



NATIONAL ASSOCIATION OF REGIONAL GAME COUNCILS

CAP 2023-2027 SUBMISSION

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The National Association of Regional Game Councils (NARGC) is the largest voluntary organisation in Ireland involved in game shooting and conservation. The Association has 26,000 members in 926 Clubs spread throughout the country – one Club in almost every parish. It has enjoyed an increasing membership year on year for the past ten years with an average increase of 500 per annum. It is also a **Seanad Nominating Body**. The Association co-ordinates the activities of its members and clubs through a regional structure comprising 28 regions. The NARGC also represents the interests of all its members at not only a national level but also at international level.

Since its establishment in 1968, the Association has been instrumental in the development of significant beneficial legislation since that time. Of particular note was The Wildlife Act 1976, The Wildlife (Amendment) Act 2000, The Firearms Non-Residents Act 2000 etc. NARGC has been to the forefront in leading challenges through the Courts **against misuse and abuses of Ireland's environmental and shooting legislation**. In all cases to date, the Association has been successful and this has resulted in the development of new and more beneficial legislation.

NARGC receives no grant aid from the State and is funded entirely by subscription from its members. Currently the Association's members contribute some €22 million to the Irish economy annually. In addition, NARGC members spend almost €1 million per annum at club level on non-shooting conservation projects. The Association also provides a fund-raising scheme for conservation through the **Irish Habitat Trust**, which it established in 1997.

Viable Farms and farming practices are very much part of the mix to keep the countryside vibrant, and keeping rural Ireland alive. This latest buzz word 'Wilding' is precisely what Rural Ireland does not want. While wilding has never been fully explained, it is generally thought to mean leaving the ground completely to nature, with no farming been pursued at all, and the theory being that it will return to complete woodland cover. What we really need to do is to Re-Wind our farming practices and engage farmers in the protection of fauna and flora.

Ireland, particularly rural Ireland needs working farms, with a mosaic of habitats, and mixed farm uses. It is generally accepted now that type of farms we had prior to joining the EU fulfilled many biodiversity needs, more so than what we have today.

Ireland's food security should be a national policy and priority, pursued and encouraged in a model to guarantee security always, rather than totally on market forces, particularly unit price. Agriculture practices geared towards concentrated single product production, meant all the land use in vast areas of the countryside just produced high yielding grass / cereals to the exclusion of all other plants. Gone is the diversity of plant and insect life from our island.





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Sustainable hunting is an important activity in Ireland for both urban/city and country dwellers. It is a sport which has deep social community relevance for those who participate. The friendships and social interaction between members of the hunting community goes far beyond the day spent hunting together. In many parishes in rural Ireland, the game/gun club is at the centre of all that happens in the locality. In many areas, the rule is that if you want something done for the community, you talk to the local club members. Hunting also instils in those who participate, a lasting love of the countryside and the outdoor life. This relationship between the shooter and the countryside engenders a real concern for conservation issues and a clean environment. Many of our members come from the farming community and are actively involved in field sports.

Hunting people have a vested interest in investing in conservation and ensuring that the game species which they hunt are cared for and that their populations are not threatened. This means that **hunting people spend more on non-hunting conservation work than any other environmental group** and all of this money comes from their own pockets. It is because of the activities of hunting people, together with farmers and anglers that the landscape which we enjoy today in Ireland exists at all.

To this end we make this submission to the Department of Agriculture on possible biodiversity protection measures under the next round of CAP.

The following points/measures are our recommendations for the next CAP budget expenditure in Ireland. The next round of CAP measures must address the challenge intensive agriculture has placed on Biodiversity flora and fauna. Species specific to Ireland must be protected and valued as strongly as our built heritage.

The measures proposed will help to ensure that Irelands famed “forty shades of green” endure for the next century. Contained in these recommendations are climate change mitigation and biodiversity loss halting measures. We would request that the Department of Agriculture adopt some if not all during the next round of CAP payment measures.

We are available to discuss, brief and explain any or all of these measures and their intentions if so requested.

The NARGC **must** be a stakeholder in any upcoming CAP negotiations!

Submission for CAP from the National Association of Regional Game Councils

The following options should be considered under the next round of the C.A.P

- 1. Farmers should be encouraged to protect habitat areas on the farm and duly financially rewarded for doing so.**

The following natural features and habitat areas must be protected; Ponds, lakes, wetlands, bogs and small mixed species woodlands to protect these BISS payments must be double the average of the utilisable area on the farm. Benefits both in carbon capture and biodiversity increases.

- 2. Wetlands that are created for on farm treatment of dairy washings and brown water should be paid BISS payments equivalent to the farm average.**

To encourage farmers to treat dairy washings before discharge into waterways.

- 3. Habitat areas, rough grazing and scrub lands must not longer penalised under BISS or the code of good farming practice.**

To protect essential habitats for woodcock, snipe, lapwing, curlew and ground nesting birds

- 4. Low impact agriculture e.g. extensive grazing, summer grazing or transhumance to be rewarded with higher payments.**

To protect essential habitats for woodcock, snipe, lapwing, curlew and ground nesting bird species. To decrease the reliance on nitrogen fertiliser and to manage scrub as an aid to wildfire prevention.

- 5. Extra payments where tillage farmers do not use pesticide or herbicide on the headlands of a cereal crop.**

This measure will increase **biodiversity, flora and fauna** by providing plants and insects that bird species and pollinators need to survive.

- 6. Bird nesting habitat. Long grass nesting habitat areas to be offered as an alternate option to cereals or oilseeds for tillage farmers.**

To protect essential habitats for woodcock, snipe and ground nesting birds. This will also increase **soil capture of carbon** in these areas over time.

- 7. Plot size; payments to be paid to a maximum plot size of 10 ha for one tillage crop**

This is to discourage the creation of large fields of mono culture and the removal of ditches. As an aid to carbon capture by hedgerows and an improvement in water quality by slowing runoff.

- 8. Over wintered stubbles; a % non-tilled overwintered stubbles to be a requisite after cereals.**

The current practice of sowing a cover crop/winter cereal is removing a vital winter feed source for farmland birds. If volunteer cereals were allowed alongside planned cover crops there would be a saving in the need for tilling. This would also leave a feed area for birds in particular Linnet and yellowhammer.

- 9. A wild bird/pollinator feed crop to be sown on all tillage farms at a rate of 5% of total arable area maximum block size 2ha. The mix to contain at least 5 different plant types e.g. cereal, brassica, legume and two flowering species e.g. phacelia. This crop to be**

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incorporated by 15 February by disking or topping unless a two year crop. All crops to be sown by 15th of April with random inspections on at least 5% of crops sown.

To provide winter feed for migratory bird species and pollinator insects. Increasing the area available to insects beneficial to aphid reduction and increasing food sources for seed eating birds and as an aid to increasing soil carbon capture.-see below



- 10. Approved deciduous tree planting; A native tree planting scheme to mitigate the effects of climate change. Each participant in BPS to sow 10 native trees per year to draw down BPS payments. Trees to be standalone capitol trees in hedgerows. Agroforestry premiums must be for 15 years.**

To encourage native tree species and provide a carbon sink.

- 11. Farmers to be encouraged to adopt a threatened species e.g. Yellowhammer, Twite, Grey partridge etc. and be paid a specific premium for farming sympathetically to said species.**
- 12. Farmers who allow access to their lands for the benefit of European citizens e.g. Hunting, Bird watching , Fishing, historical societies etc. should be rewarded for their generosity and civic spirit.**

To show European citizens the benefits of CAP and the value to society of funding environmental schemes.

- 13. Farmers who partake in heather management be rewarded for so doing; managed heather burning/flaying at the correct time, targeted predator control and sustainable sheep grazing.**

To protect endangered breeding wader and grouse species and to ensure farming populations in difficult upland areas are viable.

- 14. Ditches and hedgerows need to be invested in long term easements where farmers at the start of the CAP round guarantee not to remove any features for the 5 years of the specific CAP round. Hedgerow loss can no longer be allowed under any circumstances and the current practice of allowing "screening" (sowing a whitethorn hedge to replace a hedgerow)**

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is degrading the quality and quantity of these vital wildlife corridors. New hedgerows should be multi species, with a minimum of 5 native species.

15. A farm-based review and census of all hedgerows as an aid to stopping decline and to provide a baseline where an increased can be measured from.

To provide long-term data to show improvements and to help slow down leaching of NPK minerals from the soil into rivers.

16. A once of payment for pond creation similar to the hedgerow construction payment.

To help biodiversity and amphibians and to slow the runoff from agricultural lands thus improving water quality.

17. Rewetting of smaller peat areas or reinstitution of flood meadows or splashes to be

allowed as a measure under the CAP Eco Scheme. To aid in the prevention of carbon release, decrease of flooding in urban areas and to increase the available habitat for waders, wildfowl and other migratory species.

18. Farmers to be encouraged to manage both flora and fauna by attending an online course.

To protect native flora and fauna. Farmer picks 2 modules each year to complete online.

See link to online training options:

[Countryside Management Training introduction \(vimeo.com\)](https://vimeo.com/344444444)

- **Online training models could include:**
 - **Water Quality, Invertebrate sampling**
 - **Invasive species – plants and animals**
 - **Risk of disease in outdoor work/pursuits**
 - **Soil sampling / soil management**
 - **Hedgerow creation**
 - **Wild bird surveying**
 - **Pollinator / Wild bird crop planting**
 - **Restoring, preserving and enhancing ecosystems**
 - **Flood management, slow the flow**

19. The creation of small copses and woodlands by both planting and natural regeneration. To aid carbon capture and the creation of wildlife corridors and refuges.

20. Conservation Grazing with native cattle breeds on uplands, promoted and supported.

To protect endangered breeding wader and grouse species and to ensure farming populations in difficult upland areas are viable.

21. Catchment management approach, farmer not working to improve biodiversity in isolation.

A group of farmers working together with a common goal. Good for nature, the farmer, their neighbours and the community.

We would be happy to discuss the above points if so required.

We further request that the department of Agriculture in conjunction with NARGC roll out a Grey Partridge KT scheme under the guidelines listed below. This scheme could be modified to include the protection of other species e.g. Curlew, Lapwing, Grouse. Participation in such a scheme would count as a high scoring option for the farmer in any new CAP eco scheme.



Grey Partridge Farmer Cluster Knowledge Transfer

This project will be delivered over 7 modules with a combination of practical lectures, online elements and in field demonstrations

Module 1 Is a two-hour meeting where farmer cluster members and local NARGC club members meet to be briefed on the grey partridge its biology reasons for decline measures to increase numbers. Outline will be the parts each stakeholder will play and roles in the conservation of the species. Decision on 5 year plan for action.

Module 2 On farm visit see Partridge ideal habitat pens and equipment identify farmer input and where stakeholders need to cooperate. One hour on targeted predator control and why and equipment and game cover.

Module 3 Online game crop training to be view live or recorded compulsory multiple-choice exam to ensure participation and validation.

Module 4 Online training on predators and control with multiple choice predator identification exam for validation

Module 5 Second on farm visit topics to include preparation for release and action plan

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Module 6 Autumn partridge count all farmer cluster members on the same day in cooperation with local NARGC members. NARGC members to record any sightings while hunting on the NARGC online bag return site. This may be coupled with a spring pair count in years 2 to 5

Module 7 End of year evaluation and future planning delivered over Zoom or similar platform. Lessons learned from other successful groups/projects.

- A. Each meeting to have a sign in sheet.
- B. Farmer cluster must include the involvement local NARGC club.
- C. Trap equipment subsidised or paid for
- D. Game crop area allowed payments under CAP.
- E. Partridge seed stock sourced under NARGC national project
- F. All modules compulsory
- G. Suit of aided measures to be aided beetle banks, unsprayed headlands, late cut hay, winter feeding etc.
- H. A 5-year agreements and plans for all parties.



AIMS and benefits

The aim of this project is to increase this threatened species the benefits will spread across many other species and invertebrates.

The NARGC has a number of long-running Partridge project and was a founding stakeholder in the Bora partridge project. Through our extensive parish level membership base we have continue to roll out our projects across the country. Without farmer stakeholder involvement none of our projects can flourish we see this as an idea opportunity to work with farmers and the department of



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agriculture to further strengthen this cooperation. The formation of farmer clusters is key to the success of partridge conservation. There is very little use spending time and energy on one farm when next door lacks the essentials for partridge production, partridge do not recognise different farms.

The basis of wild game production is a three leg stool habitat feed and protection from predation. We see no reason why farmers cannot provide some or all of these elements when properly guided and supported by the NARGC and the Department of Agriculture.

Gains from the programme

It is hoped that this programme will provide a template of farmer cluster development which can be rolled out across any species restoration scheme. We would see no reason why multiple species could not be protected under this or similar measures. Farmer clusters have been successful in many other European countries and we think it is a model suited to Ireland's family farm model.

The NARGC ideal hope to get to a situation where this iconic game bird can feature once again on Irish farms, however this is still a long way off.