

Irish Native & Rare Breed Society (INRBS) CAP Submission

The INRBS has been approached by the 4 Irish Rare Breed cattle societies to put forward a submission specifically on how rare breeds will be dealt with under the new CAP. Also included is a submission from the Galway Ewe, Native Irish Honey Bee, Irish Draught Horse Society, Irish Cob

The breeds concerned are the Irish Moiled, Dexter, Kerry and the Droimeann Below is the submission. All the breeds are coming from a much lower base with regard to numbers, so ongoing support will be required to ensure the survival. To date the breeds have been supported in REPS and GLAS. Payment in GLAS was at the rate of 200/lu up to 10 IUs. We would contend that this is very little encouragement for farmers to take up the rare breed option if this level of payment continues.

Eco Scheme

Rare Breed payments should be considered under a Pillar 1 Eco Scheme as a biodiversity measure. Farmers would be paid for the ecosystem services they provide, contribution to genetic diversity and heritage and also the reduced impacts they have on land and soil due to their small stature, and low nitrogen output.

Suckler Cow Welfare Scheme

In any future suckler cow scheme the rare breed cow could receive a top up of up to 30%. This again would encourage suckler farmers to consider moving to a rare breed. This would also encourage the Rare Breed farmers to use all the facilities of ICBF to improve the individual breeds and breed out any recessive traits from the breeds.

Rare Breed Numbers

All rare breeds still have critically low numbers and all are listed as endangered breeds. The most successful breed is The Dexter. There will be approximately 800 purebred breeding females calving in 2021. To ensure the sustainable development of this breed and all native rare breeds in the future, it is essential that new breeders are encouraged to buy our native animals. This task is more important now than ever before. Current market difficulties due to Covid 19 and Brexit have resulted in a lack of outlets and consequently a lack of confidence in these breeds.

Agri Environment Climate Measure

Bovines:

New environmental programmes and strategies at EU level have been signed by our Government. Part of these new strategies is a commitment to biodiversity enhancement and any actions targeting this area will be monitored and assessed by the EU. The development of our Native breeds falls within the scope of Biodiversity Enhancement. Therefore, these breeds must receive additional support to commercial breeds and this support must be obvious.

In order to achieve growth in numbers to a sustainable level, the following is required:

- No reference year for entry to scheme as is the case currently. (This current criterion prevents breed development and new entrants and therefore is counterproductive and senseless.)
- Increase in payment per livestock unit for any future eco scheme. No upper limit on numbers but payment only for animals producing fully registered calf in the current year. We would support any new Rare Breeds scheme to support the first 5 LU at the rate of €500 /LU under The Complementary Redistributive Income Support for Sustainability (CRISS) and then have the next 20 LU paid out at 200 /lu . This will encourage more farmers to transition to rare thus ensuring their protection
- Only animals that breed every year to be eligible. (see exception below) (Data to be retrieved from AIM system and Pedigree status to be confirmed by ICBF. Herd information for all rare breeds to be available on ICBF portal . Only stock that produce a calf each year to be made eligible as this will ensure the maximum return on investment by DAFM and will also encourage breeding. That there be a 10% or 1 livestock unit allowance for misadventure on any given year whereby an animal does not give birth due to circumstances beyond the control of the breeder such as fertility problems up to a maximum of three years occurrence over five years. The breeder may be required to provide a letter from a veterinary surgeon as well as from the breed society in question in support of the claim. All livestock to be bred pure and in accordance with the rules of the breed society in question and the breeders to be fully signed up members of the society. No requirement on breeders to be members of the breed society for an extended period prior to entry into the scheme as there is a hope that such schemes will expand the number of breeders.
- Rare breed measure to be included in programme as a priority action for entry to scheme as Previously.
- No nitrates figure to be associated with Native Bovine breeds. These animals are extensive grazers and are small in stature with adult cows weighing only 300 kg. The current nitrates rule can inhibit some breeders from expanding.

Galway Ewe

1. The Galway Sheep are Ireland's only recognised breed of ovines and should obviously be conserved for scientific, cultural and agricultural reasons. This case has been made repeatedly by people like Dr. Seamus Hanrahan.
2. The following table reflects the present numbers of pure bred ewes registered with Sheep Ireland.

Year	2016	2017	2018	2019	2020
No of Ewes	692	630	722	684	759

As can be seen the trend over the past 5 years places the Breed in the **vulnerable** category according to the definition of the Rare Breeds' Survival Trust.

3. A payment of at least 300 euro per unit is essential as there are many costs associated with producing and registering Galway sheep.
4. All sheep both male and female over the age of 6 months should be eligible for calculation and valued as 0.15 of a unit. - calculating sheep between 6 months and 1 year as 0.01 of a unit is just complicating matters and is of no benefit to anyone – any Galway sheep over 6 months of age is destined for breeding.

A Co-op has recently been formed to promote and market Galway wool which is a unique indigenous heritage product – consideration should be given to grant aiding the producers who fulfil the requirements of the Co-op - perhaps a figure of 5 euro per fleece would be a reasonable

The Irish Draught Horse

The Irish Draught Horse is an established jewel of our cultural and bio heritage. And yet it has found itself categorised over the past two decades, as endangered on the basis of numbers alone. Furthermore, it has been haemorrhaging genetic diversity along with a verified loss of its phenotype and distinct characteristics. A significant and critical number of the original Foundation Sire lines, have been lost.

The Irish Draught Horse Society Ltd. is the founding Society for the breed. As a member of the INRBS, it holds the same mission to preserve and restore the breed to a healthier herd, to a reserve of equine vigour.

Under the Biodiversity Enhancement prerogative within this progression of CAP, we propose that the scheme support hard pressed breeders in doing the required restorative work.

We propose that all purebred Irish Draught breeding stock will be eligible. Up to the first 8 mares per breeder would be supported at a level of €500 per head, on the basis of one mare per hectare. This €500 per head, would be payable yearly on the basis of a covering cert for each mare. Many older mares representing vanishing genetic lines, need to be targeted and their breeders incentivised to attempt to breed them. Horse breeding has greater breeding challenges compared to cattle breeding, in terms of entire males being readily available and the costs incurred in transporting and covering mares. Thus, it is much less likely for mares to produce offspring every year, despite every attempt being made. We suggest a further premium of €500 to be offered for each of these mares with 2% or less relationship to the breed herd OR are in the rarest 25 mares in the scheme (if the 2% criterium doesn't yield enough breeding mares)

In a further attempt to stem the loss of diversity, a further €500 would be provided if these mares are brought to designated rare line stallions. From 9-20 mares we propose a support of €200 per head. We also propose that Rare Stallions, representing the vanishing Foundation Sire Lines, be supported with a yearly support of €2500 as an assist in standing these stallions.

The Irish Draught Horse Society Ltd is best placed to oversee that this scheme is implemented to address biodiversity loss within our native breed of horse. And in so doing, is integral to implementing a solution for such issues across the broad spectrum of our native breeds, as part of the INRBS.

Producer Organisations

All the native breeds are making tremendous efforts to market their breeds, but are often sadly lacking in resources. The Irish Native & Rare Breed Society can play a role in the establishments of producer organisations to help develop routes to market as the breed numbers increase. It is not possible to market these animals alongside commercial animals, and supply chains will need to be enhanced to ensure that a premium exists for the finished product, which making it a viable proposition for the producers. We would suggest that Pillar2 funding for Producer Organisations be set aside and made available to Rare Breeds.

EMERGING BREEDS & the Role of INRBS

The INRBS would like to see recognition made of efforts to save what may, on the basis of genetics, turn out to be distinct breeds indigenous to Ireland. We would like to see supports given to The Irish Cob breed, which does have recognition as a breed with a pedigree register but has not yet gained status as an indigenous breed and does not currently have an incorporated society. We would also like to see supports for the Cladoir sheep. Genetic testing of sheep under a revival programme has showed very encouraging signs and a Preservation Committee has been formed with the aim of using genetic testing to guide a breeding programme and management plan and NPWS have been the driving force in this. Also of note are feral goats of two types, Old Irish and Bilberry.

The INRBS would like to assist individuals and groups as well as societies invested in saving the breeds outlined above on the basis that they work to a standard that is compatible with the requirements of the INRBS such as having recourse to DNA testing, data sharing and transparency and following the recommendations of geneticists in order to breed viable numbers of pure animals in dispersed private ownership with breeders ultimately being in a position to form functioning societies run on democratic principles for the good of the breeds in question.

Any supports available in relation to these emerging breeds would be very valuable, both in terms of monies allocated for the emerging societies to assist them in organisational terms and to assist breeders. We would like to see a system whereby individual breeders adhering to correct standards as per pedigree registers could, pending recognition of breeds, establishment of pedigree registers

Maintained to applicable standards and the granting of indigenous status, avail of headage payments comparable to what is available to already established indigenous breeds.

If any of these breeds cross the thresholds which allow for indigenous status within the time period covered by specific Agri Environmental Schemes we would like them to become immediately eligible for the same supports as established breeds and not having to wait until subsequent schemes are initiated.

In relation to emerging breeds I would propose the following text;

The INRBS supports the efforts made to preserve established and recognised indigenous breeds as well as emerging breeds, who may, on the basis of genetic testing, at some point attain indigenous breed status.

The important point is that genetic evaluation, conducted to a high standard, can identify breed distinctiveness and where results show positive results financial assistance can go a long way towards supporting the efforts of breeders. Support at this stage in breeding programmes obviously does not imply recognition of the breeds as breeds with indigenous status with corresponding pedigree registers. It does however, defray the very real costs involved in breeding livestock which, relatively speaking, are uneconomic and where the ultimate success of the project is in question. Should it emerge on the basis of genomic and archival evaluation, that these livestock do not qualify as either breeds or indigenous but may in fact be best categorised as a type, then the breeding programmes can be wound down, but for as long as there is a realistic chance of saving what may, on the basis of genetic testing, turn out to be indigenous breeds we feel that such financial support as can be given can make the difference between survival and extinction. The breeds/emerging breeds identified by the INRBS which do not have either breed status or indigenous status can be identified in two categories.

The first category involves the only native breed which has achieved official recognition but has yet to receive indigenous status, The Irish Cob. The breed has a stud book and has officially mandated inspectors as per the strictures of Horse Sport Ireland but does not currently have a society. Presumably that attainment of indigenous status is only a matter of time. There is an issue in relation to closing of the stud book as part of the granting of indigenous status and this has led to some hesitancy in applying for the status in question. The INRBS wish to assist in the efforts of Irish Cob breeders who breed them in accordance with the stud book rules and would like to see financial supports for The Irish Cob in line with other breeds who have already gained indigenous status and as a society we are happy to assist in any measures that can aid them in their efforts.

The second category involves emerging breeds which do not currently have the official status of breeds and the INRBS have identified three such potential breeds, Cladoir Sheep and goats of two types, Bilberry and Old Irish.

Initial testing of sheep deemed likely to have Cladoir genetics were far more positive than anticipated and a Preservation Committee, headquartered in Connemara National Park and chaired by NPWS, with powers delegated to Project Co-ordinators, has been established. Management of the sheep along with mating decisions is conducted on the basis of genetic analysis with the hope of ultimately establishing a viable cohort of pure livestock that can in future be deemed to be an indigenous breed. Any assistance to participants, farmers co-operating with NPWS and the Project Co-ordinators, would yield huge benefits to the successful running of the project.

In relation to goats, the vast bulk of goats, other than relatively recent imports, are feral. Goats of the Old Irish type are dispersed at various locations across the island and while there is a goat society in Mayo, the task of capturing, testing and maintaining goats from diverse locations is beyond the competence of any regional organisation. The INRBS has established that the procedure for regularising the position of feral goats being brought into domestications involves the registration of a flock book and tagging of goats upon capture and informing the local RVO. The INRBS wishes to support the efforts of anyone engaged in such endeavours so long as DNA tests are taken of captured goats with a view to building up a genetic profile that will, on the basis of data analysis, confirm whether the goats in question retain unique genetics which may, on the basis of a multi-generational breeding programme, allow for the recognition of the goats as an indigenous breed.

In relation to Bilberry goats, extensive DNA testing was undertaken in 2014 and the results were very positive, both in terms of genetic distinctiveness and purity. However ownership issues in relation to the goats as well as rights to the lands that traditionally provided the

home for the Bilberry flock stymied efforts to build on the positive results of the DNA testing. This has resulted in the dispersal of many of the goats who are not being managed in accordance to a breeding programme on the basis of ongoing genetic testing. In the first instance DAFM could assist in locating goats that may contain Bilberry genetics by tracking officially recorded movements and contacting people believed to be in possession of Bilberry goats with a view to establishing if the people concerned wish to engage in a breeding programme and management plan or would be willing to sell the goats to people willing to partake in such activities. The Bilberry Goat Heritage Trust is an incorporated legal entity and the INRBS wishes to assist them in any way possible in preserving these goats. It cannot be overstated how critical the situation is in relation to Bilberry Goats and how unforgivable it would be if we arrived at a situation where these goats went extinct, when as recently as 2014 a genetic study involving over eighty goats yielded such positive results. Bilberry Goats like Connemara Sheep, are synonymous with a defined geographical area, in the case of Bilberrys an area just outside Waterford City and in the case of Cladoir Sheep, South Connemara and both breeds could have the nucleus of their breeding activities concentrated in these areas with supplemental flocks dispersed elsewhere.

Because of the huge strides made in genetic science as well as the potential for capture of feral goats along with procurement of goats held in domestication by people committed to breeding pure animals in accordance with the advice of geneticists, the INRBS would like to see annual reviews of all Agri-environmental schemes which may provide a platform for bringing currently unrecognised breeds back from the brink of extinction. If any emerging breed does not qualify for entry into the scheme on the first year we would appreciate positive feedback as to what needs to be achieved in order to qualify in subsequent years. The INRBS will assist in any way possible in the endeavours of people involved in preserving such emerging breeds in terms of administrative and technical supports. We would like to see assistance on the basis of headage of livestock of the breeds concerned to be comparable to that of already recognised breeds provided the breeders complied with genetic advice.

The aim of the INRBS is to assist all breed societies in preserving this country's heritage of domesticated livestock, in terms of already recognised breeds, emerging breeds where there is a realistic prospect of official recognition and in the case of the native bee, in allowing the bees, notwithstanding that they are a sub-species rather than a breed, to have the beekeepers adhering to the rules of The Native Irish Honey Bee Society, avail of the same supports as other breeders of domesticated indigenous livestock.

The Native Irish Honey Bee, *Apis mellifera mellifera*, (A.m.m.), also called the Black Bee or the Dark European Honey Bee was originally widespread throughout the whole of northern Europe but sadly is no longer prevalent there now, due to hybridisation with other sub-species.

Status in Ireland: Scientific research and DNA analysis has confirmed the Irish *A.m.m* strain to be both pure and distinct in the paper '[A significant pure population of the dark European honey bee \(*Apis mellifera mellifera*\) remains in Ireland \(tandfonline.com\)](https://doi.org/10.1080/00218839.2018.1433949)'
<https://doi.org/10.1080/00218839.2018.1433949>

Thankfully the black bee is still very much alive in Ireland and is the one kept by most beekeepers (1) but it is severely threatened due to hybridisation with imported non-native sub-species as well as the effects of diseases that may be imported with non-native bees.

Along with other bees and pollinators generally, it is struggling due to habitat loss, pesticide use and intensive agriculture – **sadly, 1/3rd of all Ireland's bees are at risk of extinction.**

So the future of *Amm* is under threat of extinction due to increasing importations of non-native honey bees subspecies. Unlike other animals like cattle or pigs, honey bees fly freely and mate openly so the native bee cross-breeds with the imported one - resulting in hybridisation. When this happens, the resulting bee can be aggressive and loses the valuable characteristics and behaviours that have allowed it to thrive in our particular climate for thousands of years.

The other problem with importing honey bees is the danger of also importing pests, diseases and pathogens. A prime example of this was the Varroa mite which was brought into Ireland on imported honey bees and which then decimated honey bee populations, from which we are still suffering. One of the most distressing new pests is the Small Hive Beetle which has spread into some parts of Italy and which would have a devastating effect if it arrived here – many bees are already imported from Italy and at the moment there is a major risk due to some bee importers trying to circumvent the Brexit rules and the Northern Ireland protocol.

The importance of protecting local honey bees is now being recognised throughout Europe (2).

NIHBS is a member of the **Irish Native Rare Breeds Society, INRBS**. We very much support their non-intensive methods of farming and feel that native honey bees would happily complement their ethos of working with breeds most suited to maintaining wildlife habitats, biodiversity and generally being kinder to and working with nature.

Instead of being penalised, farmers must be incentivised to protect and improve biodiversity e.g. they should be encouraged to keep excellently maintained hedgerows which are essential corridors and habitats for a healthy wildlife population and they must be dissuaded from ripping out corners of fields which are essential to the survival of solitary and bumble bees.

When farmland was a dense mosaic of thick hedgerows, species rich grassland and pollinator-friendly plants like Dandelion, Clover, Gorse, Hazel, Willow, Holly, Blackthorn, Hawthorn, Bramble, Knapweed, Rosebay Willowherb, Dandelion, Sycamore, Lime, Chestnut and Cherry beekeepers produced much more honey - we could do that again.

For many years now we watch thousands of acres of gorse and other vegetation being removed - this is a valuable source of pollen and food for bees which should be valued.

On the other hand farmers have been paid to create artificial habitats which may never mature in the time span of some of the environmental schemes, usually five years.

We are fighting for the native honey bee NOT to become a rare breed but we want it to be recognised as a 'livestock unit', with the same status afforded to it as to the other 'native rare breeds' and therefore to also be entitled to those supports and protections. We suggest:-

- Support for hives of native *A.m.m.* bees would be a natural inclusion to the Biodiversity Enhancement part of EU strategies.

- It should be included in Pillar 1 as an Eco Scheme option
- As regards eligible livestock species, 1 hive of native honey bees would represent a livestock unit, the first 4 units would be entitled to €500 per LU and subsequent LUs to €250 each.
- We suggest a maximum of 6 livestock units (hives) per apiary site would be eligible for payment as we are conscious of the need to also look after wild pollinators.
- Farmers who provide a secure site for native honey bees should be incentivised

Premiums should also be payable for any farmer contributing towards

- Conservation of Solitary & Wild Bees, including Bumbles
- Proper maintenance and Laying of existing Hedgerows,
- Planting new or regenerating existing hedges,
- Leaving field margins beside hedges for wildlife, encouraging wildlife corners
- Low Input Permanent Pasture,
- Traditional Hay Meadows
- Planting Native Trees,

The All Ireland Pollinator Plan has excellent initiatives which the CAP should include e.g:-

- Incorporate relevant evidence-based pollinator-friendly actions and prescriptions into agricultural and agri-environment schemes.
- Encourage the responsible and sustainable use of pesticides (insecticides, herbicides and fungicides) in RoI.

Ireland has a duty and responsibility to conserve its native honey bee which is part of our genetic natural heritage; native beekeepers need help to do that.

Appendix.

- (1) Two recent studies, one by NUI Galway and one by IBA (Irish Beekeepers Association) both showed there is significant support for the native bee, the majority of beekeepers in Ireland work with *Amm*, NUIG study found approx. 90% and IBA 82% keeping native honey bees.
- (2) In March 2018, an EU Report on **Prospects and challenges for the EU apiculture sector** (2017/2115(INI)) “Calls on the European Commission and Member States to put in place measures to increase legal protection and financial support for **local honey bee ecotypes and populations** throughout the European Union, including by way of legally protected locally endemic honeybee conservation areas. Reiterates concerns that increased mortality and the decline in honeybees and wild pollinators, including wild bees, in Europe will have a profound negative impact on agriculture, food production and security, biodiversity, environmental sustainability and ecosystems..”