures be sector-specific or aimed more generally at income protection?

If such measures are to be introduced, they should be sector specific and not aimed at general income protection. However, more detail is needed for further consideration.

25. What are your views on the enhancement of fiscal measures as a means of addressing the issue of income volatility?

All fiscal measures/options should be considered such as the development of a similar deposit scheme as in Australia. Further investigation and analysis is needed before being progressed further.

26. What are your views on a possible pre-defined and agreed crisis response framework to respond to crisis events, either locally or nationally?

More details are required however this framework would need to be implemented at a national level, be financed from UK wide funds, not require ministerial approval and provide for both a rapid and flexible response. Care would be needed on implementing such a measure to ensure inclusiveness and equality.

27. What are your views on the suggested environmental principles to be incorporated within the agricultural policy framework?

The UFU's major objective from any future agricultural policy framework is to deliver profitable, sustainable agri food production. An integral element of this is to encourage environmentally sustainable farming practices.

In our view, this consultation has failed to recognise the many positive environmental benefits already delivered to date by farmers and recognition in going forward must be given to them for these past activities. There is also a strong need for the 'correct information' to be made available for farmers at the right time. Real time data and sound science are necessary to allow farmers to respond and better manage their activities.

28. What are your views on the need for investment in research and education targeted on environmental and conservation management in the agricultural sector?

Environmental research is essential however not at the expense of research for other major areas such as production. Environmental research needs to be scientifically based and more closely aligned to production, undertaken on local farms and across all farming enterprises. Farmers have an integral role to play in this and peer learning is a vital part of knowledge transfer. Collaborative research between AFBI, DAERA & CAFRE with the key focus on profitable, sustainable production is essential. It is also imperative that the necessary funding required comes from a separate budget.

29. What are your views on a shift towards outcome based environmental measures for agriculture, including co-design with farmers and land managers?

More information is required around outcome based measures. The principle is positive but how this works on the ground needs further consideration e.g. would a farmer fail to be paid if a habitat fails to improve when there are so many different factors that could impact on this despite the farmer doing everything right? However, the UFU strongly support the involvement of farmers in co-designing actions that could deliver environmental improvements.

The best environmental outcomes have been delivered on a local scale when others have worked in partnership with farmers and where farmers are genuinely part of the process. Proper facilitation is required to deliver this approach and it is vital that the facilitator has agricultural experience and can work with farmers to ensure positive results.

30. What are your views on the need for future schemes to move beyond the costs incurred income forgone approach to incentivise changes in farming practice to enhance environmental sustainability?

This is essential. The existing cost incurred/income foregone approach does not deliver enough to incentivise or encourage farmer uptake. Payments must be at the right level and any future schemes need properly designed to ensure a positive response from farmers. It needs to be fully recognised that farmers cannot be 'green' when they are in the 'red' financially.

31. What are your views on the role of other actors in the seeking to drive better environmental outcomes?

This is market led and is already happening. As such, the UFU considers that there is no role for Government in this respect. It should be noted that all players in the supply chain have an environmental responsibility. The UFU believe that this is however unlikely to deliver premiums to farmers. Any market-led initiatives must also be science led and not based on perceptions.

32. What are your views on the delivery models that would deliver the best uptake and outcomes?

Delivery must be simple and add meaningful financial profitability to farms. Profitable farmers are the best way to deliver environmental improvements. The target outcomes listed in section 6.5 need further explanation. It may be that delivering against one target area of the environment could result in perverse outcomes and negatively impact on another area. Therefore, a balanced and pragmatic approach is required along with a recognition that environmental perfection is not always achievable nor indeed desirable. Relevant sound science is also vitally important for any delivery model.

33. What are your views on the role of government in ensuring market transparency?

There remains a lack of transparency, trust and information within supply chains. The producer must be profitable, this is priority. Equality of production standards are essential despite any push for a cheap food policy. Farmers should only be competing with imported product of an equivalent not a lesser standard. Local consumers consistently demand high quality, traceable food. A secure equitable supply chain is critically important.

Government has not only a role to ensure market transparency but also that timely, accurate market information is made available to farmers.

The development of improved and more integrated supply chains going forward also necessitates government involvement.

34. What are your views on CPD extending to encompass supply chain awareness training for farmers, including increased emphasis in farmer training on business planning, benchmarking and risk management?

The UFU are supportive but this should not be compulsory, remain optional and paid for from a separate budget.

35. What are your views on the need for, and nature of, government action to achieve greater collaboration within and better functioning of the agri-food supply chain?

Government need to ensure better and more robust transparency within the supply chain but this must not be linked to direct farmer support payments. They also have the responsibility to avoid abusive practices which is key to ensuring producer confidence.

The Grocery code adjudicator should have more power/teeth to protect integrity and fairness in the supply chain.

36. Are there any equality comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

As these are not out yet as per consultation, the UFU will comment in due course.

37. Are there any rural needs comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

As these are not out yet as per consultation, the UFU will comment in due course.

38. Are there any regulatory impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

There is growing concern around the inconsistencies in planning policy between council areas. Farmers are being blocked/turned down for planning especially within areas that are designated and within the proximity to designated areas through no fault of their own. Improved and consistent guidance, training and appeal procedures are required.

39. Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to the Department? If so can you describe the evidence and provide a copy.

As these are not out yet as per consultation, the UFU will comment in due course.

40. Are there any other comments you wish to make or any other evidence of need that you think the Department would find helpful? Please submit any evidence with your response.

The UFU firmly believe that a **profitable** agriculture industry is key to providing a healthy economy, generational renewal and a better environment. The lack of the mention of the word 'profitability' and the overarching swing of questions on environment compared to productivity in this consultation document is concerning. There should be an explicit and clear overarching agricultural focus to this framework. This is a once in a generation chance for the government to develop a NI specific agricultural policy that drives integration of **profitable** food production with high environmental and animal welfare standards. Any future policy should require that, while maintaining a range of purposes for financial support, any such assistance is linked explicitly to genuine active farmers.

Over the last five years, direct CAP support (Pillar 1) amounting to £1.3bn has accounted for 83% of the cumulative total income of the Northern Ireland agricultural industry. In two of these years, the industry as a whole would have been in a loss-making position without this support. This illustrates the importance of support payments in sustaining the industry and underpinning its competitive trading position (Northern Ireland Future Agricultural Policy Framework: Stakeholder Engagement, 2018). It is therefore essential that the current level of support needs to be maintained to avoid business failures and rural social hardship.

The Agriculture and Food Processing sectors in Northern Ireland are a very substantial element of our local economy, collectively accounting for around 70,000 local jobs (based on 47,979 total farmers and workers and 23,557 food and drink processing full time and employment agency workers), and 3.25% of Northern Ireland's Gross Value Added (GVA) which equates to £1.1bn at basic prices. The Agri-Food sector has also been identified as a key future driver for the economic development of Northern Ireland, as evidenced by the publication of the Going for Growth Agri-Food strategy in 2013 which sets out a vision of, 'Growing a sustainable, profitable and integrated Agri-Food supply chain, focused on delivering the needs of the market'.

Government therefore have a strategic interest in ensuring a sufficient level of domestic food production, in a volatile world this is a critical aspect of food security. Supporting domestic agriculture to ensure food security and stability of food supply should be included in the purposes for which financial assistance can be provided under any future policy. Farm businesses also have an important role to play in other strategic priorities such as energy and water supply, so these should be further areas to which financial assistance can be provided.

This domestic food must also be safe and traceable. Short supply chains and more direct oversight of food safety processes allow greater control of, and trust in, the food we deliver to consumers, meeting a clearly expressed desire for British food by the British public. A reduction in domestic food production would also mean a greater reliance on imports from other parts of the world, where we have no control over production standards, effectively exporting and likely increasing our environmental footprint and impact on animal welfare.

The UFU's major objective from any future agricultural policy framework is to deliver profitable, sustainable Agri Food production. An integral element of this is to encourage environmentally sustainable farming practices.

In our view, this consultation has failed to recognise the many positive environmental benefits already delivered to date by farmers and recognition must be given to them for these past activities. There is also a strong need for the 'correct information' to be given to farmers at the right time. Real time data and sound science are preferable to allow farmers to better manage their activities. Viable farm businesses mean farmers are better able to deliver positive environmental outcomes. Businesses that are struggling financially will find it almost impossible to devote the time and resource to this important element of our future policy. With agriculture occupying over 75% of the NI landmass, viable farm businesses play an irreplaceable role in looking after our cherished natural landscapes.

As mentioned in question seven, rules and mechanism for inspection and resulting penalties need changed. Proportionate penalties must be introduced and 'Yellow Card' for minor offences with a chance to repair/fix the problem. There must be no further tightening of the rules and all should be reviewed to ensure they are appropriate for Northern Ireland. A system must also be considered for the deferral of penalties either for all or a proportion of the penalty to the following year to ease financial pressures on farms. This would allow farmers to plan ahead.

According to Rural Support Figures 2017/2018. Out of 338 calls to the Rural Support Helpline, 41% of clients were experiencing finance and debt issues. 54% of callers were male, with 73% over 45 years of age. 65% of callers were full time farming and almost (46%) had dependents. Government therefore need to be mindful of the personal aspect of farmers farming on their own with cross compliance inspections, FQAS Inspections, spot-checks etc. and any future changes need to be carefully managed. Any future Minister must use the power within the NI Agri Policy to minimise bureaucracy and administrative complexity, putting fairness and proportionality at the heart of enforcement mechanisms and along with an effective independent appeals system.

Northern Ireland has a world class agri-food industry that produces top quality food and it is a completely missed opportunity if we do not market and promote it strongly, both here at home and further afield, to the best of our ability. Competition in world export markets is fierce and timing is everything. Already our neighbours in the Republic of Ireland and in Scotland are forging ahead with their food promotion activities and there is a very real chance that Northern Ireland will be left behind. We believe that there is a need for a single agri-food marketing and promotion delivery mechanism within Government. We also believe that the Government must provide additional and meaningful funding for this initiative. Northern Ireland branding and labelling will be an integral part of promoting our industry and must be considered carefully.

The UFU also support applications to a new UK Geographical Indicator scheme. Achieving Protected Geographical Indication (PGI) status would help underpin the qualities of our local product and acts as a secure point of reference guaranteeing the products specificity. This would be of great benefit to NI farmers as it could be used as an instrument to encourage diversification and enhance the value of their produce. It could help remunerate producers for their investment in high quality production

Over the next few years' farmers will need to embrace and utilise a range of digital technologies in their businesses to help them farm more efficiently and productively. The current lack of digital coverage in some parts of NI is creating a huge barrier for farm businesses and putting them at a

severe disadvantage. The UFU is calling on government to ensure a roll out of superfast broadband to all farms and growers and their rural communities, alongside complete mobile phone coverage.

The UFU is actively engaged in the debate about how and why we should harness public policy and public investment to support our farm sector. The answer is clear: food and farming matter to the UK – not only because of the range of economic, social and environmental benefits it delivers, but also because of the risks that the country faces from a farming and food system that functions poorly, both in terms of food security production and the price of food for consumers. However, we recognise that Brexit provides opportunities for our sector too, and the UFU and its members believe we must use this opportunity to create the conditions for a productive, resilient and sustainable agricultural sector. We need to meet the expectations of the UK countryside and contributing to productive and robust economic growth. This consultation response therefore provides an opportunity to help meet these ambitions, and this response from the UFU provides recommendations on key measures which the Government should enact to help ensure our farming sector thrives in the potentially turbulent years to come.