



Introduction:

Wicklow Uplands Council welcomes this opportunity to make a very brief submission on the Proposed Interventions of Ireland's CAP Strategic Plan 2023-2027.

Wicklow Uplands Council is an independent voluntary organisation that serves to represent those who live, work and recreate in the Wicklow and Dublin Uplands region. Furthermore, Wicklow Uplands Council was responsible for the initiation and implementation of the SUAS Project (Sustainable Uplands Agri-environment Scheme), one of the European Innovations Partnership projects. The SUAS Project was initiated to trial practical and innovation solutions to address some of the complex agricultural, environmental and socio-economic challenges associated with commonages and hill farms in the Wicklow and Dublin uplands.

Pillar I

The rules around eligibility need to be reviewed. Current eligibility rules are driving illegal fires, scrub removal and habitat destruction in the uplands. The SUAS Project has identified areas where 'improvements' or management of areas is not possible or practical. Hence, the Project has identified a need for alternative viable options for such areas.

Pillar II

Agri-environment Climate Measure (AECM)

Wicklow Uplands Council welcomes the new AECM and the integration of results based actions and the locally led approach. Many programmes have now demonstrated that results based actions provide greater incentive for the delivery of desired outcomes while offering a more flexible management system for farmers.

While supportive of the results based system, we would like to highlight that the timeframe for improving scores in an upland system will naturally be much slower than that of a pasture system. The scale and presence of a range of important habitat types makes upland farming a very complex system for scoring. Therefore, the locally led approach will be critical to implement the measure.

Wicklow Uplands Council welcomes the landscape approach cited in the plan as it is one of the findings of the SUAS Project. A landscape approach is of particular relevance for enclosed upland areas where livestock can roam freely. Actions carried out on individual LPIS plots should ideally not be carried out in isolation but should complement the actions carried out on surrounding plots. This activity can only be achieved and coordinated effectively through the development of large scale landscape level management plans and with the involvement of all relevant government departments.

Agri-environment Climate Training

The delivery of training is a positive step. A key recommendation of the SUAS Project is that any new upland scheme should have a training programme for participating farmers and shareholders. This should be the first measure to be completed before any plans or actions are carried out as it will give farmers a better understanding and ownership of the plans.

European Innovation Partnership (EIP AGRI) Operational Groups

As stated above, Wicklow Uplands Council was responsible for the development of the SUAS Project. The EIP-AGRI projects have proven a successful model to test new and alternative solutions to specific challenges in a meaningful way. It is important that the lessons learnt from the projects are incorporated into the new RDP. It is important too that other regions or sectors of agriculture have this opportunity.

The locally led approach is a crucial element to the success of the EIP-AGRI projects. The approach has provided good buy in from farmers and resulted in positive working relationships between them and relevant stakeholder organisations.

The experiences and relationships developed with the existing EIP AGRI projects should not be lost under the new RDP. As stated previously, the lessons learnt must be incorporated into the new programme, but there should also be opportunity for the existing projects to develop further and to deliver at a regional scale.

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