

Public Consultation on the Environmental Assessment of the Draft CAP Strategic Plan 2023-2027



**ACA Submission
December 2021**

Q1. Do you have any observations on the conclusions in the Environmental Report and Natura Impact Statement?

ACA welcome the opportunity to contribute to the current consultation on the Strategic Environmental Assessment Environmental Report of draft Common Agricultural Policy strategic plan 2023-2027. ACA acknowledge the support throughout this paper of the important role of the agricultural consultant/advisor as an influencer and change behavioural agent in their close relationship with farmers. ACA also compliment the significant efforts and input from all stakeholders and the DAFM in the production of a very vast paper with considerable proposals for the betterment of Irish agriculture.

ACA, as the largest farm advisory body in Ireland and with a network of almost 170+ professional firms throughout Ireland employing in excess of 280 FAS approved advisors and 220 other technical and administration staff, have a long and established history of supporting Irish farmers since the late 1970's. Since our inception, our farmer client base has grown rapidly, based on Irish farmers seeking likeminded entrepreneurial, energetic and technical efficient individuals as farm consultants and advisors to assist them with their farming operations. Membership of ACA continues to grow with an expectation that member firms will exceed 200 in the next 12 months. Consequentially, a higher number of FAS registered advisors and farmer clients in Ireland will fall into the remit of ACA. The expectation is that the current client base of 55,000 farmers will exceed 60,000 by the end of 2023.

It must be considered that a large proportion of the current generation of Irish farmers commenced their enterprises in an era when full farm production was both encouraged and rewarded. In recent times a greater emphasis has been placed in agricultural policy of the role of the farmer in protecting and securing our environment and landscape for future generations. Now, Irish and global farmers are being challenged further to embrace and understand the effects of climate change and their industry activities on the greater society. Farmers are understandably confused and worried for the future of their businesses and their families but equally concerned at possible future implementation costs at farm level in an already very difficult market environment. The challenge to engage with and incentivise farmers on the agricultural actions, to ensure the successful implementation of all sectoral is considerable, but can be achieved through many of the measures outlined in the published proposals including many recommendations from ACA. ACA state that **the greatest challenge for farmers and both public and private advisors** and associates in the sector, **is a fundamental shift in behaviours and to encourage new adaption measures.**

The most efficient way to increase income on many farms will be through uptake of available technologies, particularly in sectors (beef farming) where profitability is low and the uptake of available technologies is generally poor. There is **clear role for ACA in a reconfigured AKIS** to assist with greater efficiency and sustainability and a win-win if farm income is improved without increasing stock numbers. Part of the farm income problem relates to an AKIS that is no longer fit for purpose. It was configured historically to increase production and related efficiencies but it needs to be radically realigned to deliver a much broader agenda and include ACA at its core objectives. State Aid funding solely to Teagasc Advisory, which has the effect of undermining competition and equality in the commercial marketplace, must cease as ACA members and other private advisors operate in the commercial advisory provision market. In order to implement and discuss all of the CAP objectives with ACA farmer clients, our members need to be provided with realistic time frames and balanced workloads to engage with their farmer clients.

ACA members working in the private sector operate their businesses on tight margins, particularly as their biggest competitor is a semi state body providing the same advisory services with a circa €40 million state subsidy per annum. The emphasis on CAP farmer schemes, corresponding deadlines and increased bureaucracy has reduced the amount of time private farm advisors can spend with their farmer clients to discuss other farm and personal related issues. This is the one major difference between public and private advisors. Therefore, ACA request that all BISS related work and new CAP programmes in 2023 (BISS, CRISS, eco schemes etc.) be 'ring fenced' to the period 1st of February to the 15th of May, therefore ensuring sufficient time with farmers and avoiding the launch or submission of other work such as the new AECM.

Q2. Having reviewed the Environmental Report, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Environmental Report and page number (if relevant) that your comment or submission relates to.

ACA will set out specific points on the following areas following review of the Environmental Report:

ASSAP pp 43-45: The Agricultural Sustainability Support and Advisory Programme (ASSAP) works closely with farmers in identified vulnerable areas to achieve improved water quality. Regretfully, the ACA are not actively involved in this programme and were ignored in the original objectives, despite the vast presence across every region in the country. The success of the ASSAP and other such programmes requires the involvement of all stakeholders and must include ACA members and their 55,000 farmer clients. Water quality policies and objectives cannot be achieved in catchment areas unless all parties are included.

CDP for advisors pp 180-181: ACA support the proposals for CPD for our members and state that the upskilling of professionals in the private advisory sector is critical in order to help farmers meet their sectoral targets. According to the RDP mid-term review in 2018, only 5% of allocated funding for CPD for advisors was used and ACA believe there has been minimal investment in the professional development of private advisors. The current situation is inequitable, in which the majority of training through national exchequer funds is given to the public advisory service, which continue to advise only 35% of the entire farming sector in Ireland, a share of the market that remains unchanged over the past 15 years ago. Public sector farm advisors receive on average 10 days training annually supported and funded by the DAFM at an average cost of €9,000 per advisor, as estimated by ACA.

ACA state that the sectoral targets and objectives will not be achieved without the collaboration of the private farm advisory service and their 55,000 Irish farmer clients in structured and agreed actions. This training anomaly needs to be corrected to ensure future targets for the sector are met, not just in the CAP, as the farm advisor is one of the key influencers in farmers' decisions. ACA support the proposals for CPD for advisors but it must be consistent, annual and meet the needs of a private agricultural consultant/advisor. Our needs are different than a public advisor and ACA seek part of the projected funding to be set aside to cater for our needs as private business enterprises. Therefore, ACA must be part of the discussion on the areas and modules to be developed for the proposed reform of the Farm Advisory Service (FAS). **Equal access to training for private farm consultants/advisors can be corrected through funding from the CAP 2023-2027, therefore somewhat mitigating the current regime of the public farm advisor being funded continuously and consistently over the past 25 years.**

Organic Farming pg. 170: ACA support the objectives for organic farming but wish to outline the following additional comments to ensure the ambitious targets can be achieved:

- The current method of payment is biased towards larger farms. There must be a higher more attractive flat rate payment per hectare, front loaded on the first 30 hectares.
- The Organic Certification is circa €700/annum and this fee does not consider the size of the farming enterprise.
- There has been a significant number of penalties on the administration area used for organic farming in the period 2015-2021. The area of payable organic is based on reference area while in BPS it is on Maximum Eligible Area (MEA), therefore habitat areas are excluded and encouraged to be removed to maximise payments. A consistent approach among all schemes of MEA's would certainly avoid negative associations with penalties.
- Introduce a subsidised payment to farmers for the Organic Training course and conversion Plan. Many farmers paid in the region of €1,000 for both and were subsequently not accepted into the Organic Farming Scheme. These farmers are now disillusioned with Organics and will not reapply.
- Payment of the cost of the Organic Training course and conversion plan to be paid directly to the farm consultant/advisor as an incentive to farmers towards their setup costs.
- Additional payment to be provided for organic demonstration farms, as were used in the old REPS programmes.
- Participation in Organic Farming to be specifically an eco-scheme option.
- Formal qualification for all advisors, including ACA members who upskill in Organic Farming. Training supports must be made available to the private advisory service to encourage a greater number of advisors to participate in organics, subsequently having the necessary skills to support farmers to convert.

Advisor Tools pg. 184: The report states *'Teagasc will progress the development of a web-based Farm Sustainability Plan that will complement the existing Nutrient Management Planning online tool and support the wider Agricultural Knowledge and Information Systems (AKIS) programme'*. Currently ACA members and their farmer clients are the only direct financial contributors to the NMP system with in excess of €600,000 paid to Teagasc (our biggest competitor) by our members in the past 6 years for the NMP and connectEd service, a cost borne by our farmer clients unlike clients of the public advisory service.

ACA are also concerned that our farmer client details in such arrangements are being stored by our biggest competitor and the DAFM must ensure clear and formal agreements are in place to protect all parties. **In the recommendations for this statement quoted above in the environmental report, the cost of such systems to private advisors is not addressed.** Therefore, all Information Technology (IT) systems developed and funded by the DAFM and used by public advisors must be made available at no cost to all private advisors as they will use those tools to advance their farmer clients in terms of innovation, farm efficiencies and income.

Q3. Having reviewed the Natura Impact Statement, please provide comments on individual sections in more detail. Please ensure to state clearly the section of the Natura Impact Statement and page number (if relevant) that your comment or submission relates to.

Pg. 145 Overarching Mitigation Measure 1: *Aim for all farms to support right measure, right place over plan lifetime:*

ACA support the continued roll-out of the Farm Environmental Survey (FES) to survey every farm in Ireland to ensure our sector captures all of the environmental assets on Irish farms. Only then will we have the data and evidence to discuss the contribution of such assets to the environmental debate. The Pilot Soil Sampling Programme (SSP) commenced in recent months. ACA state that without mandatory engagement with a FAS approved advisor, then the entire soil programme and future continuation of the same programme will be a lost opportunity in assisting farmers adapt soil fertility and nutrient management practices at farm level. A proportion of the SSP must be set aside for the cost of the provision of farm advice.

Pg. 146 Mitigation Measures & Recommendations for GAECs; Pillar I & Pillar II Interventions: *Capacity Building and Training and pg. 155/156 CDP for Advisors:*

ACA support the ambition of advisor training to have a greater emphasis on understanding and addressing key environmental challenges facing agriculture in particular water quality, climate change, biodiversity, landscape and cultural heritage. There has been minimum investment in training in the private advisory service in the past and such issues are generally discussed briefly at current FAS mandatory training days. ACA as important influencers of farmers must also be upskilled in areas such as ecology and botany to ensure baseline knowledge on these fundamental areas which will be core elements in the new AECM and other programmes.

Pg. 152 AECM General Tier 2 – Planting Trees and pg. 153 AECM General Tier 2 – Tree Belts for Ammonia Capture at Farmyard:

This section sets out that 'it is recommended that the Planting of Trees under this action provides for an appropriate targeting of tree planting using environmentally sensitive receptors/databases to avoid sensitive areas. The screening of the AECM measures by an appropriately qualified individual is also required to ensure that tree planting does not impact important areas for example ground nesting birds, many of which are listed on Annex 1 of the Birds Directive'. ACA further recommend that all such proposals for tree planting should be screened by professional foresters to ensure the appropriate land, soil and tree types are selected on all farms. There will be significant demands on the sourcing of trees due to eco scheme options and those in the AECM. Consideration for mandatory tree planting over a number of years in these measures rather than front loaded in 2023/2024 must be permitted.

Pg. 153 Farm Sustainability Plan (FSP): ACA support the proposed implementation of a mandatory FSP for AECM participants. Any current developments and future advisory role of the FSP must be communicated to ACA and private advisors in advance of its development. Additionally, there must be no cost on private advisors and their farmer clients for the use of the FSP system in meeting any mandatory requirements in the AECM.

Pg. 162, Agriculture 4, consideration will be given to extending and expanding LAWPRO and ASSAP to support the implementation of the new CAP Strategic Plan. There will be an increased focus on sustainability across the entire farm advisory service (both Teagasc and private advisory services). This may include a role in the preparation of Farm Sustainability Plans:

The ACA are not actively involved in this programme and were ignored in the original objectives and stakeholder discussions. The success of the ASSAP and other such programmes requires the involvement of all stakeholders and must include ACA members and their 55,000 farmer clients. Water quality policies and objectives cannot be achieved in catchment areas unless all parties are included.

Q4. Is there any additional information which in your view should be considered in the Environmental Report and/or the Natura Impact Statement? Please specify.

Overarching Mitigation Measure 1: Aim for all farms to support right measure, right place over plan lifetime, Pg. 175: This section states that *'the current pilot stage of the FES will focus on the development of methodology and the up-skilling of farmers and advisors in the roll-out of farm level habitat surveys on approximately 8,000 farms. The pilot FES programme will provide the farmer with an inventory of habitats, biodiversity and environmental information about his/her own farm. This should inform future knowledge transfer, awareness raising, communication and further mapping at farm level'*. ACA support the continued roll-out of FES to survey every farmer in Ireland to ensure our sector captures all of the environmental assets on Irish farms. Only then will we have the data and evidence to discuss the contribution of such assets to the environmental debate.

ACA acknowledge within the report **efforts to incorporate forestry and tree planting into AECM's** through agroforestry and other initiatives. As set out in the report, Ireland's Climate Action Plan 2019 committed to increasing afforestation to an average of 8000 hectares each year. The target for new forestation is to plant about 440 million trees over the next 20 years. ACA state that there has been a failure to address issues and develop workable procedures regarding the body of European law in respect of the habitats and water directives over many years.

The current unworkable and long delays in successfully processing afforestation, forest road and felling licences has halted the industry significantly. **ACA propose the following additional measures specifically related to forestry:**

- Current figures indicate over 100 million mature Ash trees on farms, outside of forestry areas, will be lost in the short term due to Ash Dieback Disease. The proposed Agri Environmental Scheme gives the sector the opportunity to address the diseased and dying Ash on farms. ACA foresters have an important role in assessing the financial losses and advising on alternative species to replace the loss of biodiversity and natural capital on farms.
- A Forestry Knowledge Transfer (KT) Programme to be resourced and regulated as other agricultural KT Programmes. Foresters to be included as external experts in the agricultural KT programme.
- Existing farm forestry areas must be eligible for inclusion in the new AECM with a role for approved Foresters in associated forestry reporting.

- The tree planting/small woodland proposed actions in the AECM must require the input of an approved Forester.
- Forestry area should be defined as Agricultural Land Use and all farmers engaged in forestry must be defined as active farming.

AKIS: AKIS is only referred **in the Environmental Report 6 times, which is a very poor reflection on the importance of it approaching the next CAP.** The **starkly obvious omission** in the report is the lack of ambition and or meaningful actions on how Teagasc will collaborate with ACA and all private advisors over the next CAP to ensure 55,000 farmers of the private advisory service receive the same benefits as farmers in the public advisory service, as such, a complete reform on the implementation of AKIS in Ireland.

As a semi state body, Teagasc have a responsibility to all Irish farmers and they must lead in finding ways to get public funded research and information to ACA members and other stakeholders. Although Ireland has a good advisory service for farmers, it is somewhat fragmented with an unwillingness to integrate the private farm advisory service into accessing directly all publicly funded materials, data, information, new IT technologies, presentations etc., despite many attempts by ACA.

There must be an urgent coherent and structured system in Ireland to ensure all Irish farmers have equal and fair access to such publicly funded information. Farmers will be the ultimate beneficiaries from such an arrangement. ACA have suggested on numerous occasions that greater collaboration between the private and public advisory sector will yield major benefits for the farming sector, securing innovative ways to provide advice to over 100,000 farmers rather than circa 44,000 currently through the public system. The report **'Recalibrating Advisory Services for a New Era in Irish Farming'** compiled by Economist Jim Power in 2019 concluded as follows:

'The private advisory services already play the most significant role in the provision of advisory services to farmers, but with proper official support and investment, there is considerable potential for an enhanced contribution. It seems clear, that the private advisors will have an increased role to play in complementing the advisory services provided by Teagasc, but to do this, proper government support; proper funding; proper access to research services; and collaboration with Teagasc will be essential and would represent a sound investment by Government'.

There has been some progress, although slow, on this issue as ACA and Teagasc met in recent weeks to discuss and identify opportunities to benefit the 55,000 farmer clients of ACA members. However, similar meetings took place 2 years ago without progress and unfortunately ACA are pessimistic on any significant evolution on this issue during 2022 and in the next CAP unless rapid changes occur immediately. If recent progress on these discussions is a reflection of future engagement, then the entire next CAP will be another missed opportunity and farmer clients of the private advisory service and all others outside Teagasc will continue be treated as 'second class citizens'.

The DAFM must be an active facilitator in this discussion between both parties for the benefit of the sector and must no longer be on the 'sideline'. The alternative is a failed implementation of AKIS in Ireland, which is a critical support mechanism to many of the core objectives of the next CAP.

Additional comments on this question:

- The DAFM must introduce a register of approved environmentalists (ecologists, botanists etc), as was in place during REPS, if they will have any involvement with FAS advisors in the new AECM.
- Advisor training must include content on the Birds Directives to enable them to understand the different required habitats.
- Payments in the Natura areas must be increased to reflect the additional management practices being enforced on the farmer.
- All grassland scorecards must be modified to include all targets within SAC areas e.g. breeding waders, geese, swans and machair habitat could be all within the same area and require different prescriptive actions but cannot be currently facilitated on the same scorecard.

Q5. Are there additional mitigation/monitoring measures that you would like to propose? Please specify.

ACA outline below the main mitigation and monitoring measures that will show uptake and interaction of farmers and advisors across all proposals for the benefit of the sector and assisting in reaching all targets:

- 1. Continuation of the Farm Environmental Survey (FES) in the next CAP until all Irish farmers have been surveyed.** Without this data and information from this programme, there is a significant threat and lack of protection to Irish farmers and the agri sector with regard to the amount of environmental assets and their management and maintenance on farms in Ireland. **Measurement:** all farms in Ireland surveyed through the FES.
- 2. Ensure the AECM caters for farmer participants in excess of 50,000 farmers** in the new programme. There must be a balance on farms in a new AECM between already successful non results based environmental actions and a progression to results based actions only. The Low Input Permanent Pasture and Traditional Hay Meadow actions contributed greatly to the reduction of fertiliser and over grazing of livestock on these lands. The new AECM must include these lands and ensure they are not omitted in the new programme as the alternative will be a reversion of some of these lands to more intensive type agricultural swards. **Measurement:** in excess of 50,000 participating farmers in a 5 year programme with the inclusion of many past successful environmental scheme actions in the new AECM, all contributing to the environmental policy objectives in conjunction with adapting.
- 3. Knowledge Transfer Programme:** the KT programme in the current CAP that ended in 2019 was the first meaningful opportunity for private advisors and their farmer clients to participate. The KT programme in CAP 2023 – 2027 must ensure participation in excess of 20,000 farmers. ACA support the ambition of the next KT to permit the farm advisor to focus on 'knowledge transfer' through additional meetings, group discussions and targeted on farm objectives. ACA request higher facilitator payments to our members to reflect the increased business costs since 2015 and state that allowances for administration and associated expenses such as travel and subsistence must be included in the facilitator payment to the private advisory sector in the next KT programme.

To incentivise private advisors to be part of KT and to reflect the real costs in the private sector, **the facilitator payment for every group participant must be in the region of €1,240 (costing submitted to the DAFM in recent weeks)**. It is not equitable to remunerate public and private advisors with the same facilitator payment when all expenses related to the public advisory KT groups are paid additionally through DAFM state funding.

Additionally, **ACA seek €1,200 funding per event to support our own National KT events**, events that are currently supported by the DAFM in Teagasc through direct funding. Measurements on the success of KT and specific actions for individual farmers and their groups have been developed by ACA and are being presented to the DAFM. In summary, they are mainly methods of assessing the impact of KT on the participants knowledge on sectoral ambitions and their relevance to the individual farmer in fertiliser and emission reductions, enhanced animal breeding and performance, protection and further enhancement works for biodiversity and environmental habitats, water quality, soil fertility, health and safety and the overall health and well-being of the farmer and his/her family.

Measurement: secured KT funding in CAP to support 20,000 farmers. High uptake of KT groups by private advisors (60%) by ensuring attractive rates of pay to the private advisor facilitator, a distinctive payment that reflects the additional business costs paid by the DAFM in the provision of the public advisory KT groups. Data to show increase in the farmer knowledge on the objectives of CAP and all associated agricultural policies.

4. Resourcing of an ACA back office for the private advisory service as over 75% of private advisors in Ireland are members of the ACA. The public advisory service in Ireland receives significant funding annually to fund the support services for their entire advisory network, thus providing close and regular contact with their farmer clients. The preparation of presentations, leaflets, hosting farmer events, marketing of events, newsletters, farmer meeting materials and all related staff, administration costs and travel/subsistence costs are all currently supported through funding. Such funding does not exist in Ireland for the private advisory service. In the EU-Agri paper '**Building stronger Agricultural Knowledge and Innovation Systems (AKIS) to foster advice, knowledge and innovation in agriculture and rural areas building stronger agricultural**' it states there are four main groups of actions for the successful implementation of AKIS in EU member states :

- Enhancing knowledge flows and strengthening links between research and practice;
- Strengthening all farm advisory services and fostering their interconnection within the AKIS;
- Enhancing cross-thematic and cross-border interactive innovation;
- Supporting the digital transition in agriculture.

These objectives cannot be met in Ireland with the participation of the private farm advisory service unless a resourced back office is in place. This is outlined in more detail in question 6 below.

Measurement: consistent and timely advisory messages from private advisors to 55,000 farmer clients through an ACA back office. These additional Irish farmers to receive latest information, research and data on IT advancements in structured dissemination policies with Teagasc and other government agencies.

5. Farmer Training. Annual training of farmers to upskill them in all the latest objectives of the sector, the new measures within the CAP, biodiversity, water quality, soil fertility and protection, climate action, reduction in emission, results based projects, EIP's and other all other sectoral targets.

Measurement: all Irish farmers to attend at least 1 mandatory training day throughout the next CAP, with up to 3 days for those participating in the new AECM. Short revision and update courses also to be provided, particularly in regions with areas of high priority status to upskill the farmers in the local ambitions.

6. Advisor CDP: ensure that the allocated projected spend (€1.9m) is used on the upskilling of advisors, predominately private sector advisors to mitigate the lack of investment in the previous CAP. Yearly monitoring of the financial commitment and number of participants in addition to meaningful modules for the private advisor, whose needs are uniquely different to public advisors.

Measurement: annual spend of the proposed budget on advisor training. Unique courses and modules tailored specifically to the needs of the private advisor. ACA members' satisfaction rates of the proposed structure and training to be the ultimate metric of this ambition.

Q6. If you wish to make comments on the draft CAP Strategic Plan 2023-2027 (CSP), please ensure to state clearly the section of the draft CSP and page number (if relevant) that your comment or submission relates to.

Most of our contributions above relate also to the draft CAP Strategic Plan and these additional comments must be considered in context with our submission in September on the CSP. Overall, ACA in the main, support all the proposed measures outlined but our specific analysis, revised positions and contributions must now be considered. ACA believe one of the biggest challenges is to ensure all proposals are actioned and measured throughout the next CAP. **One of the ACA proposed solutions is to resource a private advisory service back office from the CAP 2023 – 2027 to mitigate many of the potential threats and lack of progress on all the ambitions and targets.**

ACA state that the private advisory service (agricultural consultants/advisors and foresters) are a large untapped resource to help the Irish agricultural sector in meeting its targets across all EU and National policies. By isolating and allowing a continued unstructured private farm advisory service rather than embracing its significant contribution to the sector and vast opportunities, will expose the agri sector in the next CAP and beyond. Failing to capture 55,000 additional Irish farmers in the private sector through an overhauled AKIS will be a huge missed opportunity and there must be a formal collaborative approach to ensure state and EU funded research is disseminated to private advisors and their farmer clients. Time is not on our side in relation to sectoral targets and future milestones. Unless progress on a reformed AKIS, which includes meaningful openness by Teagasc to embrace ACA and the private advisory service and our 55,000 farmer client base, to find ways to ensure information and latest technology and advancements are distributed, then ACA believe the sectoral targets will be extremely difficult to achieve.

In the **Commission Staff Working document: Commission recommendations for Ireland's CAP strategic plan (18 December, 2020)** it states on page 4 the following: *'AKIS seeks to bring about regular and structural interplay between information, knowledge, advice, innovation, training, education and research. However, since the interaction with private advisors that receive training from the public advisory service is not yet up to speed, a stronger back-office serving all Irish advisors may improve the situation'*.

The **Commission paper further states on pages 22 and 23** *'the CAP can finance interventions that help to make use of up-to-date scientific information for agricultural practices, for instance through the CAP network and its knowledge platforms and knowledge reservoirs, and by setting up advisory back-offices where the latest knowledge and innovation is collected and shared with the field advisors and the farmers'*.

In the paper ***'Delivering too much, too little or of target—possible consequences of differences in perceptions on agricultural advisory services'*** (Kraft J., Höckert J., Ljung M, Lundberg S., and Lunner Kolstrup C., 21 June 2021), which assessed advisory services in Sweden, it states *'the challenge for the advisory organisations is to create a back-office that offers a conducive environment for their advisors. In practice, this means helping advisors develop the necessary skills and giving them the agency to take on new roles (cf Landini et al. 2017; Nettle et al. 2018), as well as offering organisational structures that support collaboration between advisors with different types of expertise, in order to better meet the challenges faced by agriculture'*.

There are other extensive research papers across Europe including the **SCAR AKIS policy brief on the future of Advisory Services (2017)** concluded that supporting back offices in the advisory service is critical for the requirements of farmers today and in meeting the new challenges within the sector. The DAFM, in their paper Background Paper Agriculture Knowledge & Innovation Systems (AKIS) state *'the establishment of innovation support services (ISS) to serve as a back-office for innovation support and advice should be considered, so that multi-actor project ideas can develop more easily'*.

Without supports, the Irish private advisory service will remain fractured with inconsistent messages to Irish farmers across the entire country, which is undesirable for the sector. **Therefore, ACA seek funding of €825,000 per annum in CAP 2023 – 2027 to introduce support services for our members and consequently 55,000 Irish farmers through our own back office. It is the equivalent of €15 funding per ACA farmer client per annum**, an insignificant investment for potentially very considerable achievements considering that postage and phone costs alone within Teagasc to the exchequer are in excess of €2 million annually.

This funding will support all the objectives below but also the new professional staffing and operating costs in addition to the direct costs in communicating with farmer clients in Ireland. A recently introduced corporate governance policy, appointment of external auditors and additional internal restructuring, supported through a future oversight role for the DAFM, ensures that the direct funding to ACA for the support of a back office will meet modern regulatory requirements.

The funding of the ACA back office will support the following, similar to the proposals in the SCAR AKIS policy document outlined above:

1. The **ACA back-office support will be built with a view to supporting public policy goals** such as improving research impact, dissemination and keeping agricultural education knowledge, tackling issues related to public goods (water and waste management, climate change, bio economy, biodiversity etc.) and common management of ICT tools. It will create standardised presentations and information packs for use across all ACA advisor consultations and meetings with farmer clients.
2. Input from **researchers' work into this back-office to be organised for ACA members and their clients**. An important part of the back-office is developing a "translation" from purely scientific language with limited practical application potential towards information which is adjusted to the needs and requirements of ACA advisors and their clients.
3. Ensure a **high degree of connectivity in the AKIS system**, in particular with researchers, advisors, all Irish government agencies with a remit to agriculture and rural landscapes/environment, EU H2020 multi-actor projects, EU related advisory networks and EIP Operational Groups in Ireland and EU member states.
4. **Support the front-office of every individual ACA member** and potentially all private advisors in Ireland, which is delivering either general or specialised on-farm advice directly to their farmer clients. Introducing a library/reference area and online platforms to condense all information into user friendly and practical materials, as is completed and funded by the state in Teagasc.
5. **Support the peer to peer learning between ACA advisors**, which will build trust among our members in a world of changes and uncertainty.
6. **Support for in-house ACA advisory team-leaders** who will organise and train ACA advisors both on skills, farm practices and new technologies.
7. **Innovation brokering**. ACA advisors are in continuous contact with their clients (end-users of knowledge) and are ideally positioned for capturing the needs of our farmer clients and encouraging the building of interactive projects, thus capturing innovative ideas from practice. An ACA back office will be able to allocate the right person to the right problem and connect complementary actors around a common objective tackling a practical problem or opportunity.
8. The **dissemination of latest research and advancements to ACA farmer clients** will be through direct and indirect communications (ACA member) by methods such as texts, emails, advisory brochures and others.