Farming For Nature Technical Group (FFNTG) response to public consultation on the environmental assessment of the draft CSP 2023-2027 (8th December 2021)

Contents

Background

The Farming for Nature Technical Group was convened by the Heritage Council as part of its ongoing High Nature Value (HNV) Farming Ireland work, in association with GMIT and the EFNCP. Together, we offer many years' worth of experience of working directly with HNV farmers across Ireland, including through EIP AGRI Groups, and with a range of other partners including the Heritage Council, DAFM and NPWS. Full details on the group are available at https://www.heritagecouncil.ie/projects/farming-for-nature-technical-group

We previously produced a detailed proposal for the CAP green architecture and its implementation in Ireland which was submitted to DAFM in 2020 and have had ongoing engagement responding to calls for consultation throughout 2021. The original 2020 document is available here. An infographic summary is provided at the end of this document (see Appendix 3).

The following are the group's comments on DAFM's draft CAP strategic Plan (8th of December 2021) with a particular focus on the green architecture elements plus comments on key related measures on farm advisory and cooperation/EIPs. This submission reiterates our previous proposals and provides further details, taking into account the content published in the draft CSP.

The members of the Heritage Council Farming for Nature Technical Group are:

- [redacted] (Manager Freshwater Pearl Mussel Project EIP (PMP))
- [redacted] (Galway-Mayo Institute of Technology, Department of Natural Resources & Environment) (secretarial assistance)
- [redacted] (Manager Burren Programme (BP))
- [redacted] (European Forum on Nature Conservation and Pastoralism)
- [redacted] (Catchment Scientist Local Authority Waters Programme)
- [redacted] (Manager Caomhnú Árann EIP)
- [redacted] (Manager Wild Atlantic Nature LIFE IP)
- [redacted] (Manager Hen Harrier Project EIP (HHP))
- [redacted] (Galway-Mayo Institute of Technology, Department of Natural Resources & Environment) (Chairperson FFN TG)
- [redacted] (Wildlife Officer Heritage Council)
- [redacted] (Assistant Manager HHP EIP)
- [redacted] (Catchment Manager Western Region & Blue Dots Catchment Programme)

Pillar 1 (Comments):

Definitions/Eligible hectares:

All features on farmland that are contributing to the CAP objectives, including environment and climate objectives, and which require farming intervention of some kind, are eligible for support.

A critical component of the CAP are the eligibility criteria for the Basic Payment, which are linked to the definition of "agricultural land" to be specified at MS level within the context of "framework definitions" set at EU level. It is critical that the definition of "agricultural activity" and "agricultural land", including "permanent grassland and permanent pasture" (together referred to as "permanent grassland"), do not hamper but rather assist the delivery of policy outcomes on Irish farms. That means that they should reflect local conditions in Ireland and convey a coherent message.

We welcome the changes to the definitions and minimum requirements in section 4.1. Section 4.1.2.3 has the welcome inclusion and clarification that "all herbaceous forage traditionally found in natural pastures" and "land that can be grazed where grasses and other herbaceous forage are not predominant, for example heather dominated swards…" are included under the "permanent grassland" definition. Section 4.1.3.1 includes welcome additions in relation to scrub, copse and woodland together; listed landscape features; areas included under national schemes for biodiversity or greenhouse gas reductions contributing to objectives laid down in (d) (e) and (f) of article 6 of the regulations; or duly justified for environmental, biodiversity or climate related reasons. Together these should resolve some of the existing conflicts between eligibility criteria, definitions and achievement of environment objectives of the CAP.

We have some concerns about the definition of maintenance of agricultural activity section 4.1.1.2. It must be clarified that controlled burning or spraying on their own do not constitute an agricultural activity. For improved coherence across the CAP green architecture we would advise the following addition under section 4.1.1.2 Definition of maintenance of agricultural activity: "*agricultural activity shall also include activities to meet the requirements of agri-environmental measures where duly justified for environmental, biodiversity or climate related reasons and contribute to objectives (d), (e) and (f) of Article 6 of the CAP Strategic Plan Regulation"*.

In relation to landscape features and other semi-natural vegetation under GAEC 8 it is not clear what features will be included under these definitions apart from areas already included under baseline conditionality (page 253). We have proposed a list in Appendix 1.

Conditionality:

GAEC 8: We agreed with the original 5% proposal and welcome ambition above regulatory text which is only targeted at arable farmers. We are very unclear of rationale for reducing this to 4%. The original DAFM proposal is fair across farm types (not just restricted to arable areas) and has greater environmental ambition than the EU minimum requirements. It is achievable in an Irish context given the existing cover of semi-natural features on farms. All semi-natural vegetation on farms (Appendix 1) should contribute to the target. Forestry should only be included here if it is made up of native species. As a result, most plantation forestry should be ineligible. Areas of biodiversity enhancement in forestry are covered under forestry premium and should not be double counted here. "Eligible forestry" needs to be clearly defined here.

The control of non-native invasive species is an important addition to GAEC 8 but the requirements and implementation of this under baseline conditionality needs to be clearly defined. The experience from various EIP and LIFE projects in Ireland highlights that non-native invasive species are costly to control and often require specialist training in order to implement effective control programmes. Non-native invasive species in a particular catchment can occur on private farmland, public owned lands and road sides managed by the local authorities and transport infrastructure Ireland. As a result, control of invasive species requires a multi-actor approach and coordinated action between farmers, advisors, local authorities, state agencies and government departments at a catchment/landscape level.

Eco-schemes:

The Eco-scheme should maintain and expand semi-natural vegetation to a defined minimum cover on all farms, this will deliver benefits for biodiversity, climate, water and landscape and will represent an appropriate response to our climate and biodiversity crises. The list in Appendix 1 should also be used for the "space for nature" eco-scheme.

However, environmental equivalence of the other eco-schemes with the "space for nature" eco-scheme is highly questionable for the majority, as outlined below. The main issue is that a participant in the eco-schemes can choose two other eco-schemes options that essentially may contribute very little to the environment objectives of the CAP (Table 1). Where participants do not commit to the minimum space for nature of 7% in eco-scheme 1 then the other eco-schemes available to them must be of equivalent benefit. Evidence suggests that the vast majority of farms in Ireland have a minimum 5% space for nature, with Irish farms on average having between 10-14%. The standards set in the CSP must have safeguards to ensure that there is no net loss of space for nature on farms[1].

[1] Larkin, J., Sheridan, H., Finn, J. A., Denniston, H. & Ó'hUallacháin, D. 2019. Semi-natural habitats and Ecological Focus Areas on cereal, beef and dairy farms in Ireland. Land Use Policy, 88, https://doi.org/10.1016/j.landusepol.2019.104096; Rotchés-Ribalta R, Ruas S, Ahmed KD, Gormally M, Moran J, Stout J, White B, Ó hUallacháin D. (2021) Assessment of semi-natural habitats and landscape features on Irish farmland: New insights to inform EU Common Agricultural Policy implementation. Ambio. 2020 May 29. https://doi.org/10.1007/s13280-020-01344-6.

Table 1: Farming for nature technical group qualitative assessment of Eco scheme potential contribution to environment objectives of the CAP. Green = considered appropriate as eco-scheme; Yellow = requires clarifications/improvements; Red = not considered suitable as an eco-scheme due to lack of evidence of direct contribution to environment objectives of the CAP.

	Qualitative assessment of eco-scheme contribution to CAP environment objectives
Eco-scheme 1-Space for Nature	
Eco-scheme 2-Extensive Livestock Production	
Eco-scheme 3- Limiting Chemical Nitrogen Usage	
Eco-scheme 4-Planting of Native trees	
Eco-scheme 5-Use of GPS-controlled fertiliser spreader	
Eco-scheme 6-Soil sampling and where appropriate liming on all eligible hectares	
Eco-scheme 7-enhanced crop diversification	
Eco-scheme 8- Sowing of multispecies sward	

Eco-scheme 1-Space for Nature: We welcome that the space for nature eco-scheme will be considered as two actions where a farmer commits to 10% and this brings this eco-scheme in line with the targets in the Agri-Food Vision 2030. However, what qualifies as 'space for nature' must be more clearly defined (see Appendix 1).

Eco-scheme 2-Extensive Livestock Production: It is not clear how the maximum figure of 1.5LU/hectare is set. What is considered extensive is very land-type specific and this figure would be considered high in many extensive farmed grassland types in Ireland. This is particularly significant in the context of upland commonages where the proposed stocking rates could provide a perverse incentive for unsustainable stocking rates. We recognise that it would be administratively burdensome to differentiate this figure based on land types and as a result we consider 1 LU/ha as a more appropriate maximum figure which would have clear environmental benefits. Farms stocked at this level require less than 50kg/ha chemical N on grazed swards. The maximum figure should definitely not be above the figure previous set for extensification premium payments in previous iterations of CAP of 1.4 LU/ha.

Eco-scheme 3- Limiting Chemical Nitrogen Usage: The amendments to the "limiting chemical nitrogen usage" eco-scheme still requires an evident reduction on the Teagasc recommended nutrient management advice published in 2020 for N fertiliser on dairy farms. However, the fertiliser rates quoted in the draft CSP would involve little or no reductions on beef and sheep farms. If this eco-scheme is to achieve an objective of contributing to water and climate objectives, then N fertiliser rates for productive grass-white clover swards as published by Teagasc in 2020 [2] should be used.

Eco-scheme 4-Planting of Native trees: This eco-scheme has potential to contribute to the environmental objectives of CAP and we welcome the addition of planting of hedgerows together with

[2] Wall D.P. & Plunkett, M. (2020). Major and Micro Nutrient Advice for Productive Agricultural Crops 5th Edition. Teagasc. https://www.teagasc.ie/media/website/publications/2020/Major--Micro-Nutrient-Advice-for-Productive-Agricultural-Crops-2020.pdf

trees. However, the environmental equivalence between this and the 10% space for nature is questionable. Planting 6 trees per eligible hectare or 2m of hedgerow per eligible hectare on an average farm of 35 ha amounts to 210 trees or 70 m of hedgerow planting per annum, which is about 0.04% of the farm. The length of hedgerow required would need to be tripled to cover an equivalent area of that required for 210 trees at 2m spacing.

Eco-scheme 5-Use of GPS-controlled fertiliser spreader. The "Use of GPS-controlled Fertiliser Spreader" could lead to improved nutrient use efficiency but the eco-scheme does not include any requirements for input reductions. As a result, there is no guarantee that it will directly contribute to environmental and climate objectives of the CAP.

Eco-scheme 6-Soil sampling and where appropriate liming on all eligible hectares. This should only be required on improved agricultural grassland and cropland. Liming may not be appropriate on semi-natural pastures. Safeguards to ensure that high quality habitat are not adversely affected would have to be introduced.

Eco-scheme 7-enhanced crop diversification. It is not clear what additional environmental benefits/contributions this enhanced crop diversification will deliver above requirements in GAEC 7.

Eco-scheme 8- Sowing of multispecies sward. This is a welcome addition, but safeguards must be in place to ensure that this does not result in the reseeding of extensive semi-natural pastures. It should be limited to existing improved agricultural grasslands. As with eco-scheme 6, adequate safeguards to prevent damage to existing semi natural species rich swards would have to be included to prevent biodiversity loss.

Pillar 2 (Comments):

AECM:

As stated in our submission in September on the proposed interventions for Ireland CS 2023-2027, we welcome the integration of results-based AECM and the locally led approach in the design of the agri-environment scheme. We also welcome the proposal to use a landscape approach and the proposal to identify landscapes with higher environmental priorities for cooperation actions. As this will be restricted to 20,000 farmers, careful delineation of these priority areas will be crucial.

Observations on the AECM general measure

The following observations relate to the AECM-general measure:

- There is no evident integration with the successful Agricultural Sustainability and Support Programme (ASSAP) for water targets. This is a missed opportunity.
- There is also a requirement for specialist supports and the development of breeding wader options in the AECM general areas.
- The evident gap for water and waders in the AECM general could be filled with the provision of EIPs similar in scale to the Hen Harrier or Pearl Mussel EIP projects in the current programming period.
- The absence of any measures to improve the quality of exiting hedgerows is a worrying omission considering the enhancement of hedgerow quality could have considerable benefits from a landscape, biodiversity and climate perspective.
- The REAP scorecard needs to be split in order to have separate quality measures for field boundaries and semi-natural grasslands. This same boundary scorecard could then be used on both improved grasslands and cropland areas.

Observations on the AECM Cooperation measure

Our observations on the AECM-CP are:

- Critical to the success of this new AECM cooperation approach will be adequate preparation and lead in time in 2022.
- Engagement from farmers, government departments, state agencies and an effective local partnership in the preparation of Local Area Plans will be key to successful implementation. It is essential that it is carefully designed to take into account a variety of key aspects including the development of administrative, IT and advisory capacity. It is important that flexibility to target local issues and circumstances is retained by all CPs. The ability to shape a bespoke response has been central to the success of the BP and many of the EIP-AGRI projects and this must be retained.
- Some clarification is required on the proposed capping of payments to participants in the AECM -CP.
    - An important aspect of the payment structure of existing successful projects on which the AECM-CP is modelled is that there is no maximum payment ceiling, and this is facilitated by degressive payment bands. We believe this is of critical importance to ensuring that farmers strive to continue to improve their environmental outcomes and is an essential feature for hybrid, results-based agri-environment programmes.
    - The average farmer agri-environment package (incl GLAS) across the three existing programmes using this model is approximately €10,000 per annum (see Appendix 2). This average payment figure suggests that the current budget estimates for annual farmer payments in AECM cooperation project areas for 20,000 farmers in the CSP 2023-2027 will be extremely challenging.
- We urge that the funding allocated is sufficient to ensure that no 'backsliding' in payments occurs from the current average payment (BP/EIP plus GLAS). Rather, funding should be increased to reflect the additional commitments/risks entailed for farmers (whole-farm approach, more targeted actions, higher level of oversight etc).
- Clarity is required regarding the funding of various aspects of the AECM-CP under articles 70, 73 and 77 as the current proposal does not appear to be consistent or complete with regard to existing approaches (Burren and EIP AGRI). For example, funding for scrub removal and access provision appears to be funded only as cooperative measures under Article 77 whereas most of these actions are typically most relevant at an individual farm level. This could be deemed eligible under article 77 if the targeting of these actions is coordinated by the cooperation team, similar to current implementation under EIPs/BP.
- There must be flexibility at cooperation project level in terms of the allocation of budget between different actions funded under article 70, 73 and 77. Funding for CPs must be as flexible as possible – over time, across measures, between farmers and, ultimately, across CPs to ensure that the budgets allocated are fully spent and achieve maximum impact.
- Clear definition of cooperation and what defines cooperation in article 77 is very important. Cooperation also involves co-ordinated actions by multiple farmers, perhaps not in concert with each other but definitely directed towards a common goal. Cooperation includes one or more of the following:
    - Cooperation between a group of farmers to address a key agri-environment challenge on a commonage or contiguous parcels of land
    - Co-ordination of actions delivered by multiple farmers by a CP project team across a landscape directed at addressing a key agri-environment challenge e.g. prevention of sediment loss to water across a catchment

- Direct delivery of an action by a CP Project team in support of multiple farmers, e.g. bird monitoring
    - A payment could be included in the transaction costs for the farmer to cover the cost of cooperation and engagement (with monitoring team and nest protection officers). This would ensure that monitoring and nest protection meet any definition of co-operative action.

- We would advise that in defining indicators for the CPs, consideration should be given to the inclusion of indicators based on results (field scores) rather than indicators solely based on numbers of contracts/expenditure/areas receiving support.
- We suggest that where possible, areas of overlap between CPs (e.g. audit systems, permission protocols, cybersecurity, the need for specialist advice etc.) should be identified and supports provided at a shared-services level. We further ask that DAFM apportion sufficient in-house staff to support the eight CPs and optimise their impact.

AECM training:

Training in the Agri-Environment Climate Measure is essential to deliver the desired objectives by the programme participants. The delivery of training in Co-operation project areas should be restricted to trained advisors approved to assess habitats in the relevant Co-operation project area.

EIP-AGRI operational Groups

We welcome the continuation of the successful EIP measure in the CSP. The larger themed EIPs (e.g. Hen Harrier and Pearl Mussel projects) in the previous RDP have been particularly successful and we welcome the use of themed EIPs again to complement the competitive call approach particularly for specific challenges or areas of the country that are not included in proposed local cooperation areas approach to combat agri-environment challenges. There is a need for targeted thematic EIPs to fill identified gaps in the AECM approach.

CPD for advisors

As previously stated in our September submission we welcome the provision for Continuous Professional Development of Advisors. This must be designed around equipping advisors to assist farmers addressing challenges on their farms. CPD programmes should contain multiple modules from which advisors could select topics appropriate to the needs of their clients. Allied to this there is a need to broaden the skills base within the Farm Advisory Service. The current restriction to Agricultural Science graduates with certain production-related modules in their degree course does not provide for a pool of new entrants with the environmental science, ecology or hydrology skills that will be needed to meet the aims of the CAP. We recommend widening the eligibility criteria for FAS advisors to recognise the evolving role of advisors in the provision of agri-environment advice.

KT programme

As previously stated in our September submission the continuation of the Knowledge transfer programme is welcome. Within AECM cooperation project areas KT facilitators should be obliged to work closely with the local Cooperation Project Team to ensure that the KT programme contributes to meeting local objectives. The review of Priority KT tasks in each area should have input from the local Cooperation Project Team. As part of the approval process for KT facilitators operating in these areas, there must be a requirement for them to attend and pass a course of training provided by the local Cooperation Project team. The Project team should also provide training for facilitators on relevant Priority KT tasks and where appropriate provide training aides. CP Project teams could also present on certain topics at meetings or demonstrate at national events held as part of the KT programme.

Appendix 1: Proposed list of features beneficial for water, climate and biodiversity (and other ES?)

Habitat type (Fossitt 2000 codes)	**Summary of Fossitt (2000) habitat description with some additional clarifications**
Semi-natural grassland (GS1, GS2, GS3, GS4) Including grassland/ limestone mosaics	Semi-natural grasslands receive no chemical fertiliser input and have not been reseeded in at least the last 30 years. They have a relatively high proportion of forbs to grasses and are unimproved from a production perspective. The key distinction being made is between grasslands that are improved, which are relatively species-poor and intensively managed, and those that are unimproved or semi-improved. 'Semi-improved' grasslands may receive some inputs of fertiliser (organic or artificial), but they are not intensively managed and have not recently been reseeded. Low levels of improvement and high levels of grazing can influence sward composition.
Machair grasslands (CD6)	These are specific semi-natural grasslands that occur on coastal grassy plains that are formed of wind-blown calcareous sands. Machair develops in places with a cool, moist and windy climate and, in Ireland, can be found along the west coast from Galway Bay to Malin Head, in Donegal, where gales and high winds are frequent. It is characterised by herbaceous vegetation that is often species-rich and features elements of sand dune communities and calcareous grassland.
Heathland and peatland mosaics (HH1, HH2, HH3, HH4, PB2 and PB3)	Heathland includes areas where the vegetation is open and there is at least 25% cover of dwarf shrubs, or where mosses dominate in the case of some montane areas. If the underlying soil is peat, peat depths of less than 0.5 m are usually, but not always, indicative of heath with wet heath occurring on peat of almost 1m in depth. Trees and larger shrubs may be present but should not be abundant; low-growing Western Gorse (Ulex gallii) and Juniper (Juniperus communis) are exceptions as they may be components of heath. Note all heathland in coastal areas are included here. Upland Heathland and peatland often occur together with acid grassland extending over large landscapes complexes used for extensive livestock grazing.
Peatland (Bogs and Fens - PB,PF)- excluding turbary/cutover areas unless	Peatlands are subdivided into two main types, bogs and fens. Bogs are ombrotrophic (rain-fed) peatlands where almost all inputs of water to the system are derived from precipitation

under active restoration as part of AECM measure	and where acid, oligotrophic peat deposits accumulate. Fens are minerotrophic peatlands that, in addition to precipitation, are fed by groundwater or moving surface waters. They have a higher nutrient status than bogs and can be either acid or base-rich.
Woodlands (WN1, WN2,WN3,WN4,WN5,WN6)	Natural or 'ancient' woodland vegetation is now very rare in Ireland and most stands of trees have been modified and managed to some extent by humans over centuries. Because of this, the term 'semi-natural' is generally used for stands that resemble the potential natural woodland cover. To be considered as semi-natural, woodland should be dominated by native trees, the understorey should be reasonably well-developed, and there should be no systematic removal of timber, dead wood or fallen trees. Stands that originate from planting in the past may be included if they are now regenerating naturally, together with stands that were formerly coppiced
Scrub/Transitional Woodland (WS1 and WS2)	This broad category includes areas that are dominated by at least 50% cover of shrubs, stunted trees or brambles. The canopy height is generally less than 5 m, or 4 m in the case of wetland areas. Scrub frequently develops as a precursor to woodland and is often found in inaccessible locations, or on extensively managed farmland. In the absence of grazing and mowing, scrub can expand to replace grassland or heath vegetation. Trees are included as components of scrub if their growth is stunted as a result of exposure, poor soils or waterlogging.
Aquatic marginal wetlands with emergent vegetation, N.B. not open water area: **Turloughs** - (FL6) tall reeds and swamp (FS)	FL6 - Turloughs are ephemeral lakes that occupy basins or depressions in limestone areas, and where water levels fluctuate markedly during the year. Turloughs support a range of different plant communities that comprise a mixture of aquatic, amphibious and terrestrial species. Plant communities typically form a concentric pattern around the basin. FS - Swamps are stands of emergent herbaceous vegetation that generally occupy a zone at the transition from open water to terrestrial habitats. Water levels may fluctuate but swamps typically remain wet with the water table above ground level for most of the year. They can be associated with freshwater or brackish systems, and the water may be stagnant, slow-moving or tidal. Swamps occur along the margins of rivers, lakes, canals, lagoons and estuaries, but may also occupy more extensive flooded areas or infilling basins. Some swamps occur as floating mats of vegetation.

Fresh water marsh (GM1) **Upper Salt Marsh** (CM2)	Marsh is found on level ground near river banks, lakeshores, coastal areas (upper salt marsh) and in other places where mineral or shallow peaty soils are waterlogged, and where the water table is close to ground level for most of the year. Unlike swamps, standing water is not a characteristic feature except, perhaps, during very wet periods or in winter months. In coastal areas the upper salt marsh is subject to less frequent inundation that the lower salt marsh. Marsh is comparatively species-rich and supports a high proportion of wetland species.
Hedgerows/Treelines (WL)	Linear strips of shrubs, often with occasional trees, that typically form field or property boundaries. Most hedgerows originate from planting and many occur on raised banks of earth that are derived from the excavation of associated drainage ditches. Dimensions of hedgerows vary considerably, depending largely on management and composition, and are taken here as being mainly less than 5 m high and 4 m wide. When wider or taller than this, or dominated by trees, the habitat should be considered as a narrow strip of scrub or woodland, or as a treeline - WL2.
Drainage ditches (FW4)	This category includes linear water bodies or wet channels that are entirely artificial in origin, and some sections of natural watercourses that have been excavated or modified to enhance drainage and control the flow of water. To be included here, drainage ditches should either contain water (flowing or stagnant) or be wet enough to support wetland vegetation. **Drains in peatlands should not be included as eligible landscape features or contribute to eligible area for GAEC 8 or eco-schemes**
Pond (FL8)	Manmade ponds included in farmland for biodiversity value. Source for distinguishing small lakes from ponds. When does a pond become a small lake? Defra (2007) Hedgerow Survey Handbook. A standard procedure for local surveys in the UK. Defra, London. Lakes: Any inland water-body larger than 2ha (i.e. larger than a pond). Pond: A body of standing water, 25m2 to 2ha in area, which usually holds water for at least 4 months of the year. Natural small ponds and freshwater springs would be covered under aquatic marginal wetlands and marsh where they may have small areas of permanent water.

Dry stone walls and earth banks	Only included where there is no herbicide or pesticide spreading on structure. Dry stone walls are built structures occurring on field boundaries, they main be standalone structures or be a retaining wall as part of an earth bank. Earth banks are field boundaries constructed of local material such as peat, soil, gravel or stone or a mix of these forming narrow linear ridges often in association with a drainage ditch. When woody material has colonised or planted on these they are considered hedge rows.

- **Buffer strips** can be included that are undergoing succession or correspond to one of the habitats above
- **Field margins** that are undergoing succession or correspond to one of habitats above. This includes Earth banks and field margins associated with Stone walls (min. Width of 1.5 m)

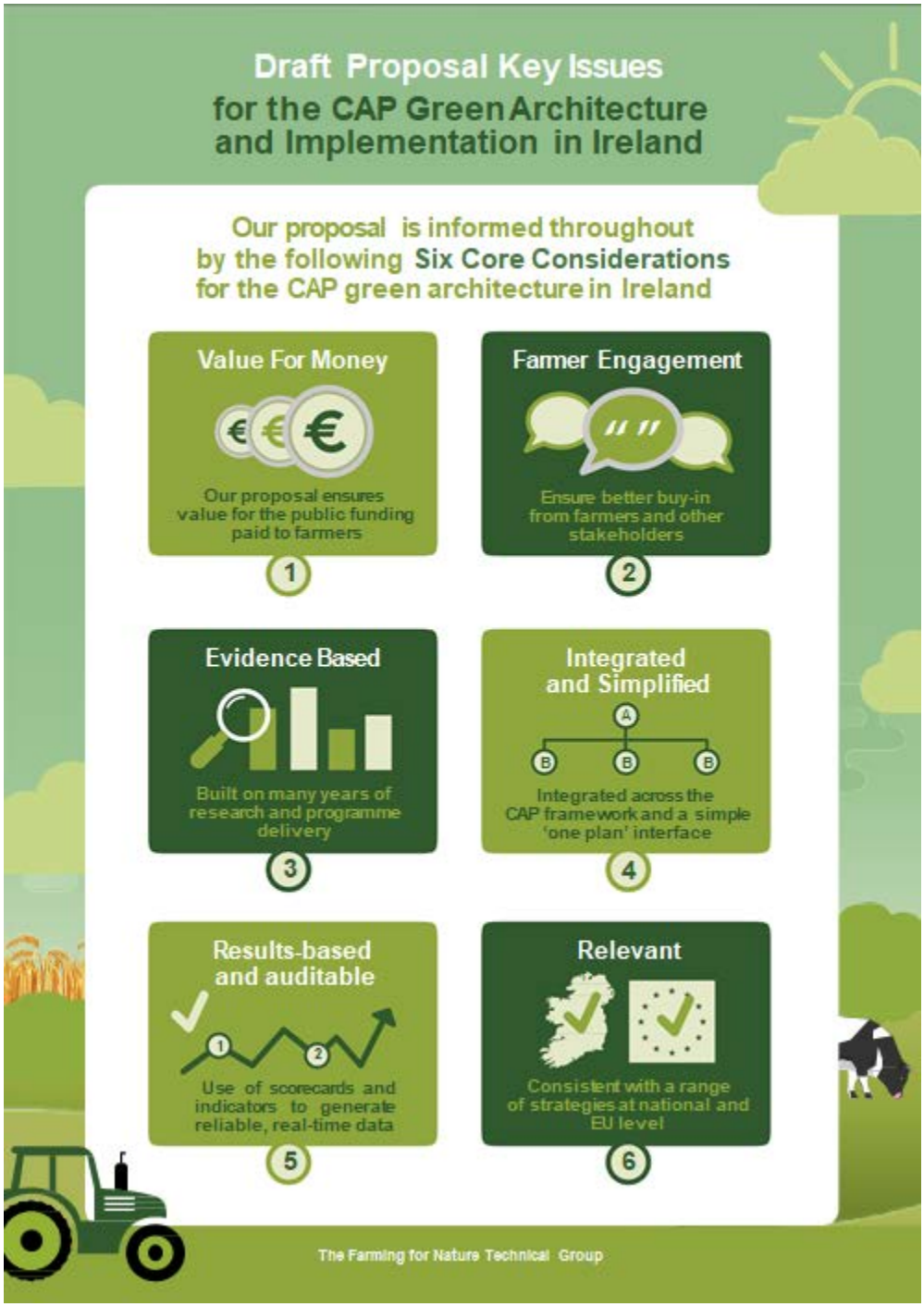
Buffer strips and field margins could be included but will not have been mapped in national habitat map and as a result will need declaration by farmer and may require more resources for verification. Would advise only use where minimum area threshold is not met by other features listed in table.

Appendix 2: Summary of annual farmer payments (including GLAS estimates) in Burren Programme, Hen Harrier EIP and Pearl Mussel EIP.

Programme	Burren Programme Participants				HH Programme Participants					PMP Programme Participants				
	GLAS	BP Inter-vention 1	BP Inter-vention 2	**Total**	*GLAS*	Results based Habitat payment	Suport-ing Actions	Hen harrier Bonus	**Total**	*GLAS*	Results based Habitat + Floodplain Payments	Support-ing Actions	Training	**Total**
Average Payment per participant	*€5,000*	€3,434	€1,530	**€9,964**	*€6,300*	€2,320	€851	€486	**€9,957**	*€5,000*	€3,500	€1,157	€100	**€9,757**
Max Payment	*€5,000*	€10,000	€7,000	**€22,000**	*€7,000*	€25,340		€1,200	**€33,540**	*€7,000*	€18,697	€1,200	€100.00	**€26,997**
No of farmers	**320**; I-1 (308); I-2 (224)				Total/habitat payments **1550**; Supporting Actions (293); HH bonus (996); GLAS participation ~84% (1300)(65% of GLAS participants receive €7000 as have min required SPA area for full payment)					Total/Training **450**; Supporting Actions (198);				

The above table was compiled from information supplied by the 3 projects to detail the agri-environment payments including GLAS received by farmers participating in these projects using 2020 data. An important aspect of the payment structures is that there is no maximum payment ceiling, and this is facilitated by degressive payment bands. We believe this is of critical importance in ensuring that farmers strive to continue to improve their environmental outcomes. This is critical to hybrid results based agri-environment programmes.

Appendix 3: Summary of CAP green architecture proposal submitted to DAFM in 2020 with full details available to download at https://www.heritagecouncil.ie/content/files/Proposals-for-the-CAP-Green-Architecture-and-Implementation-in-Ireland-Farming-for-nature-task-group.pdf



Draft Proposal Key Issues for the CAP Green Architecture and Implementation in Ireland

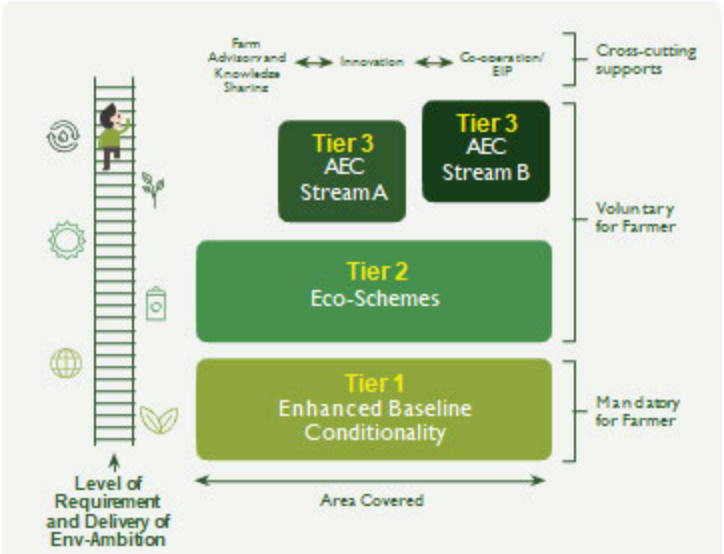
We propose Three Tiers in this green architecture

With increasing levels of environmental ambition and delivery as you progress from Tier 1-3

Tier 1 Enhanced Baseline Conditionality
Minimum standards to keep agricultural land in GAEC

Tier 2 Eco-schemes
Practices that are beneficial to the environment and climate

Tier 3 Agri-Environment Climate Measure
A national agri-environment scheme and a locally-adapted farming for nature scheme



We propose that the Tier 3 AEC measure be divided into 2 streams

Tier 3 Stream A Builds on Ireland's 25 years of experience with national agri-environment schemes

Tier 3 Stream B Builds on 10 years of experience with locally-adapted, hybrid results based agri-environment payments.

The Farming for Nature Technical Group