



National Parks & Wildlife Service
Department of Housing, Local
Government & Heritage
Flood Street
Galway

3 September 2021

Via email to: CAPStrategicPlan@agriculture.gov.ie

**Ireland's CAP Strategic Plan 2023-2027 Public Consultation on Proposed Interventions:
Submission by the National Parks and Wildlife Service, Department of Housing, Local
Government and Heritage**

Introduction

The overarching goal of this Department is to seek to maximise the contribution of the CSP to the protection of biodiversity and water quality and to the restoration of biodiversity in Natura 2000 sites and water quality in “at risk” river catchments.

Reporting under the Habitats Directive has shown that only 15% of habitats are in good status; many ground nesting birds are suffering serious declines and the number of ‘pristine’ rivers has declined significantly.

Ireland's CAP Strategic Plan (CSP) must reflect actions and targets set nationally in the Programme for Government, Ag Climatise, the National Biodiversity Action Plan, the National River Basin Management Plan and the Prioritised Action Framework for Ireland. The CSP must also reflect targets set at European level by the Farm to Fork and Biodiversity Strategies to deliver on the higher level objectives of the Common Agriculture Policy.

The upfront statement in the preamble to the consultation that “a new performance-based approach will be adopted” and that “performance will be judged on outputs and results” sets the right tone and is very welcome.

Comments are provided by NPWS for consideration under the headings of Pillar 1 and Pillar 2.

PILLAR 1



Definition/Eligible hectare

Our Departments have worked together on the significant issue of land eligibility and continue to have ongoing communication to ensure coherence across policies, especially in the context of the biodiversity and climate crises.

The proposals set out in the draft interventions for Ireland's CAP Strategic Plan are welcome, as follows:

“From 1 January 2023, it is proposed to allow up to 30% of a parcel consisting of features that may be beneficial to water protection, climate or biodiversity to be considered eligible. This would ensure that for areas of certain non-agricultural features, a farmer would not have to remove them to allow them draw down a BISS payment, Eco Scheme, or any Pillar II area-based payments”.

Eco-schemes

There is a need to be mindful that actions undertaken in Eco-schemes complement and do not detract from measures under Agri-Environmental Climate Measures and that they are ‘workable’ and attractive to farmers, so that there is optimum uptake and engagement. But the measures also clearly need to deliver an environmental dividend. To that end, this Department would advocate a points-based system in assessing the farmer's contribution to the environment by way of the committed actions.

We suggest that farmers in Natura 2000 sites and Natural Heritage Areas should be recognised as providing essential ecosystem goods and services. Rewarding farmers for these services via an Eco-scheme would assist in conferring an advantage to farmers with designated land.

As Eco-scheme payments are based on eligible area, consideration should be given to eligibility criteria under BISS and how existing habitats are protected and rewarded.

Conditionality

Further clarity is required in relation to definitions and in particular in relation to GAEC 2. The 5% proposal under GAEC 9 is welcome, as is the intention to not limit the ambition to arable farmers. Greater effort is required to improve the identification, communication and protection of Environmentally Sensitive Permanent Grassland (via GAEC 10) in Ireland.

PILLAR 2

Pillar 2 Agri-Environmental Schemes (Framework)

The National Parks and Wildlife Service welcomes the proposal for an improved delivery framework under the CAP Strategic Plan (CSP) to address specific environmental challenges. We also welcome the inclusion of co-operation projects and non-productive investments and we look forward to further discussion on the most appropriate means of delivering these interventions.

That necessary farm/landscape measures will be implemented with the assistance of a Local Project Team at local level in identified areas is very welcome, and will build on the positive experience of the Burren Programme and the EIPs. The commitment in the proposed intervention that “this co-



operation element will support a landscape approach in these areas for the management and restoration of priority habitat/species, carbon storage, water quality, and biodiversity through improved land management and resilience” is very welcome and that higher payments can be made for improved delivery. This is an important signal to farmers who are prepared to do more.

Without a fully coherent delivery framework in the CSP, meeting individual targets for nature, water or climate will be increasingly challenging. If the measures envisaged under the AECM can be effectively promoted and deployed in a coordinated and coherent way, at sufficient scale nationally, they have a realistic prospect of making a very significant contribution to achieving our shared environmental objectives.

European Innovation Partnerships (EIPs)

This measure was a very welcome development in the last RDP, was well received at local level and has been designed to meet national priorities. It is positive to see the inclusion of continued support for European Innovation Partnership AGRI Operational Groups. This Department would advocate for significant funding under this intervention in the CSP, now that confidence has been built in this model.

Consideration should be given to increasing the capacity in DAFM to support the EIP operational groups.

Under the AECM delivery model, important biodiversity areas that are not targeted for support by local co-operation projects should be considered as priority areas for EIPs.

Agri-Environment Training/Knowledge Transfer

This will be an integral part of the CAP Strategic Plan and this Department would advocate specific focus on biodiversity and water quality. Experience has shown farmers are more likely to improve management on their lands when environmental actions, particularly nature and water protection actions, are explained properly. The framework within which this knowledge is exchanged is of critical importance. There should be scope for upskilling of advisors and ‘training the trainer’ and it would be worth considering a module for agri-contractors and machinery operators, who could be put on a list of approved/trained operators for projects/non-productive investments under the CSP.

LEADER

In the context of declining biodiversity and water quality both locally and nationally, this Department advocates that consideration should be given to Local Action Groups (LAGs) having a minimum percentage of projects or budget allocation for nature/water projects in their Local Development Strategies. Such measures have proven to be popular and of benefit to the entire community.

Overarching issues

No backsliding for existing RDP projects

This Department advocates that the Burren Programme and successful EIPs, including the Hen Harrier and Pearl Mussel Projects, should continue/be mainstreamed under the new programming period. It is critical that these projects are supported to continue to deliver locally-led solutions, possibly in a wider geographical area, and remain focused on delivery of results for nature. We remain available to discuss how this is best taken forward.

Integration of current LIFE projects



This Department advocates that the CSP should strive to integrate existing initiatives as appropriate. Both our Departments are working closely on current LIFE projects such as the Wild Atlantic Nature IP and Corncrake LIFE and successful initiatives (eg tested results-based scorecards and landscape approaches) from these projects should be considered for inclusion in the CSP delivery framework.

Data Sharing

Both our Departments should strive to develop data sharing agreements to assist in our collective need to report of delivery of conservation measures nationally under the CSP.

The NPWS of the Department of Housing, Local Government and Heritage (DHGLH) acknowledges the work of the Department of Agriculture, Food & the Marine in drafting the interventions for Ireland's CAP Strategic Plan and we hope that these comments are helpful and constructive.

Yours sincerely,

A handwritten signature in black ink that reads "Andy Bleasdale".

Andy Bleasdale
Principal Officer
National Parks and Wildlife Service
Email: andy.bleasdale@housing.gov.ie