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Robbie Butler MLA
Committee for Agriculture, Environment and Rural Affairs,
Northern Ireland Assembly

By email only to
Committee.AgriEnvRural@niassembly.gov.uk

3 July 2026

Dear Robbie,

Thank you for your email regarding the Committee's Call for Views for the 'Areas with Natural Constraints (Payments) Bill'.

We have reviewed the Citizen Space survey but believe that it would not be appropriate for the OEP to respond to questions related specifically to financial supports. Any future comment would be considered, where appropriate, in the context of regulations made under the powers contained in any resulting Act. However, there are a few wider points that we feel may be helpful to make at this time.

The OEP has noted repeatedly that the environment is coming under increasing pressures. In our first annual report on the Executive's Environmental Improvement Plan (EIP), we said that progress is largely off-track and noted three particular areas for prioritisation: addressing nutrient pollution (from agriculture and wastewater), speeding up action on circular economy, and ensuring nature's recovery. These recommendations build on the earlier findings of our 'Drivers and Pressures affecting Nature' report, in which we noted that the two principal pressures causing biodiversity loss are land use change and pollution, closely linked to agricultural intensification.

Against this concerning background, Areas with Natural Constraints (ANCs) are particularly important. They are vital for the delivery of the Executive's commitments under the EIP, Draft Climate Action Plan, Nature Recovery Strategy, Peatland Strategy and others. As we highlighted in our report on Protected Sites, even our most treasured places, which support rare or threatened plants, animals and habitats, are coming under increasing pressure. Therefore, it is clear that ANCs are important for nature protection and as such they should be valued and managed appropriately.

In particular, we would support an approach where these sites are managed to deliver the wide range of public goods and services that a healthy natural environment can provide, including - greater biodiversity, carbon sequestration, flood control, clean air and water - all of which are essential for human wellbeing.

While we understand the financial pressures that many farmers are under, we urge caution in developing proposals that prioritise agricultural production over the delivery of the public goods listed above. It would be damaging to the Executive's stated ambitions to improve the environment and adapt to climate change, if the vital public goods delivered by ANCs are inadvertently impacted by further, negative land use or land use changes.

We advise that in order for the Executive to improve prospects of achieving its environmental ambitions, payments in ANCs would best be oriented towards supporting farmers to provide environmental protection and improvement and that this would, in turn, create greater value for public prosperity and well-being.

I hope this brief response is helpful. We would be happy to discuss with the Committee if that would be helpful.

Yours sincerely



Professor Robbie McDonald
Chief Scientist

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