

Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 If you are providing a submission on behalf of an organisation or business please state its name

Name of organisation or business :

4 The Committee for Agriculture, Environment & Rural Affairs would like your permission to publish your response as part of the survey results. Please indicate your preference.

Publish my response but keep it anonymous

Agriculture Bill

Clause 1– Aid in the fruit and vegetables sector (FVAS): amendment of CMO Regulation

5 Do you agree with the power's provided in this clause to allow the Department to continue with the FVAS on a discretionary basis only and to remove the current requirement for all eligible claims to be funded?

No

If no, please explain:

I'm hesitant, usually these things look shiny on the outside however, this causes uncertainty for farmers- the government outwardly shows they put the local communities first, but in reality it's greed and more power, and more trade internationally rather than locally. instead of sourcing from all over the world, there should be grants put in place for setting up new technologies and new farming systems that allow us to grow produce that we source elsewhere. The shift to discretionary funding raises the risk that decisions could be influenced by changing political agendas rather than being based on clear, transparent criteria- where does this leave SMALL farms? Potential Reduction in Overall Funding.

Clause 2 – Aid in the fruit and vegetables sector: power to modify

6 Do you agree with the power being conferred on the Department by Clause 2 to make regulations as described above?

No

If no, please explain further:

small farm risks: 1. Increased Uncertainty in Funding Rules Frequent changes to regulations could make it harder for small farmers to predict and plan for financial aid. If funding rules keep shifting, farmers may struggle to make long-term investments in infrastructure, equipment, or sustainable practices. The lack of stability could discourage new entrants to the sector, particularly young farmers who rely on financial assistance. 2. Risk of Reduced or More Selective Funding The Department may tighten eligibility criteria under new regulations, making it harder for small farms to qualify for aid. If funding rules become more focused on efficiency and large-scale output, smaller, more traditional farms could be pushed out in favor of large agribusinesses. Subsidies could be redirected towards farms with more advanced technology, leaving smaller, family-run farms at a disadvantage. 3. Bureaucratic and Administrative Burden If the Department modifies the review process for funding decisions, small farmers may face longer approval times or more complex paperwork to access aid. Larger farms often have the resources (e.g., consultants or dedicated staff) to navigate regulatory changes, whereas smaller farmers could struggle with new administrative requirements. Delays in financial aid due to lengthy decision reviews could harm small farms that rely on timely subsidies to stay operational. 4. Potential for Unequal Treatment If the modification powers are used to favor certain types of farms, there is a risk that larger farms or certain sectors will receive more support. Small farms in rural or less politically influential areas may lose out if funding decisions are shaped by lobbying from bigger agricultural businesses. 5. Limited Transparency and Accountability If the Department can modify aid rules without Parliamentary approval, small farmers may have little say in how changes impact them. Without clear oversight, there is a risk of inconsistent decision-making—some farmers may benefit more than others depending on who controls policy at the time.

Clause 3 – Information provision and promotion measures: power to modify

7 Do you agree with the power being conferred on the Department by Clause 3?

No

If no, please explain further:

Key Risks to Small Farmers: 1. Reduced Access to Promotional Support Current promotional schemes may help small farmers by marketing local produce, organic products, or traditional farming practices. If funding is redirected towards large-scale commercial farms, smaller farmers could lose out on marketing opportunities, making it harder for them to compete. Changes could mean less investment in regionally specific branding, which often benefits small, independent farms selling niche or local products. 2. Favoritism Towards Large Agribusinesses The Department might prioritise mass-market or export-oriented promotion strategies, which are more beneficial to large farms. If regulations are changed to focus on volume-based production, small-scale and specialty growers (e.g., organic, permaculture, or heritage crop producers) might struggle to gain visibility in government-supported campaigns. Supermarket supply chains could be favored over direct-to-consumer or farmers' market models, disadvantaging small producers who rely on local sales. 3. Potential Loss of Transparency in Information Sharing If the Department modifies regulations without clear accountability, farmers may lose access to important industry data, such as market trends, subsidies, or regulatory updates. There is a risk that larger farming groups with lobbying power could gain exclusive access to better market intelligence, leaving small farmers at a disadvantage in making business decisions. 4. Higher Costs for Small Farmers If new regulations shift promotional costs to farmers themselves, smaller farms may struggle to afford participation in national or regional marketing campaigns. There's a possibility that government-backed certification or marketing schemes could become more expensive or harder to qualify for, limiting the ability of small farmers to benefit. 5. Weaker Local and Sustainable Farming Narratives If the Department modifies promotion measures to focus only on large-scale efficiency and exports, this could undermine support for local, sustainable, and small-scale farms. Traditional and regenerative farming may receive less attention if policies favor intensive, high-yield agricultural models.

Clause 4 – Regulations

8 Do you agree that the regulations made under this Bill may contain the above wide-range of provision's?

No

If no, please explain further:

Regulations should not be granted such wide-ranging powers without additional safeguards. Small farmers, in particular, need greater clarity on how these provisions might affect their operations. Transparency, consultation, and limits on modifications to existing statutory provisions should be required before such broad authority is granted.

9 This clause also provides that regulations under the Bill can only be made following approval by the Assembly. Do you agree that the regulations in this Bill can only be made following approval by the Assembly?

Yes

If no, please explain further:

Requiring Assembly approval is essential to ensure that changes to farming regulations undergo proper scrutiny, protecting small farmers from abrupt, unfair, or poorly considered regulatory shifts. This process helps maintain transparency, accountability, and democratic decision-making.

Clause 5 – Interpretation

10 This clause provides interpretation of terms used in the Bill, including that "modify" includes amend, repeal or revoke. Do you agree with the term 'modify' as interpreted in the Bill?

No

If no, please explain further:

!!! The term "modify" is too broadly defined, allowing for full repeal or revocation of key farming regulations without adequate oversight. While some flexibility in legislative updates is necessary, the power to completely remove existing laws should require specific approval, safeguards, and consultation with stakeholders (including small farmers). A clearer distinction should be made between "modification" (adjustment) and "repeal" (removal).

General

11 Do you feel that the Bill if enacted will have any direct costs to you or your organisation?

Yes

If yes, please explain further:

The Bill, if enacted, will have financial consequences for farmers and rural communities in Northern Ireland. The shift from statutory to discretionary funding in the FVAS creates uncertainty, making it harder for farmers to plan ahead. While the Department may not face direct costs, farmers, small agri-businesses, and local food production will bear the burden of reduced financial support. Over time, this could harm NI's agricultural economy, food security, and rural livelihoods.

Producer Organisations (PO)

12 Are you or your organisation currently a member of a Producer Organisation (PO)?

No

13 If no, have you ever been a member?

No

If yes, please explain why you or your organisation left the PO :

14 If no, would you ever consider becoming a member of a PO?

No

If no, please explain your reasons :