

Irish Organic Association

Ireland's CAP Strategic Plan 2023-2027: Public Consultation on Proposed Interventions

August 2021

Introduction

The Irish Organic Association (IOA) welcomes the opportunity to make a written submission on the public consultation paper concerning the proposed interventions for Ireland's CAP Strategic Plan 2023-2027. The growing demand for organic produce amongst Irish and other EU consumers with consecutive years of double-digit growth in grocery sales and valued at €41 billion in 2019¹ is a good news story for the agri-food sector across Europe. Leading Irish organic processors such as Glenisk and the Good Herdsman see huge potential for market growth both domestically and abroad if Irish producers can respond to the demand for high quality Irish organic produce (see Annex 2).

Not only is the expansion of the organic sector an opportunity for Irish farmers and food business, but its proven contribution to environmental and climate performance, economic viability and social well-being², makes organics well-placed to support Ireland's sustainability goals and commitments (e.g., the Food Vision 2030, the EU Farm to Fork and Biodiversity Strategies). This includes the majority of recommendations set out by the European Commission for Ireland's CAP Strategic Plan. Our National Organic Strategy and the new Action plan for organic production in the EU³ both provide pathways for the development and expansion of the organic sector in Ireland. However, they need to correlate with a planned and supportive policy environment including key interventions under the new CAP. This submission builds on the IOA's extensive proposals on CAP as part of the CAP Consultative Committee focusing on several interventions outlined below.

CAP Interventions Addressed	Pillar I:		Pillar II:	
	1) Definitions	X	1) Agri-environment climate measure	X
	2) Conditionality	X	2) Agri-environment Training	X
	3) Basic Income Support for Sustainability (BISS)		3) Organic Farming Scheme	X
	4) Complimentary Income Support for Young Farmers (CIS-YF)		4) Areas Facing Natural Constraints (ANC)	
	5) Eco-scheme	X	5) Producer Organisations in the Beef and Sheep Sector	
	6) Apiculture Programme		6) Suckler Carbon Efficiency Programme	
	7) Sectoral Intervention in the Fruit and Vegetable Sector		7) Dairy Beef Welfare Scheme	
	8) Coupled Income Support for Protein Aid	X	8) Sheep Improvement Scheme	
	9) Complementary Redistributive Income Support for Sustainability		9) European Innovation Partnership Operational Groups	
			10) On-farm Capital Investment Scheme	X
			11) Continuous Professional Development for Advisors/ Farm Advisory Service (FAS) ⁴	X
			12) Knowledge Transfer Programme	X
			13) LEADER Programme	X

¹ Willer, H et al., (2021) eds. The World of Organic Agriculture 2021: Statistics and Emerging Trends. Frick/Bonn. FiBL/IFOAM Organics International

² Reganold, J.P., Wachter, J.M. (2016). Organic agriculture in the twenty-first century. Nature Plants 2; Sanders, J. (ed.) 2013: Evaluation of the EU legislation on organic farming. Braunschweig: Thünen Institute of Farm Economics.

³ European Commission (2021). Communication on an Action Plan for the development of organic production. COM/2021/141 final.

⁴ See response to Continuous Professional Development for Advisors

Organic Farming Scheme (OFS)

Purpose

The IOA supports the Food Vision 2030 target to reach at least 7.5% of organic farmland (~350,000 ha) in Ireland within the lifetime of the Programme for Government and that the new organic farming scheme (OFS) will be explicitly aligned to that target. At the same time, the target is based on the EU-28 average in 2018 and the EU has continued to record an increase in organic farmland since then. This is backed by growing demand for organic produce both at home and abroad. Current figures show that the EU-27 organic farmland area accounted for 8.5 % of agricultural land in 2019. However, as noted in the Commission's CAP Recommendations to Ireland, the country recorded the second-lowest share in the EU. The IOA agrees that the development of the organic farmland area must be used strategically to increase the number of sustainable farming systems in Ireland and capitalise on market demand. As a result, Ireland's national target for organic farming should be reviewed on an annual or bi-annual basis throughout the programming period and modified upwards accordingly. While supporting the current target, the IOA believes that a 12% share would set a more ambitious direction of travel for the agri-food industry to 2030 and is achievable with the right policy foresight.

Structure

Delivering a progressive and sustained increase in the share of Irish organic farmland by 2027 will require a reliable and attractive OFS for existing organic farmers and new entrants that supports different land-use types (e.g., grassland, tillage, horticulture etc). Our understanding is that 5-year contracts will consist of 2 years in-conversion, 3 years in maintenance for new entrants, and 5-years maintenance for existing organic farmers.

Given the experience of the current programming period, where the OFS has only been opened on 3 occasions since 2015, the new scheme must be accessible much more regularly – preferably on an annual basis for up to 3 months. This would give both farmers and food business more opportunities, flexibility and a certain level of predictability to exploit the latest market trends. Conversion planning could also be undertaken at an early stage, with organic operators confident in the knowledge that the scheme will be open each year. For example, to develop and expand their organic sales both food manufacturers and the food service require a guarantee of sufficient supplies of high-quality organic produce for years not months.

Eligibility conditions/selection criteria

In terms of the core requirements of the scheme, the IOA endorses the continuation of many existing eligibility conditions/selection criteria including the prioritisation of total conversion over partial conversion, mixed farms and young farmers as well as achieving appropriate sectoral balance. The IOA agree that all participants should have completed the NFQ Level 5 Organic Farming Principles course. However, other education qualifications should also be eligible, where organic farmers can demonstrate that they have completed a more advanced organic farming courses above NFQ Level 5 (including equivalent courses under the European Qualifications Framework - EQF).

The IOA acknowledges that the OFS will continue to be market-led, however, it is also important to recognise that the scheme is a sustainable land management intervention. In other words, a key part of its role is addressing several of Ireland's environmental objectives related to biodiversity, soil, water, air and climate etc. The IOA also recognises that deficits in supply in certain sectors (e.g., horticulture, dairy and tillage) will inform the ranking and selection criteria of the scheme (where applicable). For farms with a tillage component in particular, selection criteria need to take account of the 2-3-year fertility building phase for organic arable enterprise whereby farmers can declare nitrogen-fixing crops such as clover and vetch in grass leys as part of their arable rotation. This refers

specifically to the basic direct payment application which is then cross-checked with an organic farmer's OFS application.

Nevertheless, any focus on sectoral balance and prioritisation of certain sectors should remain mindful of overall market trends and that wider supply chains challenges cannot necessarily be addressed by the OFS. Furthermore, it is important to recognise that there is significant growth potential for organic beef and lamb and that the OFS must appropriately support these sectors. While the scheme can help to incentivise farmers to manage their farmland organically, complementary policy measures are also needed to address known bottlenecks⁵.

When the ranking and selection criteria of the OFS are applied, the various criterion and requirements need to be clear and transparent so that farmers can make an informed decision before making an application. Effective implementation of the National Organic Strategy and regular monitoring of the progress in meeting Ireland's organic targets is essential to ensure that the annual tranche of the scheme is in line with key objectives of Ireland's CAP Strategic Plan and market trends.

Support rates/financial allocation

For the organic sector to develop sustainably in Ireland, the budget for the OFS must be sufficient to capitalise on the expansion potential for the sector throughout the next CAP cycle. Appropriate ring-fencing is not only necessary to support existing farmers and incentivise new entrants, but also to encourage engagement amongst food business and consumers and to further promote confidence in Irish organic produce. Notwithstanding Ireland's current organic target, a recent EU-wide analysis of the level of CAP expenditure that would be required in different Member States to contribute to the EU's 25% target, suggests that for Ireland to reach a 12% share by 2030 up to €125m would need to be ring-fenced.⁶

Recent EU-wide research conducted by the Thuenen Institute of Farm Economics found that the overall spend for organic farming support payments in Ireland on a per hectare basis in 2018 was almost 50% below the EU average, notwithstanding variations across sectors, the use of frontloading and degressivity of payments.⁷ This also contrasts with many other Member States. For example, albeit with regional variations, conversion rates for tillage and grassland farms in Germany are up to €520/ha and €364/ha respectively, with maintenance rates up to €273/ha. The new and ambitious OFS must have payment rates that fully reflect the income forgone and costs incurred of organic production. Rates should also be in line with the most recent representative costs possible (i.e., to account for changes in costs since 2013/2014).

The IOA acknowledges that the DAFM has undertaken a review of OFS costings for the calculation of adjusted payment rates. As part of informing this review process, we wish to recall that under this current CAP cycle, organic payments only partially compensate organic farmers and do not take into account transaction costs. While the payment rates are determined based on the costs of organic farming vis-à-vis conventional farming methods, current Irish practice of using conventional reference farms that have a "similar land area, intensity of production and efficiency" is often not fully representative of the current trajectory in the Irish agriculture sector. Not taking account of conventional farming methods that are truly reflective of the development patterns occurring in

⁵ Key examples include leakage into the conventional supply chain, disconnect between organic suckler farmers and beef finishers and/or exploring market opportunities in the organic sheep sector, including regionally-differentiated meat produce and wool for high-end textiles

⁶ IFOAM Organics Europe (2021). Organic in Europe: Prospects & developments for organic in national CAP Strategic Plans. Available here

⁷ Lampkin, N., Sanders J (2021 in press) Organic support payments in the European Union. Thünen Working Paper. Braunschweig: Thünen Institute of Farm Economics.

different parts of the agricultural sector means that costings may be under-estimated and can make organic farming a less attractive option. Payment rates that do not fully reflect the true costs of organic production also put Irish organic farmers at a competitive disadvantage vis-à-vis their counterparts in other parts of the EU.

It is also important to take account of other environmental payments offered to conventional farmers which are relevant to organic farming methods. A notable example is the straw incorporation measure (SIM) where farmers can receive up to €250/ha on the first 40 ha. Indeed, organic farmers with tillage land incorporate organic residues into their soil as a matter of good agronomic practice, however, this appears not to be fully reflected in current organic tillage payment rates. As organic farmers are heavily reliant on animal manure for fertility building, there are very few stockless organic farms in Ireland. With high animal welfare requirements being a cornerstone of organic principles, straw is inevitably used for bedding animals before being recycled and composted prior to land application. As the organic regulations permit conventional straw for bedding to be used on organic holdings, the SIM will have a detrimental impact on the availability of straw required by organic farms. With limited sustainable alternatives, the IOA is concerned about the consequences that this could have for the organic sector. To restore balance to this unwelcomed situation, costings for organic tillage land area should start with a deficit of €250/ha to truly reflect income forgone. A measure should also be considered to incentivise tillage farmers to supply organic farmers with straw. Otherwise, the prospects of growing and further developing organic livestock systems, which can internalise the environmental costs of agricultural production, will be seriously inhibited.

As well as payment rates that fully reflect the costs of organic production, current payment thresholds under the OFS need to be revised. While some Member States differentiate organic payments based on land use intensity and crop types and use, very few have implemented a degressive payment model like Ireland, whereby the payment level is based on the size of the organic area and frontloaded. If a degressive payment model is to be continued, it should be reflective of the median farm size across different sub-sectors. In particular the IOA strongly recommends that, the upper rate of support should be increased from ≤ 20 ha to at least 60 ha for tillage and from ≤ 6ha to 20 ha for horticulture, whilst maintaining the upper rate for other holdings at 60ha. At the same time, second tier payments for all land use (grassland, tillage and horticulture) should represent at least 80% of the costs of organic production up to at least 100 ha or more.

Environmental interventions (eco-schemes and the agri-environment schemes)

To address key objectives and targets relevant to the agri-food sector set out in the European Green Deal and Ireland's key environmental and climate planning tools,⁸ the CAP Strategic Plan must have both strong eco-schemes and agri-environment climate measure (AECM) to reward and incentivise farmers who undertake beneficial actions. For the agri-food sector to make a meaningful contribution to these respective goals and targets, both interventions must be designed to work together in an integrated way. Issues identified in the SWOT Analysis and Needs Assessment are all areas where organic farmers have a proven track record as well as scope to increase their performance and actively contribute to EU and national policy goals. Therefore, the portfolio/menu of management-based and result-based schemes available under both interventions must be appropriate for organic farms. Furthermore, discriminatory terms and conditions and any budgetary or intake limits should not inadvertently undermine the ability of organic farmers to contribute to increasing environmental and climate performance. The specifics of both interventions is addressed below, while an overview of

⁸ e.g., the 3rd River Basin Management Plan 2022-2027, the revised Ag Climatise Roadmap⁸, the Priority Action Framework for Natura 2000 in Ireland 2021-2027 and an anticipated 4th National Biodiversity Plan)

potential eco-schemes and AECM actions relevant to organic farming are set out in the table under Annex 1.

Eco-scheme

Purpose

The IOA agrees in principle with the general aims of the eco-scheme set out in the consultation document. The eco-scheme have a key role to play in rewarding and incentivising greater environmental and climate performance including amongst organic farmer (outside the scope of the organic standards). In the interest of ensuring that both environmental interventions work together, we would propose the primary emphasis of the eco-scheme (although not exclusive) should be on rewarding existing farm structures and practices of benefit to the environment, climate action and animal health and welfare.

Structure

Based on information set out in the consultation document and the presentation to the CAP consultative committee (20 May 2021) we welcome the current proposal to design the eco-scheme across four different packages (climate change, natural resource management, biodiversity protection and animal health and welfare) using a points-based system.

The IOA understands that organic farming systems will also be included in the points system⁹. However, more details are required to make an informed assessment including

- how will organic farming systems be effectively integrated into the points system;
- whether the points system will affect the per hectare payment rates for eco-schemes; and
- a clear overview of the specific targets that will inform the four different packages as well as details of the methodology to be used to measure progress.

As well as recognition under the points system there must be a sufficient number of appropriate options for different organic farmland types across the four packages of measures. Some of the sample measures proposed so far may be appropriate for organic farms e.g., credit for existing habitats and hedgerows, extensive livestock production. However, others are not e.g., reducing chemical nitrogen inputs. Other actions need to be modified to reflect the different management options available to farmers e.g., it should be permitted to undersow catch crops as part of a crop rotation (see overview of potential actions in table below under Annex 1).

Eligibility conditions/selection criteria

The eco-scheme should be open to all farmers, including organic farmers, to ensure active contribution to key environmental and climate objectives and targets. However, while the eco-scheme may be designed as an entry-level scheme that will complement more advanced agri-environmental schemes under Pillar 2, given that it will target the majority of farmers actions must be designed to have a meaningful impact across different land-use types.

Finally, it appears from the consultation document that the DAFM is considering allowing some eco-schemes to be made available to groups of farmers. There may be merit to do this in some circumstances. However, more details are needed to understand the potential added-value of targeting and tailoring of the scheme in that way and the possible implications for farmers.

⁹ Based on DAFM's presentation to the Oireachtas Joint Committee on Agriculture, Food and the Marine (22 June 2021)

Support rates/financial allocation

To ensure the credibility of the eco-scheme amongst Irish citizens and send a clear message to farmers that they will be rewarded and incentivised to increase their environmental and climate performance at least 25% of direct payments must be allocated to the eco-scheme. This should be seen in the context of the current CAP where the total greening budget represented 30% of direct payments. As a result using the flexibility in the regulation to reduce this percentage by applying various derogations would be regressive. It should also be avoided that choices taken on the other direct payments have implications for the amount of funds allocated to the intervention as greater investment is needed to support farmers to address key environmental and climate challenges. Furthermore, a higher level of spending allocated to AECM (e.g., the amount that exceeds 30 % of the total EAFRD contribution) should not be used as a justification for using the available flexibilities. This is especially the case when it is proposed that 50,000 farmers would be expected to take up AES compared to 130,000 farmers for the eco-scheme.

There is also some clarity needed on how eco-scheme payments will be calculated including how farmers will be motivated and incentivised to increase their environment and climate performance. The eco-scheme is certainly a clear opportunity to fully implement the principle of public money for public goods whereby the more farmers achieve the more they receive (subject to budget ceilings etc). In other words, payments should be rewarded in terms of the overall environmental and climate contribution on the farmland not as a flat rate per hectare payment.

The IOA recognises that there are some concerns that if there is low participation that Ireland could lose these funds. Given that this funding is reserved for addressing environmental and climate objectives and in the interest of transparency and simplification, there should be a commitment to transfer unused funds to environmental interventions under Pillar II. This would allow for greater flexibility to roll funds over successive years and avoid any risk of having to return funds to the EU purse.

Agri-environment Climate Measure (AECM)

Purpose

The IOA agrees with the general aims and focus areas of the agri-environment climate measure (AECM) set out in the consultation document. We welcome that AECM will be more targeted and tailored to Ireland's environmental and climate needs based on the principle of the "right action, in the right place". However further clarity is needed on how this will work in practice including the integration of results-based actions and locally-led approaches alongside existing prescription-based approaches. It is also crucial that the AECM actions and approaches are complementary to the eco-scheme. In the interest of ensuring that both environmental interventions work together, we would propose that the primary emphasis of the AECM should be on incentivising maintenance and enhancement of environmental and climate performance across different land-use types.

Structure

Based on the presentation to the CAP consultative committee (20 May 2021) and from correspondence with the DAFM (11 June 2021), the IOA understands that organic farmers will be eligible to participate in either Menu A or Menu B options subject to the environmental and climate needs of their farming systems and/or location.

On Menu A, the IOA endorses the initiative to apply a hybrid model to the new AECMs by taking the best of management-based and results-based approaches to deliver more ambitious and effective agri-environmental-climate schemes. At the same time, the IOA has received mixed messages from

the DAFM about how this hybrid model may prioritise or discriminate against organic farmers. On the one hand, the DAFM is on record that organic farmers will have priority access to the new AECM. On the other hand, we are informed by other officials that organic farms will not be part of new result-based schemes because of the assumptions used for the payment calculations – even after the trial period of current Results Based Environment Agri Pilot Programme (REAP). It remains unclear to the IOA why organic farms participating in the OFS were excluded from the REAP as the risk of double funding does not seem to stack up since the outcomes of the scheme including the scheme indicators (used to determine the result-based payments e.g., number of species in the sward, boundary features) are not specific compliance requirements of the organic standards. Therefore, there is no clear justification for the exclusion of organic farmers from the scheme.

The experience of REAP as well as several misinterpretations of double-funding between OFS and GLAS actions¹⁰ can no longer be ignored. These exclusions not only undermine the ability of organic farms to be rewarded for enhancing their environmental and climate performance but often make the OFS unattractive vis-à-vis these other agri-environmental options. Furthermore, it discriminates against smaller organic farms (i.e., <20ha) with insufficient land to obtain both OFS and GLAS.

This issue must be addressed especially if Ireland is serious about rewarding farmers for existing public good delivery and incentivising further improvements to support the development of more sustainable farming systems. Similar to the eco-scheme, the different actions and approaches must be sufficiently appropriate for existing organic farming systems as well as farmers who are open to convert.

In addition, to ensure better integration between the CAP and the forthcoming National Forestry Programme, the IOA strongly welcomes that tree planting and agroforestry actions (for establishment and maintenance i.e., thinning) will be part of the AECM.¹¹ We understand that to mean that they would have the same application and implementation process as other AECM actions. It is also important that the establishment of agroforestry systems does not undermine land eligibility for accessing CAP schemes, including the ability to receive organic support payments on that farmland. (For an overview of potential AECM actions relevant to organic farming see table below under Annex 1).

On Menu B, the IOA understands the approach will be targeted at defined co-operation areas. In this respect organic farming may offer some added value to address certain local issues e.g., tackling water quality. However, details are required to understand the rationale and implications of these bespoke farm/landscape measures as well as the potential target areas. For example, is it envisaged that land re-wetting would be implemented cooperatively, are there existing locally-led EIP Operational Groups that will continue to be implemented using a collective approach, and what new priority areas have been identified? We look forward to learning more about the priority environmental and climate issues that the DAFM envisage will be covered under Menu B as well as the procurement process for the selection of these locally-led projects.

Eligibility conditions/selection criteria

The IOA welcomes confirmation within the consultation document that organic farms will continue to have priority access to the successor to the Green Low-carbon Agri- environment Scheme (GLAS) based on their organic certification. However, further details are needed on the ranking and selection

¹⁰ e.g., key actions such as the management of specific farmland bird habitats and the traditional hay meadows and low-input permanent pasture

¹¹ Moving these farmland actions from the Afforestation Scheme and fully integrating them into the AECM obviously does not preclude that the funding for agroforestry could still be financed through the national exchequer via the forthcoming National Forestry Programme. However, we consider that packaging them under AECM could be a potential 'game-changer' for how farmers consider forest elements as part of their overall farm holding. In the end it could lead to much more effective alignment between the CAP and the National Forestry Programme.

process for the different actions and approaches as well as how they will specifically contribute to key environmental and climate objectives and targets. In particular, we wish to understand how the scheme landscape approach will be applied including:

- will the existing 'Priority Environmental Assets and Actions (PEA) framework be further developed or will schemes be guided by sectoral needs and/or farmland type e.g., upland/lowland, HNV farmland types, SACs/SPAs or a combination of both?
- how will organic farmers have priority access in the context of other components of the ranking and selection process?; and
- will the targeting of schemes interact with other government-supported programmes outside the scope of AECM e.g., ASSAP, Origin Green, if so how?

In addition, the design and implementation of the new landscape approach must be clearly communicated to farmers and other stakeholders (i.e., beyond the computer says no!) to ensure buy-in, good up-take and effective implementation.

Support rates/financial allocation

There is also some clarity needed on how AECM payments will be calculated including how to motivate and incentivise farmers to increase their environmental and climate performance. Agri-environmental payments are usually calculated in terms of standard income forgone and additional costs and while transaction costs can be considered there is often not a sufficient incentive component to fully reward farmers who integrate additional environmental and climate concerns into their overall farm business. As a result, payment calculations need to take account of the 'opportunity costs' faced by farmers in committing to environmental actions and not putting the land into other commercial use. Similar to our suggestions for the eco-scheme, total payments should be determined by a farm's overall contribution to the objectives of the AECM whereby the more a farmer achieves the more he or she receives (subject to budget ceilings etc). In other words, payments should be rewarded in terms of the overall environmental and climate contribution on the farmland not as a maximum annual lump sum.

On-farm Capital Investment Scheme

The IOA welcomes the continuation of the Organic Capital Investment Scheme (OCIS) which has over the years played an important role in supporting new entrants to convert to organic farming as well as assisting existing organic farmers in enhancing their farm and land management. To complement an enhanced and ambitious OFS and encourage farmers to make the transition towards more sustainable farming systems, eligible costs under the OCIS should be supported at a higher rate similar to the Young Farmers' Capital Investment Scheme (i.e., currently up to 60% of eligible costs). It is also essential that the financial allocation for the OCIS is at a minimum aligned to Ireland's target to have 7.5% of UAA under organic management.

Finally, it is important to ensure that smaller-scale organic farmers such as fruit and vegetable growers or poultry producers are also able to avail of grants under the OCIS. Therefore, they should be exempt from the 5ha threshold (1ha for horticulture producers) once they can demonstrate that they are a holder of an active sub-sector or department identifier and have an organic license.

Other area-based interventions and related definitions

Conditionality

Crop rotation - GAEC 8: Like all other farmers in receipt of CAP area-based payments organic farmers must demonstrate that they fulfil conditionality requirements. However, the IOA wishes to seek clarification that farmers certified in accordance with Organic Regulation (EU) No 2018/848 shall be deemed to comply with GAEC 8.

Non-productive areas - GAEC 9: Clarity is needed on how the minimum share of agricultural land devoted to non-productive areas will be implemented in an Irish context. This includes the types of non-productive features that will be deemed eligible, how this will interact with relevant actions under the eco-scheme (e.g., credit for existing habitats & hedgerows) and AECM actions (e.g., maintenance, enhancement and creation of habitats & hedgerows). Clarification is also needed on how GAEC 9 will interact with the DAFM's proposal to allow up to 30% of a parcel to consist of non-productive features.

Coupled Income Support for Protein Aid

The IOA backs this intervention as a means to support the domestic production of protein crops to reduce dependence on imports. Protein aid is also relevant to support the sustainable development of the organic sector where an insufficient supply of organic proteins can undermine the expansion of the organic livestock sector. In particular, Ireland's National Organic Strategy has proposed that a protein payment for organic combi-crops should be considered under the next CAP. We, therefore, welcome that mixed cropping (i.e., protein/cereal mixes) are under consideration. There may be opportunities to use both coupled income support and the AECM in an integrated way to support protein aid and mixed cropping respectively.

There are also potential opportunities for producing proteins including legumes for human consumption and as a result, there may be scope to support innovative production of other protein crops (i.e., not only limited to peas, beans and lupins). Such support would be targeted at crops which are grown at small-scale, but that in the medium to long-term may help to improve competitiveness, sustainability, and/or quality in an Irish context.

Coupled income support for protein aid should also permit the undersowing of legume and grass mixes as part of a farm's crop rotation.

Definitions

Agricultural activity: The IOA supports that the 'permanent grassland' definition will specifically include rushes. Its inclusion in the definition should mitigate the risk of perverse effects as farmers seek to maintain eligibility. However, the definition may need to be extended to include grazable areas with woody vegetation such as heather and gorse as well as areas of environmental value which are accessible to livestock including agroforestry.

Eligible hectare: Alongside the definition of permanent grassland, we welcome the proposal to allow up to 30% of a parcel to consist of features that may be beneficial to water protection, climate or biodiversity and thereby be considered part of the eligible area. Clarity is needed on which features will make up this percentage and how actions under eco-scheme or AECM could be used more proactively and effectively to maintain and increase the environmental value of these features (and as well prevent wider perverse effects (e.g., accumulation of harmful substances in downstream waters)).

Agriculture Knowledge and Innovation System

Continuous Professional Development for Advisors/Farm Advisory Service

The National Organic Strategy has clearly identified the lack of expertise in organic advisory services as a major impediment for the sustainable development of organic farming in Ireland. The current deficit in both public and private advice targeted at organic farming needs to be urgently addressed. Advisors require a sound knowledge of organic farming practices and systems relevant to existing organic farmers and new entrants to assist sector development. For new entrants, as organic farming

is knowledge-intensive, poor availability of advice can be a key issue affecting the decision to convert. During the most recent tranche of the organic farming scheme (March-April 2021) the lack of advisory services to support conversion planning was regularly mentioned as a barrier to conversion. The REAP scheme meanwhile incentivised advisors to direct farmers to opt for this scheme. While the factors influencing a farmer's decision to convert can be numerous and varied this experience may partly explain why the target of increasing the number of organic farmers by 30% was not fully achieved.

While the consultation document looks at the Continuous Professional Development for Advisors, it contains no information on how to address Ireland's deficit in organic advisory services nor is it clear how the Farm Advisory Service (FAS) will support the implementation of CAP interventions including the OFS. Notwithstanding the NFQ Level 5 'Organic Farming Principles' course implemented by Teagasc, there is currently no specific provision of training for advisors in organics under the FAS. Furthermore, where FAS advisors may have the right level of expertise this is not indicated in the list of approved advisors.¹² This lack of basic information can make it difficult for new entrants to source appropriate expertise. In the first instance a mapping exercise of existing FAS approved advisors with appropriate expertise. Expertise could be determined based on the completion of the 'Organic Farming Principles' course tailored to advisors (at a minimum), an organic specific qualification at NFQ Level 7-9 (EQF Level 6 or 7 equivalent) or relevant professional experience (where applicable). The mapping exercise should also be accompanied by a target to increase the baseline number of accredited FAS advisors in line with sector growth trends so that an appropriate number of advisors have a minimum understanding of organic conversion planning.

In addition, there needs to be an appropriate amount of budget for the Continuous Professional Development for Advisors intervention (including current RDP funding¹³) dedicated to training advisors on the farm and land management requirements of the Irish Organic Standards. This is necessary to support the long-term development of organic advisory services for both new and existing organic farmers. The development of CPD for organic advisors must also ensure a more level playing field between public and private advisors. The terms of reference for competitive tender CPD contracts should be developed in partnership with key organic sector stakeholders and experts, drawing on the relevant objectives and actions in the Organic National Strategy.

Agri-environment Training

The IOA welcomes the enhanced provision of training for farmers who take part in the AECM. Such training is also potentially relevant to farmers who participate in the eco-scheme. At the very least the training programme should be cognisant of the interaction between both schemes at the farm level. It is essential that training is predominantly focused on the effective implementation of AECM action throughout the lifetime of the scheme i.e., more hands-on and focused on active management - well beyond the provision of basic information about actions. Training should ideally be targeted and tailored to the specific actions in the context of different land-use types and farming systems. With this in mind, the two training courses should include both class- and field-based components that allow both trainers, advisors and farmers focus on the actual achievement of environmental and climate goals.

More details are needed on how it is foreseen (or not) that other AKIS initiatives such as the Teagasc Signpost Programme may interact with the agri-environmental training.

¹² DAFM (n.d.) List of approved advisors. Available at: assets.gov.ie/133715/b9c5c485-9a72-4d65-a722-2aa5de1caf54.xlsx (Last accessed 12 July 2021)

¹³ A significant amount of EAFRD funding earmarked for agri-environment-climate training for farmers and CPD for advisor in 2021s, but it is uncertain to what extent some of the budget will be adequately targeted at the organic sector

Knowledge Transfer Programme

The IOA supports the continuation of this intervention as part of the further development of Ireland's AKIS programme. Through peer-to-peer exchange and learning guided by an appropriate facilitator, farmer-led KT groups can play an important role in complementing individual advice on farm and land management. While organic KT groups have been established using CAP funded in the past, there is scope to better target the KT programme to the needs of new and existing organic farmers. Geographical dispersal of organic farms can be a challenge to organise KT groups although there may be clusters of organic farmers in a locality to form a group. To combat this challenge, inter-sector organic groups may be relevant when farm and land management issues are cross-cutting. For example, grassland management and animal health and welfare for dairy, beef and sheep farms and soil health and fertility and pest and weed management for tillage and field-scale horticulture farms.

Notwithstanding that KT groups should be based on a competitive tender process and demand-driven, the IOA strongly recommends that a minimum percentage of the KT groups are representative of the growth trends in organic farming. There should also be appropriate consideration of the sectoral and geographical distribution of KT groups across different regions of Ireland (e.g., via targeting at NUTS-3 level). This could help to ensure that KT group opportunities are made available to different systems and enterprises e.g., arable, beef/sheep, dairy and horticulture and farmland types e.g., upland and lowland. In terms of the minimum qualifications for facilitators, holders of equivalent EQF at level 6 (i.e., those equivalent to NFQ level 8) should be eligible to deliver KT groups.

Mixed conventional and organic groups may be useful when farmers are exchanging on land management issues concerning the environment and climate action e.g., management of multi-species and low-input pasture, the management of farmland habitats, hedgerows and agroforestry, or improving and optimising soil and nutrient management and crop rotations. With these crossing groups in mind, we recommend that organic and agro-ecological farm and land management should be a 'Priority KT Topic'.

More details are needed on how it is foreseen (or not) that other AKIS initiatives such as the Teagasc Signpost Programme may interact with the new KT groups.

LEADER Programme

This intervention can play an important role in stimulating the development of organic sector opportunities in local areas across Ireland. The National Organic Strategy has highlighted many strengths and opportunities for the organic sector which demonstrate its potential to support community-led local development (CLLD). These include that the quality and taste of local Irish organic produce is considered very high, the growing demand for locally produced food, emerging trends related to health and lifestyle (which have increased further with the COVID pandemic) and the prospects of supporting local employment in rural areas. For instance, over 18% of IOA farming members have on-farm processing, 32% of them are managed or owned by women. Furthermore, circa. 49% of IOA processing licensee holders are either managed and/or owned by women. Therefore prioritising the organic sector under the LEADER programme can help to support new income streams through diversification and encourage more gender-balanced participation.

The 'bio district' concept¹⁴ is a key action for the Member States in the new EU Organic Action Plan (Action 14) designed to reinforce local and small-volume processing and foster the short trade circuit. It is one area that should be strongly encouraged for inclusion the Local Development Strategies (LDS)

¹⁴ FAO (2017) The experience of Bio-districts in Italy. Agroecology Knowledge Hub. Available at: www.fao.org/agroecology/database/detail/en/c/1027958/

of the Local Action Groups (LAGs). Originally emerging in Italy, a 'bio district' is a geographical area where local authorities and rural-urban stakeholders aim to maximise the economic and sociocultural potential of the territory through a working partnership agreement that is designed to address common economic, social and environmental needs based on organic principles and practices. Each 'bio district' addresses issues related to lifestyle, nutrition, human relations and nature considerations, with a strong emphasis on high value local organic production as well as strong collaboration with the tourism sector. The cross-cutting nature of the 'bio-district' concept is also highly relevant to the high-level LEADER themes (e.g., economic development, social inclusion and sustainable development). To stimulate the development of the 'bio-district' concept in Ireland, the IOA recommends that certified organic interventions, supported by LAGs through the LEADER programme, should receive 100% aid intensity rates.

Gender and diversity in the agri-food sector

The IOA is committed to supporting the mainstreaming of gender and diversity in the Irish agri-food sector. It is critical to ensure that there is strong collaboration between CAP interventions and initiatives and programmes (e.g., the ACORNS programme, Immigrant Council training) that promote, support and safeguard gender and diversity. Regular working dialogue between the DAFM, farming stakeholders and national bodies such as the Women's Council of Ireland, the Immigrant Council of Ireland and other relevant civil society groups are also needed to ensure both equality of opportunity and equality of outcome. A National Dialogue on Women in Agriculture, as proposed by the Women's Council of Ireland, would also be a welcome starting point for addressing some of these issues in the context of delivering a greener and fairer CAP.

Annex 1: Proposed package of land-based CAP interventions for organic farming including indicative actions*

Based on DAFM presentation to the CAP Consultative Committee (20/05/21)

Organic farming Scheme			
General principles	<ul style="list-style-type: none">- Tranche opened annually for 2-3 months- Existing organic farmers: at least a 5-year multi-annual maintenance scheme- New converters: at least a 5-year multi-annual scheme with a 2-year conversion phase- Payment rates that fully reflect the costs of organic production vis-à-vis farms representative of the Irish agriculture sector		
Eco-scheme			
General principles	<ul style="list-style-type: none">- Organic farming systems should be recognised as part of the points-system, with the flexibility for farmers to engage in cross-compensation where appropriate- The emphasis of the eco-schemes should be on rewarding existing farm structures and practices- Complementarity between eco-scheme and AECM actions should be clear to the farmer, with AECM training tailored to the specific actions selected		
Land use	Grassland	Arable	Horticulture
Package 1 (Climate)	<ul style="list-style-type: none">-Extensive livestock production (based on land-appropriate stocking rate)^b-<i>Milk Recording</i>-Nutrient management plan, including budget^a-Establishment and maintenance of grass/clover ley, including stitching^b-<i>Presence of Environmentally Sensitive Permanent Grassland</i>	<ul style="list-style-type: none">-Nutrient management plan, including budget^a-Catch crops (including undersown in a rotation)^b-land lying fallow, including fertility-building crops^a-Establishment and maintenance of grass/clover ley (fertility-building phase)^b	<ul style="list-style-type: none">-Nutrient management plan, including budget^a-Catch crops (including undersown in a rotation)-Establishment and maintenance of grass/clover ley (fertility-building phase)^b-land lying fallow, including fertility-building crops^a
Package 2 (Natural Resources)	<ul style="list-style-type: none">-Appropriate spring application of slurry (i.e., avoid excessive applications)^b-<i>Low Emission Slurry Spreading (LESS)</i>-<i>Precision Agriculture</i>-<i>Excluding Bovines from Watercourses</i>-Composting^a-Controlled trafficking system	<ul style="list-style-type: none">-Appropriate spring application of slurry (i.e., avoid excessive applications)^b-<i>Low Emission Slurry Spreading (LESS)</i>-<i>Precision Agriculture</i>-Composting^a-Intercropping (min. of two crops)^a †-Controlled trafficking system^a	<ul style="list-style-type: none">-<i>Precision Agriculture</i>-Composting^a-Intercropping (min. 2 crops only)^a †-Controlled trafficking system^a

Package 3 (Biodiversity)	-Credit for existing habitats & hedgerows -Planting groves of trees or isolated trees on field boundaries ^b -Hedgerow management specifically to maintain a triangular profile ^b Nature Corridors incl. field margins ^b -Appropriate management of scrub or invasive species control using non-chemical methods ^a -Small scale field < xx ha ^a - Alternative mowing regimes e.g., mowing grass for conservation 'inside outwards' ^a -Bee-keeping for biodiversity ^a -Development/updating of NPWS Farm Plan ^a	-Credit for existing habitats & hedgerows -Planting groves of trees or isolated trees on field boundaries ^b -Hedgerow management specifically to maintain a triangular profile ^b -Nature Corridors/field margins ^b - Appropriate management of scrub or invasive species control using non-chemical methods ^a -Alternative harvesting regimes e.g., late harvesting ^a -Small scale field < xx ha ^a -Bee-keeping for biodiversity ^a -Development/updating of NPWS Farm Plan ^a	-Credit for existing habitats & hedgerows -Planting groves of trees or isolated trees on field boundaries ^b -Hedgerow management specifically to maintain a triangular profile ^b -Nature Corridors/field margins ^b -Appropriate management of scrub or invasive species control using non-chemical methods ^a -Alternative harvesting regimes e.g., late harvesting ^a -Small scale field < xx ha ^a -Bee-keeping for biodiversity ^a -Development/updating of NPWS Farm Plan ^a
Package 4 (Animal health and welfare)	- <i>Bio-security Assessment</i> - <i>Veterinary Medicines Usage</i> - <i>Animal Health Monitoring</i> - <i>On-farm welfare assessment</i> -Credit for existing traditional breeds ^a		
AECM			
General principles	<ul style="list-style-type: none">- Organic farming systems should have priority access to all management and results-based schemes- Emphasis of AECMs should be on incentivising maintenance and enhancement of environmental and climate performance- Complementarity between AECM and eco-scheme actions should be clear to the farmer, with AECM training tailored to the specific actions selected		
Menu A			
Land use	Grassland	Arable	Horticulture
Climate change (Obj 4)	-Multi-species swards including forage legumes ^a -Enhanced manure management and composting ^a	-Enhanced crop rotation grain and forage legumes (at least 3 crops) ^a -polycropping ^a -Minimum/reduced tillage ^b	-Enhanced crop rotation (at least 3 crops) ^a -polycropping/companion cropping ^a -Minimum/reduced tillage ^b

	-Protection and management of semi-natural grasslands	-Enhanced manure management and composting ^a -Enhanced use of cover crops and green manures to retain crop residues ^a	-Enhanced manure management and composting ^a -Enhanced use of cover crops and green manures to retain crop residues ^a
Natural resources – water, soil & air (Obj 5)	-Wetland creation, restoration and maintenance ^a -Non-chemical treatments for parasites (protect soil, species e.g., dung beetle) ^a -Enhanced management of buffer strips to support soil and water quality ^a -Reduction of surface water run-off from land ^a -Loosen compacted soils and apply preventive practices ^a -Preventive practices to mitigate soil erosion ^a	-Wetland creation, restoration and maintenance ^a -mulching ^a -Spring sown cereals (reduce leaching) ^a -Maintenance of over winter stubbles ^a -Increasing soil organic matter ^a -Enhanced management of buffer strips to support soil and water quality ^a -Reduction of surface water run-off from land ^a -Loosen compacted soils and apply preventive practices ^a	-Wetland creation, restoration and maintenance ^a -mulching ^a -Maintenance of over-winter stubbles ^a -Increasing soil organic matter ^a -Enhanced management of buffer strips to support soil and water quality ^a -Reduction of surface water run-off from land ^a -Loosen compacted soils and apply preventive practices ^a
Biodiversity, habitats, landscape (Obj 6)	-Habitat management/creation e.g., landscape features, ponds - overall to reach 10% of holding ^b -Food for birds/insects e.g., wild bird cover, flower strips ^b -Managing and enhancing hedgerows and trees ^b -Implementation of NPWS farm Plan/commonage management plan ^a -Conservation of farmland birds and other threatened species ^b -Rare breeds ^b -Management of low-input permanent pasture and traditional hay meadows ^c -Agroforestry e.g., combining trees with grazing livestock, including traditional	-Habitat management/creation e.g., landscape features, ponds – overall to reach 10% of holding ^b -Food for birds/insects e.g., wild bird cover, flower strips ^b -Managing and enhancing hedgerows and trees ^b -Implementation of NPWS Farm Plan/commonage management plan ^a -Conservation of farmland birds and other threatened species ^b -Heritage and preserving seeds ^a -Agroforestry e.g., alley cropping including traditional orchards (5-year establishment and maintenance grants) ^{a, c}	-Habitat management/creation e.g., landscape features, ponds – overall to reach 10% of holding ^b -Food for birds/insects e.g., wild bird cover, flower strips ^b -Managing and enhancing hedgerows and trees ^b -Implementation of NPWS Farm Plan/commonage management plan ^a Conservation of farmland birds and other threatened species ^b -Heritage and preserving seeds -Agroforestry e.g., alley cropping including traditional orchards (5-year establishment and maintenance grants) ^{a, c}

	orchards ^{a,c} -Management of riparian margins to enhance biodiversity value ^a -Pollinator management plan ^a -Hay-making as an alternative to silage production ^a -Grazing regime for biodiversity - appropriate to land type e.g., semi-natural, improved grasslands in lowland or upland areas -Monitoring habitats/species diversity e.g., inspect populations and applying appropriate land management ^a -Restoration and maintenance of HNV farmland ^a	-Management of riparian margins to enhance biodiversity value ^a -Pollinator management plan ^a -Monitoring habitats/species diversity e.g., inspect populations and applying appropriate land management ^a -Rare crop varieties e.g., heritage varieties ^a -Use of biological and other alternative pest controls ^a -Restoration and maintenance of HNV farmland ^a	-Management of riparian margins to enhance biodiversity value ^a -Pollinator management plan ^a -Monitoring habitats/species diversity e.g., inspect populations and applying appropriate land management ^a -Rare crop varieties e.g., heritage varieties ^a -Use of beneficial insects in greenhouses ^a -Use of biological and other alternative pest controls ^a -Restoration and maintenance of HNV farmland ^a
Protect food & health quality (Obj 9)	-Sustainability assessment and management plan addressing key environmental and socio-economic objectives with appropriate weighting ^b	-Sustainability assessment and management plan addressing key environmental and socio-economic objectives with appropriate weighting ^b	-Sustainability assessment and management plan addressing key environmental and socio-economic objectives with appropriate weighting ^b
Higher priority targeting and result-based measures	These options should also be available to organic farmers. As well as the national roll-out of low input grassland and multi-species ley results based agri-environmental programmes, result-based measures should also target other land uses e.g., plant species on arable land incl. arable weed populations.		
Menu B	Organic farming in local areas should have equal access to locally-led schemes if they wish to choose this option		

Notes: Italics = DAFM sample measure a = proposal, b = proposal to modify DAFM sample measure/GLAS action, c – existing GLAS actions

*Proposed actions are non-exhaustive †Protein crops funded through coupled payments

Annex 2: Letters of Support for Organic Food Business

See letters from Glenisk and the Good Herdsman accompanying this submission.