



Northern Ireland
Assembly

Research and Information Service Briefing Note

Paper 000/00

03 September 2015

NIAR 271-15

Barbara Love

Inquiry into ‘Better Regulation’: Results of the 2015 Farmers Survey

1 About the survey

In May 2015, the Committee for Agriculture and Rural Development launched an Inquiry into ‘Better Regulation’. The purpose of the Inquiry is to examine the current regulatory framework within the agricultural industry and to seek ways to reduce the administrative and regulatory burden on farmers. This Briefing Note presents the findings of a survey of the views of farmers on the level of EU regulation, which areas farmers find most burdensome/onerous and how this burden could be reduced.

An electronic survey was issued between May and August 2015 using SurveyMonkey. As well as being promoted on the Committee for Agriculture and Rural Development’s webpage, tweets and a press release were issued to publicise the survey. An article was published in Farming Life to encourage farmers to participate in the survey. The Committee also contacted representative organisations of the industry to ask them to further promote the survey.

2 Profile of respondents

In total, 33 completed responses were received from farmers. Ages ranged from 19 to 72 years with a mean age of 42 years. Almost two thirds of respondents were full-time farmers while just over a third were part-time farmers. The greatest proportion of respondents held medium-sized farms. Responses were received from across farm types with the greatest proportion of responses from dairy and from cereal and crop farmers. Most respondents either farmed on their own or with one other person. Most respondents were from Counties Antrim, Armagh and Down.

As the number of responses received was relatively low, it is advised that the findings of this survey be treated with caution as they may not be representative of the farming population. Nevertheless, the results provide some useful insights into the views of farmers on the areas they find burdensome.

3 Areas of regulation that were rated as most burdensome

A number of respondents expressed the view that all areas of regulation are burdensome:

“Regulation is getting more and more laboursome and intense and we are in constant fear that what we write down is then taken and explored in minute detail as if to find a fault in what we say or do.”

“All NI farmers are over regulated and all these new regulations have done nothing to help improve the farming industry. Farming is the back bone of NI economy and DARD do nothing to help or assist farmers.”

“It’s like a lot of other industries these days -far too much .Some of it necessary, but a lot of it over the top, Gold Plated. The DARD/DOE are like policemen, just ready to apply penalties at any opportunity. This was the message I got very clearly from the DARD roadshows on implementation of the new CAP reform this year.”

The areas of regulation respondents reported as being most burdensome were:

- Nitrates Action Programme (record keeping and inspections) – 8 respondents gave this the highest rating possible while 2 respondents gave this the second highest rating possible);
- Pollution prevention and control (permit system and applications) - 6 respondents gave this the highest rating possible while 4 respondents gave this the second highest rating possible); and,

- Single Farm Payment/Basic Payment and cross compliance (application form and inspection) – 8 respondents gave this the highest rating possible while 1 respondents gave this the second highest rating possible).

4 Comments

This section presents the comments of respondents regarding specific areas of regulation.

4.1 Comments regarding the Nitrates Action Programme

Two respondents made comments regarding nitrates regulation and inspections. One respondent was concerned by the time taken by inspections and felt that these could be less frequent. Another respondent was concerned by the level of documentation and preparation nitrates regulations and inspections require and commented that:

“The inspection itself sets out to criminalise farmers and are operated with a zero tolerance to errors attitude. Surely it would be of more benefit to advise and support during these inspections where errors are of a less serious nature. We feel that inspectors arrive with the attitude that farmers are all “doing wrong” according to these regulations and it’s up to us to prove otherwise or face financial penalties. The amount of investment required to ensure continued adherence with these regulations is substantial.”

4.2 Comments regarding pollution prevention and control

One respondent reported that they had requested a waste disposal licence for the disposal of sheep dip 4 years ago but, despite their requests, they have not received any responses to their queries or received a licence. Another respondent said that they found the old rules regarding silage easier to negotiate and adhere to and find the new rules more costly:

“What is the difference between selling grass from a field to another farmer for 1st and 2nd cut silage as opposed to having to make round bale silage and selling them on? It only creates extra cost, time and labour to the process!!!!”

4.3 Comments regarding the Single Farm Payment

Two respondents expressed concerns or fears about the Single Farm Payment:

“If they could only use some common sense and stop using Single Farm payment as a rod to beat the farmers back.”

“Living in fear of losing SFP.”

Another respondent commented that:

“SFP/BP for has got better recently (online) as it remembers previous details and you only need to change the applicable sections although with rubbish broadband speeds especially if needing to change anything on farm map is a nightmare.”

4.4 Comments regarding Animal disease control

One respondent found the frequency of testing (mostly twice per year) particularly burdensome. They said that they “don’t mind when the cattle are housed” but that “gathering the stock up on day 2 can be difficult.” They felt that this causes stress on the stock and suggested a blood test (similar to BRUC) which would limit the test to 1 day as a way of reducing the burden.

4.5 Comments regarding Livestock Identification

Two farmers felt that they should be provided with free animal tags. One respondent suggested that steel tags be re-introduced so that they won’t get lost.

4.6 Comments regarding Trade in animals and animal products

One respondent found the restriction to trading activity burdensome while another said they felt that the “onerous testing / paperwork exporting breeding livestock to Great Britain & ROI” was particularly burdensome.

Another respondent suggested:

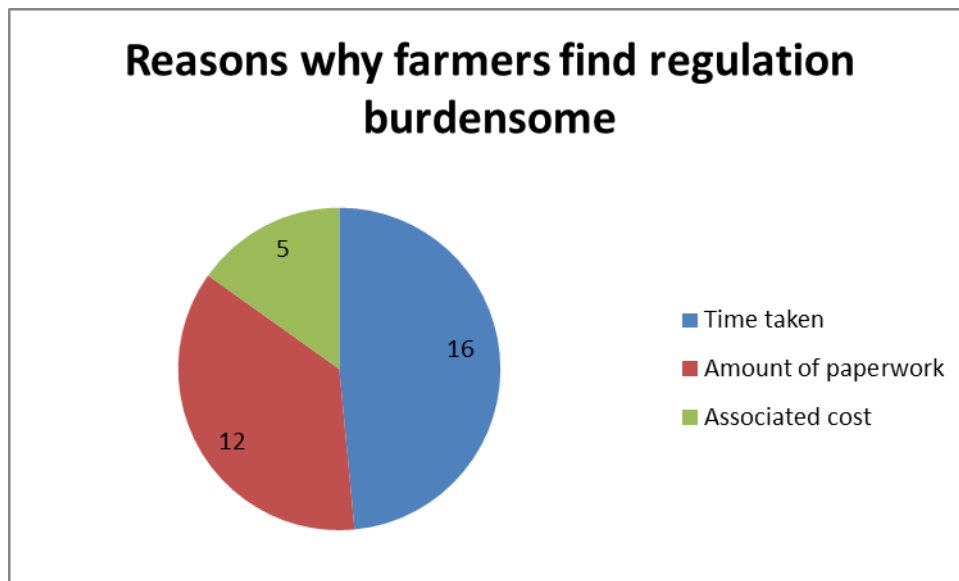
“Make it easier for young farmers to gain herd numbers/flock.”

5 Reasons why regulation is burdensome

The main reasons why farmers find regulation burdensome are due to the time taken followed by the amount of paperwork:

“Far too much CC paperwork (some of which doesn’t really apply but still needs done).”

“Duplication of paperwork dictated by people who have an absolutely no practical experience.”



To reduce the time taken, it was suggested that farmers could have combined inspections.

6 Other comments

6.1 General Comments

“Regulations are there for a purpose, however they need to be thought through before they get to statute level and the impact that they have on the process.”

“Allow farmers to use their initiative and discretion instead of imposing calendar farming upon the industry. Farmers will mostly comply with regulations only a few will spoil it for everyone else so target these offenders and allow the rest of us to farm in peace and produce food.”

6.2 Comments regarding the cost of compliance

“Regulate falling stock scheme as this is VERY expensive, should be free as departments want this done. Pre-movement testing should also be free as again DARD are the only one that wants this done.”

“DARD should also be made pay for all that they want the farmer to do i.e. pay for animal tags, disposal of falling stock (total money racket), pre movement tests, replacement tags, electronic tags etc. This list is exhaustive.”

“STOP annoying farmers, learn to respect them, provided free animal tags, re-introduce steel tags that won't get lost, stop penalising farmers that are not farm quality assured (another money racket I might add).”

“Let us farm. Stop dictating to us. We have hardship, sleepless nights, we're only human. Every mistake we make is punished financially. Every inspection we have costs money that we don't have.”

6.3 Comments regarding DARD¹

“Lack of overall advice from any single DARD official - some know a little part of the cross compliance nightmare, some know nothing but none know it all. We, as farmers, are treated punitively for any failure to comply, yet we are unable to obtain effective help from DARD. I spent 1 hour and 45 minutes using Dard Direct, having been connected to 11 different officials, and failed to get a "yes" or "no" answer to a very basic question. This query arose from the Greening video on YouTube showing how to measure hedges. The demo used fields with no gates! I wanted to know whether to measure the hedge then omit the gateways from total, giving one hedge per field or whether a new hedge was started after each gate, giving up to 5 hedges per field. Not one DARD official could provide an answer. Why was the video made without gates in the field?”

“The injustice of paid officials happily not knowing the details of the compliance that they are enforcing upon farmers results in a defensive barrier alienates DARD from the industry.”

“Get rid of Dard Direct which simply shunts callers around many departments. Have departments clearly identified so that one may direct oneself to the appropriate destination. Ensure that at least some Dard officials know the complete block of regulations that farmers are required to implement (SFP compliance, Nitrates reg, greening, Countryside management etc). It is perfectly reasonable that some paid officials should be familiar with the complete range of requirements that a farmer, working full-time running the farm, is expected to know in detail.”

“Could department officials be more understanding of our hard work and be a bit more compassionate to different farmer's situations. Seems like every farm inspection is an opportunity to punish farmers.”

“Timeless of information flow from DARD in order to make decisions, for example greening clarification / EFAs re new CAP. Apparent lack of foresight as to medium to long term effect of policy and strategic decisions- e.g. Definition of a 'young farmer' under new BPS not only means the farmer must be young to qualify but also a new or recent entrant therefore the scheme becomes a new entrants scheme. Another example, the effect on the conacre land market by the 'active farmer' definition. Also, frustration of the inability to be able to contact DARD with an enquiry. For example, change of GAEC with effect of 1/8/15 re ability to apply for permission to cut hedge early to plant OSR. I still have been unable to access application form, and received a letter with no reference as to where to get form. But the question is- what is the need

¹ Note: one comment has been excluded due to the offensive nature of the language used.

for the form in the first instance? That to me to unnecessary burden - why not make rule change, require farmer to keep record with cross compliance info, but no need to contact DARD. Perhaps there is an unknown benefit that we cannot see to DARD knowing the number of hedges cut on arable land between 15/8 and 31/8?"

"Clarity, timeless, available of straight honest answers, more farmer driven policies, more senior level DARD team understanding of day to day agricultural, less of 'Europe says', cancellation of the move to Ballykelly (perception of DARD is free to spend capex when the whole industry is struggling at grass roots with global pricing issues not least market collapse, euro sterling exchange rates)."

"Inspections, red tape, department officials making perceptions that your farm is a mess."

7 Rank order of areas of regulation from most to least burdensome

Areas of regulation were ranked by respondents as most to least burdensome as follows:

- Nitrates Action Programme (record keeping and inspections);
- Pollution prevention and control (permit system and applications);
- Single Farm Payment/Basic Payment and cross compliance (application form and inspection);
- Pesticides (Control and guidance for use);
- Veterinary medicines (record keeping to ensure food safety);
- Livestock Identification;
- Welfare of animals;
- Trade in animals and animal products;
- Agri-environment (Countryside Management Scheme membership and compliance); and,
- Animal disease control.

However, as noted previously, due to the low response this ranking should be treated with caution as it may not be representative of the views of all farmers.