



# Mountaineering Ireland's response to consultation on Ireland's CAP Strategic Plan 2023-2027 - August 2021

## Introduction

Mountaineering Ireland is the representative body for hillwalkers and climbers on the island of Ireland, and has an interest in the protection and sustainable management of Ireland's mountains, hills, bogland, forests, cliffs and coastline. We also have an interest in promoting understanding of, and care for, these cherished natural landscapes. Mountaineering Ireland has over 13,900 members, comprising 191 clubs and 2,060 individual members (October 2020) and we welcome the public consultation on Ireland's CAP Strategic Plan (CSP) for the period 2023-2027.

The latest IPCC report<sup>1</sup> is unequivocal on the need for immediate, rapid and large-scale reductions in greenhouse gases to limit the changes in climate being experienced across the globe. In general terms, Mountaineering Ireland welcomes the aspiration expressed within the CSP to deliver a higher level of climate and environment ambition than heretofore. With CAP direct payments accounting for 78% of family farm incomes, this CSP provides a significant opportunity to support sustainability of economic, societal and environmental development in rural Ireland and thereby strengthening the fabric of these areas.

## Mountaineering Ireland remarks

The continuance of the European Innovation Partnership (EIP-AGRI) approach, Section 5.2(9), is viewed as a positive in promoting understanding of, and care for, our natural landscapes, through these locally-led, results-based approaches. Mountaineering Ireland highlights the need for landscape level plans and actions in upland areas, to bring upland habitats into more favourable condition, and to optimise the ecosystem services, such as water retention / flood mitigation and carbon storage which these areas can provide. The co-operation element in EIPs has been a factor in their success, for example the SUAS project in Wicklow has formed commonage groups and has structures in place to support collective decision-making for the management of seven commonage

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<sup>1</sup> <https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/>

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areas<sup>2</sup>. There is much climate, biodiversity and societal gain to be made by extending this model across the Wicklow uplands. A piecemeal approach to the delivery of the CAP in upland areas undermines the multiplier effect that can be generated by working at a landscape scale.

Mountaineering Ireland recommends the use of eco-schemes to mainstream the EIPs' locally-led, results-based approach in the CSP for 2023-2027. A recent socio-economic evaluation of the Kerry LIFE project showed that discontinuity between the LIFE project and the Pearl Mussel EIP (which some of the farmers were eligible to join) affects relationships and diminishes farmer support for agri-environment schemes, also the closure of the LIFE project office in Glencar left a void<sup>3</sup>. Avoiding, or at least minimising, any hiatus between the current upland EIPs and the successor schemes is advocated.

With recreation an important cultural ecosystem service, Mountaineering Ireland seeks the inclusion of a recreation measure in the design of Eco-schemes (Section 5.1(5)), so that with landowner agreement, land can be used for recreation, for example to enable the development of community trails close to towns and villages, or to facilitate access to upland areas.

Overall, it is felt there is a lack of detail contained within the eco-scheme section of the CSP, Section 5.1(5). Of particular concern is the absence of detailed actions aimed at reversing the ongoing, and significant, deterioration in the quality of our air, water, and soil resources due to agricultural activity<sup>4</sup>.

It is strongly recommended that the requirement for minimum stocking levels for farms in ANC area should apply only to permanent grassland and cultivated land, Section 5.2(4). Such a change would mean that farmers owning large tracts of upland or other priority habitats would not be required to carry increased stock numbers to be eligible for the ANC support. The current stocking rates are a factor in high grazing pressure and consequent biodiversity loss in some upland areas.

With the great variety of farms and farming areas, it is felt that the Agri-environment Climate Training proposed is at too high a level and imprecise, Section 5.2(2). Such training would be much improved were it tailored to farm types or geographic areas, but especially if tailored to farm level and thereby help farmers understand the impact of intensive farming on the environment, and how climate change will directly affect them. The knowledge and skill transfer methods used in the current SUAS project would be a useful reference point. The training of inspectors and advisers by people with strong ecological experience will also be crucial in successfully addressing the CSP objective of environmental protection, including biodiversity, and climate action,

The protection of our wetlands and peatlands is imperative in both the reduction of GHG emissions and the removal of carbon from the atmosphere. While it is welcome that the CSP contains a Good Agricultural and Environmental Condition (GAEC) to this effect, Mountaineering Ireland calls for the

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<sup>2</sup><https://wicklowuplands.ie/suasproject/>

<sup>3</sup> <https://www.southkerry.ie/kerrylife-socio-economic-evaluation-report/>

<sup>4</sup> <https://www.gov.ie/en/publication/76026-common-agricultural-policy-cap-post-2020/#developing-our-national-cap-plan>

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immediate implementation of the RAMSAR definition Section 5.1(2), a convention to which Ireland has been a signatory since 1985.

Mountaineering Ireland welcomes the inclusion in the eligible hectare definition of up to 30% of total farm area for features beneficial to water protection, climate and biodiversity, Section 5.1(1). This will help remove the driver to drain wetlands and burn or clear scrubland, so that the land is eligible for direct payments. However, upland farmers often have a small % of improved grassland, with the rest uncultivated high nature value land, much of it with features beneficial to water protection, climate and biodiversity. Applying the 30% allowance to these upland farmers would still leave huge swathes of priority habitat at risk. A mechanism to allow a higher percentage, such as 60% of uncultivated land parcels to be declared would be a more effective way to protect priority habitats and support these smaller farmers.

The LEADER programme and its community-led rural development approach supports the socio-economic structure of rural Ireland. Increased investment, in areas rich in natural heritage has potential to build technical know-how and capacity, move farmers up the food chain and improve local governance of our natural heritage assets. Furthermore, such funding could be directed toward supporting climate adaptation in rural communities. As such, Mountaineering Ireland call on the 5% of EU Pillar II funding to be increased, Section 5.2(13).

### Mountaineering Ireland response to key questions

Based on the priority given during the CAP reform discussions at EU level on the importance of fairer and more targeted distribution of direct payments and the flexibility provided to Member States in achieving this, Mountaineering Ireland responds as follows to the Key Questions regarding direct payments:

- Should Ireland implement capping at an effective rate of €66,000 or €100,000, or at a rate in between?
  - With an average farm income in Ireland at the €66,000 and the current inequality in CAP payments favouring intensive farms we support capping at an effective rate of €66,000.
- Should internal convergence stop at 85% of the national average payment entitlement value in 2026, or should it go to a higher percentage?
  - We support an internal convergence of greater than 85% in keeping with the CSP ambition “to deliver a higher level of climate and environment ambition”
- 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?
  - We would support going beyond the 10%, up to 25% by 2026. By targeting this redistribution to farms with less than 30 hectares, this CSP underpins the socio-

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economic sustainability of rural Ireland. The use of results-based payment models is favoured. Additionally, the use of Economic Size Units (ESUs) in place of hectares would support fairer distribution of payments across farming systems with differing levels of profitability.

- 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?
  - With agriculture the largest contributor to GHG emissions, as well as its detrimental effects on water quality and biodiversity, increasing the level above 25% is needed to rectify the damage done and provoke the urgent and required change in behaviour. The new eco-schemes must include proven landscape scale methods such as the Bride project<sup>5</sup> and SUAS<sup>2</sup>. These are farmer led, widely accepted and are producing significant ecosystem benefits and must be prime candidates for inclusion within Pillar I funding.
- Should there be a specific intervention to incentivise gender equality?
  - The CSP SWOT analysis showed that women are significantly under-represented in the agriculture setting and experience significant gender inequality<sup>6</sup>. In the Needs Analysis document this is identified as a “further challenge as women are often cited as more likely to drive the change necessary to ensure the future viability of some farm enterprises”<sup>6</sup>. Therefore, if gender equality is to be aimed for, the research points to the need for specific interventions to achieve that equality.

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<sup>5</sup> <https://www.thebrideproject.ie/>

<sup>6</sup> <https://www.gov.ie/en/publication/76026-common-agricultural-policy-cap-post-2020/#developing-our-national-cap-plan>