



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

Submission by the Irish Uplands Forum, August 2021

Re. 'Draft interventions for CAP Strategic Plan'

The Irish Uplands Forum (IUF) is a voluntary body, established in 1995, that pursues a partnership approach to sustainable management of upland areas. Our membership, which is all-island, includes farmers, recreational users, ecologists, geographers, tourism and other countryside service providers, who represent those who live, work or recreate in the Irish Uplands. IUF promotes evidence-based approaches in our work with upland communities and decision-makers, and we commission and undertake research, organise workshops, enable networking and disseminate best practices. We welcome the public consultation to inform Ireland's forthcoming CAP strategic plan 2023-2027.

Irish Uplands Forum welcomes:

The vision and ambition that underpins the new CAP Strategic Plan (CSP). In particular we welcome the proposed transition from the traditional compliance approach to a new performance-based approach that will be underpinned by a 'New Delivery Model', under which performance will be judged on outputs and results, and on how the CSP contributes to CAP objectives at EU level. The proposed linkage of the interventions under Pillars I and II offers the potential for a more holistic and integrated Strategic Plan. These adjustments to the CAP are aligned with the direction set out in high level policy documents agreed by the EU and other multilateral institutions, especially in relation to the management and mitigation of climate change. The CSP provides an opportunity to enable farmers and other stakeholders to embark on new models of production that will support the economic, environmental and social sustainability of rural areas at levels that are appropriately commensurate with the well documented challenges that need to be addressed as a matter of urgency for the benefit of the current and future generations of society regardless of where people reside.

We welcome the principles that underpin the cross-cutting and specific objectives outlined in section 1.3 of the CSP and the statements in section 1.4 (The Green Architecture of the CAP SP) that it *"will have a particularly strong emphasis on achievement of a higher level of climate and environment ambition"* and that *"Ireland proposes to implement a system of enhanced conditionality through the CSP"*. The inclusion in Section 3 of specific commitments on Coherence with National Policies is important, especially since the approach to the deployment of the CAP SP funding will have a significant direct impact on the potential to achieve the wide ranging objectives in both the *Food Vision 2030 Strategy* and *Our Rural Future 2021-2025* which represent the early to medium phases of the longer term *Ireland 2040* strategy.

Irish Uplands Forum notes:

The text of the draft CAP SP conveys a sense of geographical uniformity about the distributions of issues and challenges to be addressed – it has often been argued by many rural researchers that the CAP is a 'spatially blind' policy which has led to outcomes at EU level that are in conflict with other policy objectives



such as social cohesion, balanced regional development and ecological sustainability. Research on these issues in Ireland has reached similar conclusions. The strategy needs to explicitly acknowledge that there is a great variety of rural areas with different potentials for food production, social cohesion and demographic survival, and for the protection and management of ecological biodiversity. The Uplands are of particular interest to the Irish Uplands Forum. It is disappointing that such distinctive rural landscapes with their own challenges and potentials are not referenced anywhere in the text of the CAP SP. It is also important to note that a significant minority of people live in the Uplands and rely on them for their livelihoods, while supporting their families and local enterprises.

The distinctive challenges and opportunities that they present, and the variability in potentials between different upland areas, are well documented in research that we have commissioned and reported¹. Our research, including collaborations with universities, the lived experiences of our membership and the multiple outputs of the UN International Year of Mountains (2002) and Plant Health (2019), as well as several EU LIFE and INTERREG projects, among other reliable and objective sources, provide abundant evidence of the increasingly significant roles our uplands play as water towers and purifiers, recreational and food production spaces, habitat refuges and harbours of biodiversity, especially in an era of climate change. In addition, upland communities, and in particular those who farm and work in our uplands, are repositories of unique socio-cultural heritage, diversity and knowledge capital.

Irish Uplands Forum response to Key Questions:

¹ [REDACTED] (2021) for Irish Uplands Forum: **Wild Atlantic Nature LIFE 2021. Integrated Study Preliminary Stakeholder Mapping and Analysis**. In advance of activation of the Wild Atlantic Nature (WAN) LIFE project by NPWS, the IUF supported by the Heritage Council, a partner in the WAN project, commissioned research of local stakeholders in the catchments of 26 Special Areas of Conservation along the western Atlantic seaboard. The research heard from a diversity of interests including farming, community, natural resource management, conservation, recreation, environmental education and tourism. The research identified issues and opportunities associated with early community engagement, mobilisation, public awareness and educational activities for the project. Overall, taking an integrated, participative, collaborative, place-based approach to future development will be important, as well as effective collaboration through good governance for conservation. Acknowledging and including traditional knowledge and local people in awareness and education activities will serve to embed the project in communities and sustain its work after LIFE. https://irishuplandsforum.org/wp-content/uploads/2021/08/210325-IUF_Wild-Atlantic-Nature-Life-Report-Final_Crowley-2021.pdf

[REDACTED] (2020). **The KerryLIFE Project (LIFE13/NAT/IE/000144) - A Socio-Economic Review**. The KerryLIFE project 'Sustainable land use management for the conservation of freshwater pearl mussels' worked with farmers and forest-owners in two river catchments to develop and demonstrate sustainable land use practices to conserve the freshwater pearl mussel and to benefit the unique natural environment of the Iveragh Peninsula. It operated from 2014–2020 funded through the EU LIFE Nature Fund (50% LIFE funding; 50% Irish project partners). The project demonstrated measures to address physical and chemical changes associated with farming and forestry, contributing to the deterioration of the freshwater pearl mussel's habitat. The project coupled local farming knowledge and experience with scientific expertise of project partners to improve the conservation status of the Natura sites. <https://irishuplandsforum.org/wp-content/uploads/2021/08/Kerrylife-high.pdf>

We note that one of the key objectives that has informed the CAP reform discussions at EU level is the need to ensure a fairer and more targeted distribution of direct payments, and that Member States have been given a good degree of flexibility to achieve this.

The following are our responses to the questions in respect of direct payments:

- a) *Should Ireland implement capping at an effective rate of €66,000 or €100,000, or at a rate in between?* The traditional distribution model unfairly benefits a relatively small number of very intensive farms. Much of the environmental damage from agriculture over recent decades can be linked to these farms. The unequal allocation of CAP payments contributes to imbalances in regional and rural development contrary to national policies. The CSP should aim for an ambitious and radical redistribution of CAP direct payments. We support capping at a level between €66,000 and €75,000 with €66,000 as the target for 2026.
- b) *Should internal convergence stop at 85% of the national average payment entitlement value in 2026, or should it go to a higher percentage?* In keeping with the ambition for a transformative reform of the CAP direct payments, the internal convergence should aim for 95% of the national average payment entitlement by 2026.
- c) *Should Ireland go beyond the 10% of direct payments to redistribute from larger to smaller or medium-sized holdings? Or should Ireland seek to use the derogation to reduce the percentage? Should this funding be redistributed to farmers with holdings of less than 30 hectares?* Ireland should go well beyond the 10% to 25% by 2026. The redistribution should be targeted towards the lowest income farms in the interests of maintaining the social fabric of vulnerable rural areas, and therefore should be confined to farms with less than 30 hectares. All payments should as far as possible be linked to the achievement of demonstrable results in respect of pre-agreed objectives. Given the variability in the potential economic returns from different types of farming it would be more appropriate to use Economic Size Units (ESUs) instead of hectares. Lands held in commonage will need to be treated separately and the metric will need to reflect the lower economic potentials, that are associated with such lands.
- d) *Should Ireland go beyond the 25% of direct payments to be allocated to eco-schemes? Or should Ireland use the flexibility in the regulation to reduce the percentage allocated to eco-schemes?* There is an urgent need to improve the relationship between agriculture and the environment so that national objectives in relation to ecology, water resources, green house gas emissions and climate change can be achieved. Maintaining the status quo or implementing only minimal changes to conventional practices will not be sufficient. We therefore request that the 25% target should be raised to 35% in order to stimulate radical transformative behavioural responses.
- e) *Should there be a specific intervention to incentivise gender equality?* Gender inequalities have become structurally embedded in many facets of Irish society in both urban and rural contexts. The evidence to date is that small incremental changes are insufficient to overcome deep-rooted historical inequalities. We therefore support the need for some specific interventions to incentivise gender equality.



In addition to the above, Irish Uplands Forum makes the following operational recommendations in relation to the implementation of the CAP Strategic Plan 2023-2027:

- Avoid any time lags or discontinuities between the current agri-environmental schemes, EIPs and local development activities, and the interventions that will succeed them;
- Ensure full consistency between all elements of agricultural policy and practice, so that agricultural, energy and rural development strategies, measures and supports contribute to the attainment of agri-environmental objectives and duly reward and incentivise farmers;
- Mainstream 'Farming for Nature' from the margins to the heart of agricultural policy, so that this model is fully embedded and celebrated as a constant in the EU and Ireland;
- Provide fair and just remuneration for farmers who participate in agri-environmental schemes by valorising the public good contributions that they make;
- Develop a market-led approach to High Nature Value farming to promote and support premium pricing of HNV agricultural products;
- Increase community participation (i.e. outside the farm gate) in activities that promote HNV farming in upland areas;
- Increase synergies and linkages between agri-environmental actions and interventions to sustain upland communities – demographically and socially, including in respect of planning policy, community development and public service provision;
- Incentivise more cross-border (and inter-county) collaborations, e.g. on the basis of river catchments, so that ecological and social realities are the spaces in which policies and practices are given effect;
- Increase investment in community-led local development and inter-community networking, particularly on the basis of natural areas of development, and the associated equipping of communities with the technical know-how and capacity to engage in leadership roles in the collaborative governance of upland resources;
- Implement more formative approaches to the ongoing monitoring and evaluation of CAP activities that are characterised by high levels of stakeholder engagement, co-creation of knowledge and the application and implementation of evaluation findings, through effective and transparent feedback mechanisms;
- Incentivise the roll-out of learnings from the various Farming for Nature/ HNV pilot programmes into mainstream agricultural practice, supported by leadership and integrated policies at all levels of Government; and
- Support training and research programmes in agricultural colleges to ensure young farmers are equipped to meet the agri-environmental challenges of the future. It is vital that agricultural education includes modules reflective of Uplands farming practice (e.g. Uplands management, Uplands livestock management; Uplands flora and fauna and their contribution to biodiversity and habitats sustainability).


on behalf of Irish Uplands Forum
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