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Muck, brass and smoke: Policy post-exceptionalism in the agri-food sector

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1. Introduction

European agriculture has for a long time enjoyed special economic treatment, whereby the rules that generally apply to other major sectors of the economy do not apply to it (Greer, 2017). This means that it is protected from market forces and receives extensive state intervention (see, for instance, Cox et al., 1985; Daugbjerg and Swinbank, 2012; Daugbjerg and Feindt, 2017). Consequently, tariffs, subsidies and payments are terms that permeate the agri-food policy domain. However, in recent decades, this special status has been eroded. Opposition to the protected from market forces and receives extensive state intervention (Greer, 2017). This means that it is

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The involvement of stakeholders beyond government in the policymaking process is reflective of a wider shift from government to governance across many different sectors including health, education and agriculture. At its simplest, governance is characterized by the erosion of traditional boundaries, relying on new partners including the community, public and private sector, and based on devolved power as a way of ‘getting things done’ (Stoker, 1998; Jessop, 2005). The outcomes of governance do not differ from that of government, which is about making decisions and enforcing them, but the way of achieving this is different and it suggests greater power for a wider range of stakeholders (Rhodes, 1997; Stoker, 1998). The perception of process becomes as important as the policy itself and it is important for stakeholders to feel that they are closer to decision making. Effective governance relies on attention towards positive and negative consequences, while also achieving a fine balance between the appropriate and legitimate involvement of different interest groups, often operating at different levels (Jessop, 2005; Stephenson, 2013; Westerink et al., 2017). Gerry Stoker pointed out twenty years ago that “[t]ensions and difficulties with the institutions of civil society, as well as inadequacies in the organizations that bridge the gaps between public, private and voluntary sectors may lead to governance failure” (1998, p. 22). Governance

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failure arises where institutions are not capable of evolution, learning, adaptation and public defence (Goodin, 1996). This can result in failures of leadership, lack of shared aspirations and social conflict among key partners (Stoker, 1998). Accordingly, we want to analyse the extent to which modes of governing within the agri-food sector in Northern Ireland (NI) have led to governance failure. Specifically, we use the concept of policy (post-)exceptionalism to critically assess the role of ‘Going for Growth’ (GfG) (AFSB, 2013), a strategic action plan underpinning the NI agri-food sector for five years from 2012. It set out a series of priorities and recommendations for that sector and was led by a Board which was appointed by government. Fundamentally, growth and job creation were major priorities, with an anticipated expansion of turnover by 60 percent to £7bn in 2020 and an increase in employment by 15 percent within the sector. This was to be achieved through seven wide-ranging themes, including regulation; market share; and innovation and entrepreneurship. Emphasis was placed on growth within specific sectors, notably the pig and poultry sectors, the latter being held up as a “role model of a highly integrated and successful sector” (GfG, p. 54). Crucially, the strategy identified the need to overcome barriers to expansion of that sector, namely poultry waste. We return to this important factor later when we also elaborate on the strategy.

Our analysis contributes to wider debates on policy post-exceptionalism that analyse a shift away from agricultural exceptionalism towards what Daugbjerg and Feindt (2017) have termed ‘post-exceptionalism’, by illustrating the complexity of post-exceptionalist governance dynamics. Agricultural exceptionalism refers to a socio-political climate in which national food security and farmers’ economic interests prevail, and farmers receive ‘special’ political treatment in the form of favourable policies and subsidies (Skogstad, 1998; Daugbjerg and Feindt, 2017; Alons, 2017). Post-exceptionalism is not a straightforward concept and there is no consensus in the literature on exactly what it is. While it involves new actors; shifting roles for the state, with emphasis on market-based solutions; expanded policy issues and policy innovation, ambiguity remains. For instance, is the shift of concentration of power away from primary producers towards food retailers and processors exceptionalism or post-exceptionalism, or is some government intervention likely? Neither is there consensus in the literature on whether or not European agriculture has fully transitioned to post-exceptionalism. While some argue that a clear transition to post-exceptionalism has indeed been made (Repplinger, 2017), particularly within specific arenas such as farm animal welfare (Vogeler, 2019), others suggest that there has been only a partial transition from exceptionalism to post-exceptionalism, as manifest within the Common Agriculture Policy (CAP) (Alons, 2017; Greer, 2017).

In our analysis, we find a transition from exceptionalism, where power remains concentrated in the hands of a few but has shifted away from primary producers towards the corporate sector, namely large food processing companies. This shift is strategically important as these advantageously-placed individuals can manipulate policymaking to realize their own interests (Goldstein and Keohane, 1993; in Skogstad, 1998). Not only is this an insidious and hidden form of power (Lukes, 1994; Daugbjerg and Feindt, 2017) identify as ‘tense post-exceptionalism’ (p. 1579), where political viability is undermined due to unbalanced involvement of different interests. In doing so, we seek to add clarity to debates on what constitutes post-exceptionalism and what the implications of problematic transitions are.

The article is structured as follows: we begin with a general overview of governance and power in food systems, including analysis of the concept of policy (post-)exceptionalism. The GfG strategy is then presented before we critically examine its environmental implications. Our analysis moves on to use two schemes that emerged out of the strategy to illustrate asymmetric power relations within the agri-food sector. We show how the sector represents a form of tense post-exceptionalism, effectively limiting the wider interests of society and prioritizing a privileged few.

2. Governance and power relations in food systems

Examining the processes of governance and policymaking is critical in understanding relationships between the state and other stakeholders in the agri-food industry. It has been shown how conceding disproportionate power to certain interest groups can lower the effectiveness of policies, not least because those policies may ignore the embeddedness of markets in wider social structures and so omit broader societal interests such as concern for the environment or animal welfare (Foord, 2017; Benoit and Patsias, 2017; Richardson, 2018). In recent years, scrutiny has been directed towards a range of issues within agri-food, including relationships between industry and the state; environmental degradation; the position of more vulnerable groups; and the capacity and sustainability of the system overall (Barling et al., 2002; Angus et al., 2009; Clapp and Fuchs, 2009; Hinrichs, 2014; Bui et al., 2016; Kirwan et al., 2017; Lang, 2020). To investigate this more fully, we examine the overarching approach to governance within the agri-food sector.

2.1. Governance in the agri-food sector

The European agri-food sector remains a special case in governance terms. Exceptionalist policy approaches tend to occur where a sector is perceived to deliver significant benefits to the public good, e.g. health or education (Daugbjerg and Feindt, 2017). It occurs in farming because of the belief that disproportionate state intervention is warranted due to its difference from most other economic sectors. In short, agricultural producers face unpredictable natural and economic risks, and the agricultural sector is seen to contribute to wider national interests such as food security (Skogstad, 1998; Daugbjerg and Swinbank, 2012; Daugbjerg and Feindt, 2017). This has long been the case. For instance, in 1918, the Selborne Committee in the UK recognized the need for “increasing home-grown food supplies in the interest of national security, to consider and report upon the methods of effecting such increase” (cited in Cox et al., 1985, p. 132). Post-Second World War, agricultural exceptionalism was also central to the state-assisted policy paradigm that arose in both Europe and the United States (Skogstad, 1998). The European Union’s Common Agricultural Policy was a key element of this post-war paradigm, originally using a combination of protectionist tariffs and price supports to support European food security (Harvey, 2015).

In terms of policymaking, the agriculture sector therefore long benefited from special treatment, or ‘agricultural exceptionalism’ (Cox et al., 1985; Grant, 1995; Skogstad, 1998), where farmers were viewed as the sole legitimate ‘custodians of the countryside’, and a relatively closed network of farm ministries and farm groups were traditionally responsible for developing agriculture policies (Clunies-Ross et al., 1994; Daugbjerg and Swinbank, 2012; Daugbjerg and Feindt, 2017). Historically-close ties between the agriculture sector – farmers’ unions in particular – and government prevailed (Jordan et al., 1994; Woods, 2005). While other groups such as suppliers of agricultural inputs, financial institutions and food processors benefited from this policy approach, the intention was to support agricultural producers (Clunies-Ross et al., 1994).

In recent years there has been evidence of a transition away from traditional agricultural exceptionalism: food processors and retail corporations increasingly assume a privileged position at a global level as they integrate food systems and occupy political and economic leadership roles (Lang et al., 2001; Clapp and Fuchs, 2009), and the idea of agriculture as ‘multifunctional’ – not just about food production – has become a central research and policy focus (Marsden and Sonnino, 2008; Renting et al., 2009). There has also been a broad “participative turn” in Western public policies (Benoit and Patsias, 2017, p. 2), whereby community involvement and participatory approaches to decision-making have been encouraged (Prager et al., 2015; Benoit and Patsias, 2017). This shift has been reflected in the CAP, which, under
ongoing pressure from the World Trade Organisation, moved away from legislating protectionist tariffs and price supports towards offering farmers support via less market-distorting measures (Harvey, 2015). Additionally, in response to the release of a seminal EU report on rural society (European Communities Commission, 1988), support for environmental and rural development measures was included in recognition of the multi-functional nature of the countryside. 

Alongside this evidence of a shifting trajectory of agricultural policy in Europe, there was much interest in what a paradigm shift away from exceptionalist policymaking would look like (Skogstad, 1998; Persson, 2007). Significant debate and analysis preceded the labelling of agricultural policy as post-exceptionalist in 2017 (Daugbjerg and Feindt, 2017). Skogstad argues that a shift away from exceptionalism is characterized by deregulation of agricultural markets and “the termination or substantial restraint of government expenditures for agriculture, and a discourse antithetical to government intervention” (1998, p. 471). Meanwhile, in considering agricultural policy beyond exceptionalism, Persson (2007) underlines the importance of policymaking moving away from a productivist discourse to one of environmental concerns as economic and environmental interests are balanced. According to Greer (2017, p. 1586), the shift towards post-exceptionalism occurs when new actors and interests are incorporated into the policymaking arena, effectively extending the boundaries of inclusion beyond primary producers. “Messy” policy issues such as the environment or climate change become also increasingly important, and the highly interventionist role of government becomes weakened, as reflected in changing policy instruments and programmes. However, post-exceptionalism retains the idea that a sector is special. Daugbjerg and Feindt (2017, p. 1573) articulate how the move away from a “compartmentalized policy arena” is combined with the idea that the agriculture sector still warrants special treatment, albeit with an “updated set of policy ideas” (such as those related to sustainability). They argue that this results in policy innovation. However, a full transition to market orientation does not occur and there remains room for government intervention (Daugbjerg and Feindt, 2017).

Some maintain that a neat transition to post-exceptionalism has not been made, rejecting the notion that policy instruments have been “reframed” (Persson, 2007, p. 1605) to address wider environmental interests (Alons, 2017; Greer, 2017). Writing about the CAP, Greer (2017) argues that, even though some of the policy mechanisms have changed, agricultural policy retains a key focus on propping up farm income. He argues that a form of “shallow exceptionalism” has emerged instead, with the inclusion of new actors and intuitions alongside changes to policy instruments representing change, but the ideas around redistribution and farm subsidies remaining intact (Greer, 2017, p. 1599). Clearly, the transition is not straightforward, and the literature suggests that there are circumstances which fall between the two policy approaches.

Benoit and Patsias (2017), Tosun (2017) and McCarthy et al. (2018) highlight how actors who were formerly marginalized within agrifood politics, including processors, suppliers, retailers, NGOs and consumers/consumer organizations, have begun to play an increasingly active role in the policy area. Similarly, Lawrence et al. (2015) argue that increased financialization and corporatization of the agriculture industry have brought various upstream (e.g. financial institutions, input producers) and downstream interests and agencies (e.g. processors, distributors, retailers) into the food value chain. Daugbjerg and Feindt (2017) argue that in Europe, at least, relatively little is known about the degree to which these players influence policy around food and agriculture but that “post-exceptionalist actor constellations are more complex and contain players from a wider range of backgrounds” (2017, p. 1574). This does not necessarily result is equal power sharing across those new players, but is typically manifest in “strategic positioning” of individuals or partners (Skogstad, 1998), such as a concentrated role for multi-national food corporations in food systems spanning the local and the global (Barling et al., 2002; Clapp and Fuchs, 2009; Foord, 2017).

As a result of this concentration of control, there is wide recognition that prevailing food governance systems are no longer fit for purpose due to questions of legitimacy, power, resources and interactions of relevant actors within agri-food governance (Hinrichs, 2014). Further unease exists over a range of issues including climate change; food safety and quality; and wider systemic inequalities (Angus et al., 2009; Clapp and Fuchs, 2009; Hinrichs, 2014). Policy decisions rely heavily on lengthy debates on the nature of the ‘problem’ to be addressed, and corporate actors are key influencers in how this is framed in public discourse (Clapp and Fuchs, 2009; Sacks et al., 2018). In light of these issues, contemporary research on food systems is concerned with different forms of change (see Hinrichs (2014) for an overview), specifically, transition, which “implies a gradual, pervasive shift from one state or condition to something different” (Hinrichs, 2014, p. 144) and involves adjusting imbalances and addressing “design faults” (Richardson, 2018, p. 218). Before considering the case of the NI agri-food sector as a means of scrutinizing current transitions, we provide an overview of our approach to the research.

3. Materials and methods

Language may be used by those in power to advance or impede the way a particular social issue is dealt with in society (Fairclough, 2009; van Dijk, 2009). We wanted to probe beneath the official policy documents employed in the GfG strategy to get beyond the “well-intentioned” passive construction of words and sentences (Evans-Agnew et al., 2016, p. 137). Accordingly, our study is based on a critical discourse analysis of the GfG strategy. Rather than traditional discourse analysis found in linguistics, we employed Fairclough’s (1995) popular approach which has been used to analyse social policy and practice (Hastings, 1999; Taylor, 1999; Richardson, 2000; Evans-Agnew et al., 2016). Used in this way, it takes account of language and social practices, the latter relating to behaviour and action. It relates to the complex interactions that occur in everyday life and the way in which people advance their interests. Thus, our aim was to employ a simple approach to evaluate the claim made in the GfG strategy and compare these to practice on the ground in terms of what actually occurs within farming and the agri-food sector in NI. Our data collection involved scrutiny of policy documents relating to GfG, including the final printed strategy; review of the website that was used to promote that strategy; examination of emerging policy initiatives (namely promotion of anaerobic digestors and the Renewable Heat Initiative), and fourteen semi-structured interviews with individuals involved in the agri-food sector. Interviews were necessary to give us insight into the social practices of different actors in the sector. Six preliminary interviews were conducted in 2015 and 2016, and a further eight were conducted in 2019 and 2020. We sought to achieve a range of perspectives and interviewed primary producers, individuals involved in retail, food processing and policymaking, as well as a few academics. Some of our respondents wore ‘two hats’, for instance, being primary producers but also having involvement in food processing. Generally, we found that few respondents were universally critical of the strategy, and that most identified most found some good points.

For reasons of confidentiality, the interviewees’ identities remain anonymous, but between them they represent a poultry farmer, two academics, three environmental NGO employees, four government agency employees and four individuals who are employed in different aspects of the food chain (three of whom are also part-time farmers). Interviews explored many different themes relating to food security and safety; export markets; environment; poultry waste; and family farms. Not all interviewees agreed to being recorded, but where this was agreed, interviews were transcribed. Thematic analysis was undertaken through reading and re-reading transcripts and interview notes, and coding them according to the key themes that arose. Consideration was given to discourse, style and genre to show how language and rhetoric are used to advance a particular position. With its focus on text and talk,
this approach evaluates how language is used. Specifically, it examines what is being said about the strategy and how it is presented, along with opinions about its context, rationale and expected outcomes.

4. Case study: going for growth

NI lies within the jurisdiction of the United Kingdom (UK) and enjoys devolved powers on several issues. Generally, it maintains a peculiar position within the UK, not only because government in NI is elected under the Single Transferable Vote (a power sharing government), but also because of a history of civil unrest and fractured relations with Great Britain during the later part of the 20th Century. Connected to this difficult legacy, NI relies heavily on subvention from Westminster to a degree that many ailing English regions would welcome. The power sharing government was thwarted in 2017 and was not fully restored until January 2020, having been brought down by the Renewable Heating Incentive, a scheme directly connected to the Agri-food sector in NI and to which we return later in our analysis.

4.1. The agri-food sector in Northern Ireland

Like the rest of the UK, agricultural policy here has been governed by the CAP, and although the importance of NI’s agri-food industry has declined in recent decades, it remains a significant contributor to the region’s economy, accounting for £1.46 billion (3.7 percent) of Gross Value Added (GVA), and employing 4.6 percent of the region’s population in 2018 (2.8 percent in agriculture, forestry and fishing; 1.8 percent in food and drink processing) (DAERA, 2019). The estimated contribution of agriculture and food and drink is significant for the regional economy, each with employment multipliers of 2.4; over two jobs are generated elsewhere in the regional economy for every job in those sectors (NISRA, 2019). The industry is roughly twice as important for the NI economy as it is for the UK economy as a whole; GVA from agri-food is only 2 percent nationally, and only 2.3 percent of the UK population is employed in the sector (DAERA, 2019).

Farming in NI is characterized by small, usually family-owned, farms units: the average size is 41 ha compared to 81 ha in the UK (34 in Europe) (DAERA, 2019). Nearly 70 percent of the land is categorized as Less-Favoured and most farms are cattle and sheep (59 percent) (DAERA, 2019). However, this structure is being eroded with the policy drive to intensify farms and expand production. This shift is evident in the trend of growth within the intensive dairy, pig and poultry sectors and concurrent decline of the (mainly) extensive drystock sector. Between 2008 and 2018, there was a seven percent increase in the already-significant dairy herd, a 57 percent increase in pig numbers, a 53 percent increase in broiler numbers, and an 81 percent increase in the commercial laying flock. During the same period, sheep numbers increased by only 2 percent, while the beef herd declined by 4 percent (DAERA, 2019).

4.2. The Going for growth strategy

GfG is an agri-food strategy that encapsulates the future desired direction for the sector in NI. The strategy has now run its course, having achieved much of what it set out to do (we return to this below). It is unknown what, if anything, will take its place given the disruption arising from Covid-19 and the uncertainty surrounding ongoing Brexit negotiations, which continue to make new policy decisions nearly impossible. However, GfG does provide valuable lessons for policy-making more generally, both within NI and more broadly, some of which we consider here.

4.3. The Going for growth board

In its 2011–2015 Programme for Government, the NI Executive committed to developing a strategy for expanding the region’s agri-food sector in response to what was perceived as a growth in demand for NI’s food products. Following this commitment, The NI Department of Agriculture and Rural Development (DARD - now the Department of Agriculture, Environment and Rural Affairs), the NI Department of Trade and Investment (DETI - now the Department for the Economy), and Invest NI (NI’s economic development agency) worked together to set up a bespoke Agri-Food Strategy Board (AFSB) responsible for developing this strategy, now called ‘Going for Growth’ (AFSB, 2017a). The Board was appointed for an initial tenure of three years from 2012. This was extended for an additional two years in February 2015. Tony O’Neill, then a Director at Moy Park – at the time NI’s largest private sector business and one of Europe’s largest poultry producers – was appointed Chair of the Board. Other members were subsequently appointed via an ostensibly open application process: board positions were advertised widely and applicants from a range of backgrounds were interviewed. In the end, 13 members were appointed: six representatives from some of NI’s biggest agri-food businesses; two independent dairy farmers, both former presidents of the Ulster Farmers Union (UFU); one representative from Invest NI; three government officials; and one accountant (AFSB, 2017b). Conspicuous in their absence were representatives from academia, NGOs, the environmental lobby and other community interest groups. A quote from one of our interview respondents illuminates this:

“I and others of an [environmental] bent applied, and some at least of us were interviewed, but no go. They wanted an ‘industry representative’ board, no science or [environmental] knowledge required.”

Despite the apparent ‘big industry’ focus of the board, according to the AFSB’s now archived website, efforts were made to engage with stakeholders outside of the agricultural industry, as well as with the smaller players within it. The board established nine sectoral sub-groups tasked with considering specific challenges and opportunities faced by each of NI’s key agri-food sub-sectors. The AFSB reports that more than 80 stakeholders from industry and relevant government agencies were consulted through this process. It also states that further stakeholders were engaged via a public Call for Evidence, which received approximately 40 responses from individuals representing a range of interests, including farming, food, forestry, and the environment. As well as meeting with wider agencies loosely associated with government,

1 Some of this status is derived from the legacy of the ethno-nationalist conflict known as ‘The Troubles’, which began in the late 1960s and ended with the Good Friday Agreement (GFA) in 1998. The GFA set up a series of government institutions between NI and the Republic of Ireland and between the Republic of Ireland and the UK. Significant funds have been injected into the region by the UK government and the EU to ensure that conflict remains firmly in the past.
2 Here, taken to include primary agriculture as well as food and drink processing.
3 In areas designated as ‘less-favoured’, agricultural production or activity is considered more difficult because of challenges such as difficult climatic conditions, steep slopes, or low soil productivity (European Commission, ND).
4 Authors note that the increase in the number of pigs reared during this period follows a sharp decline in pig numbers during the previous decade; numbers have yet to return to 1998 levels.
5 Before becoming a Director at Moy Park, Tony O’Neill was Managing Director of O’Kane Poultry Group, which was purchased by Moy Park in 2010. Two years into his tenure as Chair of the AFSB, O’Neill left Moy Park and became Deputy CEO at Dunbia Ltd (now owned by Dawn Meats), a multinational meat production company based in NI.
6 In 2017, Moy Park was sold for $1 billion (£780 million) to Pilgrim’s Pride, a US-based multinational food firm (Carroll, 2018a). It currently has a network of 800 poultry farms and processes around 6 million chickens each week.
including the Northern Ireland Tourist Board and the Environment Agency, the board “engaged with major retail multiples and environmental interest groups” (AFSB, 2013, p. 4). Feedback received from said stakeholders was then “considered by the main board” and it “influenced the Strategic Action Plan” (AFSB, 2017a, p. 4). Although it could be argued that this demonstrates the policymaking arena now includes more players, a key feature of post-exceptionalism, the degree to which the extra players impacted the final report could be contested given the vagueness with which their input is described, their absence on the actual board and the fact that the majority of the report’s recommendations benefit big industry while paying little regard to small family farmers, small food companies or the environment. We elaborate on the latter assertion in detail below.

4.4. Post-exceptional interventions

The key features of the GfG strategy are described in the 2013 report ‘Going for Growth: A Strategic Action Plan in Support of the Northern Ireland Agri-food Industry’ (AFSB, 2013). GfG’s premise is to expand supply, secure global markets and reduce costs and it aims to do so by “industry, Government and the wider stakeholder base, working together” (p. 11). It seeks to bring about a wholesale re-orientation of NI towards an export-dependent strategy based on large-scale industrial agriculture. The Executive Summary describes how “[t]he industry, moreover, has continued to grow … and to display tremendous potential for sustainable growth through its sharp focus on export sales, innovation and productivity. We have been immensely encouraged by the appetite for growth outside Northern Ireland…” (p. 10). Although intensive farming was the order of the day, reference is made to some environmental activities as the strategy describes how the growth of woodlands “would complement intensive agricultural production by providing improvements in soil, water and air quality” (p. 33). This reflects many of the features of post-exceptionalism given that “[p] ost-exceptionalism denotes a partial departure from compartmentalized, exclusive and exceptionalist policies and politics which, however, preserves some exceptionalist features and has not led to a complete transformation to market-oriented and performance-based policies” (Daugbjerg and Feindt, 2017, p. 1567). While the role of markets is recognized in the GfG narrative, overall there is a limited shift towards market-oriented policies and a continued reliance on government intervention. Recommendations made under beef and sheep illustrate:

The supply chain must seek to deliver greater economies of scale with a particular opportunity to improve communication, technical input and efficiencies through a higher number of larger scale beef finishing units working in partnership with processors. Industry and Government must develop an action plan to double the number of beef and sheep farms actively engaged in physical and financial performance recording over the next five years. (AFSB, 2013, p. 50).

The document deems economic scale and efficiency to be critical, and identifies government-led incentives as being important in encouraging economies of scale at producer and processor levels. In other words, support bigger farms and agri-food processing businesses. Figures are ambitious: grow sales by 60 percent to over £7 billion, create 15,000 new jobs, grow sales outside NI by 75 percent to £4.5 billion, and increase value added to £1 billion by 2020. The report also references the value of consolidating working and calls for greater integration of the supply chain, including farm producers, food processors, wholesales, retailers and export businesses.

According to GfG, significant government action, along with input from academia, will stimulate an export-oriented strategy geared towards meeting consumer demand in emerging markets, including in the USA, Europe, Asia and the Middle East (Agri-food Strategy Board, 2013). Of a total of 118 recommendations (p. 73), only 17 (14 percent) are the sole responsibility of industry. The remaining 101 recommendations (86 percent) are directed towards government, either to be delivered in partnership with industry (51 recommendations), or by government alone (50 recommendations). Proposed government commitments were not insubstantial and include a proposed government investment of £400 million over three years (to lever an industry investment of £1.3 million). The shared government-industry recommendations sometimes seemed to be heavily geared towards government. For example, number 20 (p.75) relates to government-commissioned research.

The NI Executive approved the Board’s proposed plans as published in April 2013 by responding formally in October 2014 (NI Executive, 2014). Many of the benefits of GfG are directed towards large corporations in the form of increased sales, rather than towards primary producers, while costs are borne by taxpayers in the form of subsidized grants and other interventions. The strategy offers little tangible support to small business, be they family farms, processors or retailers. Indeed, although the report states that family farms are “a major element of our economy”, it goes on to say “they also present a significant challenge in terms of long term sustainability” (p. 23). The UFU was critical of the GfG Chair’s position on family farms, publicly registering disappointment with his statement to the Agriculture and Environment Committee that only 6000 farmers are needed in NI for food production (Macauley, 2016). This constellation of actors beyond primary producers, as well as the free market language alongside government intervention, all fit with post-exceptionalist policy.

Importantly, while the rhetoric refers to the role of markets, GfG actually denotes a shift away from market-based policies, with justification of excessive state intervention. As mentioned earlier, many of the recommendations require government action. Rather than the strategy benefiting primary producers, significant benefits are directed towards large scale partners such as meat processors. We contend that GfG does not neatly fit with post-exceptionalism because, although there are more actors in the policymaking process, there is significant tension as the constellation of ideas, institutions, interests and policy “co-exists in an unbalanced way, which undermines its political viability” (Daugbjerg and Feindt, 2017, p. 1579). Further, there is little evidence of a shift in the nature of policy tools employed, a key feature in the transition to post-exceptionalism but obvious signs of continued reliance on traditional grants and financial incentives coming from government. So, if not a neat form of post-exceptionalism, what does GfG represent? To shed further light on this, we analyse what GfG implies from a sustainability perspective as a means of considering the extent of an evolving policy arena which is a key feature of post-exceptionalism.

5. Environmental implications of ‘going for growth’

According to Greer (2017), a shift to post-exceptionalism should include the emergence of “issue-network” type actors, including those from backgrounds such as consumer, environmental and animal welfare groups, and slow food activists’ (p. 1594), and broader policy issues such as the environment are brought to the fore (p. 1573). The NI government adopted GfG wholesale, without conducting any environmental impact assessment (Leroux, 2018) and with very limited involvement of environmental interests in developing the strategy overall, as is discussed earlier. Normal rules were not applicable. Further, decades of intensive farming have had a significant negative impact on biodiversity and has resulted in degradation of water systems globally, a pattern that is evident in Northern Ireland (Government Office for Science, 2011; Campbell et al., 2017; Committee on Climate Change, 2017; DAERA, 2018; Friends of the Earth, 2018). Within the EU, introduction of legislation such as the Nitrates Directive and the Water Framework Directive has begun to somewhat limited agriculture’s impact on the environment (Van Grinsven et al., 2012), and recent CAP reforms demonstrate a partial attempt to “green” agriculture (Harvey, 2015). However, GfG’s focus on expanding intensive industrial farming in NI runs counter to these efforts and has a range of negative implications.

As highlighted above, growth within the NI agriculture industry has, in the past decade, come mainly from poultry and pig production
Both operate under extremely intensive, integrated models of the kind GfG actively advocates. This is a logical economic model, as growers share costs and risks with the integrator, i.e. the corporate food processor (FAO, 2014). However, the FAO (2014) warns that careful regulation of this model is required to avoid negative externalities such as physical and chemical pollution impacting on growers, employees and wider society. Indeed, numerous concerns have been raised about the negative environmental impacts of these kinds of operations, mainly related to the high levels of animal waste they produce and the subsequent release of ammonia (Brennan et al., 2017; Friends of the Earth, 2018). Ammonia can have a significant negative impact on both aquatic and terrestrial biodiversity and on human health (APIS, 2016). Ammonia pollution is a particular problem in NI; the region is responsible for 12 percent of the UK’s ammonia emissions, despite accounting for only 3 percent of its population. Ammonia has contaminated nearly all NI’s national protected sites and in some of its ancient woodlands, more than 80 percent of native lichen species have disappeared as a result (Carroll, 2018a; Friends of the Earth, 2018; Leroux, 2019). While cattle farming currently accounts for the majority of NI’s agricultural ammonia emissions, the poultry industry is responsible for half of the increase since 2010 (Carroll, 2018a).

Thus, it can be argued that further development of these industries is incompatible with delivery of the public goods that are mentioned in the strategy (p. 36). Greater numbers of intensive chicken and pig production units not only put significant pressure on both NI’s water supply and on the biodiversity of its farmland and protected sites, but also change the physical appearance of the countryside due to the visibility of the buildings (Blackwood, 2014; Committee on Climate Change, 2017; Friends of the Earth, 2018; Gladkova, 2020). This policy outcome favours privileged interests. In the past, in the ‘normal’ course of exceptionalism, that would have comprised farmers as primary producers (Smith, 1992), but here we see the interests of the food processing and retail sectors taking precedence. Environmental interests were evidently not a major priority for the agri-food strategy. Having explained how export-oriented the agri-food sector is, one of our (government agency) interviewees stated: “[GfG] was largely targeted at one particular sector, largely because of the individual who chaired that. So the poultry got a disproportionate focus, and the environment was completely left out of it …. In terms of air quality, in terms of carbon, in terms of biodiversity […] those things were never ever talked about in that Going for Growth. It was just about pure economics.”

We pick up this issue of disproportionate focus on the poultry sector, moving on to give concrete examples of how large food processors, particularly within this sector, received special or exceptional treatment. The development of schemes to incentivise particular practices within agriculture demonstrates clear cases of exceptional treatment that allowed large players in the poultry sector to advance their interests.

### 6. Policymaking in the Northern Ireland agri-food sector

Two significant initiatives that led to recent political scandals in NI emerged from the GfG strategy and reflect the central role of agri-food in policymaking in NI. These cases demonstrate the degree to which private interests have benefitted from public subsidy. The (currently) higher profile scandal, dubbed ‘Cash for Ash’, surrounds the Renewable Heat Incentive (RHI). The more recent scandal, ‘Muck for Brass’, is still developing, but is apparently set to “dwarf” the Cash for Ash scandal (Leroux, 2018; Gannon, 2019). More than just evidencing the special treatment that the NI agriculture industry receives from the government, both appear to demonstrate how key industry players directly influenced policymaking to their benefit, using the GfG strategy as a lever. We elaborate on the schemes below.

#### 6.1. Cash for Ash: the Renewable Heat Incentive

Recommendation number 25 of the GfG strategy is that “Government must review incentives for renewable energy and ensure policies are complementary to the Agri-Food industry rather than in competition with it” (p.75). The RHI, which began in 2012, was a NI government-led initiative to encourage businesses and individuals to switch from fossil fuels to renewable energy technologies such as wood-burning boilers (Coghlin et al., 2020). In line with the GfG recommendation, this scheme was heavily promoted to the agriculture industry. However, due to deep flaws in the scheme, not only did the government make subsidies worth more than the cost of wood pellets used to heat boilers, it did not cap the total subsidy available (Brennan et al., 2017; Coghlin et al., 2020). Thus, what began as a bid to reduce carbon emissions, quickly evolved into a profit-making scheme for many in the agriculture industry. People reportedly scrambled to install boilers and began to run them 24/7. Some farmers even heated empty sheds to turn a profit (Carroll, 2018b; McBride, 2018). Different accounts have emerged about what happened and who was responsible. However, the prevailing narrative is that, despite allegedly being notified by a whistleblower in 2013 and again in 2014, NI DETI did nothing to stop the scheme, which was in fact continued and extended (BBC, 2017; Carroll, 2018b; Coghlin et al., 2020). The scheme eventually ended in 2016, but not before £500 million in taxpayer money was spent (Brennan et al., 2017; Carroll, 2018b; Gannon, 2019). When the scandal surfaced, it led to the collapse of NI’s power-sharing government in January 2017, which, as noted above, was not reinstated until January 2020. A full public inquiry into the scandal was set up in January 2017 and its findings were released in March 2020, delivering a scathing assessment of the governance failures related to delivery of the scheme, citing poor leadership, lack of transparency and little evidence of critical scrutiny of material (Coghlin et al., 2020).

#### 6.2. Muck for Brass: the renewable energy scandal

More recently, investigative journalists uncovered another renewable energy scandal – ‘Muck for Brass’ – this time involving government subsidy of anaerobic digesters (ADs) (Carroll, 2018a; Leroux, 2018; Gannon, 2019). The expansion of intensive animal farming in NI lies at the core of GfG, particularly through expansion of the pig and poultry sectors, but animal waste was a key limiting factor, as discussed above. One of GfG’s key recommendations was that government must “fast track a solution for poultry waste into energy, recognizing the environmental benefits and remove a key uncertainty over the growth of the agri-food industry in Northern Ireland” (AFSB, 2013, p.36). The solution that industry put forward was ADs, and in 2015, the NI government implemented an £800 million taxpayer-funded scheme to support the installation of ADs on NI farms.

ADs can turn animal waste into biogas, which is considered a ‘green energy’. Animal waste processed via an AD before being spread on fields has not historically been subject to detailed scrutiny in terms of its impact on sensitive habitats, thus allowing the agricultural industry to effectively bypass nutrient application limits as set out in the EU Nitrate Directive (Carroll, 2018a; Leroux, 2018). Notably, the AD process does not appreciably change the amount of ammonia (or other nutrients) present in waste (Malamis et al., 2014), which, once passed through an AD, is still spread on the fields as fertilizer, funneling ammonia back into the environment (Carroll, 2018a; Leroux, 2018). The NI government was aware of this prior to allowing the scheme to proceed; in a 2012 report, the NI agriculture and environment department specifically
acknowledged that anaerobic digestion “does not address the fundamental issue of excess nutrients in the manure, as it requires land spreading of the digestate. Therefore, it is not an alternative to land spreading” (DAERA, 2012, p. 19, in Leroux, 2018). Despite these reservations, ADs were promoted, and big industry players were able to pay contractors – using taxpayer money – to install large ADs across the countryside. As a result, the poultry industry experienced huge growth, as it was able to ‘overcome’ the problem of how to dispose of hundreds of thousands of tons of chicken litter and still meet Nitrates Directive limits (Carroll, 2018b; Leroux, 2018). The AD scheme in NI allowed large agribusinesses to fuel the expansion of intensive practices, and the solution found for one problem led to another: environmental degradation (Leroux, 2018).

7. Post-exceptional agri-food policy interventions in Northern Ireland

Brennan et al. (2017) point to the problem of the dominant perception among some of NI’s politicians that environmental costs are merely overheads in the business of promoting or supporting economic development and that funding schemes and policies are there to be manipulated for financial gain, something that is clearly demonstrated in the two schemes described above. Moreover, both cases exemplify how disproportionate power and government support was afforded the poultry industry. One of the major poultry producers in the region, indeed, in Europe, Moy Park is a powerful actor in the policymaking process and it has enjoyed exceptional treatment from government on more than one occasion. As already discussed, one of its then Directors was the Chair of the GfG Board for a time, and a freedom of information request revealed that, between 2014 and 2017, Moy Park representatives held 14 meetings with officials from NI’s agriculture ministry, during which anaerobic digestion was a main focus (Leroux, 2018).

Moreover, the NI government approved a £12 million loan scheme to build two large ADs: one in NI and one in Donegal across the border in the Republic of Ireland. The former was specifically designated for poultry waste from Moy Park; no other processor was afforded this treatment (Carroll, 2018a; Leroux, 2018). All this despite the fact that the ministry clearly understood that ADs would do nothing to mitigate the pollution problems associated with animal waste.

More recently, privileged senior Moy Park executives were apparently given advance notice of the government’s plan to end RHI subsidies, and as a result, nearly 300 poultry farmers signed up to the scheme in its final months, most of whom supply Moy Park (McBride, 2018; McDowell, 2018; Coghlin et al., 2020). Indeed, Moy Park has been singled out as acting and being treated differently than other processors. Unlike other processors, it is mentioned 52 times across the report’s 256 pages (Coghlin et al., 2020). It has been linked to approximately £500 million in RHI claims (McDowell, 2018), and the BBC reports that it was actively pushing its producers to take up the subsidy as it ultimately lowered the price it had to pay them for the chickens they produced (Macauley, 2018), thus increasing profit for the company. The interests served in the development of the initiatives emerging from the GfG were not those of all the poultry farmers in NI, as the strategy failed to identify practical measures for reducing the environmental impact of the agri-food sector. A clear paradox exists as GfG language is in line with change to ‘ideational structure’ – with consideration of market influences, environmental protection and preservation of the rural fabric – whereas its recommendations are firmly exceptionalist. We therefore argue that GfG represents an incomplete transition to post-exceptionalism, which is in line with other authors’ interpretation of recent changes to European agriculture policy (Alons, 2017; Greer, 2017).

While it would be easy to assume that what occurred through the development of the GfG strategy represents a shift back towards exceptionalism, we contend that this is an over-simplification of what has happened. The bottom line is that post-exceptionalism retains the underpinning idea that the sector is special and so warrants some intervention (Daugbjerg and Feindt, 2017). Therefore, the fact that the NI agri-food sector has continued to receive ‘special treatment’ does not necessarily denote exceptionalism. Moreover, we argue that there was a desire to make the shift from exceptionalism towards a post-exceptionalist approach, that is, away from the dominant closed policy communities focused on primary producers towards a more open style that involves a wider range of actors with competing interests.

Policy making is viewed as too closed, with some industry stakeholders having disproportionate influence. There is excellent input from a few environmental champions, but there is a perception that the wider environmental sector is marginalized and excluded. One interviewee suggested that policy decisions are often, in effect, made prior to public consultation. There are numerous working groups and fora addressing different food issues (e.g. climate change; food poverty, food waste; etc.) but no holistic, strategic approach that allows joined-up thinking (Foord, 2017, p. 5, p. 5).

Including interest groups in policymaking is important, for if this is not done, policies tend to be ineffective (Richardson, 2018) and lacking innovation (Daugbjerg and Feindt, 2017). As our case shows, post-exceptional policymaking is a delicate balancing act between appropriate inclusion and excessive power. Environmental groups were included along the margins, but not in any meaningful way. Attempts to involve them were rather shallow; they were given the opportunity to engage through consultation but were not embedded into institutional processes. That is to say, they were not actually part of the decision-making realm. The AFSB responsible for the development of the GfG strategy comprised a limited range of industry stakeholders, and little action was taken by this Board and the government department to obtain legitimacy across a wider range of stakeholders by inviting new policy actors into the policy arena. Further, it seems the NI government encountered another problem: when governments grant interest groups excessive power, policy effectiveness can be compromised (Peters, 1997; Richardson, 2018). Richardson (2018) calls this “a central paradox in government/interest group relations” (p. 228). As both the RHI and ‘Muck for Brass’ scandals illustrate, the policymaking process facilitated, and to some extent, sought to legitimate the disproportionate benefits and influence afforded a few powerful interests. This was to the detriment of the taxpaying public and NI’s natural environment.

8. Towards ‘tense’ policy post-exceptionalism?

GfG creates the illusion of a smooth transition to a post-exceptionalist policy agenda where we might expect significant representation from ‘new’ actors such as consumer and environmental groups; greater consideration of issues such as water pollution and climate change; and a shift away from interventionist government policies towards market solutions (Greer, 2017). The reality is that it creates the conditions that support a concentration of power by a few key actors. Rather than power resting with primary producers and other groups that have traditionally benefited from exceptionalist policies, corporate business assumes a privileged position and government remains heavily involved in supporting the industry. Further, the strategy fails to identify practical measures for reducing the environmental impact of the agri-food sector. A clear paradox exists as GfG language is in line with change to ‘ideational structure’ – with consideration of market influences, environmental protection and preservation of the rural fabric – whereas its recommendations are firmly exceptionalist. We therefore argue that GfG represents an incomplete transition to post-exceptionalism, which is in line with other authors’ interpretation of recent changes to European agriculture policy (Alons, 2017; Greer, 2017).

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7 Authors note that a limited number of AD plants are now employing innovative processing techniques to remove a significant percentage of the nutrients present in digestate. However, it will be some time before this is a universal practice (if ever).
government intervention remained strong; and it failed to initiate novel policy solutions. This created at least one political scandal, bringing down the devolved government while also raising questions of legitimacy and transparency. It is an extreme example of what can happen when post exceptionalist policymaking goes wrong. The shift of emphasis away from primary producers towards large-scale industry and the way in which political viability was undermined due to unbalanced power held by different actors constitutes what Daugbjerg and Feindt term “tense post exceptionalism” (2017, p. 1579). This is in line with other literature, which clearly identifies iterations of post exceptionalism, with varying emphasis on the environment, productivity and the power afforded different stakeholders (Alons, 2017; Greer, 2017)

Peters suggests that, where sub-optimal policies have developed, “the role of government then becomes providing the leadership to shape the debate and move decisions away from the lowest common denominator realm into a more socially desirable space” (1977, p. 57). This would seem to be very pertinent for NI. Already, the GfG strategy is outdated as market circumstances have radically altered since the time the strategy was first envisaged. Back then, markets were buoyant, but in the intervening years global prices have fallen. Meanwhile, the Brexit vote has initiated a significant period of uncertainty as politicians figure the future agri-food landscape. This is not likely to be sorted quickly (Hubbard et al., 2018).

More widely, the role of the state is critical if progressive, post exceptionalist agricultural policies are to emerge. It has an important function from the outset in ensuring a smooth transition. Richardson (2018) suggests that “design faults” are often unwittingly built into policies, a result of either asymmetric power balances at the design phase, or poor problem definition and options choice. This is an important consideration in the successful transition beyond exceptionalism. Without awareness of all the pitfalls in policy development and a commitment to an open, inclusive process, powerful interests assume a central position and advance a very particular agenda, with undesirable political and environmental consequences. The processes by which policy is developed clearly have huge implications for all stakeholders involved and the long-term sustainability of the agri-food industry, and should therefore be given as much attention as the policy itself. The task for further research is to uncover the impact of these processes.

CRediT authorship contribution statement

Adrienne Attorp: Conceptualization, Methodology, Formal analysis, Writing - original draft, Writing - review & editing. Ruth McAreeavey: Conceptualization, Methodology, Formal analysis, Writing - original draft, Writing - review & editing.

Declarations of competing interest

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