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Northern Ireland's agri-food sector – background and possible 'Brexit' considerations

1 Context

The agriculture and food processing sectors in Northern Ireland are a significant element of our local economy, collectively accounting for around 70,000¹ 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 Growth² 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'.

¹ Includes farmers, spouses, farm workers, total direct employees and agency employment in food and drink processing –based on 47,979 total farmers and workers and 23,557 food and drink processing full time and employment agency workers

² [Going for Growth: a strategic action plan in support of the Northern Ireland agri-food industry, Agri-Food Strategy Board, April 2013](#)

The strategy also set a number of overall and measurable targets for the development of the agri-food sector by 2020 as follows:

- Grow sales by 60% to £7billion;
- Grow employment by 15% to 115,000;
- Grow sales outside Northern Ireland by 75% to £4.5billion; and
- Grow by 60% to £1billion the total added value of products and services from local companies.

This briefing paper provides contextual information on the agriculture and food and drink processing sectors, as well as exploring potential considerations for the sectors following on from the UK referendum decision to leave the European Union on the 23rd June. It should be stated that the full ramifications of this decision will not be known until such time as the UK has formally negotiated the terms of its exit from the EU, and as such some or all of the information in this paper will undoubtedly be subject to change.

Whilst the agri-food terminology is well established and utilised within Northern Ireland, for the purpose of this paper the two sectors are treated separately.

2 Key features of the agriculture and food processing sectors

2.1 Key features of agriculture in Northern Ireland

Table 1 below highlights a number of key features for Northern Ireland agriculture and compares these to the data from the rest of the UK and Republic of Ireland where available.

Table 1: Key agricultural statistics for Northern Ireland, UK and ROI (most recent comparable data)

Feature	NI	Scotland	Wales	England	UK	ROI ³
Share of total GVA (%)	1	1	0.7	0.6	0.6	2.5
Total Income from Farming (TIFF) (£m)	183	667 ⁴	175 ⁵	2,774	3,769	-
Number employed in agriculture forestry and fishing ('000)	26	40	32	259	356	109
Share of overall employment (%)	3.2	1.5	2.3	1.0	1.1	5.5

³ <http://www.cso.ie/en/releasesandpublications/ep/p-fss/farmstructuresurvey2013/>

⁴ <http://www.gov.scot/Resource/0050/00501331.pdf>

⁵ <http://gov.wales/docs/statistics/2016/160225-aggregate-agricultural-output-income-2015-en.pdf>

Feature	NI	Scotland	Wales	England	UK	ROI ³
Number of farms ('000)	25	52	35	102	214	140
Cereals farms as % of total farms	1	5	1	17 ⁶	9 ⁷	-
Dairy farms % share of total farms	11	1.5 ⁸	5 ⁹	7	6	-
Cattle and Sheep (LFA) % share of total farms	58	28	31	12	24	-
Cattle and Sheep lowland as % share of total farms	20	5	6	32	20	-
Poultry farms as % share of total farms	2	2	1	2	2	-
Pig farms as % share of total farms	0.7	0.5	0.26	2	1	-
Mixed farms as % of total farms	2	10	2	8	7	-
Average farm size (ha)	40	118	45	88	80	33
Less Favoured Area ¹⁰ (LFA) - % of agricultural area	69	86	80	17	49	75
Crops: Grass: rough grazing % of total farmed area	5:78:17	10:24:66	5:68:27	46:44:10	-	8:81:11
Average Dairy Farm Business Income 2014/15	45,728	68,471	70,181	83,800	-	-
Average LFA Cattle and Sheep Farm Business Income 2014/15	14,745	26,185	23,337	14,600	-	-

Looking at the data within table 1 it is clear that in UK terms, Northern Ireland is most reliant on agriculture in terms of the share of GVA and percentage share of total

⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/441238/structure-june-eng-farmtypeseries2014-02jul15.xls

⁷ Approximate figure based on 2014 data for Wales and England and 2015 data for Scotland and Northern Ireland

⁸ <http://www.gov.scot/Resource/0050/00501331.pdf>

⁹ <http://gov.wales/docs/statistics/2015/151028-welsh-agricultural-statistics-2014-ency.pdf>

¹⁰ Areas of land affected by agricultural disadvantage as designated under Directive 75/268/EEC and Directive 84/169/EEC

employment. Conversely, however, Northern Ireland also has the smallest average farm size within the UK.

Compared to the Republic of Ireland both our agricultural share of total GVA and agricultural share of overall employment are lower, whilst our average farm size is higher.

In terms of the component parts of the sector, the dominance of grass based cattle (both beef and dairy) and sheep within local agriculture is apparent accounting for 89% of our total farms. In UK comparative terms we have more dairy, and cattle and sheep LFA farms than any of the other UK nations.

70% of the total agricultural area farmed within Northern Ireland is defined as Less Favoured which brings challenges in terms of productivity, and whilst not as high as the figures for Scotland, Wales and the Republic of Ireland, the figure is still significant.

In relation to the key issue of farm income, the data in table 1 reveals that Northern Ireland's dairy farmers had the lowest average Farm Business Income (FBI)¹¹ in 2014/15 across the entire UK, whilst the average LFA cattle and sheep FBI was the second lowest within the UK.

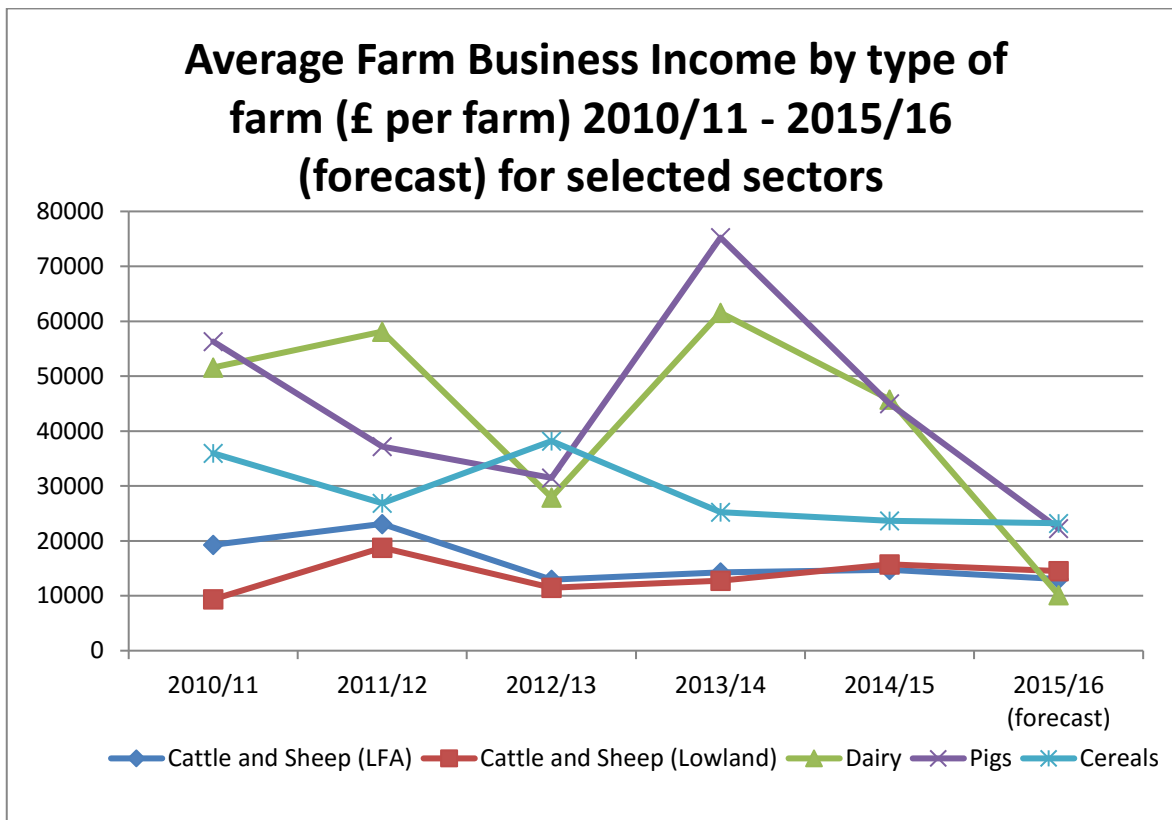
Being more locally specific, farm incomes within Northern Ireland over the last five years have shown considerable volatility (see figure 1) and this presents challenges for the long- term sustainability of the industry.

The dairy and pig sectors in particular have experienced considerable income variability. A number of factors have contributed to this, including the costs of inputs, currency differentials between sterling and the euro, the ending of milk quotas and the Russian import ban to name but a few. The impact on farm businesses has been significant.

Whilst the cattle and sheep sectors have not experienced the same extreme rises and falls in income, the fact remains that the incomes for both of these sectors are relatively low and this may raise questions around the viability of these businesses.

¹¹ Farm Business Income (FBI) is the return to all unpaid labour (farmer, spouses and others with an entrepreneurial interest in the farm business) and to their capital invested in the farm business which includes land and buildings

Figure 1: Average Farm Business Income by type of farm – 2010/11 to 2015/16

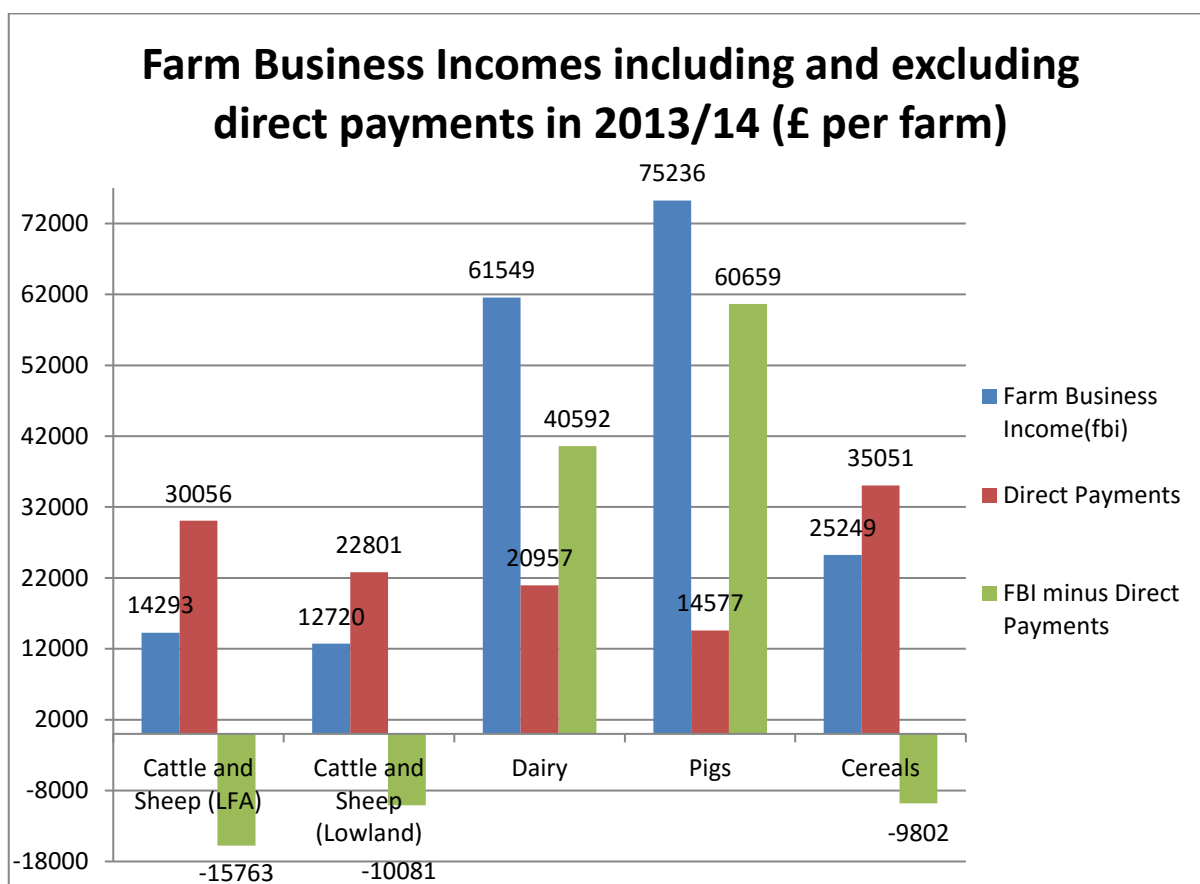


An additional feature of agricultural incomes within Northern Ireland, as illustrated in figure 2, is how reliant they are on direct payments under the auspices of the EU’s Common Agricultural Policy. Department of Agriculture and Rural Development (DARD) data from 2013-14 reveals that when measured across all farm types the average Farm Business Income with EU direct payments removed equated to £3,780 per farm.

Cattle and sheep farms are particularly reliant on EU direct payments with Less Favoured Area (LFA) farms from these sectors recording a negative Farm Business Income of -£15,763 in 2013-14 when direct payments are removed. Based on 2014-15 data¹² average ‘as due’ direct payments represented 103% of the value of average total Farm Business Income within Northern Ireland.

¹² [Farm Incomes in Northern Ireland, 2014/15, Policy and Economics Division, DARD, table 7 page 16](#)

Figure 2: Farm Business Incomes including and excluding direct payments in 2013/14 (£ per farm)



Taking stock of all this information relating to the agricultural sector in Northern Ireland within the context of the EU referendum vote a number of broad conclusions could be made as follows:

- Agriculture is more significant in Northern Ireland than any other part of the UK in terms of employment and economic contribution and as such anything that effects the sector, either negatively or positively, will have significant impacts;
- Direct payments are critical to the short term survival, never mind long term sustainability of many farms, particularly given the variation in farm incomes;
- The high level of LFA land within Northern Ireland, combined with the small average farm size, may present challenges for farm profitability; and
- The heavy reliance on cattle (dairy and beef) and sheep within Northern Ireland may make local agriculture particularly sensitive to any changes to policy affecting these sectors.

2.2 Key features of food and drink processing in Northern Ireland

Based on 2015 data, the food and drink processing sector within Northern Ireland accounts for 2.2% of GVA which equates to £760m in basic prices¹³.

¹³ Derived from [Northern Ireland Agri-Food Sector, Key Statistics, June 2016, table 4 page 5](#)

Table 2 below highlights a number of key features of food and drink processing in Northern Ireland` including the constituent sub sectors, whilst table 3 highlights the values of EU, Republic of Ireland and rest of the world sales as well as highlighting the proportion of total sales accounted for by these markets. Table 4 contains data on net profit as a percentage of sales which is a crude indicator of the profitability of each of the 10 sectors that make up the food and drink processing sector here.

Table 2: NI food and drink processing sector – gross turnover, employment by sub sector and sales¹⁴

Subsector	Gross Turnover – 2015 (£m)	Employees – FTEs 2015	Total sales 2014 (£m)	External sales 2014 (£m)	Export sales 2014 (£m)
Animal by products	59.6	119	51.2	* ¹⁵	*
Bakeries	293.1	3,461	286.1	129.9	75.3
Beef and sheepmeat	1,264.9	4,752	1,244.2	1,023.1	240.6
Drinks	424.3	1,349	416.1	227.3	179.8
Eggs	134.1	342	139.4	94	12.7
Fish	76.1	519	77.1	64.1	30
Fruit and vegetables	314.4	2,484	308.6	208.9	57.8
Milk and milk products	1,007.6	2,159	994	673.8	457.2
Pigmeat	312	1,352	320.9	188.3	82.7
Poultrymeat	709.7	4513	706	*	*
Total Sector	4,595.7	21,048	4,543.6	3,299.2	1,289.4

Table 3: NI food and drink processing sector - destinations and values of subsector sales by subsector¹⁶

¹⁴ Derived from [Northern Ireland Agri-Food Sector, Key Statistics, June 2016, table 6 page 6](#)

¹⁵ Instances where * is used within a table denote that information has been suppressed to avoid disclosure

¹⁶ Derived from [Size and Performance of the Northern Ireland Food and Drinks Processing Sector, Subsector Statistics 2014, with provisional estimates for 2015, DARD, July 2016, table 10b page 15](#)

Subsector	Total sales 2014 (£m)	ROI sales (£m)	Other EU sales (£m)	ROI and EU combined (£m) and as % of total sales	Rest of World sales (£m) and as % of total sales
Animal by products	51.2	*	*	*	*
Bakeries	286.1	72.8	*	72.8 (25%)	*
Beef and sheepmeat	1,244.2	98.4	122.7	221.1 (18%)	19.5 (2%)
Drinks	416.1	146.8	13.4	160.2 (38%)	19.6 (5%)
Eggs	139.4	*	*	*	0
Fish	77.1	6.5	21.2	27.7 (36%)	2.3 (3%)
Fruit and vegetables	308.6	56.2	0.9	57.1 (18%)	0.7 (0.2%)
Milk and milk products	994	149.6	243.3	392.9 (39%)	64.3 (6%)
Pigmeat	320.9	68	*	68 (21%)	*
Poultrymeat	706	94	*	94 (13%)	*
Total Sector	4,543.6	708.2	440.9	1,149.1 (25%)	140.3 (3%)

Looking at the data in tables 2 and 3 it is clear that certain sub sectors of food processing are more significant than others in terms of their gross turnover, employees and total sales, with the largest being the beef and sheepmeat, milk and milk products and poultrymeat sectors. These three sub sectors combined account for 65% of the gross turnover, 54% of the employees and 65% of the entire food and processing sector.

Great Britain is the biggest market for the entire food and drink processing sector, with sales to this market being highest in six of the ten subsectors, whilst the Republic of Ireland is the largest export market accounting for 55% of exports. The rest of the EU is a significant export market for the beef and sheepmeat and milk and milk products subsectors accounting for 10% and 24% of total sales respectively. The rest of the world, which refers to those countries outside the EU accounts for a relatively small proportion of export sales across all subsectors.

The animal by-products, fish and poultrymeat subsectors are most reliant on the GB market whilst the bakeries subsector was the least reliant.

The subsectors most reliant on export markets are animal by-products, milk and milk products and drinks, whilst eggs and poultrymeat were the least reliant.

Looking at the export data for the whole EU, including the Republic of Ireland, and based upon those subsectors for which full data was available, it is apparent that the EU market is most significant for the milk and milk products, fish and drinks subsectors.

Table 4: NI food and drink processing sector - net profit as a percentage of sales by subsector¹⁷

Sector	Net profit (percentage of sales) - Minimum	Net profit (percentage of sales) - Maximum	Net profit (percentage of sales) - Average
Animal by products	6	16	13.7
Bakeries	1	11	5.3
Beef and sheep meat	0	7	1.5
Drinks	-1	12	9.4
Eggs	2	13	7.9
Fish	-2	12	3.1
Fruit and vegetables	1	9	5.0
Milk and milk products	-11	2	0.5
Pig meat	1	7	3.3
Poultry meat	-1	3	3.2
Total Sector	-11	16	3.2

The level of profitability within the food and drink processing sector is highlighted within the data in table 4. Whilst the average for the entire sector equated to 3.2% of net profit as a percentage of sales, the data reveals considerable variation in the average profitability of individual sub sectors. The highest level of net profit as a proportion of sales was recorded for the animal by-products sub sector whilst the lowest was recorded for the milk and milk products sub sector.

The ranges in net profit as a percentage of sales within subsectors also provide food for thought as they reveal that there are individual businesses operating within each subsector which are doing better or worse than the average data. The lowest figure recorded across all subsectors was -11%, which was recorded for the milk and milk products subsector, but negative minimum values were also recorded for the fish, drinks and poultry meat subsectors.

Having considered the data relating to the food and drink processing sector a number of broad conclusions can be drawn as follows:

- Food and drink processing is a significant part of the Northern Ireland economy, actually contributing more in GVA terms than farming;
- Whilst the sector has many subsectors the most significant in terms of turnover, employment and sales are the beef and sheep meat, milk and milk products and poultry meat sectors and the health of these subsectors is directly linked to the local farmers producing the raw materials;
- The EU is a significant export market for local produce, particularly the Republic of Ireland, but GB accounts for the greatest proportion of sales outside Northern Ireland;

¹⁷ [Size and Performance of the Northern Ireland Food and Drinks Processing Sector, Subsector Statistics 2014, with provisional estimates for 2015, DARD, July 2016, table 18 page 24](#)

- A number of subsectors are more reliant on EU exports (milk and milk products, fish and drinks) and as such could face greater impacts from trading changes in the UK and EU relationship;
- Exports to the rest of the world ie outside the EU are relatively small and as such could potentially be further developed;
- The level of profitability for a number of sub-sectors, which is already relatively low, could be adversely affected if costs to access the EU market increase, and this could potentially affect the viability of individual businesses.

3 Possible 'Brexit' considerations for the agriculture and food and drink processing sectors

Sections 3.1 and 3.2 summarise some, but by no means all, of the possible 'Brexit' considerations for the agriculture and food and drink processing sectors within Northern Ireland.

3.1 Agriculture

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
Direct Payments to farmers	<p>Under Pillar I of the Common Agricultural Policy 2014-20 the Basic Payment Scheme (BPS) provides an annual area based payment to eligible 'active' farmers who meet environmental and animal welfare standards (cross compliance).</p> <p>Based on 2015 figures the BPS is worth £283 million per year to farmers in Northern Ireland which roughly equates to payment of €339 per hectare (based on 2013 data).</p>	<p>As highlighted in table 1 the Basic Payment Scheme currently accounts for 103% of the average Farm Business Income in Northern Ireland. The ending of such support could threaten the viability of many farms, particularly if there was neither a replacement or gradual wind down to enable readjustment.</p> <p>The income shock of removal of direct support could see a significant drop in the number of farmers. This could well create a rural unemployment impact that would extend beyond the farm gate as many rural shops and businesses indirectly benefit from farmers spending their BPS.</p> <p>There could also be a large scale abandonment of land if farmers go out of business and dereliction could also be a problem due to a lack of incentives to maintain environmental standards.</p> <p>A drop in the number of farmers could theoretically benefit those who managed to continue to operate as prices might rise for certain produce providing demand exceeded supply and farms might be able to expand if land became cheaper/available. This could make remaining businesses more profitable/efficient and potentially lead to employment generation.</p> <p>As an interesting aside the UK decision to leave the EU could see, pending any UK government decision, UK farmers continuing to avail of direct payments whilst their equivalents the EU could potentially lose this support. This change of direction to the CAP is being openly promoted in</p>	<ul style="list-style-type: none"> • Will the UK government decide to continue to provide direct support to farmers beyond 2020? Is it more likely that support will be indirect or focussed on risk management e.g. farm insurance and export subsidies? What would be the impact of any such move in NI? • Will decisions around whether and how to provide direct support to farmers be devolved to NI? Will additional resources follow to enable this? • What is the UK and NI vision for the development of agriculture and rural communities in the aftermath of 'Brexit'? • If direct payments continue practical questions around delivery would include: <ul style="list-style-type: none"> ➤ Will they be based on an area or productivity basis? – This could create winners and losers – productivity

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
		Brussels by Commission President Juncker's sustainable development adviser who advocates ' <i>...strengthening rural development support type instead of direct payments linked to acreage</i> ' ¹⁸ . Whilst there is no indication that this will become EU policy for the future of the CAP it does suggest that it is possible.	<p>would penalise upland farmers.</p> <ul style="list-style-type: none"> ➤ Would there be a common flat rate? ➤ What conditions would apply for eligibility and continued payment?
Agri Environment Schemes	<p>Under Pillar II (Rural Development Programmes) of the Common Agricultural Policy 2014-20, EU Member States and regions have options for funding to protect the rural environment.</p> <p>Within Northern Ireland the 2014-20 NIRDP has allocated significant sums of money towards a number of agri environment measures including¹⁹:</p> <ul style="list-style-type: none"> • €194 million allocated to Agri-environment-climate measures • €79 million allocated to support 	<p>Only some of the Agri-Env Schemes within the NIRDP 2014-20 are currently open to application as follows:</p> <ul style="list-style-type: none"> • Forestry schemes – which should enable the creation of 1,800 hectares of new woodland²⁰; • Areas of Natural Constraint (ANC) scheme - 2016 Areas of Natural Constraint Scheme commenced in March and the target of making payments, worth £17.9m, to 95% of eligible businesses was achieved²¹. <p>The new Environmental Farming Scheme (EFS), successor to the Northern Ireland Countryside Management Scheme (NICMS) has yet to be rolled out, although participants under the NICMS continue to be supported whilst the new scheme is developed. The stated primary objectives of EFS are to protect and enhance biodiversity and water quality through changes in agricultural and land management practices²². DAERA Minister, Michelle McIlveen, whilst affirming her commitment to the EFS, has confirmed that funding for EFS is not covered by the recent commitment by Chancellor Philip Hammond²³ to guarantee full funding for agri-environment schemes signed before the Autumn Statement²⁴. This could raise concerns around the £100m allocated to the EFS – of which £60m is EU financed, with £40m covered by national funding.</p>	<ul style="list-style-type: none"> • Will the UK government decide to continue to fund rural development across the UK beyond 2020? Would this be a national programme or devolved? • If there is a continuation of rural development funding post the UK's EU exit, would agri environment schemes continue to be a priority for the government? Would any such decision be devolved? • Within the context of the current NIRDP 2014-20, the indications are that the EFS budget is not confirmed up until, never mind beyond 2020. What guarantees are there for funding of this scheme? Will the NI Executive be able or willing to meet any

¹⁸ <http://www.agra-net.com/agra-europe/policy-and-legislation/cap/next-cap-should-shift-focus-from-direct-aids-to-rural-development-juncker-told-523400.htm?CTR=W/BART2016-08-12>

¹⁹ http://ec.europa.eu/agriculture/rural-development-2014-2020/country-files/uk/factsheet-northern-ireland_en.pdf

²⁰ <http://assemblyapps/AIMSPortal/PrintQuestionSummary.aspx?docid=269086>

²¹ <http://assemblyapps/AIMSPortal/PrintQuestionSummary.aspx?docid=267943>

²² <http://assemblyapps/AIMSPortal/PrintQuestionSummary.aspx?docid=267942>

²³ <http://www.farming.co.uk/news/article/12844>

²⁴ <https://www.gov.uk/government/news/chancellor-philip-hammond-guarantees-eu-funding-beyond-date-uk-leaves-the-eu>

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
	for areas facing natural constraints (ANC).	<p>In more general terms, any changes to the budget or priorities within the NIRDP 2014-20 have the potential for negative impacts on the local environment. The potential loss of the ANC payment for example, which benefits farmers farming Severely Disadvantaged Area (SDA) land, could have a drastic impact on our upland environment as it could see farmers either not farming, leading to land dereliction, or could reduce the cross compliance benefits in areas such as soil protection and erosion prevention.</p> <p>Environmental stakeholder organisations such as the RSPB have also raised concerns in relation to the impacts that a removal or reduction of funding will have on projects that have benefitted various habitats and their ability to support and sustain various animal species²⁵.</p>	<p>funding shortfall that could potential amount to £60m?</p> <ul style="list-style-type: none"> • What is DAERA's understanding of the arrangements for assessing whether to guarantee funding for structural and investment projects signed after the Autumn Statement (23rd Nov 2016)? What role will DAERA play in any such assessment?
Animal and plant disease	<p>There are a series of EU Directives and Regulations which deal with a range of actions pertaining to animal and plant disease including prevention, notification, surveillance, diagnostic approaches, control and eradication. Adherence to many of these requirements is a requirement of EU membership.</p> <p>Member States can also avail of financial assistance from the EU in order to deal with</p>	<p>The potential loss of EU co-financing could have a significant impact on the costs that DAERA or the NI Executive might have to bear in relation to the control or eradication of diseases. In the case of bovine TB the costs to Northern Ireland in 2014/15 relating to control of the disease were estimated at £27m²⁷. DAERA accesses approximately €5m co-funding per year from the EU Veterinary Fund for TB to help meet these costs²⁸.</p> <p>A key area that could suffer in relation to many of the animal and plant diseases is that of research as there are a number of local EU funded or co-funded projects. Additionally, there could be potentially negative impacts for knowledge exchange or co-operation on a trans-European basis.</p> <p>There could be theoretical opportunities to change the approach taken to particular plant and animal diseases that could possibly include scaling back or taking a whole new and uniquely UK or even NI direction. Such an</p>	<ul style="list-style-type: none"> • How likely is it the UK will either 'water down' the EU requirements or take a unique UK approach to various animal or plant diseases? • What impacts could this have on our ability to access EU or wider world markets in relation to agricultural produce? • Will there be a UK commitment to meet any shortfall in EU funding for particular disease control, eradication or research programmes? • Where or will these issues feature within the upcoming 'Brexit' negotiations?

²⁵ <http://www.rspb.org.uk/community/ourwork/b/martinharper/archive/2016/07/17/brexit-implications-for-wildlife-friendly-farming-long-term-opportunity-short-term-jeopardy.aspx>

²⁷ http://ec.europa.eu/dgs/health_food-safety/funding/cff/docs/animal_vet-progs_2016-7_dec-2015-3609-ec_bovine-tuberculosis_gbr.pdf

²⁸ <http://archive.niassembly.gov.uk/./bovine.pdf>

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
	<p>endemic or emergency animal or plant diseases.</p> <p>Examples include the UK Bovine TB Eradication and Control programmes which have received £23m in EU co-financing this year²⁶.</p>	<p>approach may, however, prove to be counter-productive, particularly if changing any of the existing EU standards we are operating to restricted our access to the EU or wider world markets.</p>	<ul style="list-style-type: none"> Will UK researchers and institutions still be able to participate in knowledge sharing networks such as EUPHRESKO²⁹ post 'Brexit'? Will this all depend on the negotiated deal between the UK and EU?
Legislation and Regulation	<p>The EU's legislative and regulatory impact on agriculture is extensive. According to the EU's Acquis communautaire (the cumulative body of European Union legislation consisting of primary (treaties and protocols) and secondary legislation (regulations, directives and court decisions) there are currently 2,751³⁰ pieces of legislation in force for agriculture covering areas such as:</p> <ul style="list-style-type: none"> The CAP and its operation; Rural Development; Forestry; and Animal health and welfare. 	<p>The scale of EU legislation and regulation makes it hard to fully assess the potential impacts of 'Brexit'. In theoretical terms the UK's decision to leave the EU could see a potential reduction in the types and level of regulation that local farmers face, but whether this actually happens will depend on the relationship that the UK negotiates with the EU.</p> <p>Possible options for this relationship and how these relate to EU legislation and regulation are broadly as follows:</p> <ul style="list-style-type: none"> European Economic Area (EEA) membership, which includes Norway – all EEA members must implement all EU legislation and regulation as it relates to the single market; European Free Trade Agreement (EFTA) membership, which includes Switzerland – must adapt their domestic legislation to reflect EU laws and regulations related to the parts of the single market in which the EFTA member participates; Free Trade Agreement, various countries have deals either in place or being negotiated including Canada – exports to the EU must comply with EU rules and regulations to enter the single market. 	<ul style="list-style-type: none"> Has the UK government identified areas of EU legislation or regulation that it actively wants to abolish in relation to the operation of UK agriculture? Has DAERA any views on this issue and have they been passed to DEFRA? Conversely has the UK government identified areas of EU legislation or regulation that it actively wants to retain in relation to the operation of UK agriculture? Has DAERA any views on this issue and have they been passed to DEFRA? What specific EU legislation and regulation relating to agriculture would need to be retained in order to gain access to the single market under either the EFTA or EEA models of EU engagement? What is the UK government's preferred relationship with the EU

²⁶ <https://www.fginsight.com/news/eu-to-provide-23-million-to-tackle-bovine-tb-in-uk-9246>

²⁹ <http://www.euphresco.net/>

³⁰ http://eur-lex.europa.eu/browse/directories/legislation.html?root_default=CC_1_CODED%3D15,CC_2_CODED%3D1510&displayProfile=allRelAllConsDocProfile&classification=in-force#arrow_1510

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
		<p>Based on this information it may be the case that if local farmers want to sell their produce within the EU they will continue to have to adhere to a certain number of EU rules.</p>	<p>– EEA membership, EFTA membership, a bespoke free trade agreement or the default WTO relationship?</p>
<p>Exports and imports</p>	<p>The EU Single Market is based upon the so called four freedoms as follows:</p> <ul style="list-style-type: none"> • Goods; • people, • services; and • capital <p>This effectively means that goods can move freely within the EU without being subject to tariffs, quotas, duties or customs delays.</p> <p>Agriculture in Northern Ireland benefits from this arrangement in terms of imports and exports.</p>	<p>At present there is significant movement of agricultural produce across the Irish border with milk being a good example. In 2015 bulk milk imports into the Republic of Ireland for processing by creameries and pasteurisers amounted to 594 million litres, with nearly all of this coming from Northern Ireland. This imported milk is equivalent to 9% of domestic Republic of Ireland supplies and 26% of Northern Ireland's annual milk supplies in 2015³¹. According to Bord Bia data reveals live animal exports from the Republic of Ireland to Northern Ireland as being over 1,000 bovines and 10,000 pigs each week.³²</p> <p>Any change to the current single market arrangements could have a significant impact on the movement of agricultural products into and out of Northern Ireland and as such could affect the costs and market access for farming businesses.</p> <p>Northern Ireland could potentially be more vulnerable to change here than other parts of the UK given our reliance on agriculture and the fact that we are the only part of the UK that shares a physical border with another EU country and have a highly integrated agricultural sector for certain products across the island. The nature of any such impacts will largely depend on the nature of the deal that emerges from the forthcoming 'Brexit' negotiations between the UK and EU.</p> <p>Whilst it is impossible to predict the nature of any deal with the EU, there is available data on the types of tariffs that various products would be subject to if the UK ended up without an EU deal and had to fall back on World</p>	<ul style="list-style-type: none"> • Whilst it may be aware of the issues, how likely is it that the UK government in the forthcoming 'Brexit' negotiations will seek to secure an outcome to minimise any border impacts on Northern Ireland agriculture? • Would additional supports be made available to Northern Ireland farmers in order to address any changes to their current market arrangements with Republic of Ireland processors? • Will the UK government aim to protect agriculture in any trade negotiation or will it be willing to compromise in order to secure access for economic sectors such as financial services? • Is there any potential for the tailoring of new trade arrangements to take account of the differing economies within the devolved nations?

³¹ <http://nationalmilkagency.ie/uploads/files/annualreports/2015/annualreport2015.pdf>

³² Bord Bia (2016) *Brexit Briefing Document June 2016*. Available at <http://www.bordbia.ie/corporate/press/Documents/2016/BrexitBriefingInformation.pdf>

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
		<p>Trade Organisation terms for trade with the EU. In such circumstances agricultural exports from Northern Ireland to EU countries would face the following average tariffs based on 2015 WTO data³³ based on the UK qualifying for the WTO's Most Favoured Nation (MFN) status:</p> <ul style="list-style-type: none"> • Dairy products – 42.1%; • Fruit, vegetables, plants – 10.9%; • Live animals – 1.2%; and • Meat and edible meat offal – 5.2%. <p>It should, however, be recognised that within these broad categories there is considerable variation in tariff levels, as evidenced by the fact that the entire WTO tariff data set shows 6,526 tariff lines, as illustrated by the following examples:</p> <ul style="list-style-type: none"> • Milk and cream of a fat content by weight of > 1% but <= 6%, not concentrated nor containing added sugar or other sweetening matter – range of tariffs between €17.9 per 100/kg and €22.7 per 100/kg; • Fresh or chilled potatoes – 6.7%; • Live sheep - €80.5 per 100/kg; and • Fresh or chilled bovine meat, boneless - 12.8 % + €303.4 per100 kg. <p>As a further complication, certain products may qualify for differing rates of trade which is duty free.</p> <p>Given the complexity and variation in the tariffs it is impossible to assess the full impacts on local agriculture, but it is fair to say that products from certain local sectors could become more expensive within the EU, which might affect how attractive they are within these markets.</p> <p>A further potential 'Brexit' consequence that could impact on local agricultural exports and imports is the strength of sterling. The fall in the value of the £ since 'Brexit' has potentially made agricultural exports more</p>	<ul style="list-style-type: none"> • If the UK government fails to secure a trade deal with the EU and defaults to the WTO rules, what steps will the government take to help farmers deal with the fact that their produce will be more expensive in key EU markets due to tariffs? • Are the growth targets within the Going for Growth agri food strategy still valid, in light of any changes to access to EU markets? Will there be a need to refocus the strategy in terms of export markets?

³³ https://www.wto.org/english/res_e/booksp_e/tariff_profiles15_e.pdf

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
		<p>competitive but has conversely made imports of commodities such as feed, which are critical to certain sectors more expensive.</p> <p>Looking towards the forthcoming UK and EU 'Brexit' negotiations there may be additional challenges for Northern Ireland agriculture in terms of any negotiated trade arrangement. The UK as a whole is not an agricultural economy to the same extent as NI and this could potentially have a big impact for any negotiations with EU, or WTO if it came to it. There may be a risk here could be that protection of agriculture could be sacrificed to secure market access for something like financial services which is a far bigger element of the overall UK economy.</p>	
<p>Protection of local food</p>	<p>EU has legislation for the protection of food names based upon either their geographical point of origin, particular recipe or other uniquely distinctive features.</p> <p>At present Northern Ireland has three PGI approved products as follows³⁴:</p> <ul style="list-style-type: none"> • Comber early potatoes • Lough Neagh Eels • Armagh Bramley apples <p>Three more local products are currently seeking protected status as follows:</p> <ul style="list-style-type: none"> • Lough Neagh Pollan (applied for PDO status) 	<p>The legal protection awarded to all UK products within the food names protection schemes, including Protected Geographical Indication (PGI), means that they cannot be copied throughout the EU. Registered products also benefit from an ability to draw attention to their product and its unique properties across the EU, which can be a major marketing and sales benefit.</p> <p>Any changes to these designations, up to and including the ability to use them, could potentially leave the registered products at risk of being copied, which could both dilute the brand and its profitability to local farmers and producers.</p>	<ul style="list-style-type: none"> • What is the likelihood of UK protected food products continuing to receive this protection and marketing potential post Brexit? • Where will this issue feature in the UK and EU negotiations? • Will the UK decide to bring forward national legislation to recognise and protect local food from imitation? • What would be the economic impact for local protected products if they lost their current status?

³⁴[DOOR Database, European Commission website, 6th September 2016](#)

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
	<ul style="list-style-type: none"> Iveagh Rapeseed Oil – consultation stage prior to formal application stage Brighter Gold rapeseed oil – consultation stage prior to formal application stage 		
Rural Development Funding	<p>Under Pillar II (Rural Development Programmes) of the Common Agricultural Policy 2014-20, EU Member States and regions have options for funding to make farming more efficient.</p> <p>Within Northern Ireland the 2014-20 NIRD has allocated approximately £261m towards a number of schemes designed to support the efficiency and competitiveness of the agri food sector³⁵:</p>	<p>Farming in Northern Ireland has experienced particular difficulties over recent years as evidenced by the income data contained within table 1 and figures 1 and 2 of this paper. As a result of these difficulties, the need for investment and development in terms of farm efficiency and competitiveness to secure farm sustainability may never have been greater.</p> <p>The role of the NIRD here can be pivotal in providing farmers with investment and support at a time when securing private finance may be a challenge. Within this context changes to the budget or priorities within the NIRD 2014-20 have the potential for negative impacts on agriculture within Northern Ireland, at a time when the industry is being identified a key economic driver for Northern Ireland's economy moving forward as evidenced by the Going for Growth agri food strategy.</p>	<ul style="list-style-type: none"> Will the UK government decide to continue to fund Rural Development across the UK? Would this be a national programme or devolved? If there is a continuation of rural development funding post the UK's EU exit will schemes to improve farm efficiency and competitiveness continue to be a priority for the government? Would any such decision be devolved?
Biotechnology	The EU has a legal framework dealing with all aspects for the risk assessment, licensing, cultivation, labelling and traceability of Genetically	<p>Outside the EU there could be greater scope for the UK and Northern Ireland to either speed up/expand the process for use of GMOs, or alternatively move away from the concept altogether.</p> <p>Either of these approaches could have consequences in relation to access to the EU market. However, as they could potentially run counter to the existing provisions within EU legislation. Alternatively, and given the fact that EU controls, and public opposition within some countries, largely relate</p>	<ul style="list-style-type: none"> Will the UK government take a more liberal approach to the utilisation of GMOs post Brexit? Will any decision in this area be devolved? Where or will these issues feature within the upcoming 'Brexit' negotiations?

³⁵ <http://assemblyapps/AIMSPortal/PrintQuestionSummary.aspx?docid=243274>

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
	Modified Organisms (GMOs) ³⁶ .	<p>to the cultivation of GMOs could open up market potential for the export of UK grown GMO animal feeds or other products.</p> <p>Whilst there is ongoing debate on the merits of GMOs a more liberal approach to their cultivation and use within the UK could potentially provide a competitive advantage to UK agriculture, particularly if it boosted yields and reduced costs for pesticides or herbicides.</p>	<ul style="list-style-type: none"> • What is the NI Executive's position on the use and cultivation of GMOs within Northern Ireland? • What risks would a more liberal approach to the approval and utilisation of GMO's have on UK and NI trade with the EU and the rest of the world – would the benefits outweigh the risks? Would this be a particular issue for NI given the land border with the Republic of Ireland?
Research and Development	The EU is a key funder of research and development under the auspices of Horizon 2020 - €80 billion of funding available over 7 years (2014 to 2020). Agriculture, forestry, fisheries and aquaculture, together with the bio-based industries are all included as areas eligible for funding ³⁷ .	<p>A potential loss of access to Horizon 2020 funding could have a detrimental impact on both local agricultural research and the adoption of new approaches or improved processes by local farmers.</p> <p>The vulnerability of local agricultural research to reduced EU funding is highlighted by the Agri Food Bioscience Institute's (AFBI) EU derived income which was equated to be £2.58m in 2014/15³⁸, a figure that represented 14% of AFBI's entire income for the year. Over the 4 year period through to 2020, AFBI is currently projecting to receive £4.7m from existing EU research and development programmes and surveillance work as well as a further £8.2m from new Horizon 2020 and INTERREG VA over the 4-year period to 2020³⁹. The loss or reduction of this income stream could present challenges for the Institute and the work that it does to benefit local farmers.</p>	<ul style="list-style-type: none"> • Will the UK and Northern Ireland in particular be able to continue to access Horizon 2020 and any successor programmes as either associate members, developing countries or as an industrial and emerging economy under particular circumstances? • What steps are the UK government and NI Executive taking to explore the viability of these options? • Where does continued access to EU R&D funding sit within the UK government's negotiating priorities?

³⁶ http://ec.europa.eu/food/plant/gmo/legislation/index_en.htm

³⁷ <https://ec.europa.eu/programmes/horizon2020/en/h2020-section/food-security-sustainable-agriculture-and-forestry-marine-maritime-and-inland-water>

³⁸ <https://www.afbini.gov.uk/sites/afbini.gov.uk/files/publications/Annual%20Report%202014-15%20web.pdf>

³⁹ DAERA email response to RaSe question on EU funding levels, 15 September 2016

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
		<p>It should be noted that there could be continued access to Horizon 2020 funding post 'Brexit' as there are provisions for non EU Member States to participate as follows:</p> <ul style="list-style-type: none"> • 14 other countries are full associate members – whilst Switzerland is a partial associate. This status allows these countries to apply for funding; • 130 developing countries can also apply as third countries; • Industrial and emerging economies may also be eligible for funding if they meet the following: <ul style="list-style-type: none"> ➢ A bilateral agreement exists with that country and the EU. For example, United States researchers may apply for funding in the Horizon 2020 health programme as a reciprocal arrangement between the EU and US in this area; ➢ The country is '<i>explicitly identified in the relevant work programme and call for proposal as being eligible for funding</i>'; or ➢ Participation of a specific entity is deemed to be essential to the carrying out of a project by the European Commission. 	<ul style="list-style-type: none"> • How highly does Agricultural R&D sit as a priority area for continued access? • If access can't be secured will the UK government provide additional resources to meet R&D needs? Will this decision be devolved and will additional resources follow if it is?
Access to labour	The free movement of people is a key foundation of the EU since the 1992 Maastricht Treaty and enables all EU citizens to live and work in any of the Member States.	<p>The ability of other EU citizens to come to Northern Ireland and work here could be either restricted or abolished as result of the UK's decision to leave the EU, and this could have a potential impact on a number of agricultural sectors in Northern Ireland.</p> <p>The particular impacts here might be greatest on those sectors which make use of seasonal workers in order to plant or harvest vegetables and fruit. The short term nature of this work along with its associated hard labour and relatively low wages can present challenges in attracting labour.</p> <p>Whilst anecdotal evidence might suggest that there has been a reliance on migrant labour to meet some of this demand, it should be noted that there are no statistical data to confirm the reality or scale of this contribution.</p>	<ul style="list-style-type: none"> • What will be the UK's approach be in relation to any deal with the EU when it comes to the movement of labour? • How great is the reliance on migrant labour within Northern Ireland agriculture? Are certain sub-sectors more reliant than others? How many people are we talking about and how many businesses are reliant? • In the event of either a restriction or abolition of free movement for EU citizens in the UK what options will be open to agricultural sectors reliant on this

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
			labour source? Will the UK government or NI Executive provide support to farmers facing challenges to their businesses as a result?

3.2 Food and drink processing

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
Legislation and Regulation	<p>The EU's legislative and regulatory impact on food processing is extensive covering areas such as:</p> <ul style="list-style-type: none"> • Food traceability and labelling - General Food Law Regulation; • Food additives; and • Food standards; 	<p>The scale of EU legislation and regulation makes it hard to fully assess the potential impacts of 'Brexit'. In theoretical terms the UK's decision to leave the EU could see a potential reduction in the types and level of regulation that local food and drink processors face, but whether this actually happens will depend on the relationship that the UK negotiates with the EU.</p> <p>Possible options for this relationship and how these relate to EU legislation and regulation are broadly as follows:</p> <ul style="list-style-type: none"> • European Economic Area (EEA) membership, which includes Norway – all EEA members must implement all EU legislation and regulation as it relates to the single market; • European Free Trade Agreement (EFTA) membership, which includes Switzerland – must adapt their domestic legislation to reflect EU laws and regulations related to the parts of the single market in which the EFTA member participates; • Free Trade Agreement, various countries have deals either in place or being negotiated including Canada – exports to the EU must comply with EU rules and regulations to enter the single market; <p>Based on this information it seems likely that if local food and drink processors want to sell their produce within the EU they will continue to have to adhere to a certain degree of EU rules.</p>	<ul style="list-style-type: none"> • Has the UK government identified areas of EU legislation or regulation that it actively wants to abolish in relation to the operation of UK agriculture? Has DAERA any views on this issue and have they been passed to DEFRA? • Conversely has the UK government identified areas of EU legislation or regulation that it actively wants to retain in relation to the operation of UK agriculture? Has DAERA any views on this issue and have they been passed to DEFRA? • What specific EU legislation and regulation relating to food and drink processing would need to be retained in order to gain access to the single market under either the EFTA or EEA models of EU engagement? • What is the UK government's preferred relationship with the EU – EEA membership, EFTA membership, a free trade agreement or the default WTO relationship?

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
Exports and imports	<p>The EU Single Market is based upon the so called four freedoms as follows:</p> <ul style="list-style-type: none"> • Goods; • people, • services; and • capital <p>This effectively means that goods can move freely within the EU without being subject to tariffs, quotas, duties or customs delays.</p> <p>Food and drinks processors in Northern Ireland benefit from this arrangement in terms of imports and exports.</p>	<p>Any change to the current single market arrangements could have a significant impact on the movement of food and drink products or constituent ingredients into and out of Northern Ireland, and as such could affect the costs and market access for food processing businesses.</p> <p>Whilst it is impossible to predict the nature of any deal with the EU, there is available data on the types of tariffs that various products would be subject to if the UK ended up without an EU deal and had to fall back on World Trade Organisation terms for trade with the EU. In such circumstances agricultural exports from Northern Ireland to EU countries would face the following average tariffs based on 2015 WTO data⁴⁰ based on the UK qualifying for the WTO's Most Favoured Nation (MFN) status:</p> <ul style="list-style-type: none"> • Dairy products – 42.1%; • Fish and fish products - 12%; • Beverages and tobacco – 20.7%; and • Meat and edible meat offal – 5.2%. <p>It should however be recognised that within these broad categories there is considerable variation in tariff levels, as evidenced by the fact that the entire WTO tariff data set shows 6,526 tariff lines, as illustrated by the following examples:</p> <ul style="list-style-type: none"> • Milk and cream of a fat content by weight of > 1% but <= 6%, not concentrated nor containing added sugar or other sweetening matter – range of tariffs between €17.9 per 100/kg and €22.7 per 100/kg; • <i>Nephrops norvegicus</i> (prawns) – 16%; • Fresh or chilled cuts and edible offal of fowls of the species <i>Gallus domesticus</i> (chicken) – 6.4% • Fresh or chilled bovine meat, boneless - 12.8 % + €303.4 per100 kg. 	<ul style="list-style-type: none"> • Whilst it may be aware of the issues, how likely is it that the UK government in the forthcoming 'Brexit' negotiations will seek to secure an outcome that would minimise any border impacts on Northern Ireland agriculture? • Would additional supports be made available to Northern Ireland food and drink processors in order to address any changes to their current market arrangements with Republic of Ireland processors? • What guarantees can the UK government give that support for food and drink processing will not be sacrificed in any trade negotiation in order to secure access for sectors such as financial services? • Is there any potential for the tailoring of new trade arrangements to take account of the differing economies within the devolved nations? • If the UK government fails to secure a trade deal with the EU and defaults to the WTO rules, what steps will the government take to help food and drink processors deal with the fact that their produce will be more expensive in key EU markets due to tariffs? • Are the growth targets within the Going for Growth agri food strategy still valid, in light of any changes to access to EU

⁴⁰ https://www.wto.org/english/res_e/booksp_e/tariff_profiles15_e.pdf

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
		<p>As a further complication certain products may qualify for differing rates of trade which is duty free.</p> <p>Given the complexity and variation in the tariffs it is impossible to assess the full impacts on local food and drink processing, but it is fair to say that certain products from certain local sectors could become more expensive within the EU, which might affect how attractive they are within these markets.</p> <p>A further potential 'Brexit' consequence that could impact on local food and drink exports and imports is the strength of sterling. The fall in the value of the £ since 'Brexit' has potentially made food and drink exports more competitive but has conversely made imports of commodities/ingredients for food and drink manufacture, which are critical to certain sectors, more expensive.</p> <p>Whilst there may be challenges in relation to accessing EU markets the fact remains that the combined internal NI and GB markets still remain the biggest outlet for the local food and drinks processing sector, and the 'Brexit' impacts on this trade may well be minimal. There could even be potential for growth in supply to the GB market, particularly if any UK and EU trade deal makes EU food and drink imports to the UK too expensive, and Northern Ireland could be well placed to meet any demand in certain product areas.</p>	<p>markets? Will there be a need to expand the strategy in terms of export markets ie increase the emphasis on the rest of the world?</p>
<p>Access to labour</p>	<p>The free movement of people is a key foundation of the EU since the 1992 Maastricht Treaty and enables all EU citizens to live and work in any of the Member States.</p>	<p>The ability of other EU citizens to come to Northern Ireland and work here could be either restricted or abolished as a result of the UK's decision to leave the EU, and this could have a potential impact on a number of agricultural sectors in Northern Ireland.</p> <p>Whilst here is a lack of robust statistical data to quantify the reliance on migrant labour here, any changes to the availability of migrant labour for Northern Ireland's food and processing sector could potentially present significant challenges to the sector. By way of example Dunbia, one of Northern Ireland's major meat processors, estimates that of the 1,240</p>	<ul style="list-style-type: none"> • What will be the UK's approach in relation to any deal with the EU when it comes to the movement of labour? • How great is the reliance on migrant labour within Northern Ireland food and drink processing? Are certain sub sectors more reliant than others? How many people are we talking about and how many businesses are reliant?

Policy area/theme/issue	EU relevance	Possible 'Brexit' considerations	Key questions
		<p>people it employs in Northern Ireland around 60% at operative level are migrant workers⁴¹. A more recent wider UK report looking at the food manufacturing workforce identified 26.9% as being EU migrants.⁴²</p> <p>If UK food and drink processors are unable to access EU migrant labour there could be a potential risk in them relocating part or all of their operations to the EU, particularly if the access to such labour is critical to the viability of their business. The Northern Ireland economy could be particularly vulnerable here given both our shared physical border with the EU and the fact that there is already significant cross border movement in agricultural produce, which constitutes the raw material for many of our food and drink processors.</p>	<ul style="list-style-type: none"> • In the event of either a restriction or abolition of free movement for EU citizens in the UK what options will be open to food and drink processing subsectors reliant on this labour source? Will the UK government or NI Executive provide support to processors facing challenges to their businesses as a result? • Has any analysis been completed of the risks to the food and drink processing sectors in Northern Ireland? How likely is it that existing businesses here could move all or some of their operation south of the border in order to continue to avail of EU migrant labour?

⁴¹ <http://www.migrationni.org/DataEditorUploads/Mapping%20the%20Deployment%20of%20Migrant%20Labour%20in%20NI.pdf>

⁴² <http://foodresearch.org.uk/wp-content/uploads/2016/03/Food-and-Brexit-briefing-paper-2.pdf>

4 General questions relating to 'Brexit'

Whilst section 3 of this paper dealt with specific issues relating to the potential local impacts of 'Brexit', there may also be value in considering more general questions relating to Northern Ireland's (and more specifically DAERA's) role and participation in the forthcoming formal negotiations between the UK and EU, such as the following:

- What are DAERA's key priorities in relation to the local agri-food sector and the EU relationship? What does it consider to be the key issues for Northern Ireland?
- How are these priorities and key issues being conveyed to DEFRA? Is this process formalised?
- What steps are DAERA and the NI Executive taking to ensure that the priorities and key issues for the local agri-food sector are taken account of within the 'Brexit' negotiations? Are there any formalised protections to address any perceptions/concerns that the UK negotiating position is simply the English position?
- Building upon the previous questions, what work is DAERA and the NI Executive doing to identify areas of common interest with the UK's other devolved administrations as they relate to agri-food? How will this work be utilised and promoted?
- Whilst DAERA and the NI Executive may be feeding information to DEFRA and the UK government to inform the development of a UK negotiating position will any finalised position be subject to formal sign off by the devolved administrations?
- Will DAERA and the NI Executive have physical representation on the formal negotiation teams engaging with the EU? If not how will they be kept informed and ensure that what is being negotiated is not detrimental to Northern Ireland?