

DEPARTMENT OF AGRICULTURE, FOOD AND THE MARINE

CAP Strategic Plan 2023-2027 Ex-Ante Evaluation: Final Report

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LIST OF ACRONYMS

Acronym	Description
AA	Appropriate Assessment
AECM	Agri-Environment and Climate Measure
A-IPP	All-Ireland Pollinator Plan
AKIS	Agricultural Knowledge and Innovation System
AMS	Area Monitoring System
ANC	Areas of Natural Constraint
BDGP	Beef Data and Genomics Programme
BEEP-S	Beef Environmental Efficiency Programme – Sucklers
BISS	Basic Income Support for Sustainability
CAP	Common Agricultural Policy
CbM	Checks by Monitoring
CCO	Cross Cutting Objective
CEJA	European Council of Young Farmers
CIS	Capital Investment Scheme
CIS-YF	Complementary Income Support for Young Farmers
CLLD	Community-led Local Development
CMO	Common Market Organisation
CPD	Continuous Professional Development
CRISS	Complementary Redistributive Income Support for Sustainability
CSP	CAP Strategic Plan
DAFM	Department of Agriculture, Food and the Marine
DBWS	Dairy Beef Welfare Scheme
DRCD	Department of Rural and Community Development
EAFRD	European Agricultural Fund for Rural Development
EAGF	European Agricultural Guarantee Fund
EI	Enterprise Ireland
EIP	European Innovation Partnership
EOI	Expression of Interest
EU	European Union

Acronym	Description
FAS	Farm Advisory Service
GAEC	Good Agricultural and Environmental Condition
GHG	Greenhouse Gas
HA	Hectare
HNV	High Nature Value
ISIF	Ireland Strategic Investment Fund
IT	Information Technology
LAG	Local Action Group
LDS	Local Development Strategy
LEADER	Liaison Entre Actions de Développement de l'Economie Rurale
LESS	Low Emission Slurry Spreading
LU	Livestock Unit
NAP	Nitrates Action Programme
NBDC	National Biodiversity Data Centre
NCN	National CAP Network
NFP	National Forestry Programme
NFQ	National Framework of Qualifications
NFS	National Farm Survey
NSO	National Strategic Outcome
OFS	Organic Farming Scheme
OTSC	On-the-Spot Checks
PMEF	Performance Monitoring and Evaluation Framework
PO	Producer Organisation
REAP	Results-Based Environment Agri Pilot Programme
RDP	Rural Development Programme
SBLAS	Sustainable Beef and Lamb Assurance Scheme
SCEP	Suckler Carbon Efficiency Programme
SCO	Simplified Cost Option
SEA	Strategic Environmental Assessment
SIS	Sheep Improvement Scheme
SMR	Statutory Management Requirement

Acronym	Description
SO	Specific Objective
SWOT	Strengths, Weaknesses, Opportunities, Threats
SWS	Sheep Welfare Scheme
TAMS	Targeted Agricultural Modernisation Scheme
UAA	Utilised Agricultural Area
VMP	Value of Marketed Production
YFS	Young Farmers Scheme

GLOSSARY

Animal Welfare	The status of an animal's mental and physical wellbeing as it relates to their nutrition, health and general care.
Apiculture	The care and management of honeybees for the production of honey and wax.
Appropriate Assessment	An assessment of the potential adverse effects of a plan or project (in combination with other plans or projects) on Special Areas of Conservation and Special Protection Areas.
Biodiversity	The spectrum of living species, including plants, animals, bacteria, and fungi.
Bioeconomy	The utilisation of renewable biological resources from land and sea, like crops, forests, fish, animals and micro-organisms to produce food, materials and energy.
Biomass	Plant-based material used as fuel to produce heat or electricity.
Climate Change	Long-term shifts in temperatures and weather patterns.
Climate Change Adaptation	The process of adjusting to current or expected climate change and its effects.
Climate Change Mitigation	The avoidance and/or reduction of emissions of heat-trapping greenhouse gases into the atmosphere.
Common Agricultural Policy	The agriculture policy of the European Union.
Community-led Local Development	An approach to local development which espouses bottom-up community activism and partnership.
Conditionality	Baseline standards relating to the environment, public and animal health, animal welfare, or land management, which must be met in order to qualify for CAP payments.
Continuous Professional Development	The ongoing development of skills, knowledge and competences throughout a person's career.
Coupled/Decoupled	Financial supports related (or unrelated) to agricultural production.
Cross-Cutting Objective	An objective of the CAP focused on modernising the sector by fostering and sharing knowledge, innovation and digitalisation in agriculture and rural areas, and encouraging their uptake.
Ecosystem	A biological community of organisms and the physical environment with which they interact.
Ex-Ante Evaluation	An evaluation of each Member State's draft CAP Strategic Plan undertaken prior to its finalisation and adoption, as required under EU CSP Regulation.
Food Security	The state of having reliable access to a sufficient quantity of affordable, nutritious food.
Food Systems	All the elements and activities related to producing and consuming food, and their associated economic, health and environmental effects.

Frontloading	The mechanism whereby higher rates of payment are offered on different tiers of land area on farms, designed to ensure equitable distributions for small and large farms.
Genomics	The field of biology focusing on the structure, function, evolution, mapping, and editing of genomes.
Genotype	An organism's complete set of genetic material.
Good Agricultural and Environmental Condition	A set of EU standards associated with sustainable agriculture, in areas such as land maintenance, the protection and management of water, soil erosion, soil organic matter, and soil structure.
Green Architecture	All of the elements of the CAP which in combination seek to address each Member States' environmental and climate challenges.
Greenhouse Gas	A gas that contributes to the greenhouse effect by absorbing infrared radiation.
Greening	The orientation of EU financial supports towards farming practices which contribute to EU environmental and climate goals.
Habitat	Places or environments where plants or animals naturally or normally live and grow.
Horticulture	The production and/or cultivation of plants in gardens to produce food and medicinal ingredients, or for comfort and ornamental purposes.
Intervention	A policy initiative or scheme financially supported by the EU under the CAP.
Just Transition	The process of protecting the rights and livelihoods of different groups as economies shift to sustainable forms of production and consumption.
Livestock Unit	A reference unit used for the calculation of livestock numbers, whereby 1 livestock unit is the grazing equivalent of one adult dairy cow producing 3 000 kg of milk annually
Natura 2000	A network of nature protection areas in the territory of the European Union.
Nitrate	A compound formed naturally when nitrogen combines with oxygen or ozone.
Organic Farming	A farming process which avoids the use of inorganic materials such as synthetic pesticides, antibiotics, synthetic fertilizers, genetically modified organisms, and growth hormones.
Pesticide	Substances used to kill, repel, or control certain forms of plant or animal life that are considered to be pests.
Pillar	One of two categories of CAP interventions focused on (i) income support, or (ii) infrastructure, environment and development support.
Pollinator	Anything that helps carry pollen from the male part of the flower (stamen) to the female part of the same or another flower (stigma).
Regulation	An EU-wide legal act that applies directly at the national level.

River Basin Management Plan	A plan setting out actions to improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, estuaries and coastal waters).
Slurry	The combination of animal waste, organic matter and water.
Specific Objective	One of nine objectives for the Common Agricultural Policy in the period 2023-2027.
Statutory Management Requirement	A set of standards defined within a number of European regulatory requirements covering environmental, public health, plant health and animal health and welfare.
Stocking Rate	The number of livestock farmed within a precise land area.
Strategic Environmental Assessment	A procedure (set out in relevant EU Regulations) which requires the environmental assessment of certain plans and programmes which are likely to have a significant effect on the environment.
Suckler	A cow used to breed and suckle calves for beef.
Tillage	The production of crops for harvest.
Value Chain	The full set of activities necessary to bring (in this context agricultural) products to the point of consumption.

1. EXECUTIVE SUMMARY

Introduction and Background

This report presents the Ex-Ante Evaluation of Ireland's CAP Strategic Plan (CSP) 2023-2027. It has been prepared on behalf of the Department of Agriculture, Food and the Marine (DAFM) by a consultancy team led by RSM Ireland. Preparation of the Ex-Ante Evaluation is a requirement which must be fulfilled under Article 125 of the European Union (EU) proposed CSP Regulation (COM (2018) 392).

As it has in the past, the Common Agricultural Policy (CAP) is entering a new phase and has been subject to a range of reforms and shifts in focus to reflect contemporary EU priorities. Key amongst these for the incoming multi-annual period are greater environmental ambition with specific goals concerning climate change, management of natural resources and biodiversity, greater emphasis on the fair distribution of supports and resources and strengthening of the position of farmers in supply chains as well as increasing the competitiveness of agriculture.

While new arrangements were initially intended to operate within the period 2021-2027, between 2019 and 2021 a number of factors gave rise to delays in the schedules for both negotiation and adoption of the agreed CAP framework, leading to the shortening of the intended implementation period to 2023-2027, as well as the introduction of a two year "transition" period from the previous 2014-2020 multi-annual programming period, to operate in 2021 and 2022.

The main purpose of the Ex-Ante Evaluation is to "improve the quality of the design of the CSPs", as stated in Article 125 of the CSP Regulation. It has a number of more specific objectives, also set out in the Regulation.

Regulatory and Policy Context

The EU context in which the CAP proposals have been formulated, and with which Union-wide implementation and Member State's programmes must align, features three key strategic policies:

- the European Green Deal, which aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy, where there are no net emissions of Greenhouse Gases (GHGs) in 2050 and where economic growth is decoupled from resource use, and to protect, conserve and enhance the EU's natural capital, and protect the health and well-being of citizens from environment-related risks and impacts, but in a just and inclusive manner, taking account of regions, industries and workers that face the greatest challenges;
- the EU Biodiversity Strategy to 2030, which seeks to increase protection and restoration of nature through further improvement and widening of the EU's network of legally protected areas, to develop an EU Nature Restoration Plan, to develop a comprehensive new governance framework to steer the implementation of biodiversity commitments agreed at national, European or international level, and to build an integrated and whole-of-society approach to protecting and restoring biodiversity, including consideration of biodiversity in investment, pricing and taxation decisions, promotion of biodiversity action in the business community, and improving related knowledge, education and skills;

- the EU Farm to Fork Strategy, which seeks to comprehensively address the challenges of sustainable food systems, and recognise the inextricable links between healthy people, healthy societies and a healthy planet, by promoting a shift to a sustainable food system that can bring environmental, health and social benefits, offer economic gains and ensure a sustainable livelihood for primary producers.

The regulatory package for CAP implementation reflects and is integrated with each of these overarching EU policy frameworks, and the CSP Regulation sets out EU objectives, indicators, common requirements, types of interventions, and a range of other provisions with which Member States must adhere when setting out their proposals in CSPs.

The national policy context in Ireland includes:

- plans and policies relating specifically to the agriculture sector in Ireland, e.g., “Food Vision 2030”, “Ag Climatise”;
- plans and policies relating to the wider climate action, environmental and sustainability agenda, e.g., National Climate Action Plan, Nitrates Action Programme (NAP), National Biodiversity Action Plan; and
- plans and policies relating the wider economic development, regional development and rural development agenda in Ireland, e.g., National Planning Framework, National Rural Development Policy.

CSP Overview

Ireland’s draft CSP follows a structure and format set out in the draft Regulation, and as such provides a strategic statement, an overview of the needs assessment, a number of thematic elements, a proposed framework for implementing conditionality (the minimal environmental, animal health and welfare and related standards with which farmers must comply in order to receive CAP supports), the framework of selected interventions along with their financial allocations, a system of output and result indicators, targets and milestones, proposals for modernisation and simplification, and a range of other required components.

The structure of the draft plan, in terms of proposed interventions under each of its two Pillars, is shown below.

Draft CSP – Structure and Components

Pillar	Intervention Type	Intervention
Pillar I	Decoupled Income Support	Basic Income Support for Sustainability (BISS)
		Complementary Income Support for Young Farmers (CIS-YF)
		Complementary Redistributive Income Support for Sustainability (CRISS)
		Eco-Scheme
	Coupled Direct Payments	Protein Aid
	Sectoral Interventions	Sectoral Intervention for the Apiculture sector
		Sectoral Intervention in the Fruit and Vegetable Sector
Pillar II	Rural Development Supports	Areas of Natural Constraint (ANC)
		Agri-Environment and Climate Measure (AECM)
		Straw Incorporation Measure
		AECM Training
		Organic Farming Scheme (OFS)
		Capital Investment Scheme (CIS)
		Suckler Carbon Efficiency Programme (SCEP)
		SCEP Training
		Early-Stage Support for POs in Certain Sectors
		Continuous Professional Development (CPD) for Advisors
		European Innovation Partnerships (EIPs)
		Knowledge Transfer
		Dairy Beef Welfare Scheme (DBWS)
		Sheep Improvement Scheme (SIS)
		Collaborative Farming Grant
		LEADER


The plan provides for total expenditure of some €9.83bn over the course of 2023-2027, of which:

- €5.97bn (or 61%) is allocated to Pillar I; and
- €3.93bn (or 39%) is allocated to Pillar II.

Of the Pillar II allocation, some €2.3bn (c.59%) represents national exchequer financing, with the remainder EU funds.

SWOT and Needs Analysis

The CSP Regulation requires that Member States prepare CSPs which set targets, define interventions, and allocate financial resources in accordance with identified needs, which in turn have been informed by a detailed SWOT analysis. DAFM commenced the preparation of the SWOT analysis at a very early stage (in late 2018/early 2019) and carried this work up to and into 2020, engaging in a range of public consultations which considered or were specifically oriented to the development of the SWOT. An extensive analysis emerged from this process and continued to be updated and refined as required until late 2021 (the current phase of CSP preparation). The latest version of this (draft) SWOT analysis takes the form of a 300+ page document structured according to the 9 SOs as well as the CCO, and comprising a detailed and sequential assessment of strengths, weaknesses, opportunities and threats in respect of each of the nine objectives.



Our findings are that the SWOT and needs assessment have been undertaken very comprehensively by DAFM, with the tasks having been strongly driven by the Regulation, the requirements of which have been followed in a meticulous and measured way. There have been high levels of consultation with stakeholders, the public, experts, and interest groups, and the resulting SWOT and needs assessment complies strongly with the requirements of the Regulation.

Objectives, Coherence, and Intervention Strategy

The preparation of the CSP has responded to the EU Specific Objectives (SOs) from the outset, with the SWOT analysis and needs assessment each designed and framed very explicitly according to the nine SOs and the Cross-Cutting Objective (CCO) therein. A total of 37 prioritised needs were identified which were aligned and related to the nine SOs and the CCO both clearly and directly.

The suite of interventions included in the plan responds to those needs (and the SWOT analysis which determined them), and each intervention contributes to one or numerous SOs/CCO, again both directly and explicitly within the CSP's intervention strategy and logic. A number of the interventions have wide-ranging goals which support or have the potential to support many SOs/CCOs simultaneously, while others have stronger direct links to one or a small number of SOs.

A comparison to the financial plan indicates that the draft CSP is likely to contribute most significantly to SO1 (income support), as well as SO4 (climate), SO5 (natural resources) and SO6 (biodiversity and ecosystems) due to the focus and resourcing of the Eco-Scheme and AECM interventions.

The strong alignment of the draft CSP to the Regulation, its SOs, and its detailed provisions, ensures strong coherence with key wider strategies at EU level, including the Green Deal, Farm to Fork Strategy and Biodiversity Strategy. Such links are direct and clearly evident across the scope of the plan.

Similarly, there are very clear links with wider national policies and strategies, most obviously with respect to Food Vision 2030, Ag Climatise, Our Rural Future, the National Biodiversity Plan, and the River Basin Management Plans. Direct links and synergies are also evident with wider sectoral policies and strategies with narrower focuses.

Since the draft CSP has been prepared, the Irish Government has published the Climate Action Plan 2021, as described in Chapter 3. This contains a range of explicit targets and goals for achieving a 51% reduction in overall GHG emissions by 2030 and a roadmap for reaching net-zero emissions by no later than 2050. It includes a broad suite of targets and interventions for the agriculture sector, and states that “the CSP will be an integral delivery mechanism to achieve our climate ambition”. As the Climate Action Plan had not been drafted or published before the draft CSP, the latter's coherence with it was not possible to demonstrate before now. While there are many actions proposed to which the CSP will clearly and evidently progress as currently constructed, there are many areas of activity in which progress will need to be outside the scope of the draft CSP (such as in numerous research initiatives).

The internal coherence of the CSP is also reasonably strong and identifiable. There are many areas of self-contained activity which have neither synergy nor overlap with others, while there are other areas of clear cross-referencing and avoidance of duplication.

The over-arching intervention strategy is clearly demonstrated in the framework of prioritised needs, their relationship to objectives, the suite of interventions selected, the proposed budgetary allocations, and in the framework of output and result indicators, targets and milestones developed alongside these. Together they illustrate a logical and coherent chain of relationships, although one which by necessity is detailed and multi-layered. As well as the chain of effects across these different dimensions, the plan is underpinned by clear definitions, an explicit conditionality framework, and in many cases clear targeting, e.g., of beneficiaries, of farmer categories, of sub-sectors.

Management and Monitoring

The past record of DAFM (and other implementing organisations), the degree of continuation of existing interventions and consistency between the new plan's requirements and existing delivery mechanisms, and the degree to which administrative systems have become automated and information technology (IT) based in recent years, all provide a strong basis to suggest the management and administrative capacity is in place to deliver the plan effectively. There is much "built in" capacity to capture and record output and result indicators for monitoring purposes, which simply reflects how those indicators have been defined and how closely they reflect core levels of activity rather than any more complex implementation dynamics.

The draft CSP describes various processes and initiatives which are likely to effect ongoing administrative burden reduction and administrative efficiency in the roll-out and implementation of the interventions, and these are likely to build on much progress that has already occurred under existing and past programmes.

Conclusions and Recommendations

The draft CSP has been prepared thoroughly and carefully and complies with all of the critical requirements set for it as such in the CSP Regulation. It was built from a detailed SWOT and needs assessment which drew on extensive evidence, and it was subsequently built around a clear intervention logic linked explicitly to the EU-wide objectives for the CAP in the period 2023-2027. Preparation involved widespread, open and recurrent consultation processes, with the analysis of needs and identification of responses involved open communication and stakeholder engagement. In Ireland the plan will exemplify, albeit to varying degrees, the reforms to the overall CAP agreed within the EU for the period, including in relation to simplification, modernisation, subsidiarity, environment and climate ambition, and performance.

The plan is to be implemented over a shorter duration than was expected towards the end of the previous programming period, now to extend over five rather than the seven years than anticipated. Nevertheless, it is a period during which environmental and climate challenges will be severe, and during which formal responsive policies and policy targets point to a need for immense change within the sector. So while the draft CSP responds fully and commendably to the EU CSP Regulation and integrates new dimensions of environmental ambition and change, important aspects of the full policy machinery which will be needed to drive such change are either outside the programme or will need to be highly effective if within it. The specific contribution the

CSP is to make within this wider policy framework is not as clear as might be desirable. The CSP does not seek to provide the bulk of agricultural research funding and support in Ireland, yet the Climate Action Plan points to a substantial role for research in addressing the climate agenda within the sector. The Climate Action Plan determines that GHG emissions from agriculture must decline by between 20% and 30% by 2030, however the 2023-2027 CSP has not yet been required to establish targets for impact indicators, including one for that very metric. The plan is not yet required to include a detailed evaluation plan, yet the importance of understanding the impact and contribution its numerous interventions make, from an early stage, is clear and pressing.

We recognise that the Climate Action Plan has only been very recently published, and that the CSP Regulation does not require evaluation metrics and plans to be fully developed and included until after CSP approval. However more explicit framing of the plan against the national climate, environmental and biodiversity challenges and targets to be met over its lifetime, and in preparation for the journey and challenges that will still remain thereafter, is desirable. This should cross-reference to the wider policy actions planned outside the CAP, along with greater reference to the never higher importance of measuring and understanding impacts, in evaluation, in learning, in maintaining scope for significant changes to priorities and for renewed ambition, and in stakeholder understanding and buy-in. Improved clarity on the role other policies and programmes are to play, as well as on ensuring the impacts of the CSP itself are measured, understood, and acted upon, would strengthen the draft CSP as a key strategic programme making a defined contribution to the wider change agenda over the period.

The draft CSP contributes directly to and broadly across the nine CAP SOs, with the means by which it does so clearly referenced and evident, and the relationship between SWOT, needs, interventions and SOs also clearly mapped. Nevertheless, how lessons from previous programming periods have informed either needs or intervention selection or design, are not always made explicit or as clear. This is particularly so beyond high profile but broad evaluations such as the 2014-2020 RDP Mid Term Evaluation, where more basic implementation lessons, uptake data, participation feedback and participant profiling data, could inform plan design, or at least more explicitly so.

Other key conclusions are as follows:

- the draft CSP contributes directly to and broadly across the nine CAP SOs, with the means by which it does so clearly referenced and evident, and the relationship between SWOT, needs, interventions and SOs also clearly mapped. While it draws extensively from sources of evidence, the lessons from previous programme implementation are not always as clearly evident;
- while both its external and internal coherence is strong, more explicit specification of how the draft plan relates to and will operate to support the national Climate Action Plan would provide some further helpful evidence of its external coherence, while internally, care will be needed to maintain appropriate boundaries and relationships between interventions with similar objectives or those with similar target groups;
- the budgetary profile of the draft Plan is also very clearly consistent with the CAP SOs. As shown in Chapter 6, the numerous interventions selected contribute directly to all the SOs and to the CCO, and most contribute to numerous of these simultaneously. While the bulk of funding across both Pillars is directed towards income support, this is a function of the differing roles and national allocations from

the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD) as well as the Exchequer co-financing under Pillar II. The plan also has new dimensions which distribute such supports more equitably and links them with new environmental standards, and also represents no significant departure from the historical pattern of overall CAP funding;

- at a general level the output and result indicators and targets are logical and likely to be met if assumed levels of participation materialise;
- while there are historic grounds for expecting the administrative capacity to implement the Plan to be in place, there are new challenges in this regard. The plan has elements which are entirely new, complex, and likely to attract very high levels of participation, including the enhanced conditionality requirements, the Eco-Scheme, and elements of the AECM, on top of new features of smaller interventions. There will also be additional challenges in the inspection and controls function. Work to ensure the alignment of management and administrative capacity to these implementation challenges will need to feature strongly in 2022;
- there is much “built in” capacity to capture and record output and result indicators for monitoring purposes, however the procedures necessary for the more comprehensive monitoring function associated with impact indicators will need to be designed and established as more detailed evaluation and performance measurement plans evolve;
- the draft CSP describes various processes and initiatives which are likely to effect ongoing administrative burden reduction and administrative efficiency in the roll-out and implementation of the interventions, and these are likely to build on much progress that has already occurred under existing and past programmes.

We make a number of cross-cutting recommendations below. These are organised under a set of thematic headings.

CSP as a Strategy

- Further clarity should be provided on the role the CSP is to play in addressing the targets set out in the Climate Action Plan 2021, alongside the other policies and programmes expected to contribute.
- Some further clarifying statements should be included on the boundaries between key features of the green architecture, as regards definitions, additionality, and the avoidance of duplication. In particular, the conditionality requirements, Eco-Scheme actions, AECM obligations, and other land-use interventions.
- Statements should be included regarding plan flexibility and change during its implementation, in light of the requirements to achieve stringent sectoral climate targets over the course of its duration.

Performance Management and Monitoring

- The draft CSP sets out a detailed structure and arrangements for the Plan oversight and implementation, including managing and monitoring performance. We propose that these include:
 - preparation of an ambitious Evaluation Plan that will not just meet but exceed Commission requirements for performance management and monitoring, and will include a real focus on tangible outcomes and impacts on the agricultural, rural development and environmental aims of the CSP;
 - a strong central unit responsible for this on a day-to-day basis, building on the plans already in place, and involving close cooperation between the relevant DAFM Divisions but also potentially other public and private institutions and advisory organisations;
 - an early inventory of all performance-related data currently and potentially available to support the tracking, monitoring and measurement of results;
 - strong commitment to more regular surveying of farmers and to applying behavioural economics in evaluating agricultural and CSP interventions and performance;
 - initiation of some early evaluation of proposed or recent predecessor initiatives that would inform the new CSP implementation, e.g., Eco-Scheme, ANC, Young Farmer supports, AECM;
 - a commitment to carry out a deep and evidence informed Mid-Term review of the CSP in 2025, and with an openness to make major alterations to the CSP at that time, especially in the context of the evolving external environment.

Human Resources and Administrative Capacity

- In the period immediately ahead, and alongside the plan's further development and Commission approval, DAFM will be required to finalise implementation plans, promote and launch interventions, prepare for their management and monitoring, and ensure all other structures and resources are in place for effective programme delivery. To help ensure these the capacity and resources are planned and in place to do this, we propose:
 - preparation of a systematic inventory of the human resource requirements by Intervention, the availability of this, and the readiness of the personnel involved;
 - consideration of the timing and build-up of activity, and the usefulness of possible staggering some of the schedules;
 - potential outsourcing of the management/implementation of some schemes to relevant partners;
 - consideration of a potentially greater role for public and private research and advisory organisations in implementing and supporting delivery within the new plan.

Co-ordinated Oversight and Information Sharing

- Mechanisms should be considered for co-ordinated CSP delivery, monitoring and data sharing regarding CSP implementation and impacts across DAFM, the Department of Environment, Climate and Communications, the National Parks and Wildlife Service, the Environmental Protection Agency, the National Biodiversity Centre, and others with a role in mapping and monitoring agricultural activity and its effects.

Capturing Lessons

- Where lessons from previous or other programmes have informed specific needs or scheme specification for 2023-2027, these should be more clearly referenced.
- Similarly, the plan could more explicitly discuss its scope and process for future potential change, in light of lessons from early and ongoing implementation and delivery.

Conclusions and recommendations concerning individual interventions are set out in the main report.

2. INTRODUCTION AND BACKGROUND

2.1 Introduction

This report presents the Ex-Ante Evaluation of Ireland's CAP Strategic Plan (CSP) 2023-2027. It has been prepared on behalf of the Department of Agriculture, Food and the Marine (DAFM) by a consultancy team led by RSM Ireland.

Preparation of the Ex-Ante Evaluation is a requirement which must be fulfilled under Article 125 of the European Union (EU) proposed CSP Regulation (COM (2018) 392)¹. The main purpose of the Ex-Ante Evaluation is to "improve the quality of the design of the CSPs", as stated in Article 125 of the CSP Regulation, while a more detailed outline of the evaluation's objectives is provided in Section 2.3 below.

2.2 Background

The Common Agricultural Policy (CAP) is the EU's flagship policy for the development and support of agriculture. It has operated since 1962 and has been subject to numerous reforms and modernisations since. Proposals for the operation of the CAP over the period 2021-2027 were first put forward in detail by the EU Commission in June 2018, with the publication of three draft Regulations:

- the draft CSP Regulation (referred to above);
- a draft Regulation on the financing, management and monitoring of the CAP² (often referred to as the "horizontal" regulation); and
- a draft Regulation on the common organisation of agricultural markets³.

While new arrangements were initially intended to operate within the period 2021-2027, there were a number of factors during 2019 and 2021 that gave rise to delays in the schedules for both negotiation and adoption of the agreed CAP framework. This led to the shortening of the intended implementation period to 2023-2027, as well as the introduction of a two year "transition" period from the previous 2014-2020 multi-annual programming period, to operate in 2021 and 2022.

The key features of the proposed reforms underpinning the CAP for 2023-2027 include: greater environmental ambition with specific goals concerning climate change, management of natural resources and biodiversity; greater emphasis on the fair distribution of supports and resources and strengthening of the position of farmers in supply chains; and increasing the competitiveness of agriculture.

A detailed and wide-ranging programme of work has been followed by DAFM in the period since the publication of the draft EU Regulations, aimed at ensuring Ireland's proposed CSP is agreed and ready for submission to the EU Commission at the end of 2021.

¹ Available at [EUR-Lex - 52018PC0392 - EN - EUR-Lex \(europa.eu\)](#)

² COM (2018) 393, available at [EUR-Lex - 52018PC0393 - EN - EUR-Lex \(europa.eu\)](#)

³ COM (2018) 394, available at [EUR-Lex - 52018PC0394R\(01\) - EN - EUR-Lex \(europa.eu\)](#)

2.3 Ex-Ante Evaluation Objectives

The main purpose of the Ex-Ante Evaluation is to “improve the quality of the design of the CSPs”, as stated in Article 125 of the CSP Regulation. It must appraise 10 specific aspects of the draft CSPs, as follows:

- i. the contribution of the CSP to the CAP SOs, taking into account national and regional needs and potential for development as well as lessons drawn from implementation of the CAP in previous programming periods;
- ii. the internal coherence of the proposed CSP and its relationship with other relevant instruments;
- iii. the consistency of the allocation of budgetary resources with the SOs of the CSP;
- iv. how the expected outputs will contribute to results;
- v. whether the quantified target values for results are realistic, having regard to the support envisaged from the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD);
- vi. the adequacy of human resources and administrative capacity for management of the CSP;
- vii. the suitability of the procedures for monitoring the CSP and for collecting the data necessary to carry out evaluations;
- viii. the suitability of the milestones selected for the performance framework;
- ix. measures planned to reduce the administrative burden on beneficiaries;
- x. the rationale for the use of financial instruments financed by the EAFRD.

2.4 Approach and Methods

The evaluation has been undertaken alongside the extended period of plan consultation and preparation led by DAFM during 2019, 2020 and 2021, and has involved active co-ordination, assessment and engagement as well formal and informal feedback across the various phases of CSP development. The principal methods and workstreams have included:

- review of documentation, including in respect of previous evaluations, EU Regulations, policy, interventions, and other CSP inputs and plan components;
- participation in consultations with programme stakeholders, and the review of submissions made within numerous formal consultative phases;
- review of SWOT analysis and needs assessment outputs and findings;
- collation and analysis of data concerning contextual socio-economic and agricultural circumstances and trends, and aspects of plan implementation, financing and performance indicators;
- liaison, co-ordination and engagement with the development of the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) of the CSP which have taken place concurrently with the Ex-Ante Evaluation; and
- periodic analysis, synthesis and reporting of findings to DAFM.



2.5 Structure of Report

The remainder of the document is structured as follows:

- Chapter 3 describes the regulatory and policy context, at both EU and national level;
- Chapter 4 presents a summary overview of the draft CSP;
- Chapter 5 assesses the SWOT and needs assessment;
- Chapter 6 evaluates the CSP's objectives, intervention strategy and coherence;
- Chapter 7 evaluates CSP management, monitoring and evaluation arrangements; and
- Chapter 8 presents evaluation conclusions and recommendations.

3. REGULATORY AND POLICY CONTEXT

3.1 Introduction

This chapter describes the regulatory and policy context in which Ireland's CSP is being prepared. To do this, it separately describes both the EU policy context and the Irish national policy context for the CSP.

Section 3.2 considers the EU-wide regulatory and policy context, examining the EU's priorities for the modernisation of the CAP coming into the new funding round, and setting out the main features of the European Green Deal, the EU Biodiversity Strategy, and the EU Farm to Fork Strategy, all of which the new phase of CAP implementation has to be appropriately aligned to. In addition, it summarises the main provisions of the draft CSP Regulation, which defines the framework within which Ireland's proposed CSP has been developed.

Section 3.3 then describes the key elements of national policy that are relevant to the development of the CSP, including agricultural policy, spatial and regional policy, rural development policy and key policies with respect to the environment, climate and biodiversity.

3.2 EU Policy Context

Since its inception in 1962 the CAP has had the aim of:

- supporting farmers and improving agricultural productivity, ensuring a stable supply of affordable food;
- safeguarding EU farmers to make a reasonable living;
- helping tackle climate change and the sustainable management of natural resources;
- maintaining rural areas and landscapes across the EU; and
- keeping the rural economy alive by promoting jobs in farming, agri-food industries and associated sectors.

The most recent comprehensive CAP reform process was agreed in 2013 and took effect in 2015, and saw key changes in the following areas:

- the 'greening' of farm payments, through the introduction of environmentally sound farming practices;
- more equality in the distribution of income supports and a reduction in payments above a certain amount for the biggest farms; and
- better targeting of income support to farmers most in need, particularly young farmers, farmers in low-income sectors and farmers in areas with natural constraints.

The CAP's existing two-pillar structure was maintained, whereby Pillar I included income support and market management measures, while Pillar II addressed rural development.

Coming into (what was expected to be) the 2021-2027 multiannual funding round, EU priorities for the new phase of CAP implementation centred around:

- a new, simpler delivery model;
- stronger research and innovation;

- a smarter and more resilient agriculture sector with fairer income support, improved market returns for farmers, and enhanced risk management;
- significantly enhanced environmental care and climate action, contributing to overall EU goals in this respect;
- strengthened socio-economic conditions in rural areas and
- ensuring sustainable agricultural production, including with respect to health, nutrition, food waste and animal welfare⁴.

European Green Deal

The European Green Deal⁵ for the EU and its citizens, published at the end of 2019, sets out the European Commission's commitment to tackle climate and environment-related challenges. Underlying this commitment is a new growth strategy, which aims to:

- transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy, where there are no net emissions of Greenhouse Gases (GHGs) in 2050 and where economic growth is decoupled from resource use; and
- protect, conserve and enhance the EU's natural capital, and protect the health and well-being of citizens from environment-related risks and impacts, but in a just and inclusive manner, taking account of regions, industries and workers that face the greatest challenges.

To implement the strategy, the Commission presents an initial roadmap of key policies and measures that are needed to achieve the European Green Deal, while declaring that all EU actions and policies will have to contribute to Green Deal objectives. Key objectives to be addressed through this policy roadmap include:

- increasing the EU's climate ambition, whereby the target for emissions reduction by 2030 will be 50%-55% (when compared with 1990 levels), aided by initiatives such as the adoption of a European "Climate Law" that enshrines the climate neutrality objective in legislation, and the adoption of a new, more ambitious EU strategy on adaptation to climate change;
- supplying clean, affordable and secure energy, through further decarbonisation of the energy system, preparation of revised energy and climate action plans at member state level, adoption of measures to reduce energy poverty, and increased deployment of smart infrastructure;
- mobilising industry for a clean and circular economy, through decarbonisation of energy-intensive industries, expansion of sustainable and job-intensive economic activity, development of a new circular economy action plan, development of "sustainable product" policies, and increased use of digital enabling technologies;
- building and renovating in an energy and resource efficient way, by means of increased renovation of building stock to improve energy efficiency, and enforcement of legislation relating to the energy performance of buildings;

⁴ See Commission Communication on the Future of Food and Farming, November 2017. Available here: [pdf \(europa.eu\)](https://ec.europa.eu/food/communication/food-farming-future)

⁵ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: The European Green Deal, COM (2019) 640 Final, Brussels, December 2019.

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- accelerating the shift to sustainable and smart mobility, through measures to reduce transport pollution, increased promotion of multi-modal transport, automated and connected multi-modal mobility, increased use of transport pricing that reflects environmental impacts, and increased use of sustainable transport fuels;
 - designing a fair, healthy and environmentally friendly food system, including development of an EU “Farm to Fork Strategy” and a more sustainable food policy across all operators in the value chain, reduced environmental impact on the food processing and retail sectors, and promotion of sustainable food consumption and affordable, healthy food;
 - preserving and restoring ecosystems and biodiversity, including development of an EU biodiversity strategy, an EU forestry strategy, specific measures to meet strategy objectives, plus measures to promote a sustainable “blue economy”; and
 - targeting a zero-pollution ambition for a toxic-free environment, including more action to prevent pollution of air, water, and soil from being generated as well as measures to clean and remedy it.

Achieving the European Green Deal objectives, however, will require massive public investment and increased efforts to direct private capital towards climate and environmental action, with the European Commission estimating that the 2030 climate and energy targets will require €260 bn of additional annual investment in order to be achieved, equivalent to about 1.5% of GDP (in 2018). Therefore, the Commission proposes a Sustainable Europe Investment Plan to help meet the additional funding needs, a 25% target for climate mainstreaming across all EU programmes, providing at least 30% of the InvestEU Fund to address climate change, and provision of a Just Transition Fund for regions, industries and workers that face the greatest challenges. In addition, it also proposes increased “greening” of national budgets and increased mobilisation of research/innovation and education/training to advance Green Deal objectives.

Regarding the CAP, the Commission commits to ensuring that national strategic plans for agriculture: fully reflect the ambition of the Green Deal and the Farm to Fork Strategy; are assessed against robust climate and environmental criteria; lead to the use of sustainable practices (such as precision agriculture, organic farming, agro-ecology, agro-forestry, reduced use of pesticides and fertilisers, and stricter animal welfare standards); and shift focus from compliance to performance, e.g. through rewarding of farmers for improved environmental performance through eco-schemes.

EU Biodiversity Strategy

Under the EU's Biodiversity Strategy for 2030⁶, published in 2020, the EU stresses the need for nature in our lives, including the air we breathe, the food we eat and the water we drink, as well as its importance for mental and physical health and well-being. Protecting and restoring biodiversity and well-functioning ecosystems is also considered to be critical to boosting our resilience and preventing the emergence and spread of future diseases; safeguarding EU and global food security; and aiding economic recovery following the Covid-19 crisis.

The EU therefore declares itself to be ready to show ambition to reverse biodiversity loss, so as to ensure that all of the world's ecosystems are restored, resilient and adequately protected by 2050. In this regard, it aims to ensure that Europe's biodiversity will be on the path to recovery by 2030 by addressing the five main drivers of biodiversity loss (i.e., changes in land and sea use, over-exploitation, climate change, pollution and invasive alien species), setting out an enhanced governance framework to fill remaining gaps, ensuring the full implementation of EU legislation, and pulling together all existing efforts.

Key elements of the EU's biodiversity strategy to 2030 include:

- increased protection and restoration of nature through further improvement and widening of the EU's network of legally protected areas, with clear conservation objectives and measures and a target to legally protect at least 30% of land and 30% of sea in the EU, including 10% of each to be under "strict protection";
- development of an EU Nature Restoration Plan that seeks to strengthen the legal framework in the EU for nature restoration, bring nature back to agricultural land, address land take and restore soil ecosystems, increase the quantity of forests and improve their health and resilience, prioritise solutions for energy generation, restore the good environmental status of marine and freshwater ecosystems, promote greening of urban and peri-urban areas, reduce pollution, and address alien invasive species;
- development of a comprehensive new governance framework to steer the implementation of biodiversity commitments agreed at national, European or international level (with clear sets of agreed indicators) and increased implementation and enforcement of EU environmental legislation; and
- building on an integrated and whole-of-society approach to protecting and restoring biodiversity, including consideration of biodiversity in investment, pricing and taxation decisions, promotion of biodiversity action in the business community, and improving related knowledge, education and skills.

The proposed EU Nature Restoration Plan, in turn, will be underpinned by a number of key targets or commitments up to 2030 that are relevant to the CAP, such as:

- reversal of decline in pollinators;
- reduction in use of chemical and more hazardous pesticides by 50%;
- at least 10% of agricultural area to be under high-diversity landscape features;
- at least 25% of agricultural land to be under organic farming management;
- significant progress made in the remediation of contaminated soil sites;

⁶ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: *EU Biodiversity Strategy for 2030 – Bringing Nature Back into Our Lives*, COM (2020) 380 Final, Brussels, May 2020.

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- restoration of at least 25,000 km of free-flowing rivers;
 - planting of three billion trees across the EU; and
 - reduction in the use of fertilisers by at least 20%, and reduction in the loss of nutrients from fertilisers by 50%.

In this regard, for example, targets to reduce the decline in pollinators or increase the planting of trees in the EU align with the CAP objective to contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes. Similarly, targets to reduce the use of chemicals, fertilisers and pesticides, remediate contaminated soil sites, or increase the share of land under high-diversity landscapes or organic farming all align with the CAP objective to foster sustainable development and efficient management of natural resources such as water, soil and air.

EU Farm to Fork Strategy

As noted earlier, the EU's Farm to Fork Strategy⁷ is an important element of the European Green Deal. In particular, it seeks to comprehensively address the challenges of sustainable food systems, and recognise the inextricable links between healthy people, healthy societies and a healthy planet, by promoting a shift to a sustainable food system that can bring environmental, health and social benefits, offer economic gains and ensure a sustainable livelihood for primary producers.

The Farm to Fork Strategy lays down a new approach to ensure that agriculture, fisheries/aquaculture and the food value chain contribute appropriately to the process of reducing emissions in line with European Green Deal targets, while also taking advantage of the economic opportunity presented by the transition to sustainable food systems.

The goals underlying the Farm to Fork Strategy are to reduce the environmental and climate footprint of the EU food system and strengthen its resilience, ensure food security in the face of climate change and biodiversity loss, and lead a global transition towards competitive sustainability from farm to fork and tapping into new opportunities. This means:

- ensuring that the food chain (covering food production, transport, distribution, marketing and consumption) has a neutral or positive environmental impact, which: preserves and restores the land, freshwater and sea-based resources on which the food system depends; helps to mitigate climate change and adapt to its impacts; protects land, soil, water, air, plant and animal health and welfare; and reverses the loss of biodiversity;
- ensuring food security, nutrition and public health, by making sure that everyone has access to sufficient, nutritious, sustainable food that upholds high standards of safety and quality, plant health, and animal health and welfare, while meeting dietary needs and food preferences; and
- preserving the affordability of food, while generating fairer economic returns in the supply chain, so that the most sustainable food also becomes the most affordable, which then fosters the

⁷ *Farm to Fork Strategy: For a Fair, Healthy and Environmentally-Friendly Food System*, European Commission, 2020.

competitiveness of the EU supply sector, promotes fair trade, creates new business opportunities and ensures the integrity of the Single Market and occupational health and safety.

To ensure sustainable food production, the strategy proposes human and financial investment in new green business models that incorporate carbon sequestration, circular bio-based economy practices and associated renewable energy production (such as biogas), reduction in use of chemical pesticides, reduction in the loss of nutrients, reduction in GHG emissions, improved animal welfare and increased adoption of organic farming, among others. To ensure food security, it will provide a new framework to increase the sustainability of food producers, continue to closely monitor food security, protect the working conditions and health and safety of workers, improve its co-ordination of common European response to crises affecting food systems, and develop contingency plans to ensure food supply and food security in times of crisis. Stimulating sustainable food processing, wholesale, retail, hospitality and food services practices will be fostered through actions such as codes of conduct for responsible practice in the food industry and retail sectors, promotion of circular business models and food packaging initiatives, while initiatives to promote sustainable food consumption and a shift to healthy, sustainable diets among consumers will also be actioned. Finally, the strategy proposes to set legally binding targets to reduce food loss and waste, and monitor progress against these targets.

CSP Regulation

Scope

The draft CSP Regulation published by the Commission in 2018 sets out the rules that are to guide the preparation of CSPs in EU Member States. In this regard, it specifies:

- general objectives and Specific Objectives (SOs) to be pursued through EAGF and EAFRD financial support under the CAP;
- a common set of impact, result and output performance indicators by which the achievement of the objectives is to be assessed;
- types of interventions Member States can include in CSPs;
- common requirements of CSPs; and
- obligations concerning coordination, governance, monitoring, reporting and evaluation.

Objectives

Article 5 of the draft Regulation defines the general objectives of EAGF and EAFRD support as follows:

- a) to foster a smart, resilient and diversified agricultural sector ensuring food security;
- b) to bolster environmental care and climate action and to contribute to the environmental- and climate-related objectives of the Union;
- c) to strengthen the socio-economic fabric of rural areas.

A further Cross-Cutting Objective (CCO) is to modernise the sector by fostering and sharing knowledge, innovation and digitalisation in agriculture and rural areas, and encouraging their uptake.

Nine SOs are also set out:

- i. support viable farm income and resilience across the Union to enhance food security;
- ii. enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation;

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- iii. improve the farmers' position in the value chain;
 - iv. contribute to climate change mitigation and adaptation, as well as sustainable energy;
 - v. foster sustainable development and efficient management of natural resources such as water, soil and air;
 - vi. contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;
 - vii. attract young farmers and facilitate business development in rural areas;
 - viii. promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;
 - ix. improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare.

Common Requirements

Two common requirements of Member States are provided for in the draft Regulation as follows:

- they must adopt systems of “conditionality” whereby penalties are imposed on beneficiaries receiving direct payments or annual premia under agri-environment and disadvantaged area programmes, who do not comply with Statutory Management Requirements (SMRs) and standards for Good Agricultural and Environmental Conditions (GAEC) of land, which relate to
 - the climate and the environment;
 - public health, animal health and plant health;
 - animal welfare;
- they must provide a system for advising farmers and other beneficiaries of CAP support on land management and farm management ('Farm Advisory Systems (FAS)), covering economic, environmental and social dimensions, based on up to date technological and scientific information. Such services should be integrated with researchers, farmer organisations and other relevant stakeholders, that together form the “Agricultural Knowledge and Innovation System” (AKIS).

Types of Interventions

Articles 14 to 72 set out the range of, and rules applicable to, eligible interventions under CSPs. These are presented in three categories:

- decoupled and coupled direct payments, including schemes for the climate and the environment;
- sectoral interventions; and
- interventions for rural development.

Other Provisions

Finally, the draft Regulation includes wider provisions in areas such as finance, the content of CSPs and the process of preparing and approving them, co-ordination and governance, performance management, monitoring and reporting, competition, and information systems.

3.3 National Policy Context

The national policy context for the CSP in Ireland includes:

- plans and policies relating specifically to the agriculture sector in Ireland, e.g., “Food Vision 2030”, “Ag Climatise”;
- plans and policies relating to the wider climate action, environmental and sustainability agenda, e.g., National Climate Action Plan, Nitrates Action Programme (NAP), National Biodiversity Action Plan; and
- plans and policies relating the wider economic development, regional development and rural development agenda in Ireland, e.g., National Planning Framework, National Rural Development Policy.

In general, the CSP also appears to be strongly aligned with this wider policy context at the national level, and to broadly reflect policy priorities at the sectoral level, the socio-economic level and the environmental level.

Food Vision 2030

Food Vision 2030⁸, published in August 2021, is Ireland’s current strategy for the agri-food sector, which outlines the vision, key objectives and associated actions that are designed to make Ireland a world leader in sustainable food systems, i.e. a system that is profitable throughout (economic sustainability), has broad-based benefits for society (social sustainability) and has a positive or neutral impact on the natural environment (environmental sustainability).

The strategy has been developed using a “food systems” approach, which recognises the interconnectedness between policies for food, environment and health, and which acknowledges that each actor in the food chain, from “farm to fork”, has an important role in developing a sustainable food system. The adoption of this approach, in turn, is regarded as a significant change in direction in comparison to previous agri-food strategies developed since 2000, albeit while acknowledging important continuities with these earlier strategies.

The strategy sets out a vision for the agri-food sector that aspires for Ireland to become a world leader in sustainable food systems over the next decade, delivering significant benefits for the Irish agri-food sector itself, for Irish society and for the environment, while also providing a basis for the future competitive advantage of the sector. Within this vision, Ireland will produce safe, nutritious, and high-value food that tastes great, while protecting and enhancing natural and cultural resources, and contributing to vibrant rural and coastal communities and the national economy. By 2030, it is targeted that agri-food exports will reach €21 bn, and expenditure on private R&D in the agri-food sector will be equivalent to 1% of sectoral turnover.

To realise the vision, the strategy has adopted four high level missions, underpinned by a series of 22 key goals (see below) and 200 actions, which seek to strike a genuine balance between the three dimensions of economic, social and environmental sustainability. These missions are:

- a climate smart, environmentally sustainable agri-food sector;

⁸ *Food Vision 2030: A World Leader in Sustainable Food Systems*, Department of Agriculture, Food and the Marine, August 2021.

- viable and resilient primary producers with enhanced well-being;
- food which is safe, nutritious and appealing, trusted and valued at home and abroad; and
- an innovative, competitive and resilient agri-food sector, driven by technology and talent.

These missions appear well aligned with the EU SOs that have been set for the CAP in the new programming period, and it is expected that many elements of the new CAP (such as its “green architecture” and the Eco-Scheme) will contribute to the implementation of actions contained in the strategy. In addition, the strategy aspires to a climate neutral food system by 2050, with verifiable progress achieved by 2030, to include: a 10% reduction in biogenic methane; a 50% reduction in emissions attributable to chemical fertilisers; a 50% reduction in nutrient losses from agriculture to water; a 10% share of farmed area that is prioritised for biodiversity; a 7.5% share of farmed area under organic farming; a 5% reduction in ammonia emission levels; increased afforestation to at least 8,000 hectares (ha) per annum; and a 50% reduction in food waste (per person).

Figure 3.1 Food Vision 2030 – Missions and Goals

Missions	Goals
A climate smart, environmentally sustainable agri-food sector	<ul style="list-style-type: none"> • Develop a climate neutral food system by 2050 and improve air quality • Restore and enhance biodiversity • Protect high status sites and contribute to protection and restoration of good water quality and healthy aquatic ecosystems • Develop diverse, multi-functional forests • Enhance the environmental sustainability of the seafood sector • Embed the agri-food sector in the circular, regenerative bioeconomy • Strengthen the Origin Green initiative and sustainable supports to reflect a higher level of ambition
Viable and resilient primary producers with enhanced well-being	<ul style="list-style-type: none"> • Improve the competitiveness and productivity of primary producers • Improve the creation and equitable distribution of value • Increase primary producer system diversification • Improve the social sustainability of primary producers
Food which is safe, nutritious and appealing, trusted and valued at home and abroad	<ul style="list-style-type: none"> • Prioritise coherent food and health policies to deliver improved health outcomes • Enhance consumer trust in our food system, providing evidence of a safe, ethical food supply

Figure 3.1 Food Vision 2030 – Missions and Goals

Missions	Goals	
An innovative, competitive and resilient agri-food sector, driven by technology and talent	<ul style="list-style-type: none"> • Create value-added in food through insight, innovation and product differentiation • Develop market opportunities at home and abroad • Move to a challenge-focused innovation system • A strategic funding approach for research, development and innovation • Develop a dynamic knowledge exchange environment • Enhance the use of technology and data • Maintain and improve competitiveness and resilience • Attract and nurture diverse and inclusive talent • Policy coherence in sustainable food systems between Ireland's domestic policy and its development co-operation/foreign policy 	Ag

Climatise

Ag Climatise⁹, published in December 2020, presents Ireland's roadmap towards climate neutrality in the agriculture sector. In its vision for the sector, it (like Food Vision 2030) aspires to a climate neutral food system by 2050, whereby the climate impact of biogenic methane is reduced to zero and remaining agricultural emissions are balanced by removals through land use and through a significant contribution to renewable energy.

The roadmap is therefore based on stabilising methane emissions and on a significant reduction in fertiliser related nitrous oxide emissions, leading to an absolute reduction in the agricultural GHG inventory by 2030. To achieve this, the roadmap identifies six key tasks that need to be addressed to meet climate and environmental objectives, while maintaining viable farm incomes in the sector, which are:

- reducing GHG emissions from the sector, as methane from enteric fermentation and nitrous oxide are the dominant GHGs from agriculture;
- increasing the carbon sequestration and carbon storage potential of Ireland's land use sector;
- reducing nutrient loss to the environment and contributing to improved water quality and biodiversity;
- meeting ammonia emissions reduction targets;
- building sustainable, resilient food production and land use management systems that meet climate and environmental obligations, while also meeting market expectations; and
- transparently communicating progress in achieving the roadmap's goals.

⁹ Ag Climatise: A Roadmap Towards Climate Neutrality, Department of Agriculture, Food and the Marine, December 2020.

The roadmap proposes two strands of activity: actions that can be implemented now to ensure farmers act immediately on the changes necessary to address climate change; and the development of cross-cutting enabling actions into the future, e.g., research and innovation. In terms of actions that can be implemented immediately, it proposes 29 actions across 15 themes, which are listed below.

Figure 3.2 Ag Climatise – Themes and Actions

Themes	Actions
Fertilisers	<ul style="list-style-type: none"> • Reduce chemical nitrogen use to an absolute maximum of 325,000 tonnes (annually) by 2030, with an interim target of 350,000 tonnes by 2025 • Where chemical fertiliser is applied, promote the use of protected nitrogen products
Animal Breeding	<ul style="list-style-type: none"> • Genotype the entire national herd by 2030 to underpin the development of enhanced dairy and beef breeding programmes that help achieve a reduction in our overall GHG output at a national level
Grassland Management	<ul style="list-style-type: none"> • Maximise production of grazed grass
Animal Health	<ul style="list-style-type: none"> • Further enhance animal health strategies to support climate ambitions and environmental sustainability through promotion of sustainable animal health and welfare practices and enhancing food safety and authenticity
Crude Protein, Feed Additives and Livestock Rations	<ul style="list-style-type: none"> • Reduce the crude protein content of livestock feeding stuffs to minimise ammonia loss • Continue to invest in novel feed additives to reduce biogenic methane • Increase the proportion of home-grown protein in livestock rations
Organic Farming	<ul style="list-style-type: none"> • Increase the current area under organic production to 350,000 ha by 2030
Tillage and Horticulture	<ul style="list-style-type: none"> • Increase the area under tillage production above the current area of 300,000 ha by 2030, producing more native grown grains and legumes for the livestock industry, while further enhancing the environmental credentials of the sector • Further enhance carbon credentials of the horticulture sector

Figure 3.2 Ag Climatise – Themes and Actions

Themes	Actions
Bioeconomy	<ul style="list-style-type: none"> Promote the development of a sustainable circular bioeconomy within the agri-food sector Explore all options in relation to land use diversification
Forestry	<ul style="list-style-type: none"> Increase afforestation levels and maximise the contribution of existing forests to climate change mitigation and adaptation
Carbon Sequestration	<ul style="list-style-type: none"> Reduce the management intensity of at least 40,000 ha of peat based agricultural soils to reduce CO2 loss Protect, enhance and increase the number of hedgerows on farms Develop a pilot scheme in relation to on-farm carbon trading to reward farmers for the public goods they are providing
Sustainable Energy	<ul style="list-style-type: none"> Generate at least a 20% reduction in agricultural energy use by 2030 across all farms, plus at least 20% deployment of renewable energy technologies focusing primarily on energy intensive farming systems Double the sustainable production of biomass from forests by 2030 and ensure biomass mobilisation for heat production Engage with stakeholders to maximise the potential opportunities from anaerobic digestion for the agriculture sector
AKIS	<ul style="list-style-type: none"> Undertake AKIS strategic development Develop a continued professional development strategy for all advisors Establish a network of “sign-post farms” Establish a Centre of Excellence to ensure Ireland is a global leader in research and innovation related to climate smart agriculture and land use Develop an information portal relating to the actions of the roadmap
Quality Assurance	<ul style="list-style-type: none"> Bord Bia to develop a roadmap of initiatives in partnership with industry to support farmers to achieve market demands
Funding	<ul style="list-style-type: none"> Review the Rural Development Programme (RDP) (2014-20) and consider national fiscal policy instruments to ensure further supports for our climate targets Ireland Strategic Investment Fund (ISIF)/Enterprise Ireland (EI) Innovation (Climate Smart Agriculture/Smart Farming) Fund

Figure 3.2 Ag Climatise – Themes and Actions

Themes	Actions
Just Transition	<ul style="list-style-type: none"> Establish a “Future of Farming in Ireland Dialogue”, which will include farmers, scientists, environmentalists and social groups to find practical solutions for productive, sustainable agriculture

Climate Action Plan


Ireland's current Climate Action Plan¹⁰, published in November 2021, seeks to develop a roadmap for taking decisive action to halve Ireland's emissions by 2030, and reach net zero emissions no later than 2050, as committed to in the most recent Programme for Government. Central to this plan are the targets that have been set to reduce emissions by 2030 across a range of key sectors. This includes:

- a 62%-81% reduction in emissions from the electricity sector;
- a 29%-41% reduction in emissions from the enterprise sector;
- a 44%-56% reduction in emissions from buildings;
- a 42%-50% reduction in emissions from transport;
- a 37%-58% reduction in emissions from land use; and
- a 22%-30% reduction in emissions from agriculture.

Recommended steps to achieve emissions reductions in agriculture incorporate a commitment to use less chemical nitrogen and adopt more targeted use of fertiliser, while maintaining the same level of grass growth through multi-species swards. Other measures include improving the genetics of our herds to reduce emissions and improve productivity, incentivising increased organic farming and encouraging diversification into forestry, biomethane and energy production. Related to this, recommended steps to achieve emissions reductions in land use include bog rehabilitation, increased afforestation, improved management of grasslands on mineral soils, increased use of cover crops in tillage, and rewetting of organic soils. Recommendations for the sector, therefore, are reflected in both the Food Vision and Ag Climatise strategies, and indeed in the draft CSP.

In order to achieve emissions reductions in other sectors, the plan makes recommendations, *inter alia*, to increase renewable electricity, decarbonise industry and encourage the “green economy”, implement a significant programme of residential retrofitting, and encourage substantial transport shifts to electric vehicles and public transport, while seeking to reduce emissions across public sector activities by 51% by 2030. It acknowledges the need for unprecedented levels of investment in climate action over the next decade, with €5.0 bn out of €9.5 bn in additional carbon tax receipts (in the decade to 2030) to be allocated to increased capital investment in energy efficiency, and with more than €500 mn committed to decarbonising projects (such as retrofitting, ecosystem resilience and regeneration, climate mitigation and adaptation, green data

¹⁰ Climate Action Plan 2021: Securing Our Future, Department of the Environment, Climate and Communications, November 2021.



systems) under the National Resilience and Recovery Plan. It also seeks to ensure that citizens are engaged with the need for climate action and that the transition is fair, highlighting the need to help people with the costs of the transition to ensure that it happens, particularly in sectors that will be more impacted than others.

Nitrates Action Plan

Abundant, clean and healthy water is a fundamental cornerstone of any thriving society and is necessary for a vibrant economy and enjoyable living environment. However, the recent Water Quality Indicators Report for Ireland¹¹, published in July 2021, noted that nitrate concentrations are too high in many Irish waters, particularly in the south and south east of the country, and that trends are going in the wrong direction. Nearly half of Ireland's river sites and one quarter of groundwater sites have elevated nitrate concentrations, for example, estuaries and coastal waters are particularly sensitive to high nitrogen concentrations, while over one quarter of river monitoring sites and almost one third of monitored lakes have unsatisfactory phosphate concentrations.

Therefore, giving effect to the EU Nitrates Directive, and supported by successive national regulations, NAPs are designed to prevent pollution of waters from agricultural sources and to protect and improve water quality. The current NAP, which covers the 2017-21 period, sets out the requirements for managing agricultural nitrogen and phosphorous over this period, and across an extensive scope that addresses both the major sources of agricultural nutrients and a national farming population of over 139,600 holdings.

Principal elements of the NAP include:

- limits on farm stocking rates;
- legal maxima for nitrogen and phosphorus application rates;
- prohibited spreading periods, preventing the application of organic and chemical fertilisers during more environmentally vulnerable times of the year;
- minimum storage requirements for livestock manures;
- requirements regarding maintenance of green cover in tillage lands; and
- set-back distances from waters.

Such programme elements, therefore, would again appear to align with the CAP objectives to contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes, and to foster sustainable development and efficient management of natural resources such as water, soil and air.

In common with other EU member states in which agricultural activity is practised, Ireland has also availed of a derogation from the 170kg N/ha livestock manure nitrogen limit, as provided for in the Nitrates Directive. However, Ireland's next NAP, which is currently at second stage consultation, is being developed in the context of a significantly greater environmental ambition, both in the current national Programme for Government context and at a wider EU level.

National Biodiversity Action Plan

There have been a number of assessments of the state of Ireland's biodiversity. To date, Ireland has undertaken "Red List" assessments of the threat of extinction of vascular plant, bryophyte and non-marine

¹¹ *Water Quality in 2020: An Indicators Report*, Environmental Protection Agency, July 2021.

vertebrate taxa, plus the better-known invertebrate groups, and while most are not considered threatened, just over 14% are assessed as under threat of extinction. Also, the most recent assessment of the status of EU protected habitats and species in Ireland, in 2013, showed that 91% of the 58 habitats assessed had an unfavourable conservation status.

The need for strategies to address threats to biodiversity in Ireland is therefore well recognised. In this regard, the current National Biodiversity Action Plan for Ireland¹², which covers the period 2017 to 2021, outlines a vision that *“biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society, and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally”*.

To achieve this vision, the National Biodiversity Action Plan sets out seven key objectives, which are to:

- i. mainstream biodiversity into decision-making across all sectors;
- ii. strengthen the knowledge base for conservation, management and sustainable use of biodiversity;
- iii. increase awareness and appreciation of biodiversity and ecosystem services;
- iv. conserve and restore biodiversity and ecosystem services in the wider countryside;
- v. conserve and restore biodiversity and ecosystem services in the marine environment;
- vi. expand and improve management of protected areas and species; and
- vii. strengthen international governance for biodiversity and ecosystem services.

Aligned to these objectives, moreover, are a suite of 18 different targets (see below), with targets relating to tackling pollutant pressures, controlling harmful invasive species, and more generally optimising opportunities to benefit biodiversity through agriculture and rural development being especially relevant in the context of the CSP objective to contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes.

Figure 3.3 National Biodiversity Action Plan – Objectives and Targets

Objectives	Targets
Mainstream biodiversity into decision-making across all sectors	<ul style="list-style-type: none"> • Shared responsibility for the conservation of biodiversity and the sustainable use of its components by all sectors • Strengthened legislation in support of tackling biodiversity loss in Ireland
Strengthen the knowledge base for conservation, management and sustainable use of biodiversity	<ul style="list-style-type: none"> • Increased knowledge of biodiversity and ecosystem services and substantially advanced ability to ensure conservation, effective management and sustainable use by 2021
Increase awareness and appreciation of biodiversity and ecosystem services	<ul style="list-style-type: none"> • Enhanced appreciation of the value of biodiversity and ecosystem services amongst policy makers, businesses, stakeholders, local communities and the general public.

¹² *National Biodiversity Action Plan*, Department of Culture, Heritage and the Gaeltacht, 2017.

Figure 3.3 National Biodiversity Action Plan – Objectives and Targets

Objectives	Targets
Conserve and restore biodiversity and ecosystem services in the wider countryside	<ul style="list-style-type: none"> • Optimised opportunities under agriculture and rural development, forestry and other relevant policies to benefit biodiversity • Principal pollutant pressures on terrestrial and freshwater biodiversity substantially reduced by 2020 • Optimised benefits for biodiversity in Flood Risk Management Planning and drainage schemes • Control of harmful invasive alien species and reduced risk of introduction and/or spread of new species • Improved enforcement of wildlife law
Conserve and restore biodiversity and ecosystem services in the marine environment	<ul style="list-style-type: none"> • Progress made towards good ecological and environmental status of marine waters over the lifetime of the plan • Fish stock levels maintained or restored to levels that can produce maximum sustainable yield, where possible, no later than 2020
Expand and improve management of protected areas and species	<ul style="list-style-type: none"> • Natura 2000 network designated and under effective conservation management by 2020 • Sufficiency, coherence, connectivity and resilience of the protected areas network substantially enhanced by 2020 • No protected species in worsening status by 2020, and majority of species in or moving towards favourable status by 2021
Strengthen international governance for biodiversity and ecosystem services	<ul style="list-style-type: none"> • Strengthened support for biodiversity and ecosystem services in external assistance • Enhanced contribution to international governance for biodiversity and ecosystem services • Enhanced co-operation with Northern Ireland on common issues • Reduction in the impact of Irish trade on global biodiversity and ecosystem services

National Planning Framework

The National Planning Framework (NPF)¹³, which is part of the over-arching “Project Ireland 2040” strategy published in 2018, is Ireland’s current framework to guide development and investment over the coming years. It is a high-level strategic plan for shaping the future growth and development of the country up to 2040, which

¹³ *Project Ireland 2040: National Planning Framework*, Government of Ireland, 2018.

is intended to guide public and private investment, create and promote opportunities for Irish people, and protect and enhance the environment.

The strategy underlying the framework emphasises mutually complementary development of Ireland's regions, its capital, its other major cities and its rural fabric. The vision for the current national planning framework, meanwhile, is expressed through a shared set of goals for every community across the country, which are described as National Strategic Outcomes (NSOs) as follows:

- *NSO1: Compact Growth* – careful management of the sustainable growth of compact cities, towns and villages to add value and create more attractive places in which people can live and work;
- *NSO2: Enhanced Regional Accessibility* – ensuring that all regions and urban areas in the country have a high degree of accessibility to Dublin, as well as to each other;
- *NSO3: Strengthened Rural Economies and Communities* – harnessing improved connectivity, broadband and rural economic development opportunities alongside traditional natural resource and food sector potential;
- *NSO4: Sustainable Mobility* – including progressive electrification of mobility systems in line with Ireland's climate change mitigation plans;
- *NSO5: A Strong Economy supported by Enterprise, Innovation and Skills* – creating places that can foster enterprise and innovation and attract investment and talent, through regional economic drivers and by supporting opportunities to diversify and strengthen the rural economy;
- *NSO6: High Quality International Connectivity* – investment in our ports and airports in line with sectoral priorities already defined through National Ports Policy and National Aviation Policy;
- *NSO7: Enhanced Amenity and Heritage* – investment in public realm, heritage and amenities to ensure that our cities, towns and villages are attractive and can offer a good quality of life;
- *NSO8: Transition to a Low Carbon and Climate Resilient Society* – investment to meet the objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050;
- *NSO9: Sustainable Management of Water, Waste and other Environmental Resources* – conserving and enhancing the quality of natural and environmental resources that are critical to our environmental and economic well-being; and
- *NSO10: Access to Quality Childcare, Education and Health Services* – enhanced and effective provision of a range of accessible services, facilitated by compact, smart growth in urban areas and strong and stable rural communities.

Strategic investment priorities that are aligned to these outcomes include investment in: housing and sustainable urban development; the national road network; rural development; environmentally sustainable public transport; enterprise, skills and innovation capacity; airports and sea ports; culture, heritage and sport; climate action; water infrastructure; and education, health and childcare. The National Development Plan 2021-30, which is a companion to the NPF, outlines in turn the investment strategy to support the spatial planning framework provided by the NPF and deliver on each of its identified NSOs.

Our Rural Future - Rural Development Policy 2021-25

“Our Rural Future”¹⁴, Ireland’s policy for rural development over the 2021-25 period, was published in 2021. It provides a framework for the development of rural Ireland over five years, which seeks to be forward looking and ambitious, and address both the challenges facing rural areas and the opportunities which rural economies and communities can benefit from in the coming years.

In this regard, its vision for rural Ireland in the future is for *“a thriving rural Ireland, which is integral to our national economic, social, cultural and environmental well-being and development, which is built on the interdependence of urban and rural areas, and which recognises the centrality of people, the importance of vibrant and lived-in rural places, and the potential to create quality jobs and sustain our shared environment”*. To achieve this, it seeks to adopt a more strategic, ambitious, holistic, co-ordinated and multi-sectoral approach to investing in and maximising opportunities for rural areas, which is underpinned by a programme of commitments across Government departments and agencies, and which addresses nine thematic objectives as follows:

- i. optimising the opportunities for rural communities from high-speed broadband;
- ii. supporting improved quality employment and career opportunities in rural areas;
- iii. assisting the regeneration, repopulation and development of rural towns and villages;
- iv. enhancing the participation, leadership and resilience of rural communities;
- v. enhancing public services in rural areas;
- vi. supporting a just transition to a climate neutral economy;
- vii. supporting the sustainability of agriculture, the marine and forestry;
- viii. supporting the sustainability of our island and coastal communities; and
- ix. nurturing our culture and heritage.

Of particular relevance to the CSP are its objectives in supporting (a) the sustainability of agriculture and (b) the transition to a climate neutral economy. In supporting the sustainability of agriculture, in particular, the policy highlights the importance of developing and implementing the CSP for the 2023-27 period, so as to address existing and emerging challenges, including climate action, environmental protection, generational renewal, viable farm incomes and vibrant rural areas. It also advocates the implementation of both the Food Vision 2030 and Ag Climatise strategies, and supports research and development in areas such as agri-food, bio-based systems, smart agriculture and precision agriculture in order to promote and encourage innovation and diversification. In supporting the transition to a climate neutral economy, the policy advocates the maximisation of resources and strengths in the “green economy” to support employment opportunities for rural communities in areas such as the bioeconomy and the circular economy. Furthermore, it supports the implementation of a new LEADER (Liaison Entre Actions de Développement de l'Economie Rurale) Programme in further delivering a community-led approach to rural development that supports communities and enterprises in progressing job creation, social inclusion and environmental projects at local level.

¹⁴ Our Rural Future: Rural Development Policy 2021-2025, Department of Rural and Community Development, March 2021.

4. CSP OVERVIEW

4.1 Introduction

This chapter presents a summary overview of Ireland's draft CSP, based on the proposals as of November 2021. Section 4.2 provides a high-level strategic profile of the plan, while Section 4.3 describes the SWOT analysis and needs assessment. Section 4.4, Section 4.5 and Section 4.6 then discuss thematic elements, conditionality and a range of general provisions. Section 4.7 describes the components of the plan and its financial profile, while Section 4.8 introduces proposed interventions individually. To conclude, Section 4.9 and Section 4.10 briefly describe the plan's performance framework and its provisions concerning modernisation and simplification.

4.2 Strategic Overview

The draft CSP contains a strategic statement which summarises its core features and strategic approach. It summarises its goal as being to “underpin the sustainable development of Ireland's farming and food sector by supporting viable farm incomes and enhancing competitiveness, by strengthening the socio-economic fabric of rural areas, and by contributing to the achievement of environmental and climate objectives at national and EU levels”. The plan incorporates measures of income support (including its redistribution towards smaller farms), rural development, and a “green architecture” comprising enhanced conditionality, a new Eco-Scheme, and wide-ranging Pillar II measures aimed at supporting the environment, biodiversity and sustainable farming. In addition, the programme seeks to support knowledge transfer, generational renewal, and human capital, as well as socio-economic development in rural areas through LEADER.

4.3 SWOT Analysis and Needs Assessment

The preparation of the plan has involved a detailed SWOT analysis, which is summarised in the draft CSP document and is presented in full in a separate document. The SWOT analysis was structured according to the nine EU SOs as well as the CCO, identifying numerous distinct strengths, weaknesses, opportunities and threats in respect of each objective.

The SWOT analysis provided the platform for a detailed needs assessment, which is also summarised in the draft CSP document, and identified sets of priorities, of between two and six key needs, in relation to each objective. These are shown in the following figure.

Figure 4.1 Summary of Needs Assessment

SO1 Support viable farm income and resilience across the Union to enhance food security	SO2 Enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation	SO3 Improve the farmers' position in the value chain	SO4 Contribute to climate change mitigation and adaptation, as well as sustainable energy	SO5 Foster sustainable development and efficient management of natural resources such as water, soil and air	SO6 Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes	SO7 Attract young farmers and facilitate business development in rural areas	SO8 Promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry	SO9 Improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare	CCO Modernise the sector by fostering and sharing of knowledge, innovation and digitalisation in agriculture and rural areas, and encouraging their uptake
<p>N1. Support family farm income and address income disparities between agriculture and other sectors of the economy; and between agri-food systems</p> <p>N2. Support farmers facing natural and other constraints to maintain a viable farm income, maintain the landscape and protect against the abandonment of agricultural land</p> <p>N3. Encourage farm diversification to improve the resilience of the agri-food sector</p> <p>N4. Increase awareness of risk management tools and encourage financial planning to improve resilience</p>	<p>N1. Increase efficiency and competitiveness through on farm investment and the adoption of new technologies</p> <p>N2. Expand and diversify into new markets</p>	<p>N1. Increase primary producers' share in the value chain</p> <p>N2. Develop and promote local markets supporting locally produced food, including organic produce</p>	<p>N1. Reduce Green House Gases (GHG) emissions from agriculture</p> <p>N2. Improve the protection and management of existing carbon stores, including grasslands and peatlands</p> <p>N3. Increase the carbon sequestration potential of Ireland's forests and woodlands</p> <p>N4. Encourage climate adaptation</p> <p>N5. Increase energy efficiencies on farm through the uptake of new technologies and facilitate the production and use of renewable energy sources</p>	<p>N1. Improve air quality through the reduction of air pollutants arising from agriculture, particularly ammonia</p> <p>N2. Protect and improve water quality</p> <p>N3. Improve soil health</p> <p>N4. Increase the number of sustainable farming systems that better utilise and protect natural resources</p>	<p>N1. Restore, maintain and improve Ireland's habitats and landscapes in order to halt biodiversity decline, including farmland birds and pollinators</p> <p>N2. Maximise the contribution of forestry including the planting of native trees in appropriate locations, safeguarding existing biodiverse habitats</p>	<p>N1. Effective mechanism to increase the numbers of young farmers, including through income support, encouraging land mobility and succession planning</p> <p>N2. Support young farmers in accessing finance so they are in a better position to invest in and develop their farm enterprise</p> <p>N3. Provide opportunities and support to businesses and individuals looking to develop rural enterprises</p>	<p>N1. Maximise the opportunities presented by the circular and bio-economy in rural areas</p> <p>N2. Improve infrastructure and access to services in rural areas including broadband</p> <p>N3. Support sustainable community development in rural areas, in particular to address environmental and climate challenges</p> <p>N4. Support the further development of the tourism industry in rural Ireland</p> <p>N5. Improve on farm safety and increase awareness of the importance of farmer well-being</p> <p>N6. Increase opportunities for women in agriculture and business development</p>	<p>N1. Increase the share of Utilisable Agricultural Area (UAA) under Organics</p> <p>N2. Continue improving animal health and welfare standards and increasing awareness of antimicrobial (AMR) and anthelmintic resistance</p> <p>N3. Support the efficient and environmentally responsible use of pesticides and encourage alternative practises</p> <p>N4. Promote the consumption of safe, nutritious, sustainable food, (including organics); and increase consumer awareness in relation to the high animal health and welfare standards</p> <p>N5. Support the assessment of food loss along the food chain</p>	<p>N1. Increase farmers' and advisors' understanding of climate change, air quality, water quality, soil health, animal health and welfare and biodiversity related challenges and opportunities at farm level</p> <p>N2. Review education and training courses and advisory services to reflect new challenges and ambition</p> <p>N3. Ensure consistency of advice across the advisory services by providing for CPD for advisors and for primary producers</p> <p>N4. Continue to provide support for research and innovation in the agri-food sector; and encourage the application of findings at farm level</p>

4.4 Thematic Elements

Green Architecture

The three key components of the Plan's "Green" (environmental and climate) architecture are:

- its system of enhanced "conditionality";
- its Pillar I Eco-Scheme; and
- its Pillar II climate, environment, and animal welfare interventions.

The first of these is described in Section 4.5, while the latter two are described in relevant parts of Section 4.8.

Generational Renewal

The minimum 3% of the direct payments' envelope is to be allocated to Complementary Income Support for Young Farmers (CIS-YF), which seeks to provide additional income support for farmers in younger age cohorts. Further generational renewal supports arise by way of the National Reserve, the Collaborative Farming Grant scheme, and a new Capital Investment Scheme (CIS) intervention which will include specific supports for Young Farmers.

Distribution of Income Support

The plan provides for a new redistributive component within Pillar I income support (Complementary Redistributive Income Support for Sustainability (CRISS), commonly known as "frontloading"). Under this measure, some 10% of Pillar I financial resources are redistributed towards each recipient's first 30 ha, thereby increasing the share of income supports devoted to smaller farms or farms with lower entitlement values.

Risk Management

The plan acknowledges insufficient sectoral risk management components within historical programmes and supports and includes components which address this including those relating to income support, supports aimed at avoiding land abandonment, financial management training, and supports within specific sectors aimed at enhancing producers' successes in fluctuating market conditions.

Animal Welfare

The plan seeks to bring renewed focus on efforts to support animal welfare and reducing antimicrobial resistance, through a suite of measures and requirements both within the conditionality framework, as well as across various livestock interventions relating to sheep, dairy beef, the suckler herd, and elements of the on-farm CIS, as well as through numerous actions supported within the AKIS.

4.5 Conditionality

Detailed proposals are made within the draft CSP concerning the proposed system of conditionality, in response to Articles 11 and 12 of the draft CSP Regulation. These include a framework of implementation proposals concerning GAECs (these are summarised in Annex 1), and an overview of the legislative framework applicable to, and implementation arrangements for, SMRs.

As laid down in the Regulation, the GAECs relate to climate change mitigation and adaption, with requirements which concern permanent grassland, protection of peatland and wetland, and the burning of arable stubble; protection of water courses; nutrient use; soil protection; and biodiversity protection.

SMRs meanwhile address water protection, biodiversity, food safety, animal identification and registration, animal diseases, animal welfare, and plant protection products.

Together the proposals within the CSP define the standards which define the “enhanced conditionality” requirements which will apply in Ireland’s implementation of the CSP.

4.6 General Provisions and Common Elements

The plan also sets out general proposals in relation to over-arching elements, including:

- definitions;
- technical assistance;
- networking;
- co-ordination; and
- eligibility conditions.

4.7 CSP Components and Financial Plan

The draft CSP includes four decoupled and one coupled income support measure, along with two sectoral interventions under Pillar I, as well as a suite of 16 rural development interventions under Pillar II. These are shown in Table 4.1.

Table 4.1 Draft CSP – Structure and Components

Pillar	Intervention Type	Intervention
Pillar I	Decoupled Income Support	Basic Income Support for Sustainability (BISS)
		Complementary Income Support for Young Farmers (CIS-YF)
		Complementary Redistributive Income Support for Sustainability (CRISS)
		Eco-Scheme
	Coupled Direct Payments	Protein Aid
	Sectoral Interventions	Sectoral Intervention for the Apiculture sector
		Sectoral Intervention in the Fruit and Vegetable Sector
Pillar II	Rural Development Supports	Areas of Natural Constraint (ANC)
		Agri-Environment and Climate Measure (AECM)
		Straw Incorporation Measure
		AECM Training
		Organic Farming Scheme (OFS)
		Capital Investment Scheme (CIS)
		Suckler Carbon Efficiency Programme (SCEP)
		SCEP Training
		Early-Stage Support for POs in Certain Sectors
		Continuous Professional Development (CPD) for Advisors
		European Innovation Partnerships (EIPs)
		Knowledge Transfer
		Dairy Beef Welfare Scheme (DBWS)
		Sheep Improvement Scheme (SIS)
		Collaborative Farming Grant
		LEADER

The plan provides for expenditure of €9.83bn over the course of 2023-2027, of which:

- €5.97bn (or 61%) is allocated to Pillar I; and
- €3.93bn (or 39%) is allocated to Pillar II.

Of the Pillar II allocation, some €2.3bn (c.59%) represents national exchequer financing, with the remainder EAFRD funds.

The breakdown of funding across Pillar I is shown in Table 4.2, with the allocations to Basic Income Support for Sustainability (BISS) and Eco-Scheme together accounting for more than 85% of Pillar I financial resources.

Table 4.2 Pillar I Financial Allocations 2023-2027 (€m)¹⁵

	€m	% of Total
BISS	3,642.5	61.00%
Eco-Scheme	1,482.9	24.83%
CRISS	593.1	9.93%
Complementary Income Support for Young Farmers	178.5	2.99%
Sectoral Intervention in the Fruit and Vegetable Sector	39.0	0.65%
Protein Aid	35.0	0.59%
Sectoral Intervention for the Apiculture sector	0.6	0.01%
Total	5,971.6	100.00%

Source: Draft CSP

Proposed financial allocations across Pillar II interventions are shown in Table 4.3.

Table 4.3 Pillar II Financial Allocations 2023-2027 (€m)

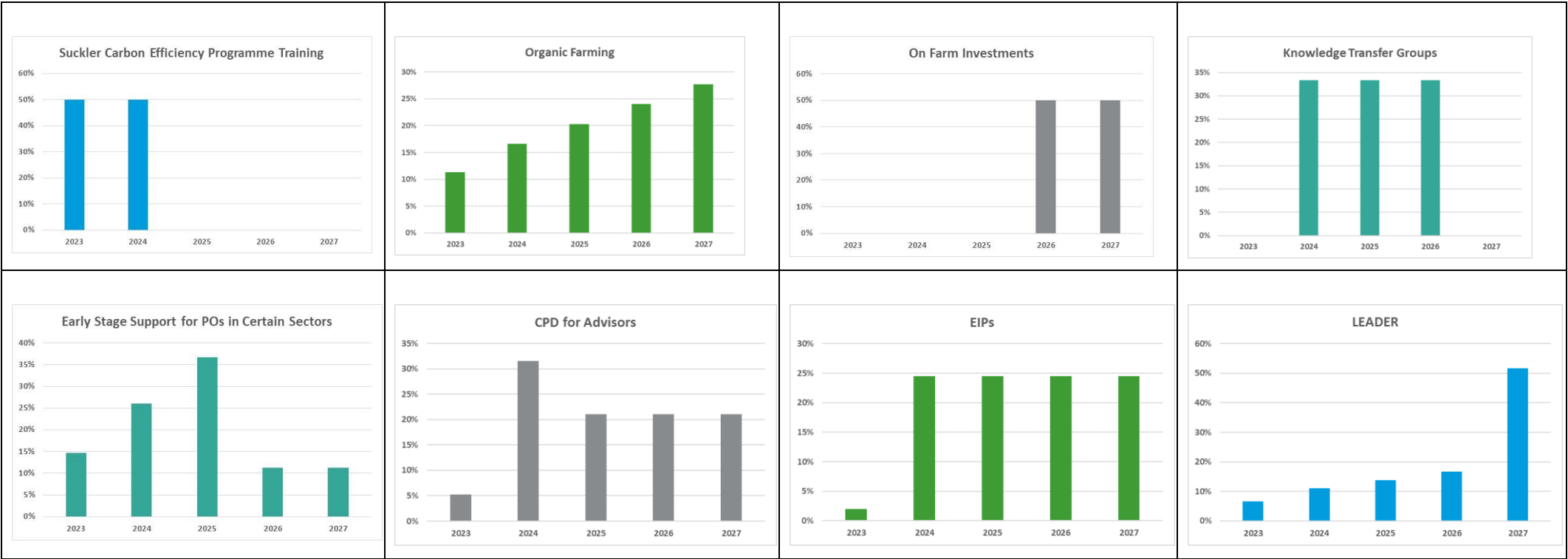
	€m	% of Total
AECM	1,550.0	40.14%
ANC	1,250.0	32.37%
Organic Farming Scheme	256.0	6.63%
Suckler Carbon Efficiency Programme	206.0	5.33%
LEADER	180.0	4.66%
Capital Investment Scheme	100.0	2.59%
SIS	100.0	2.59%
Knowledge Transfer Groups	71.1	1.84%
Straw Incorporation Measure	50.0	1.29%
EIPs	36.1	0.93%
DBWS	25.0	0.65%
AECM Training	21.6	0.56%
Technical Assistance	6.3	0.16%
Suckler Carbon Efficiency Programme Training	4.0	0.10%
Collaborative Farming Grant	2.0	0.05%
CPD for Advisors	1.9	0.05%
Early-Stage Support for POs in Certain Sectors	1.5	0.04%
Total	3,861.6	100.00%

Source: Draft CSP

Under Pillar I annual expenditure is expected to be consistent each year at a level of €1.194bn, with no interventions seeing annual variation. Under Pillar II eight of the proposed interventions are expected to have consistent annual levels of expenditure, while the other eight are expected to have varied expenditure profiles year on year. The profile of annual expenditure anticipated under the latter interventions is shown in Figure 4.2.

¹⁵ Some very minor adjustment to this profile may take place following receipt of this data by the evaluators.

Figure 4.2 Anticipated Expenditure Profile for Interventions with Annual Variation



Source: Draft CSP

4.8 Overview of Interventions

The following table introduces each of the interventions proposed in the draft CSP.

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
Pillar I Interventions	
BISS	<p>Agriculture policy in the form of the CAP has been one of the cornerstones of EU policy since its foundation, and direct income support to farmers has been a centrepiece of the CAP from the outset. In the new 2023-27 period, basic income supports in the form of the BISS will also continue to be the single largest element of CAP funding.</p> <p>Under the new Irish draft CSP four of the seven Interventions under Pillar I involve uncoupled direct payments to farmers, namely the BISS, CIS-YF, CRISS and the Eco-Scheme. Together these four interventions account for most budgeted spending under Pillar I (98.7%), for nearly 80% of all EU funding in the CSP, and for 60% combined EU and National co-financing in the Plan.</p> <p>The BISS is the largest of these direct payment Interventions, accounting for some 61% of Pillar I, and 37% of the CSP investment (EU and national funds). The scheme is the successor to the Basic Payment Scheme in the 2014-2020 period, and in budgetary terms is by far the largest CSP Intervention.</p> <p>As summarised in the draft Plan, eligible beneficiaries are required to:</p> <ul style="list-style-type: none">• submit a BISS application each year via the online application system, declaring their land located within the jurisdiction of Ireland;• meet the minimum requirements to receive a direct payment as per Article 15 (a) of the CSP Regulation. In this regard, support under BISS is not granted for amounts lower than €100;• meet the definition of an “active farmer”;• hold one BISS payment entitlement for each eligible hectare claimed. <p>BISS beneficiaries can be individual farmers, joint ventures or companies.</p> <p>Eligible beneficiaries must also comply with conditionality requirements.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
CRISS	<p>Alongside the BISS, the CRISS is also a decoupled direct payment scheme. This is a new intervention for Ireland and is mandatory in the new CSP planning period. In the current period (2015-22) a similar redistributive element was present in the Regulation but was optional and was only adopted by a minority of Member States.</p> <p>The intervention contributes to SO 1(a), namely supporting viable farm income and resilience. As agreed under the political agreement, it constitutes 10% of the direct payments as a whole.</p> <p>The focus on redistribution of CAP of direct payments, already present in the current Regulation, springs from concern at EU level at the concentration of payments among a relatively small number of large farmers across the Member States. A commonly cited metric is that “80% of the funds go to 20% of the farmers”. This is because across the EU the share of EU payments is closely associated with the distribution pattern of agricultural land ownership. In Ireland some 56% of funds go to the largest 20% of farmers.</p> <p>The CRISS is part of the response to the twin concerns at EU level about both the high absolute level of CAP payments to some beneficiaries, and the frequent concentration of CAP payments among a relatively small numbers of farmers. These concerns have led to increased focus, in the current and upcoming periods, on both “capping” of overall payment levels and “convergence” of payment levels towards the average level per farmer. The CRISS is therefore designed to redistribute CAP Pillar I basic payments away from larger farmers and in favour of medium and smaller ones. The basic, rather general, premise behind the measure is that support through CAP should go to “those who need it the most, or those who are contributing most” to the CAP objectives, and that redistribution of funds from larger farms to small and medium sized farms aids this objective.</p> <p>Support is provided per hectare to eligible farms up to a maximum of 30 ha, in accordance with Article 26 of the CSP Regulation. Member States could set a maximum threshold, not less than 30 ha. Following extensive modelling of various parameters and options, DAFM decided on 30 ha maximum so as to benefit the majority of farmers i.e., approximately 75% of farmers will benefit financially at this threshold. Farmers below the 30ha threshold receive payments for 100% of their holding.</p>
CIS-YF	<p>There is an <i>a priori</i> case for intergenerational change in agriculture and agri-business, as in any other sector. Schemes to encourage and assist this have long been a feature of CAP-funded support schemes, most recently the Young Farmer Scheme (YFS) introduced during the 2014-20 Pillar II RDP.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>This focus on young farmers has continued in the new CAP period. One of the nine SOs of the 2021-27 Regulation is to “attract young farmers and facilitate business development in rural areas.”. Regulation Article 27.2 goes on to stipulate that a minimum of 2% of the Pillar I budget must be devoted to the topic. The Plan allocates 3% devoted exclusively to the young farmers, in the form of complementary income support to young farmers setting up for the first time. In financial terms this amounts to an estimated €174.9m over the plan period. This makes the CIS-YF the smallest of the direct payment schemes, but still larger than Pillar I sectoral schemes and most Pillar II schemes.</p> <p>Under the scheme young farmers (defined as below age 40) who are setting up as head of the holding (whether for the first time or having done so in the previous five years) can receive support. They must have completed a recognised agricultural course, at Level 5 on the National Framework of Qualifications (NFQ), and be entitled to a payment under the BISS. Payments of €178 per ha are payable, up to a maximum of 50 ha.</p> <p>The scheme is a successor of the 2015-20 YFS, and current beneficiaries of that scheme will continue to receive support under this one for the remainder of their eligibility period.</p>
Eco-Scheme	<p>Alongside enhanced conditionality and the environment/climate interventions in Pillar II, the Pillar I Eco-Scheme is one of the key components of the new Green Architecture in the 2023-27 CAP period. It is also a significant innovation in the proactive use of direct payments in support of the green agenda. It is obligatory for Member States under the Regulation which stipulates that at least 25% of the Pillar I budget be allocated to it. In principle this could be reduced to 18% if additional environmental investment was undertaken in Pillar II but the Plan has not adopted this approach.</p> <p>With a predicted budget of €1.4b over the Plan period, it is the second largest intervention in Pillar I and the third largest in the Irish CSP as a whole (after BISS and AECM). All farmers (singularly or in groups) who are eligible for basic payments under the BISS will be automatically eligible to also participate in the Scheme, but participation is voluntary. DAFM’s aim is to operate it as an attractive mass-participation option involving all or most farmers. When applying for their annual BISS, farmers will have to opt in or out of the Scheme for the year ahead. In Ireland this will be a single Eco-Scheme, with a menu of eight pre-defined “Agricultural Practices” in which they can participate:</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<ul style="list-style-type: none"> i. Non-productive areas and landscape features (based on GAECs) ii. Extensive Livestock Production (low stocking rate, not no stock) iii. Limiting Chemical Nitrogen Usage iv. Planting of Native Trees v. Use of GPS controlled spreaders to apply chemical fertilisers vi. Soil sampling and Appropriate Liming vii. Enhanced Crop Diversification viii. Planting of Multi-Species Sward. <p>These are all known and proven environmental practices, and already practiced on some farms.</p> <p>Farmers participating in the Eco-Scheme must undertake activities in at least two of the Practices in any year. These can vary year by year. The practice areas are in effect “sub-schemes” each with its own defined objectives, environmental targets, activity requirements, costings and targeted farming groups.</p> <p>Fundamental to the Scheme is the requirement that actions undertaken by farmers under the eight areas must go beyond the basic conditionality and legislative requirements for direct payments under BISS. Participating farmers will, for the relevant Practice Area, need to meet the existing GAEC requirement at a predefined higher level than for basic payments under the BISS. These additional requirements are therefore typically clearly specified in terms of higher metrics levels than for BISS. Farmers who meet the requirements will receive an estimated average payment of €74 per ha of eligible land.</p> <p>The scheme is essentially an optional annual top-up of BISS payments in exchange for environmental effort above the minimum BISS compliance requirements. It reflects a view that a lot of farmers making some changes may achieve more than a small number making large-scale changes as under a conventional grant scheme.</p>
Protein Aid	<p>This intervention is a successor to the Voluntary Coupled Support Scheme for Protein Crops, which was implemented in the 2015-2020 period. It provides direct financial support for Irish farmers growing eligible protein crops, i.e., peas, beans, lupins, soya and mixed cropping (protein/cereal mix), in line with Article 30 of the CSP Regulation.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>Direct financial support to farmers under the scheme is intended to give greater certainty to growers of protein crops in the face of sectoral difficulties and challenges, thus aiding the competitiveness, sustainability and quality of the sector, as intended by Article 29 of the CSP Regulation. In addition, development of the sector also offers the potential to confer certain sustainability and environmental advantages that accrue from the production of protein crops.</p> <p>Eligible beneficiaries are required to submit a BISS application, declaring the areas in which they are planting eligible crops. Direct financial support for farmers is to be provided each year on a per hectare basis, with a maximum unit amount of €500 per hectare payable for protein crops and a maximum unit amount of €250 per hectare payable for mixed cropping, or 50% of the full protein crop rate. Minimum unit amounts per hectare that will be payable in a given year will be €300 for protein crops and €150 for mixed crops.</p>
Fruit and Vegetable Producer Organisations	<p>This intervention continues the work of an existing measure, funded under the CAP during the 2015-20 period, which supports Producer Organisations (POs) in the fruit and vegetable sector. POs have been a key delivery mechanism for EU support for the fruit and vegetable sector since the mid-1990s, and this intervention is mandatory for all EU member states under the draft CSP Regulation. The intervention is intended to provide support to groups of fruit and vegetable producers (excluding producers of potatoes) that wish to be recognised as a PO. In order to qualify for support, such POs must:</p> <ul style="list-style-type: none"> • have more than five members; • produce fruit and vegetables (excluding potatoes) worth a combined value of marketed production (VMP) of at least €2.5 mn; and • fulfil all EU legislative requirements for producers. <p>Both existing and newly recognised POs may submit a 5-7 year Operational Programme (OP), which will describe the interventions that they will action to achieve their selected objectives. In line with the requirements of the CSP Regulation, such OPs will therefore typically include actions to improve joint marketing and promotion of product among fruit and vegetable producers, improve product quality, increase market orientation, increase producer competitiveness, encourage R&D and innovation and address environmental aspects of fruit and vegetable production, including climate change mitigation/adaptation.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	Financial support to POs is to be provided up to a maximum of 4.1% of VMP (or 5% for transnational POs), at a maximum EU co-funded rate of 50% (or 60% in certain circumstances), which means the maximum total budget for supported OPs (including both EU funding and matched funding) is equivalent to 8.2% of VMP (or 10% for transnational POs). Also, at least 15% of aid must be used to address environmental or climate change mitigation/adaptation measures, while at least 2% of aid must be used to promote R&D and innovation.
Apiculture	<p>This intervention is a successor to previous National Apiculture Programmes, which have provided funding with EU support between 2016 and 2019 and during the current 2020-22 period. Also, unlike in previous periods, this intervention is now mandatory for all EU Member States under the draft CSP Regulation.</p> <p>These programmes have provided support to research institutions to engage in research actions and associated activities, which support needs and objectives for the development of the apiculture sector in Ireland, but in particular the need to address the high levels of over-winter bee colony losses experienced by the sector. Previous programmes have focused on: testing treatments to combat the impact of disease, e.g. varroasis¹⁶, within the bee population in Ireland; testing management techniques to control the level of disease within the bee population; technical assistance to beekeepers and beekeeper organisations in Ireland through dissemination of information/training on good practice, e.g. with respect to general bee husbandry, colony management, bee breeding, queen rearing, nutrition; and international collaboration with specialised bodies in applied research projects in the sector, e.g. COLOSS¹⁷.</p> <p>The new five-year programme will incorporate:</p> <ul style="list-style-type: none"> • funding for a national surveillance programme that tests the prevalence of selected bee diseases and pests in Ireland; • appointment of a part-time advisor to communicate research results within the sector and contribute to/support educational programmes for the beekeeping sector; and • further co-operation with specialised bodies in applied research programmes in beekeeping and apiculture. <p>All research institutions that can demonstrate the necessary research capabilities, including universities, Institutes of Technology, Teagasc or DAFM's own laboratories will be eligible to submit proposals for funding under the new National Apiculture Programme.</p>

¹⁶ Varroasis is an infestation of honeybees with the varroa mite. It is a parasite that weakens a bee's immune system, leading to loss of bee colonies if not properly treated.

¹⁷ COLOSS is an international, non-profit association that is focused on improving the well-being of bees at a global level.

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>Proposals for funding will be required to specify a detailed scientific programme of work that is based on the aims of the national programme, and they will be expected to have a strong emphasis on the dissemination of findings to beekeepers and the wider scientific community, while preference will also be given to programmes involving inter-institutional collaboration that develops a critical mass of research capacity.</p> <p>Funding is to be awarded for a single contract, following an open competition. However, and in line with previous programmes, individual beekeepers will not be eligible for funding under the new National Apiculture Programme.</p>
Pillar II Interventions	
ANC	<p>The Areas of Natural Constraint (ANC) Scheme is a direct successor to the existing ANC scheme under the 2014-2020 RDP, which itself succeeded previous similar schemes over previous funding periods. It is included under Article 66 of the draft CSP Regulation. The scheme provides financial support to farmers operating in land designated as disadvantaged, and seeks to compensate them for the additional costs or income foregone which arises for them by so doing.</p> <p>All farmers operating on land within such designated areas will continue to be eligible for the ANC supports. The specific criteria for eligibility are:</p> <ul style="list-style-type: none"> • applicants must meet the definition of a “genuine / active farmer”; • they must occupy and farm a minimum of 3ha of forage and arable land situated in a designated area; and • they must have a holding with a minimum stocking level of 0.15 livestock units (LUs) per ha. <p>Areas so designated are categorised into four groups tiered according to their degree of constraint or disadvantage, and payments are calculated across these as follows:</p> <ul style="list-style-type: none"> • Category 1 Land - €148 per ha. on the first 12 eligible ha. and €112 on remaining ha up to a maximum of 34 ha. • €148 per ha. on the first 12 eligible ha. and €112 on remaining ha up to a maximum of 30 ha. • €93 per ha. on the first 8 eligible ha. and €88.25 on remaining ha up to a maximum of 30 ha. <p>There is also a distinct payment available to farmers operating on offshore islands.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	Eligible farmers will be able to apply for ANC as part of their application for basic income support payments under Pillar I.
AECM	<p>The AECM was developed to address several climate, environmental and biodiversity challenges that were identified as part of the CSP's SWOT analysis and needs assessment.</p> <p>The AECM has two options that farmers can use:</p> <ul style="list-style-type: none"> • A General Option (Menu A) is available nationally and is split into 3 tiers. Tier 1 is for actions undertaken on identified priority areas, such as sensitive landscapes and high-status watercourses. Tier 2 is for actions undertaken on farms with high stocking rates, on certain types of arable land, or near vulnerable water sources. Tier 3 is a general suite of actions offered to all farms. • A Co-operation Project Option (Menu B), which is available to farmers in defined high priority geographical areas, who can opt to undertake measures in the general option, as well as bespoke farm, landscape, and catchment measures. Farmers participating in this option can use Local Cooperation Project (CP) Teams. The Cooperation option will contain a higher ambition tier (1) and a lower ambition tier (2). Tier 1 will incorporate elements of previous programmes and will contain options prioritised for certain areas or catchments. Tier 2 will be options from the General option of the AECM. <p>The intervention also offers non-productive investments available in both options (General and Cooperation), such as support for hedgerows and tree planting. This will help to achieve the agri-environment and climate objectives and in enhancing the environmental value of the areas where such investments are supported.</p> <p>Both options have different eligibility criteria. For the General Option, the beneficiaries will be active farmers and the scheme will be open nationwide to all categories of active farmer. Participating farmers will be required to address priority assets (such as critical sources of water or priority habitats) on their farms. These are the basic actions for entry into the scheme. To qualify for higher payments farmers must have land with higher environmental priorities. All farmers participating in the AECM General option must comply with several scheme conditions, namely:</p> <p>An approved agricultural advisor must prepare the AECM application to ensure that the most suitable and appropriate actions for the farm are selected.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<ul style="list-style-type: none"> • A Farm Sustainability Plan must form part of the AECM application to improve the targeting of measures and see more appropriate actions taken. • Attendance at the AECM training course is mandatory in the first year of participation. • The farmer must keep required records. (It is not specified in the draft intervention what these records are or what form they will take). <p>For the Cooperation Option, the beneficiaries will be active farmers and the scheme will be open to applications from farmers in High Priority areas. The draft intervention estimates that there will be 36,000 participants who will be eligible to apply for the intervention.</p> <p>For the Cooperation Option, the eligibility conditions in the General option still apply, with some differences:</p> <p>The Cooperation teams will oversee the preparation of the farm plan by advisors trained by the CP teams, including all appropriate actions and costings and made available to potential participants and advisors.</p> <ul style="list-style-type: none"> • The CP team will design a bespoke Farm Sustainability Plan (FSP) based on the Cooperation Project action plan, which must be adopted by the farmer. • Bespoke training which is tailored to local needs may also be offered by CP Teams on an ongoing basis. This will be important when dealing with fragile landscapes such as peatlands and other wetlands; and when learning appropriate methods of nest protection, seasonal grazing or managing fires. <p>For non-productive investments, the beneficiaries are eligible farmers who intend to take actions that require non-productive investments in their overall AECM plans. Non-productive investments must:</p> <ul style="list-style-type: none"> • Be linked to the achievement of agri-environment climate objectives • Not lead to a significant increase in the value or profitability of the agricultural holding • Be located on the farm • Support for investments is conditional on the participation of the beneficiary in a related agri-climate management commitment

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>The AECM General is a structured ‘package’ which offers an average payment per applicant of €5,000 per full calendar year. While a fixed rate is payable for most of the actions, a variable rate will apply to four actions, namely, Commonage, Low-Input Grassland, Sustainable Grazing Pasture and Protection of Rare Breeds. The Cooperation Option is a hybrid delivery model that intends to offer both fixed and result-based payments to participating farmers. A higher proportion of payments will be results-based using score cards specifically designed for the land types and regions involved. The average payment for the Cooperation Option will be €7,000 per full calendar year.</p> <p>Access to the scheme is determined through a ranking and selection process, where priority access will be provided to organic farmers, farmers with priority assets and farmers who agreed to undertake specific priority actions. In total, it is expected that 50,000 farmers will take part in the intervention. For the Cooperation option, it is expected that there will be 20,000 participants.</p> <p>The AECM bears similarities to the Green, Low-Carbon, Agri-Environment Scheme (GLAS) and GLAS+, the OFS and Locally led targeted Agri-Environment Schemes that were in the RDP 2014 – 2020. The new AECM is described in the CSP as more environmentally ambitious, more targeted, specific, and innovative than the previous intervention under the 2014-2020 RDP. Specific differences are set out in the CSP, including environmental enhancement of existing measures and the introduction of new measures; with the intervention being reorientated from species specific actions towards actions which seek to establish and enhance habitat quality. Changes have been made based on the comprehensive review of GLAS undertaken by ADAS on behalf of DAFM. Prescriptions for existing actions have been improved based on experience and new advice, while low impact actions have been removed. New actions have also been introduced based on learnings from GLAS and European Innovation Partnerships (EIPs) from across the country.</p> <p>The AECM General will shift from a prescription-based scheme to a hybrid-based scheme combining prescription-based measures and results-based measures.</p> <p>The results-based approach has been piloted in the Results-Based Environment Agri Pilot Programme (REAP). This has seen 3,748 participants and has resulted in over 400 planners receiving training in the results-based scorecard system. It provides a strong base on which to build for the AECM, particularly given general feedback from farmers was deemed to have been positive. DAFM officials did suggest that some farmers may be put off by the judgement nature of scoring, with suggestions that scores could depend on how</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>assessors walked round the farm or on what day they came. However, there was confidence that with more experience being developed, farmers would come to trust the scoring process.</p> <p>The AECM will build on the success of innovative practices introduced, piloted, and trialled by the Burren Programme¹⁸ and EIP-Agri. Particular targeted attention will be paid to several topics including management of commonages, conservation of selected endangered bird species, management of peatlands, farmland habitat conservation, and preservation of cultural and landscape assets.</p>
AECM Training	<p>The AECM training intervention is designed to increase farmers' and advisors' understanding of climate change, air quality, water quality, soil health, and biodiversity challenges at the farm level. The objectives of the training are to:</p> <ul style="list-style-type: none"> • Increase farmers understanding of climate change, the impact of farming activities on natural resources, and the protection of biodiversity at the farm level. • Outline how the actions undertaken as part of the AECM intervention will address these challenges. • Educate farmers on how to appropriately implement the actions of the AECM, therefore equipping them with the necessary knowledge to complete the actions that they will have committed to as part of the intervention. <p>Two training courses will be provided, a mandatory course that must be undertaken by all farmers in the AECM intervention, and a voluntary course that will take place in the third year of the intervention. To be eligible farmers must have been approved for participation in AECM.</p> <p>Training providers must be registered professional advisors with DAFM. This entails</p> <ul style="list-style-type: none"> • Having been approved for participation in the AECM, whilst providers must be registered professional advisors with DAFM. • Having received the specific training for AECM delivered by DAFM for advisors. • Having been registered with the FAS.

¹⁸ See [Burren Programme – Farming for Conservation](#)

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Intervention	Overview
	<p>Participants in the AECM are required to undertake the mandatory training course as soon as possible after entry into the AECM General or AECM Cooperation but no later than the end of the first calendar year following their approval into the scheme. The voluntary training can be undertaken in the third year of participation of the course and covers ongoing management. The intervention provides a total amount payable per attendee at the training courses of €246, comprising of €90 per attendee to the trainer and €156 for the farmer in respect to his/her costs for attendance at the training.</p> <p>The intervention is comprised of several key operating parameters. As intake onto the AECM General and the AECM Co-operation will be on a phased basis, this will be reflected in the AECM training. The numbers of participants in the mandatory training course will be determined by the intake level in each tranche. Training courses will be delivered at various locations in order to facilitate greater ease of access for participants.</p>
Straw Incorporation Measure	<p>The Straw Incorporation Measure is proposed to provide supports and incentives for tillage farmers to enhance their contribution to climate and environmental objectives of the CSP and the CAP through more sensitive treatment of the straw by-product of cereal crops. All tillage farmers which meet the definition of an active farmer will be eligible to participate. Such farmers can identify the extent of their production of eligible crops, which include wheat, oats, barley, rye and oilseed rape, they must chop the resulting straw and re-incorporate it within the soil, which acts to increase soil organic carbon levels, increase soil health, and sequester carbon.</p> <p>Financial supports will be provided based on standard payment rates per hectare, which vary for different cereal crops.</p> <p>The scheme will build from a pilot project taking place during the transition period, which is currently underway (and the lessons of which are not yet known).</p>
Capital Investment Scheme	<p>The On-Farm CIS will be a demand led intervention providing capital grants to farmers to invest in capital projects on their farms. The scheme will be implemented utilising a tranche-based system, operating in rolling tranches with ranking and selection included. This will be similar to the Targeted Agricultural Modernisation Scheme (TAMS, also known as TAMS II in the 2014-2020 RDP), with grants awarded to cover a percentage of the cost of investment. The TAMS II schemes have been built on and simplified into one overall scheme within the CSP.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>Grant aid will be provided for environmental investments, animal welfare, nutrient storage, tillage farmers, dairy farmers, young farmers, women farmers, organics, and farm safety. Support rates will vary depending on the type of project and whether the applicant qualifies for a higher aid rate. Investment will be prioritised according to four different grant rates as follows:</p> <ul style="list-style-type: none"> • General on Farm Investments – Support under this category will include animal welfare, nutrient storage, and tillage and dairy farming. The grant rate will be 40% for general investments. • Young Farmers and Women Farmers – A higher grant rate of 60% will be offered to support young farmers and increase generational renewal. This aims to help overcome the high costs associated with capital investment which has been identified as a major barrier to young farmers entering the agricultural sector. The same higher rate of aid intensity (60%) will be available to female farmers, with the aim of encouraging more women into farming and promoting gender equality within the sector. • Organic Farmers/Health and Safety Equipment/Investments delivering specific environmental benefits - Aid for participants from the organic sector, farm safety investments, and any specific investments that provide a clear environmental benefit will all have a higher grant rate of 50% applied. • Low Emission Slurry Spreading (LESS) Equipment – Support will be provided to encourage investment in specialised LESS equipment. This technology has environmental benefits through reducing ammonia emissions and improving biodiversity conditions. A 50% grant rate is proposed for LESS spreading attachments and a 40% grant rate for mobile tanker and the umbilical pump, reel and pipes. The overall investment ceiling applied to other strands of support will also not apply to this equipment, to further encourage its purchase. <p>To be eligible for support from the CIS, all applicants must:</p> <ul style="list-style-type: none"> • Apply online. • Be registered as an active Farmer. • Be aged eighteen years or over on date of submission of the application for support. • Hold an active herd number/ flock/tillage or department identifier.

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Intervention	Overview
	<ul style="list-style-type: none"> • Have declared a minimum of five ha of “eligible land” owned and/or leased or rented, which have been declared under the BISS (BISS) in the year of application or preceding year, or in the case of intensive enterprises, generate a minimum of 20 production units from farming. • Comply with scheme requirements on planning permission and tax clearance. <p>There are also additional eligibility criteria for some of the different grant rates:</p> <p>Young Farmers and Female Farmers:</p> <ul style="list-style-type: none"> • Must meet the conditions for being 'head of the holding'. • Must meet the requirements for the appropriate training and/or skills required. • Young farmers must be no more than 40 years of age at any time during the calendar year in which s/he, (i) first submits an application under Pillar I measures or (ii) submits an application under Pillar II measures. • It is expected that women farmers will need to fall within the age range 40 years to 50/55 at any time during the calendar year in which she submits an application, under Pillar II measures. <p>Certified Organic Farmers:</p> <ul style="list-style-type: none"> • Horticulture producers must have a minimum farmed area of 1 ha owned and/or leased, which has been declared under the BISS in the year of application or preceding year. • LESS Equipment: • Must comply with the relevant legislation, which will exclude certain applicants from applying. For example, those stocked at greater than 170kg organic N/ha. <p>Animal housing or nutrient storage facilities:</p> <ul style="list-style-type: none"> • Must comply at the time of application with nutrient storage requirements as required under Good Agricultural Practice for Protection of Waters legislation.

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
Organic Farming Scheme	<p>The OFS (OFS) aims to build on the progress made in the development of the organic sector in the previous programming period, and in line with the Government target of 7.5% of the Utilised Agricultural Area (UAA) to be farmed organically. The overarching objective of the Scheme is to deliver enhanced environmental and animal welfare benefits and to encourage producers to respond to the market demand for organically produced food.</p> <p>The intervention is designed to provide support to farmers wishing to convert from conventional farming systems to organic farming systems; as well as to support its continuation after the initial period of conversion (a maximum period of two years). To qualify for support, participants must meet the following conditions.</p> <ul style="list-style-type: none"> • Requirement of minimum farm area of 3 ha, except for horticultural (including fruit) producers where the minimum farm area is 1 ha. • Registration with one of the Organic Control Bodies, possession of a valid organic licence and registration with DAFM. • Completion of an Approved Training Course in Organic Farming. • Be an active farmer, aged 18 years or over. • Declare all land farmed in the applicant's name on the Integrated Administration and Control System (IACS). <p>The OFS will open in tranches for applications on an annual basis throughout the CSP programming period. Those who meet the requirements may apply for funding under the scheme and will be offered payments for the conversion to organic farming and for the associated maintenance costs. These organic farmers will then be required to prioritise soil health on organic land, meet growing demand for organic produce, and adhere to organic legislative requirements pertaining to animal housing, feed, veterinary treatments, and so on.</p> <p>Like the previous OFS, the OFS will provide support to farmers in the form of an annual area-based payment. The financial support will be distributed over a maximum contract period of 5 years with increased payment per hectare and some targeted incentives aimed at areas that are deemed to be in deficit including horticulture, dairy, and tillage. This rate is comprised of:</p> <ul style="list-style-type: none"> • A higher payment for farmers converting land to organic farming for the first time payable for the initial maximum two-year conversion period; and

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<ul style="list-style-type: none"> • A maintenance payment thereafter.
European Innovation Partnerships	<p>This intervention will continue the work of the EIP delivered under the 2014-2020 RDP. It will support a range of actors in the sector to enable them to collaborate and form Operational Groups (OG) that will develop and test innovative solutions. EIPs were a new feature of the 2014-2020 RDP and, according to the mid-term evaluation of the previous programme, took a number of years to become fully functional and where results would only become observable from 2019 onwards. Despite this, the report suggested that the same approach should be continued in the next programme period which has likely prompted its inclusion in the upcoming RDP.</p> <p>The intervention is intended to provide support to EIP Operational Groups to prepare and implement EIP operations. To qualify for support:</p> <ul style="list-style-type: none"> • projects must be structured around a competitive process and based on identified themes; • successful projects must form an Operational Group; and • operational groups must be formed according to article 71(2) which involves cooperation between at least two entities which contributes to achieving the SOs set out in Article 6. <p>Project teams will be recruited using one of the following approaches:</p> <ol style="list-style-type: none"> a Direct recruitment will occur when there is a clearly defined priority theme. DAFM will roll out a competitive tender to directly recruit a project team who will help refine the objectives and methodologies for local or regionally based schemes. b Competitive calls involving the establishment of a competitive fund to select a number of collaborative-based and innovative projects on foot of agreed themes or challenges identified by the Operational Groups themselves. <p>Operational groups must submit project plans that address challenges linked to the SOs and that align to the themes of Stream A or Stream B below:</p> <ul style="list-style-type: none"> • Stream A: EIPs aimed at addressing wider competitiveness, modernisation and animal health and welfare challenges in the sector. • Stream B: EIPs aimed at addressing areas related to environmental, biodiversity and climate change challenges.

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>According to the competitive call approach, projects will be selected by an expert evaluation committee via a three-phase selection process. Firstly ideas/proposals will be submitted and evaluated by the committee, although this phase can be excluded depending on scope and timelines. Following success in Phase 1, support will then be provided to facilitate the development of a detailed operational group plan and if successful, applicants will move into the implementation stage of the project.</p> <p>Financial support will be available at Phase 2 of the call for proposals process for the development of detailed Operational Group Plans. For both Stream A and Stream B, it is expected that the funding for the development of these Plans would not exceed €10,000. Support will also be available at Phase 3 of the call for proposals process to enable the full implementation of the detailed Operational Group Plans with amounts dependent on the outcome of the various calls for proposals implemented.</p>
Knowledge Transfer	<p>This intervention is a successor to the Knowledge Transfer Groups scheme, which was funded as part of the 2014-20 RDP. It is intended to provide targeted knowledge and skills to farmers, drawing on the experience of professional agricultural advisors, while also allowing for shared learning between farmers.</p> <p>Knowledge and skills transfer is to be provided through funding on a three-year basis for Knowledge Transfer Groups, which will be established by agricultural advisors (facilitators), and which will typically include about 15 farmers in each group. Unlike the previous scheme, however, groups will not be organised on a sub-sector basis. Instead, groups will be able to form according to local needs, while also ensuring that activities include content that is clearly targeted at key challenges and issues facing the agriculture sector more generally. Each group will therefore be required to deliver four sessions per annum from a list of “priority topics” for knowledge transfer, which is to be updated annually, plus another four sessions per annum that can be delivered on topics identified within the groups.</p> <p>Advisors/facilitators that have a minimum educational qualification at Level 8 on the NFQ, or another specified qualification that is deemed eligible by the Department, will be eligible to apply to form a Knowledge Transfer Group. While eligibility criteria have not yet been set for participating farmers, it is anticipated that each participant will be required to have an identifier as a farmer, e.g., poultry number, herd number, equine number, flock number.</p> <p>In terms of funding, advisors/facilitators are to be paid €500 per annum for three years for every farmer that participates in a Knowledge Transfer Group and completes each year of the intervention. Participating farmers, in turn, are to be paid €750 per annum upon</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>completion of each year of the intervention. In return, farmers will be required to attend eight group meetings in each year of the scheme, plus three one-to-one meetings with their advisor/facilitator, at the beginning, middle and end of the intervention, in order to set out goals for the intervention and report on progress in relation to these goals.</p>
CPD for Advisors	<p>The proposed Continuous Professional Development (CPD) for Advisors intervention builds from a similar measure under the 2014-20 RDP, but with a wider scope of activity. DAFM operates the Farm Advisory Service (FAS) in accordance with the requirements of Article 12 of Regulation (EU) No.1306/2013, and maintains a register of approved advisors available to farmers. To be approved, agricultural advisors have the following minimal educational qualifications:</p> <ul style="list-style-type: none"> • a primary degree qualification at level 8 on the NFQ in Agricultural Science, and • as part of the Level 8 Degree, to have taken soil science and an animal or crop production subject. <p>Approved advisors must also participate in FAS Training – a set of short training sessions held each March tailored closely to the requirements of farmers in participating in existing programmes and schemes. Under the 2014-20 RDP the CPD for Advisors intervention supported delivery of a further programme of training, focused on the Knowledge Transfer programme.</p> <p>For the 2023-2027 CSP, the CPD for Advisors intervention is intended as a further extension of the current scheme, widening its focus to other high priority themes in relevant contemporary agricultural advisory work.</p> <p>The training is to be delivered following a tender process to appoint appropriate training providers, and while not yet certain, it is likely that participation will be mandatory for approved advisors, at least for those advising in respect of Pillar II interventions. The programme will fund the costs of the training delivered.</p>
Suckler Carbon Efficiency Programme	<p>The Suckler Carbon Efficiency Programme (SCEP) is a scheme designed to support the beef sector with a continued focus on increasing competitiveness through measures that aim to improve both economic and environmental sustainability. The design is drawn from two previous programmes, the Beef Data and Genomics Programme (BDGP) (of which this scheme is a successor) and the Beef Environmental Efficiency Programme – Sucklers (BEEP-S). These programmes demonstrated the benefits of improving the suckler herd's genetic make-up, which lead to increased efficiencies and lowered Greenhouse Gas (GHG) emissions.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>The previous delivery phase identified that amongst some beef farmers there was a very low uptake of breeding technology and best practice that could contribute to greater efficiency at the farm level. The BDGP supported the introduction of innovative practices in the suckler herd, which helped to address environmental aims around GHG reduction and underpin greater efficiency and competitiveness in the sector. Monitoring conducted during the BDGP indicated that genetic improvements in the suckler herd contributed to reducing the intensity of GHG Emissions from the suckler herd. These genetic benefits were found to be permanent, and the programme implemented data tracking practices to support the improvement of the herds genetic make-up over time. DAFM officials reported that learnings from previous programmes include the need to improve the usefulness of data recorded by participants. Therefore, this scheme requires farmers to report on their carbon footprint.</p> <p>The 5-year scheme is intended to provide support to active farmers with a suckler herd. The intervention will consist of four mandatory actions. To be eligible an applicant must adhere to the following conditions.</p> <ul style="list-style-type: none"> • Have submitted a BISS (BISS) application in a reference year and continue to submit BISS applications on which all their lands are declared for the duration of the Suckler Carbon Efficiency Scheme. • Have beef breed animals born annually in the herd in each year of the scheme. • Be a member of the 'Bord Bia Sustainable Beef and Lamb Assurance Scheme' (SBLAS) at the time of application and retain this status for the duration of their participation in the Scheme. <p>Participants will have to complete four mandatory actions within each year of the Scheme. These mandatory actions include ensuring a replacement strategy is in place, genotyping, weighing and data recording.</p> <p>Participants will also be required to attend training in each of the first two years of the scheme. The training will cover how each action is to be undertaken and a module on handling livestock.</p> <p>The scheme will prevent a participant from increasing their Suckler Cow numbers over the course of the contract, unless exceptional cases are approved by the Department. A historical reference year will be used to determine the baseline number of herd animals. Farmers can reduce the number of Suckler Cows below the reference number.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>The financial support available will be provided on a per hectare basis. €225 will be available per hectare for the first 15 ha, and €180 per remaining eligible hectare.</p>
Dairy Beef Welfare Scheme	<p>The overall goal of the Dairy Beef Welfare Scheme (DBWS) is to contribute to improved animal health and wellbeing, particularly of dairy beef animals. It aims to do so by helping farmers monitor beef liveweight. It is the first support measure which provides targeted support for the dairy beef sector. Liveweight is a key indicator of beef health, failing to reach target liveweights at different ages can indicate underlying health and welfare issues. This intervention therefore focuses on providing farmers with financial incentives for each dairy beef calf that is weighed in its first year, up to a maximum of 40 animals per farmer. Each weighed animal will be supported with a payment of €20. The total budget is €25m. This scheme operates as a one year rolling contract under Article 70 of the EU (CSP) Regulation.</p> <p>There is an existing, exchequer funded Dairy Beef Calf Programme which runs for 2021 and 2022, with a budget of €5m for 2021. It also supports farmers who weigh dairy beef calves at the same financial support levels per calf, but for a minimum of 5 and a maximum of 20 animals per applicant. This draft intervention will continue the Dairy Beef Calf Programme support beyond 2022.</p> <p>The 2014-2020 RDP included a “Targeted Animal Health and Welfare Advisory Service” intervention. This intervention addressed animal diseases that had the potential to reduce farm competitiveness and access of farm products in overseas markets. Its objective was to support national animal health priorities, as articulated in Food Harvest 2020, by the provision of targeted animal health and welfare advice.</p> <p>The Targeted Animal Health and Welfare Service intervention was distinct from the current proposal in that it focused on advice by veterinarians and training whereas the current proposed measure focuses on providing funding for calf weighing. A clear difference between the DBWS and the Targeted Animal Health and Welfare Advisory Service is that the former focuses on dairy beef whereas the latter also included advice for poultry and pigs.</p> <p>There is also a concurrent BEEP-S initiative which ran in 2020 and also runs in 2021. It is a €40m Irish government programme which includes a calf weighing measure similar to this draft intervention, alongside two optional further actions (vaccination/meal feeding or faecal egg testing).</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>To be eligible for the DBWS, farmers must keep dairy cows for production, rear, or purchase calves born from dairy cows for beef production. Applicants must also:</p> <ul style="list-style-type: none"> • Submit a BISS application on which all their lands are declared for the duration of the DBWS; and • Be a member of the Bord Bia SBLAS, and/or the Bord Bia Sustainable Dairy Assurance Scheme as appropriate, at time of application and retain this status for the duration of their participation in the scheme. <p>Provision will be made for new entrants subject to budgetary availability.</p>
Sheep Improvement Scheme	<p>The Sheep Improvement Scheme (SIS) aims to improve the welfare of sheep through a suite of actions that target farmers with lowland or hill flocks. By supporting the welfare of sheep, the intervention relates to the overall objective of improving animal health and wellbeing under Article 6(i): improve the response of EU agriculture to societal demands on food and health, including safe and nutritious food produced in a sustainable way, food waste, as well as animal welfare.</p> <p>Participating farmers must choose actions from two categories - A and B. They must choose one action from each category. Depending on the type of flock – either lowland or hill – the actions in each category have minor differences although most actions apply to both types of flock.</p> <p>A range of actions are proposed, e.g., lameness control, mineral supplementation ewes post mating, meal feeding lambs post weaning, parasite control, scanning and recording of results, flystrike control, genotyped ram.</p> <p>All farmers must choose genotyped ram for at least one year, which means that all farmers are required to buy at least one such ram. Where farmers have over 150 ewes, they must complete the genotyped ram action twice. Payments amount to €12 per eligible ewe or €120 per LU per year, with a total available budget of €100m for the duration of the intervention (2023-2027).</p> <p>The SIS will build on the Sheep Welfare Scheme (SWS) in the 2014-2020 RDP. All actions in the SIS were available under the SWS. In addition, the draft intervention requires farmers to buy a genotyped ram in at least one year. This final requirement is "to reduce instances of scrapie by selecting for scrapie resistance". The SWS paid €10 per breeding ewe or €66.66 per LU per year, and like the draft intervention, required farmers to complete two actions to qualify for payment as well as maintaining appropriate records. The SWS also categorised actions into those for lowland and those for hill flocks.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>SI's ongoing sheep breed improvement programme includes genotyping which has shown that the least Scrapie resistant genotypes are still prevalent among the sheep population in Ireland. Including the genotyped ram action in the SIS is designed to reduce the prevalence of these low resistance genotypes.</p> <p>To be eligible for the SIS, applicants:</p> <ul style="list-style-type: none"> • Must have a flock number, have breeding ewes on their holding for the duration of each scheme year, and have declared breeding ewes on their 2022 Sheep Census return. • The maximum number of ewes eligible for payment will be the average of the number of ewes in a specified historic reference period • Payment in a given year will be based on the lower of this maximum reference number or the latest Sheep Census figures returned • Will be required to submit a completed Sheep Census return by the specified date for each year of participation in the SIS.
Early-Stage Support for POs in Certain Sectors	<p>Early-Stage Support for POs in Certain Sectors aims to support the establishment of 45 new POs covering the beef, sheep, tillage, potato, amenity, and fruit and vegetable sectors. It runs from 2023 to 2027. The intervention provides annual support payments to new POs to facilitate their establishment and help set up and run administrative functions. The total allocation for the intervention is €1.5m. Payments to each individual PO are available for three years:</p> <ul style="list-style-type: none"> • Year 1 - €3,000 support for advisory costs, €10,000 in administrative function support. • Year 2 - €10,000 in administrative function support. • Year 3 - €10,000 in administrative function support. <p>The total maximum support available for each recognised PO is €33,000.</p> <p>Three POs exist in the beef sector. The EU Common Market Organisation (CMO) regulation (13/08/2013) sets out how a PO must be set up, what its activities should be, and its reporting requirements. Feedback from the beef sector highlighted that farmers need more support to meet the reporting requirements once a PO is established. Therefore, this intervention includes both set up support for advisory costs and administrative support payments.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>Beef and Sheep sector eligibility conditions</p> <p>In order to be eligible an applicant must: -</p> <ul style="list-style-type: none"> • be set up on the initiative of producers and be led by producers; • have a minimum of 20 members; • be registered as a legal entity with the Companies Registration Office. <p>Fruit and Vegetable, amenity and potato sector eligibility conditions</p> <p>In order to be eligible an applicant must: -</p> <ul style="list-style-type: none"> • be set up on the initiative of producers and led by producers; • have more than five members; • have a combined VMP of more than €2.5 million; • fulfil all EU legislative and national requirements including being registered as a legal entity with the Companies Registration Office. <p>Tillage sector eligibility conditions</p> <p>In order to be eligible an applicant must: -</p> <ul style="list-style-type: none"> • be set up on the initiative of producers and led by producers; • have more than five members; • have a combined VMP of more than €2 million; • fulfil all EU legislative and national requirements including being registered as a legal entity with the Companies Registration Office. <p>A predecessor is in place as part of the previous RDP. This previous intervention, however, only provided support for the establishment of POs in the beef sector. This intervention provided €3,000 for facilitators to support the establishment of POs in the sector.</p> <p>Through regular engagement with DAFM, sheep, tillage, fruit and vegetable and amenity sector stakeholders have expressed an interest in support to establish POs in their sector. Stakeholders fed back to DAFM that enhanced support for administrative functions</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>is necessary so that PO's can be set up and firmly established, which is why the current draft PO intervention introduces annual €10,000 payments to support administrative functions.</p> <p>There are currently producer groups in both the sheep and the beef sector which can be turned into production organisations. Therefore, this early-stage support for POs intervention aims to support the establishment of 45 new such POs (in addition to the three that exist in the Beef sector and the four that exist in the Fruit and Vegetable sector).</p> <p>In addition to the previous RDP intervention, the government's Food Wise 2025 strategy set out a ten-year plan for the agri-food sector. Its goal was to support <i>"a sector that acts more strategically and achieves a competitive critical mass in the international marketplace while targeting more quality conscious consumers"</i>. One of the recommendations of Food Wise 2025 was the development of POs in the beef and the horticulture sectors, which the RDP and the current draft intervention provide.</p> <p>A similar PO intervention exists for the fruit and vegetable sector. The fruit and vegetable PO intervention provides funding to POs who formulate 5–7-year Operational Plans. In doing so, that intervention aims to strengthen the organisational capacity of the fruit and vegetable sector, and thereby increase its share of the supply chain.</p>
Collaborative Farming Grant	<p>The Collaborative Farming Grant scheme is a further iteration of the counterpart scheme within the current RDP, and intended to provide financial support that will encourage farmers to form partnerships. It provides a parallel complementary support for older farmers to access a similar type of financial support to encourage succession planning and facilitate generational renewal.</p> <p>The grant aims at covering part of the professional costs, such as legal, advisory and financial services costs, of participants.</p> <p>Participants who form partnerships will experience several benefits, including:</p> <ul style="list-style-type: none"> • Improving the scale and efficiency within primary agricultural production by encouraging the consolidation of blocks of land held and operated by farmers not within the same family. • Encouraging new skills and specialisation in primary production through enhanced educational qualifications of partners and knowledge sharing. • Improving the age structure of Irish agriculture by supporting arrangements between younger and older farmers with higher scores assigned in the ranking and selection criteria.

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>The scheme has two measures:</p> <ol style="list-style-type: none"> 1. Financial support towards the professional costs incurred during the establishment of a Registered Farm Partnership. This scheme will contribute 50% of such vouched costs, up to a maximum payment of €1,500 per beneficiary. 2. Financial support towards the professional costs for older farmers, which would assist farmers in navigating a pathway to retirement. This scheme will contribute 50% of such vouched costs, to a maximum payment of €1,500 per beneficiary. <p>To be eligible for support, all Registered Farm Partnership arrangements must be newly formed arrangements being entered on the Department's Register of Farm Partnerships for the first time. Eligibility for the older farmer measure will be determined with reference to Article 71 (7) which suggests that Member States are to grant support to farmers at retirement age or those that will reach it by the end of the operation as determined by the Member State.</p> <p>Payment priority is based on ranking and selection criteria. Ranking is based on the type of farm, partnerships involving separate holdings, a partner having an agriculture qualification and the age of partners. Partnerships involving a younger farmer (under 40) and an older farmer (over 60) are particularly favoured as a means to encourage generational renewal.</p>
LEADER	<p>This intervention builds on the work of the existing LEADER programme, funded under the CAP during the 2014-2020 period, whereby support is provided to Local Action Groups (LAGs) to implement pre-defined Local Development Strategies (LDSs) in their local areas. LEADER was first introduced in the 1990s and has become an integral part of the EU's Rural Development policy. This intervention is now a mandatory component of rural development programming for all EU member states.</p> <p>The intervention is designed to support a Community-led Local Development (CLLD) approach to rural development. It supports the economic and social development of rural areas, by providing the resources necessary for communities to support their own development and create capacity at local level. To qualify for each type of support highlighted in bold below, the following conditions must be met.</p> <p>LEADER Implementation of operations under the CLLD:</p> <ul style="list-style-type: none"> • operations must contribute to achieving the aims and objectives of the LDS; and

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<ul style="list-style-type: none"> correspond to the objectives and priorities indicated for support in the CSP. <p>Preparation and implementation of co-operation activities of the LAG:</p> <ul style="list-style-type: none"> a concrete project must be envisaged; must comply with criteria for selection of co-operation projects from operating rules for the programme; and the need to support this kind of intervention must be identified in the LDS. <p>Support with running costs and animation:</p> <ul style="list-style-type: none"> costs must be linked to the management of the implementation of the strategy (operating costs, personnel costs, training costs linked to communication, financial costs, monitoring and evaluation costs); or costs must be linked to the animation of the CLLD strategy (Costs incurred while facilitating the exchange between stakeholders, to provide information, promote the strategy and to support potential beneficiaries to develop projects and prepare applications). <p>Local community development committees (LCDC), current local development companies (LDC) and any other groupings that wish to be considered for delivery of LEADER may propose LDSs that align with LEADERs three high level indicative themes, which are:</p> <ol style="list-style-type: none"> Economic Development and Job Creation. Rural Infrastructure and Social Inclusion. Sustainable Development of Rural Environment and Climate Change Mitigation. <p>The Local Development Strategies will be selected by an Independent Selection Committee via a two-stage selection process. Stage one is an Expression of Interest (EOI) stage involving an open call. LAGs that have achieved LAG designation in stage one, will begin the developmental phase. More comprehensive project details including governance within the LAG and management systems to support the delivery of the LDS will be required. A distinguishing feature of LEADER is that community groups are free to apply at all times during the funding period as there is no application closing date, instead applications are accepted until the project funds have been exhausted.</p>

Table 4.4 Draft CSP Interventions – Background and Overview

Intervention	Overview
	<p>Financial support to 'LEADER implementation of operations under the CLLD strategy' and for the 'preparation and implementation of cooperation activities' will be based on the strategic role these operations play in their LDS. Rates will also be in line with the aid intensity rates provided in the legal framework and relevant State Aid limitations. Support for 'running costs and animation' shall not exceed 25% of the total public expenditure incurred within the LDS and will be supported at a rate of 100%. Further detail on specific aid intensity rates available for the particular types of projects will be clarified in the detailed operating rules that accompany the LEADER elements of the CSP.</p>

4.9 Performance Framework

The draft CSP establishes and incorporates a system of output and result indicators with annual targets and milestones for the years 2023-2027. These correspond to the EU-wide framework of performance indicators set out in Annex I of the draft CSP Regulation. No targets for impact indicators have yet been determined. The output and result indicators relate to and are structured in alignment with the EU SOs, and will be monitored and reported on annually within the requirements of the performance management articles of the Regulation, (in particular Article 121). Output and result targets and indicators are addressed in relation to specific interventions in subsequent chapters of the report.

4.10 Modernisation and Simplification

Finally, the draft CSP provides a detailed overview of the national AKIS, the status of initiatives to digitalise agriculture and promote innovation and research, the organisations and roles they play, and the suite of interventions the draft CSP provides for in relation to the modernisation of the sector and its interaction with research, innovation and knowledge.

5. SWOT AND NEEDS ANALYSIS

5.1 Introduction

This chapter assesses the SWOT and needs assessment undertaken as part of the CSP preparation. It begins by recapping their role and objectives as set out in the CSP Regulation, as well as the aspects which require assessment in the Ex-Ante Evaluation. This is done in Section 5.2. Section 5.3 summarises the approach taken by DAFM in preparing the SWOT and needs assessment, the outputs and documents generated, their role in the subsequent CSP preparation process, and the overall evaluation findings in this regard. Section 5.4 presents our findings regarding the SWOT and needs assessment as they relate to the individual interventions within the draft CSP. Finally, Section 5.5 summarises our overall findings regarding both documents as a whole.

5.2 Role and Objectives

The CSP Regulation requires that Member States prepare CSPs which set targets, define interventions, and allocate financial resources “in line with the SOs and identified needs”¹⁹. Article 96 sets out the requirements of the needs assessment, which must include

- a summary of the SWOT analysis;
- identification of needs for each EU SO based on the evidence from the SWOT analysis;
- for the SO of supporting viable farm income and resilience, an assessment of needs in relation to risk management;
- where applicable, an analysis of the specific needs of vulnerable geographical areas, such as the outermost regions; and
- prioritisation and ranking of needs, including a sound justification of the choices made and if relevant, why certain identified needs are not addressed or partially addressed in the CSP.

Article 103 describes the requirements of the SWOT analysis, as follows:

“The SWOT analysis shall be based on the current situation of the area covered by the CSP and shall comprise, for each SO set out in Article 6(1), a comprehensive overall description of the current situation of the area covered by the CSP, based on common context indicators and other quantitative and qualitative up-to-date information such as studies, past evaluation reports, sectoral analysis and lessons learned from previous experiences”.

It also requires that strengths, weaknesses, opportunities, and threats are identified in the CSP in relation to each general and SO.

As noted in Chapter 3, Article 125 requires that Ex-Ante Evaluations appraise, *inter alia*, “the contribution of the CSP to the CAP SOs, taking into account national and regional needs and potential for development as well as lessons drawn from implementation of the CAP in previous programming periods”. The evaluation

¹⁹ Article 1

must therefore consider how needs have been assessed and taken account of, which in turn requires an appraisal of the SWOT analysis and how it has informed the needs assessment.

5.3 Approach and Content

DAFM commenced the preparation of the SWOT analysis at a very early stage (in late 2018/early 2019) and carried this work up to and into 2020, engaging in a range of public consultations which considered or were specifically oriented to the development of the SWOT. An extensive analysis emerged from this process and continued to be updated and refined as required until late 2021 (the current phase of CSP preparation). The latest version of this (draft) SWOT analysis takes the form of a 300+ page document structured according to the 9 SOs as well as the CCO, and comprising a detailed and sequential assessment of strengths, weaknesses, opportunities and threats in respect of each of the nine objectives.

DAFM has also prepared a detailed needs assessment document intended for inclusion within the draft CSP, as well as an assessment of supports outside the CAP. The Assessment takes the form of a document which identifies and describes a number of priority needs as relevant to each of the nine SOs, the CCO, and needs “relevant to all objectives”. As with the SWOT analysis, the needs assessment has also been the subject of extensive consultation with stakeholders.

The interrelated processes involved in developing both the SWOT and needs assessment have therefore involved scrupulous compliance with the requirements of the Regulation, extensive and detailed research and analysis by DFAM and its partners, close consultation with stakeholders, and prudent use of relevant experience from the current and earlier funding rounds. This has resulted in production of two very extensive, clear and comprehensive planning documents.


5.4 SWOT and Needs Analysis - Basis for Interventions

Overall Observations

The new CSP will involve some 23 individual interventions, 7 under Pillar I and 17 under Pillar II. In each case, and irrespective of scale, these must reflect the EU-level objectives for the new period, both general and specific, they must comply with eligibility in the new period in terms of type of funding and specific uses, they must be able to show tangible results as defined in the Regulation, and they must reflect Ireland’s specific context and needs.

In this context the SWOT and needs assessment play a central planning role. In essence the selected interventions must be “triangulated” against three critical and inter-related reference points: the EU Regulation with particular reference to its general and SOs, the SWOT analysis which must be noted or addressed, and the investment needs on which the interventions must focus.

We have therefore systemically examined each proposed intervention in regard to the evidence that the interventions reflect EU objectives, relate to the results of the SWOT analysis, and respond to identified investment needs. We summarise the results in the sections below. Our overall assessment is that individual interventions do meet this standard. While in some cases they might have been articulated better, i.e., by



more clearly relating the descriptions of all interventions in the CSP to the SWOT analysis and needs assessment, these are at most editorial lapses which need not detract from the quality and consistency of the CSP as a whole. An additional weakness in the SWOT is a dearth of explicit use of DAFM's own monitoring data, e.g., regarding predecessor schemes that operated during the 2014-20 period, to draw lessons from the previous programming period so as to inform future priorities.

Observations on Interventions

Table 5.1 sets out evaluation findings regarding the SWOT and needs assessment as they relate to individual interventions.

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
Pillar I Interventions	
BISS	<p>The basic case for the BISS reflects the core CAP premise that EU food security necessitates a viable primary producer sector, and this sector would not be viable in the absence of direct income supports. The needs assessment relates to and supports this logic in the Irish context. It points out that, notwithstanding high levels of productivity, people working in this sector have low-income levels in compared to other sectors of the economy. The draft CSP text also points out that “<i>the average entrepreneurial income in Ireland was 39.2% of the national average income in 2019 (based on € per hour worked).</i>” As a result of low-income levels, farm households rely heavily on Direct Payments and off-farm income sources to remain viable.</p> <p>The SWOT further noted that average income levels differ significantly across agricultural systems. Dairy farms have the highest average income; and livestock farmers (beef and sheep) earn the lowest. The gap in income between farming and other sectors of the economy; as well as the difference in income levels across farming systems “present challenges in relation to ensuring the resilience of the agri-food sector.” In addition, low-income levels act as a deterrent to new entrants and young farmers considering a career in agriculture, which impacts the overall sustainability of the agri-food sector. (This is also supportive of CIS-YF below).</p>
CRISS	<p>While the new Regulation puts considerable emphasis on “redistribution” of direct payments in favour of smaller and medium-sized farmers, this is not one of its nine SOs. The supportive text is contained in other parts of the Regulation, and treats redistribution more as an operating principle than as an objective per se. Reflecting this, the Needs Analysis, and the underlying SWOT, which are both structured around the SOs, do not deal extensively with the underlying imbalances this redistribution is designed to address.</p> <p>The SWOT analysis does nevertheless establish that Direct Payments as a whole are a vital source of income for all farmers across the agri-food sector, and notes that these payments are of particular importance to small and medium sized farms. Without direct support, these small-medium farms may not be viable, and this could lead to the abandonment of agricultural land which would damage the rural economy and the future viability of the agri-food sector. This could in turn lead to serious environmental abandonment and degradation.</p>
CIS-YF	<p>The needs assessment section of the draft CSP groups the needs around the Regulation’s nine SOs. It and the underlying SWOT analysis point to weaknesses and threats that arise from Irish farming’s high age profile. Citing the 2019 Teagasc National Farm Survey</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>(NFS) Sustainability Report, it points out that the percentage of all farms with a high age-profile rose from 25% in 2010 to 32% in 2019 (on a three-year rolling average). According to the SWOT analysis for the CSP, the number of young farmers (under 35) declined from 8,700 (6% of all farmers) in 2010 to 7,400 (5% of all farmers) in 2016.</p> <p>The Needs Analysis also acknowledged the challenges, faced by Ireland and the rest of the EU, in addressing the overall decline in young farmer numbers and an ageing farming population. It notes that young farm managers and young farmers in general account for an extremely low proportion of total farmers. The SWOT found that young farmers face difficulties accessing land and finance and are deterred from starting a career in agriculture due to these issues and due to lower incomes in agricultural than in other sectors of the economy. As a result, the analysis concluded that <i>“the future viability and sustainability of the agri-food sector is at risk and therefore, it is necessary to create an attractive and sustainable work environment for young farmers where they are provided with the necessary supports to begin a career in farming.”</i></p>
Eco Scheme	<p>The Scheme is designed to address three of the SOs under the Regulation, contained in Article 6.1. These respectively relate to: climate change mitigation and adoption; sustainable development and efficient management of natural resources (including water, soil and air) and reducing chemical dependency; and contributing to halting and reversing biodiversity loss, enhancing ecosystem services and preserving habitats and landscapes. In regard to these three objectives, and based on the evidence presented in the SWOT, the Plan identifies a series of relevant needs to which the Scheme will be directed.</p> <p>In relation to climate change mitigation and adoption, the needs identified and evidenced for the agriculture sector are to:</p> <ul style="list-style-type: none"> • reduce GHG (GHG) emissions from agriculture (the sector produces the largest share of GHG, mainly from livestock and fertiliser) • improve the protection and management of carbon stores, including grasslands and peatlands (changes in land use and forestry including drainage is a net source of emissions) • increase the carbon sequestration of forests and woodlands • implement measures to improve climate adaption • increased on-farm energy efficiency including use of renewable energy. <p>In relation to fostering sustainable development and efficient management of national resources, needs identified are:</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<ul style="list-style-type: none"> • improve air quality through the reduction of air pollutants from agriculture • protect and improve water quality • improve soil health • increase the number of sustainable farming systems that better utilise and protect natural resources. <p>In relation to contributing to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes identified needs are to:</p> <ul style="list-style-type: none"> • restore, maintain and improve Ireland’s habitats and landscapes in order to halt biodiversity decline, including farmland birds and pollinators • maximise the contribution of forestry including the planting of native trees in appropriate locations, safeguarding existing biodiverse habitats. <p>The evidence base for needs addressed by the scheme is thus clear and strongly related to EU objectives.</p>
Protein Aid	<p>The intervention template for the scheme clearly outlines some of the key issues that underpin its rationale, including issues raised in the SWOT analysis and needs assessment.</p> <p>The description of the intervention provides evidence to suggest that current economic returns from the sector are uncompetitive (when compared to returns for native grown cereals and when compared to protein imports), especially given that production levels fluctuate on a year-to-year basis due to factors such as susceptibility to adverse weather conditions. In addition, the SWOT analysis highlights key strengths and weaknesses, alongside related opportunities and threats, such as:</p> <ul style="list-style-type: none"> • Ireland’s heavy reliance on imports of high protein feed materials, of which there is a substantial deficit nationally, and the potential role that increased domestic protein crop production might play in addressing this; • ancillary sustainability and environmental advantages that arise from protein crop production, such as its use as a “break crop” in tillage crop rotations, its contribution to the security of animal food production, and its contribution to “nitrogen fixing” and reducing the use of chemical nitrogen fertilisers; and

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<ul style="list-style-type: none"> strong demand for protein crops within the EU, based on forecasts for growth up to 2030, and the opportunity to benefit from this. <p>The intervention strategy attributes a role for the scheme in helping to address several needs identified in the needs assessment, including: the need to encourage farm diversification to improve the resilience of the agri-food sector (by sustaining current production and encouraging further production of protein crops as a farm activity); and the needs to reduce GHG emissions, improve air and water quality, and improve soil health (through the nitrogen fixing and break crop advantages that accrue from increased protein crop production). The evidence base for the intervention, therefore, is well presented and clearly articulated.</p>
Fruit and Vegetable Producer Organisations	<p>The SWOT analysis for the CSP outlines a number of strengths, weaknesses, opportunities and threats that support the evidence base for the intervention.</p> <p>In terms of strengths, the SWOT analysis highlights the existence of already well-established POs in the fruit and vegetable sector, and PO members' relatively high share of total Irish fruit and vegetable production (71%, based on 2017 data, higher than the EU average of 48%)²⁰. In addition, it also points to the horticulture sector as being one of the most carbon efficient in Irish agriculture, and the progress made in some fruit and vegetable sub-sectors (such as mushrooms, tomatoes, soft fruit) in promoting the use of biomass as an energy source and in promoting decarbonisation.</p> <p>At the same time, however, the SWOT analysis also suggests that the small number of existing POs in the fruit and vegetable sector (4) is a weakness, as is the sector's high reliance on the UK export market (with an estimated 94% of Irish horticulture exports being destined for the UK market in 2020). The sector is described as being overly reliant on the use of peat for soil improvement/composting, while limited investment in R&D and innovation in the sector is highlighted as a further weakness.</p> <p>Threats to the sector, as highlighted in the SWOT analysis, include threats to cost, price structure and competitiveness arising from Brexit's potential impact on the nature of the trading environment with the UK, especially given the sector's high reliance on exports to the UK, plus threats posed by labour shortages in the horticulture sector and its perceived over-reliance on non-domestic, seasonal employment. Opportunities identified for the sector, on the other hand, include a perceived potential opportunity to increase fruit and</p>

²⁰ PO share of total VMP was actually 76% in 2015, before falling to 71% in 2017 and 64% in 2019. However, this 2019 share was still significantly higher than the EU average for the same year, which was 46%, though PO share of VMP continued to fall in 2020 and 2021, which was partly related to the impact of Brexit on PO membership. See https://agridata.ec.europa.eu/extensions/DashboardIndicators/AddingValue.html?select=EU27_FLAG.1.

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>vegetable production in Ireland (and thereby reduce Ireland’s level of imports of fruit and vegetables), the potential growth of the organic food sector in Ireland, and the potential to increase the number of POs in the sector so as to improve farmers’ position in the value chain.</p> <p>The SWOT analysis therefore provides a reasonably clear basis to underpin the need for the intervention, and the measures proposed would be expected to contribute to addressing some of the needs identified in the CSP, such as the need to improve farm resilience, the need to increase primary producers’ share in the value chain, the need to expand and diversify into new markets, or the need to reduce emissions/encourage climate adaptation. However, little of this is explicitly referenced in the Plan’s description of the intervention.</p>
Apiculture	<p>The SWOT analysis for the CSP clearly states both a perceived weakness and threat posed by the historical and continuing decline in pollinator species in Ireland. These are described as having experienced substantial decline since the 1980s, with about 30% of bee species in the country being considered to be threatened with extinction. This threat is attributed to habitat loss, fragmentation and degradation, whereby the availability of food plants and nesting sites has been drastically reduced. This has resulted from:</p> <ul style="list-style-type: none"> a) increased adoption of intensive farmland, forestry and urban/industrial uses; and b) a decline in the availability of wildflowers (and thus nectar and pollen) due to increased use of fertilisers on agricultural land. <p>This weakness/threat relates to the EU SO to “<i>contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes</i>” (SO6), while the CSP aligns the Sectoral Intervention for the Apiculture Sector with the identified need to “<i>restore, maintain and improve Ireland’s habitats and landscapes in order to halt biodiversity decline, including farmland birds and pollinators</i>”.</p> <p>However, the description of the intervention, as per its intervention template, makes limited reference to the wider SWOT analysis, while more comment on sectoral strengths, weaknesses, opportunities and threats from an economic rather than an environmental perspective would also have been useful. For example, the SWOT analysis cites a possible strength (though it is not highlighted as such) in the 41% increase in beekeepers recorded between 2016 and 2019 (up to nearly 4,500) and the 26% increase in bee colonies (up to more than 27,000), which suggests strong interest in the sector. Also, further brief comment on the prevailing structure and trends</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	in the sector might have been warranted to better explain the need for the intervention from an economic perspective ²¹ , e.g. the strong recent interest in the sector and strong consumer demand for the product; predominance of small scale and part-time operators/producers, and the relative inexperience of many operators; susceptibility to variable weather conditions, and its impact on output; fluctuation in the sector's output levels on a yearly basis; and the impact of colony losses.
Pillar II Interventions	
ANC	<p>The SWOT and needs assessment provide a strong basis for the inclusion of the ANC scheme in the CSP. With respect to SO1 (supporting viable farm incomes and resilience), the SWOT identifies low incomes in the sector, varying degrees of farm viability, and a high reliance on direct payments across different farming systems, all as weaknesses within Irish agriculture. In particular, it notes the very high levels of family farm income represented by direct payment, on cattle-rearing, cattle-other, and sheep farms, many of which are on land designated as disadvantaged or with natural constraints. It also notes the opportunity of incentivising the provision of ecosystem services, including high nature value (HNV) farming, which occurs most prominently on land with natural constraints, e.g., mountainous areas or areas where intensive farming is not possible.</p> <p>The needs assessment identified that supporting farmers who face natural and other constraints to maintain a viable farm income, also maintains the landscape and protects against the abandonment of agricultural land, and should be a priority need. It noted that 75% of the UAA were situated in ANC in 2019, the 7th highest of the EU-27 countries.</p>
AECM	<p>The intervention text identifies several weaknesses and threats that the measure seeks to address but is lacking a similar view of the relevant strengths and opportunities. These weakness and threats are:</p> <ul style="list-style-type: none"> • agriculture's contribution to GHG emissions; • carbon sink/emission source potential of soils; • increasing ammonia emissions; • the unfavourable or declining status of the majority of Ireland's designated habitats and landscapes;

²¹ See, for example, the description of the sector that was provided in the National Apiculture Programme for the 2020-22 period, which is available at https://ec.europa.eu/info/food-farming-fisheries/animals-and-animal-products/animal-products/honey/national-apiculture-programmes_en

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<ul style="list-style-type: none"> • lack of forest area under protection for preservation of biodiversity and safeguarding landscapes and specific natural elements; and • lack of climate adaptation measures. <p>From this list, it is evident that the intervention clearly relates to the various needs that will be addressed by the actions proposed. For example, Obj4. N1 Reduce Green House Gases (GHG) emissions from Agriculture, which is linked to several Actions such as Planting trees, Hedgerow Rejuvenation Coppicing and Low Input Peat Grassland and meets the weakness of the large contribution of the agriculture sector to GHG emissions. Additionally, Obj5.N1 Improve air quality through the reduction of air pollutants arising from agriculture, particularly ammonia, is clearly linked to corresponding actions such as Tree Belt for Ammonia Capture at farmyard, addressing the issues of increasing ammonia emissions.</p> <p>Apart from the Cooperation Option, each of the draft intervention documents follows a similar pattern in stating the challenges to be addressed, the Options that the intervention provides farmers and then how these Options and associated Actions will address the identified need.</p> <p>Strengths and opportunities within the SWOT that are relevant, but not explicitly noted by the draft intervention include: a significant national cover of hedgerows and trees, which is built upon by offering support for further planting of trees; and a high percentage of land under agri-environment-climate commitments, which this intervention can also further build upon. Similarly, the SWOT notes that opportunities exist to increase afforestation and agroforestry – and as noted, this intervention includes support for planting trees. Furthermore, soil management and soil fertility are noted as an opportunity in the SWOT analysis which the draft intervention can and does exploit.</p>
AECM Training	<p>The SWOT analysis notes a number of environmental, climate, and biodiversity related challenges that could be addressed by means of an agri-environmental climate measure.</p> <p>This training intervention will accordingly meet the need to ‘increase farmers’ and advisors’ understanding of climate change, air quality, water quality, soil health and biodiversity related challenges and opportunities at farm level’ [ObjAKIS.N1].</p> <p>The draft intervention does not specifically reference its evidence basis in the SWOT and needs assessment, as this has already been laid out in the wider AECM intervention document.</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>While the evidence basis in the draft intervention itself is not strong. However, this is because the intervention is closely linked to the wider AECM (see above) and acknowledges that it is designed to educate farmers on how to implement the actions of the AECM. Furthermore, in the CSP intervention is aligned to many of the needs and objectives that are also relevant to the AECM.</p> <p>The mandatory courses are designed to include an introduction to the elements of the AECM and related elements, an overview of the various environmental challenges to be addressed, how the AECM will address these challenges and the regulatory basis of the AECM. This will allow participants to meet the relevant needs of the AECM intervention.</p>
Straw Incorporation Measure	<p>The SWOT analysis identifies numerous sources of evidence as to the benefits of the Irish system of agriculture for the sequestration of carbon in soil. In respect of SO4 (contribute to climate change mitigation and adaptation, as well as sustainable energy), the SWOT highlights that Ireland has the highest mean organic carbon of arable land per kg in Europe, which plays a key role in maintaining soil functionality, water and air quality, and carbon sequestration. The SWOT pointed to increasing the carbon sequestration and storage potential of the land-use sector as a key task identified within the Ag Climatise roadmap. Also, with respect to SO4, the SWOT identifies increasing the area under tillage production as an opportunity, one of Ireland's most carbon efficient sectors.</p> <p>The needs assessment identifies five priority needs with respect to SO4, three of which are to:</p> <ul style="list-style-type: none"> • reduce Green House Gases (GHG) emissions from agriculture; • improve the protection and management of existing carbon stores, including grasslands and peatlands; and • increase the carbon sequestration potential of Ireland's forests and woodlands. <p>Neither the SWOT nor needs assessment identify straw incorporation specifically as a means or opportunity for enhanced carbon sequestration on tillage farms, however the above wider observations in both provide a strong basis for the inclusion of the intervention.</p>
Capital Investment Scheme	<p>As a broadly-based intervention, the intervention description lists multiple needs in the needs assessment as being related to it. This is higher than is typical for most interventions since the scope of investments supported. How directly related to each need the scheme will be in practice will depend on the projects that are supported i.e., demand for grants in different areas ultimately determine to what extent individual needs are addressed.</p> <p>While most of the objectives in the Need's assessment are addressed in some form, those that are most closely related to this intervention are objectives 4, 5, 7, and 9. There is a strong focus on environmental issues and climate change mitigation, sustainable</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>development, and increasing the diversity in age and gender of farmers. The intervention should be able to address these needs comprehensively, with a higher rate of aid intensity available for investments in these areas. In addition, the standard 40% grant rate for general on-farm investments is likely to address a number of other needs, including those related to improving animal welfare, halting biodiversity decline, and encouraging farm diversification.</p> <p>The SWOT analysis highlights a range of relevant strengths across several objectives. Firstly, there is a positive investment dynamic within the agricultural sector, with gross new investments on Irish farms growing in recent years. Climate change mitigation is also already a key priority at a national level, with policy measures and governance frameworks in place to underpin the approach to resilience in agriculture. In terms of support for young farmers, there has been an increase in support at both a national and EU level, including the previous TAMS II Young Farmer CIS which offered the same 60% grant rate proposed by the CIS. Additional support includes targeted agri-taxation measures and well-established collaborative farming arrangements (such as the Succession Farm Partnership Scheme²²) to help assist young farmers access land and business opportunities. There is also a strong knowledge base on organics and biological farming in Ireland, with a strategy in place to further develop the organic food sector.</p> <p>In contrast, there are a number of weaknesses identified in the SWOT analysis. Despite the support available, Ireland is still suffering from a decline in young farmers. There are also low levels of female participation in the sector. Other persistent issues in the sector have included animal welfare issues, low uptake of digital technologies, and low levels of farm diversification. Where there has been innovation and adoption of technologies, this leads to a wide variation across the sector, which also contributes to wide variations in productivity and efficiency.</p> <p>Where weaknesses exist, opportunities are available to make improvements. Farmers will be encouraged to use new digital technologies which can help improve efficiency and productivity. Many new technologies are also likely to have environmental benefits over existing practices. There is a major opportunity to boost farm diversification while also catering to a growing demand for sustainable produce, particularly organic. The organic sector also has sustainability benefits, with low inputs and more efficient management of</p>

²² [https://www.teagasc.ie/media/website/rural-economy/farm-management/Succession-Farm-Partnerships-TCs-Jan-2020-\(2\).pdf](https://www.teagasc.ie/media/website/rural-economy/farm-management/Succession-Farm-Partnerships-TCs-Jan-2020-(2).pdf)

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>natural resources. There is also the potential to build on the range of support available for young farmers, along with increasing opportunities for women in agriculture.</p> <p>Finally, a number of threats exist across the range of areas. The future viability and resilience of the sector is threatened by a number of issues, most notably the effects of climate change and the continuing decline in the number of young farmers. These threats are linked since younger farmers typically tend to be more conscious of environmental protection, and so a lack of generational diversity in farming could limit the uptake of climate appropriate practices. Issues around animal welfare standards could also threaten Ireland's reputation in this area, which is important for the country's image and particularly for the sale of produce.</p> <p>Overall, the intervention has a strong evidence base in the needs assessment, contributing to a wide range of needs across a number of objectives.</p>
Organic Farming Scheme	<p>Both the SWOT analysis and needs assessment support the evidence base for the intervention - identifying the need to increase the number of sustainable farming systems that better utilise and protect natural resources. In this context, it is evident that organic farming should be encouraged to reduce the pressure on resources and to maintain the production of agricultural products using a reduced number of inputs. The SWOT analysis also highlights the low level of organic farming in Ireland and recognises the opportunity for the Organic Farming Sector to expand and the impact this can generate.</p> <p>The needs assessment and Draft CAP outline the OFS's contribution to a variety of needs that align with at least six of the EU SOs. For example, the need to encourage farm diversification to improve the resilience of the agri-food sector is important due to sector specific risks caused by climate change, market volatility, and disease outbreak. Opportunities exist to diversify farm enterprises but the low level of interest among farmers, as noted in the SWOT analysis, means that OFS support is essential.</p> <p>Other identified needs align with environmental objectives including the need to reduce emissions, improve soil and water quality, and restore Ireland's habitats. Ireland's Climate Action Amendment Bill 2020 sets out the objective to achieve a 'climate neutral economy' by the end of 2050 and has set decarbonisation targets for each sector. For the agricultural sector this will require stabilising methane emissions and reducing fertiliser related nitrous oxide emissions. The SWOT analysis also notes that Ireland has been successful in decreasing the risks associated with the use of pesticides. It is important that this progress continues with the support of the OFS, with the plan to facilitate the elimination of chemical fertiliser and chemical pesticide application on organic land.</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>Further issues raised in the needs assessment will also be addressed by the intervention such as animal welfare and the promotion of local markets and consumption of safe, nutritious food. These areas are directly linked to the proposed actions of the OFS during the funding period.</p> <p>The needs assessment and SWOT analysis therefore underpin the need for the intervention, and the measures proposed in the intervention strategy document strongly reflect six of the overarching EU SOs. However, there is some inconsistency between documentation as within section 2.2 of the draft CSP it claims that the intervention will support on needs relating to eight of the SOs. The articulation of the Scheme's relationship to points in the SWOT is brief, with little reference to the strengths, weaknesses, opportunities, or threats that the intervention will directly support on. Nevertheless, the intervention represents a comprehensive and appropriate response to the need that has been identified.</p>
EIPs	<p>The broad potential for the EIP model is recognised in both the SWOT analysis and needs assessment, and the need to encourage the application of research and innovation at farm level has been identified. There is also opportunity to address many of the environmental issues identified in the SWOT in an innovative way. The Draft intervention strategy document notes the potential for all nine EU SOs to be addressed. This is followed by a more prescriptive list of needs that EIP Operational groups will contribute to, involving some five of the EU SOs.</p> <p>For example, the Need for additional support for climate change mitigation and adaptation along with sustainable energy has been identified. The draft CSP identifies that this is needed to build resilience to the effects of climate change and weather events, improve Ireland's high proportion of degraded peatlands and to lower CO2 emissions. In response to this, EIPs may engage in projects associated with reducing chemical fertilisers and low intensity management of priority grasslands. Developing innovative approaches to planning at landscape and catchment level, the management of peatlands, drain management, introducing fire resilience structures and introducing native breeds back into uplands will also contribute to Ireland's climate change needs. We would expect the evaluation committees to assess project concepts against such themes / criteria once mobilised.</p> <p>Other needs include the sustainable development and efficient management of natural resources such as water, soil, and air as Ireland is currently breaching its ammonia emissions reduction targets and is at risk of not achieving its water quality objectives under the Water Framework Directive. Alongside this, the SWOT Analysis highlights that farmer adoption of soil fertility management is low and</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>that intensive farming systems are placing excessive pressure on Ireland's natural resources. In response, stream B of this intervention's support will encourage and develop innovative approaches to reducing air pollutants, improving water/soil quality and to promote sustainable farming techniques and practices. This may involve increasing training and results-based programmes to incentivise farmers.</p> <p>Several other needs relating to improving farmers' position in the value chain, preserving landscapes, and improving animal welfare standards will also be contributed to via the intervention. For example, the Draft CSP indicates that support may be given to protect birdlife and habitats in the Shannon Callows and the rearing of pigs with intact tails on Irish farms. By implementing results-based programmes in relevant areas, the intervention will help restore, maintain and improve Ireland's habitats and landscapes.</p> <p>There is still some inconsistency across draft documentation as between section 2.2 of the Draft CSP and the draft intervention strategy document, it is evident that EIP operational groups, as a construct, have a strong evidence basis in the SWOT Analysis and needs assessment and have the potential to develop innovative approaches to help achieve various EU SOs. Also, it is important to note that the identification of themes will be an ongoing process and that more prescriptive details on actions will be available after the competitive calls take place.</p>
Knowledge Transfer	<p>The intervention template for Knowledge Transfer notes that there are a range of areas identified in the SWOT analysis and needs assessment where knowledge transfer can play a central role in underpinning a more competitive, resilient, modern and sustainable agriculture sector. In the wider SWOT analysis, however, it is clear that knowledge transfer and related issues are pervasive across multiple EU SOs, including:</p> <ul style="list-style-type: none"> • strengths, e.g., high levels of education and training among farmers, access to education and training opportunities, an existing farm advisory system, an existing base of knowledge transfer and other research and innovation programmes, strong knowledge base in some sectors, existing research and innovation base in climate change; • weaknesses, e.g., low uptake of digital technologies, low adoption of risk management tools, limited investment in research in some sectors (such as horticulture), lack of advisory support on biodiversity related issues, low awareness and understanding of the bioeconomy;

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<ul style="list-style-type: none"> opportunities, e.g., encourage increased use of new technologies, increase farmers' knowledge of risk management practices, improve farmers' understanding of climate change and environmental issues, further development and promotion of career pathways in agriculture; and threats, e.g., capacity to adjust to new demands/challenges, lack of awareness among farmers regarding climate change, failure to maximise opportunities presented by new technologies. <p>The evidence base for the intervention is thus reasonably strong and clear. However, the description of the intervention, as provided in the intervention template, could have been improved with the provision of a brief summary regarding the main knowledge transfer related issues arising in the SWOT and the assessment of needs.</p>
CPD for Advisors	<p>The SWOT and needs assessment refer widely to the national AKIS, and also specifically to FASs which form a distinct part of it. As well as the overall recognised strength of the national AKIS, the SWOT points to the strong status and role of Teagasc, the national agricultural advisory body, strong levels of engagement in the AKIS generally and a strong existing breadth and standing of the FAS, and relatively high levels of educational attainment within the agricultural workforce. Weaknesses and threats identified include structural weaknesses within the FAS (such as differences in the roles and opportunities for public and private advisors), low levels of awareness and confidence in the use of technology by farmers, and poor broadband coverage and quality. Reflecting specific findings in relation to FAS with respect to the CCO, as well as a range of findings across other SOs which highlight the need for and role of effective advisory services across the sector, the needs assessment identified four specific AKIS needs, the first three of which are to:</p> <ul style="list-style-type: none"> increase farmers' and advisors' understanding of climate change, air quality, water quality, soil health, animal health and welfare and biodiversity related challenges and opportunities at farm level; review education and training courses and advisory services to reflect new challenges and ambition; and ensure consistency of advice across the advisory services by providing for CPD for advisors and for primary producers. <p>There is no formal evidence identified regarding advisors' training needs, nor any reference to any surveys or assessments of the specific needs of the existing cohort of approved advisors. However CSP-supported CPD for advisors is not the only form of training provided to advisors, and advisors are able to seek and access a wide range of more specific training suitable to their circumstances</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	from a range of providers. The national intervention discussed here relates to general needs and priorities, and training which can and perhaps will be made a mandatory requirement for DAFM approved advisor status.
Suckler Carbon Efficiency Programme	<p>The scheme has an extensive evidence basis in the SWOT and needs assessment. It is specifically related to Need Obj4.N1: Reduce Green House Gases (GHG) emissions from agriculture.</p> <p>The strengths and opportunities identified below are referenced in the actions in place in the draft intervention strategy. The weaknesses and threats that are relevant to the intervention are addressed by the intervention's actions, such as the focus on reducing GHG emissions and ammonia.</p> <p>In terms of strengths, for example, the SWOT analysis highlights the targeted application of genomic technologies used within Irish farming, established beef, dairy and sheep breeding. The draft intervention complements these strengths well. The SWOT also identifies multiple relevant weaknesses. These include the highest share of GHG emissions arising from agriculture, where the two main drivers are biogenic methane from livestock (65%) and nitrous oxide (30%) and the breach of ammonia emissions.</p> <p>The threats to the sector compliment the weaknesses identified, noting the impact of climate change on primary production (including the increasing frequency of extreme weather events, the continued failure to meet ammonia emissions targets, and that GHG emissions have continued to increase even under existing measures, led by an increase in livestock numbers).</p> <p>The SCEP has a strong evidence basis in the SWOT analysis and the needs assessment. The intervention represents a comprehensive and appropriate response to the need that has been identified.</p>
DBWS	<p>The SWOT analysis clearly identifies the need to improve the welfare of male dairy calves. This notes that actions are needed to improve the viability of male calves from the dairy herd in locally based production systems. The intervention is also directly linked to the needs analysis as follows:</p> <ul style="list-style-type: none"> • Obj9.N2: Continue improving animal health and welfare standards and increasing awareness of antimicrobial (AMR) and anthelmintic resistance • Obj4.N1: Reduce Green House Gas (GHG) emissions from agriculture. <p>The SWOT analysis includes a number of strengths, weaknesses, opportunities and threats of relevance.</p>

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>In terms of strengths, the SWOT analysis highlights that Ireland has an existing strategy to sustain the health of farm animals²³ which provides a nationwide strategic basis for animal health. In addition, it notes a history of successful agri-food industry initiatives to improve the health and welfare of animals.</p> <p>The SWOT also includes a number of related weaknesses, e.g., an ongoing persistence of animal welfare issues alongside a dairy herd expansion. The sector has the opportunity to address such persistent animal welfare issues through interventions such as this DBWS. Threats include increasing pressures related to diseases and antimicrobial and anthelmintic resistances.</p> <p>The proposed intervention represents part of the necessary response to the need to continue improving animal health and welfare standards and increasing awareness of antimicrobial (AMR) and anthelmintic resistance (Obj9.N2). It does, however, rely on farmers to take remedial action after they weigh their animals should the animal not have reached its expected weight.</p> <p>By reducing the age at which animals are fit for slaughter, this intervention reduces GHG emissions from each individual calf over the course of its lifetime. It therefore directly contributed to the need to reduce Green House Gases (GHG) emissions from agriculture (Obj4.N1).</p>
SIS	<p>The SWOT analysis and needs assessment highlight several animal welfare issues which prevail in Ireland. The needs assessment particularly highlights lameness in sheep but also other more general issues such as flystrike.</p> <p>This Scheme specifically addresses Need Obj9N2: Continue improving animal health and welfare standards and increasing the awareness of antimicrobial (AMR) and anthelmintic resistance through a package of specific actions that target lameness and parasite control, flystrike, and food supplementation.</p> <p>The actions in the draft intervention are clearly and appropriately related to this Need: they directly address lameness and flystrike as well as parasite control. Furthermore, appropriate feeding and nutritional supplements also contribute to sheep health.</p>

²³ Keeping Animals Safe from Disease: A National Farmed Animal Biosecurity Strategy (2021-2024).

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>The SWOT analysis highlights a number of relevant strengths, weaknesses, opportunities, and threats related to the above Need. Among the strengths which the SIS builds upon is Ireland's existing national strategy to sustain optimal animal health on farms²⁴ and the country's history of successful agri-food industry initiatives concerning animal health and welfare.</p> <p>On the other hand, animal welfare issues are persistent and an ongoing weakness which the SWOT analysis highlights. Related to this, there is an ongoing threat in that animal welfare standards could potentially not be met. A corollary of failing to meet animal welfare standards is the risk this poses to consumer behaviour. Should consumers perceive the health and welfare of farm animals to be at risk, they may react by reducing their consumption of such produce.</p> <p>In terms of opportunities, fertility performance on farms could be improved – which this Scheme potentially addresses through the genotyped ram action. If farmers can increase their animals' health this could work hand alongside efforts to increase awareness of the quality of Irish farm produce, in this case specifically of Sheep.</p> <p>Overall, this draft intervention is a comprehensive and appropriate response to the identified Need. It also addresses a number of related strengths, weaknesses, opportunities, and threats.</p>
Early-Stage Support for POs in Certain Sectors	<p>Overall, supporting the establishment of POs aims to address the needs to: increase efficiency and competitiveness through on farm investment and the adoption of new technologies; expand and diversify into new markets; increase primary producers' share in the value chain; develop and promote local markets supporting locally produced food, including organic produce; and provide opportunities and support to businesses and individuals looking to develop rural enterprises. However, the second need (expand and diversify into new markets) appears less directly related to the intervention than the others. The intervention can also improve efficiency and effectiveness by sharing administrative functions and support for farms who form the POs; providing the participating farmers with a stronger voice in local markets helping them achieve a larger share in the value chain; and directly supports businesses (i.e., farms) in a rural context. If POs decide to do so, then farmers could be supported to expand into different markets.</p> <p>In addition to these needs, the SWOT analysis highlights the strength of the agri-food sector as Ireland's largest indigenous industry. Productivity is high and Ireland's strategic focus is on increasing competitiveness. In general, Irish farmers are well educated and have</p>

²⁴ Keeping Animals Safe from Disease: A National Farmed Animal Biosecurity Strategy (2021-2024).

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Intervention	Comments
	<p>access to well-established collaborative farming arrangements. This lays a strong foundation on which support for Production Organisations can build.</p> <p>On the other hand, several weaknesses are evident. It is difficult for farmers to access finance and farmers' incomes are lower than the average income in the economy (farmers' median earned income in 2016 was €19.5k compared to the median overall income of €45.3k)²⁵. Primary producers have a relatively low share of the overall value chain and there are only two established beef sector POs. While productivity is high, there is a wide variation in productivity levels at an individual farm level. All of these weaknesses can be addressed through support for the establishment of more POs.</p> <p>The opportunity exists to improve farmers' access to finance and to expand access to existing markets, including local markets. By encouraging contractual arrangements between primary producers and processors or retailers along the value chain, there is potential to expand the share of farmers within the chain. Finally, a number of threats are evident. Input costs are rising, and it is costly²⁶ to comply with EU standards.</p> <p>The needs basis is strong and unambiguous. There is therefore a clear and strong basis for the inclusion of this intervention in the needs assessment.</p>
Collaborative Farming Grant	<p>The draft intervention identifies Obj7.N1 from the needs assessment, as the primary need relevant to this scheme. It states that there is a need to increase the number of young farmers through various means including income support, encouraging land mobility and succession planning. Low numbers of young farmers in the agricultural sector is not an issue unique to Ireland. There are challenges and barriers facing young farmers that make entry to farming challenging, including the reluctance of older farmers to release their land. The concerns identified amongst older farmers include loss of income and tax concerns, the suitability of partners, ensuring the farm receives adequate care, and the retirement process as well as stepping back from farming more generally.</p>

²⁵ CSO (2016) Geographical Profiles of Income in Ireland 2016: [Executive Summary - CSO - Central Statistics Office](#)

²⁶ European Commission/CRPA (2014) Assessing farmers' costs of compliance with EU legislation in the fields of environment, animal welfare and food safety: [Assessing farmers' costs of compliance with EU legislation in the fields of environment, animal welfare and food safety | European Commission \(europa.eu\)](#)

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>There are numerous strengths that will support the implementation of the scheme. Irish farmers are well educated and have high levels of agricultural training. They have access to a range of education and training opportunities, with participation in Teagasc further education and higher education programmes increasing in recent years. Young farmers also have various existing supports in place, such as the TAMS II Young Farmer CIS and an agri-taxation policy designed to support young farmers. Collaborative farming arrangements are also well established that already assist young farmers in trying to access land and business opportunities.</p> <p>In contrast, there are multiple weaknesses identified in the SWOT analysis. Despite the support available, Ireland continues to suffer from a decline in young farmers. The number of young farmers fell from 8,700, which amounted to 6% of all farmers in 2010, to 7,400 young farmers (5% of all farmers) in 2016. Difficulties are prevalent regarding accessing land for purchase. Senior generations are reluctant to change the management and ownership structures of their farms, creating numerous socioeconomic challenges for younger farmers due to the limited land available for purchase in Ireland.</p> <p>Opportunities are available to make improvements to the weaknesses identified. The primary opportunity is building on the existing support available for young farmers, including assisting in the mobilisation of land. Long-term leasing was identified in the Agri-Taxation Review²⁷ as a key measure to address the issue of land mobility. This can be particularly important for young farmers who face greater difficulties accessing the finance needed to purchase land.</p> <p>The main associated threat is that the existing measures and new measures being put in place may be insufficient to prevent the continuing decline in the numbers of young farmers. Generational renewal in the sector is vital for its future sustainability.</p>
LEADER	<p>The SWOT analysis and needs assessment identify several challenges in rural Ireland for which a CLLD methodology such as LEADER could be utilised to improve. These include the need to support the development of rural enterprises, to maximise the opportunities presented by the green economy, and to embrace the diversity of rural communities by involving all members of society in the development process.</p> <p>The Draft CSP outlines the LEADER Programme's contribution to a variety of needs that relate to four of the EU SOs. These include the need to encourage farm diversification in order to improve the resilience of the agri-food sector, to improve life in rural areas, to</p>

²⁷ https://igees.gov.ie/wp-content/uploads/2014/10/Agritaxation_-_Review_-_Final_web-pub.pdf

Table 5.1 Review of SWOT and Needs Assessment – Proposed CSP Interventions

Intervention	Comments
	<p>guarantee proper remuneration for workers, and to combat sector specific risks caused by Ireland's climate. In response to this, CLLD actions will support agricultural diversification into agri-tourism, rural tourism, and value-added food products.</p> <p>Other identified needs include the development and promotion of local markets supporting locally produced food, including organic produce, and the provision of opportunities and support to businesses and individuals to develop rural enterprises. These have been addressed in both the SWOT Analysis and needs assessment and are necessary to improve the quality of rural life and stimulate rural economic development. The indicative LEADER theme one includes supporting enterprise development, rural food production and social, community and cooperative enterprises, all of which will address these needs.</p> <p>A number of the needs relating to SO 8 will also be supported by the LEADER programme. The funding provided to projects/actions will greatly contribute to employment, growth, gender equality, social inclusion, and local development in rural areas, including bio-economy and sustainable forestry.</p>

5.5 Summary of Findings

Sections 5.1 to 5.4 above have set out our approach to reviewing the SWOT analysis and needs assessment, our overall appraisal of their combined role and status in the CSP's preparation, and our analysis of the individual interventions against the SWOT analysis and needs identified.

Our overall findings are that:

- The SWOT and needs assessment have been undertaken in a very comprehensive and competent way by DAFM, over a long time-period and against the background of Covid disruption and challenges
- The tasks have been strongly driven by the Regulation and its evolution, and its requirements have been followed in a meticulous and measured way
- The processes have involved a high level of consultation with stakeholders, the public, experts, and interest groups
- Extensive use has been made of previous experience among officials, the industry and others
- The outcome of both processes has been woven into the fabric of the new CSP in a careful and consistent way, evident in continued reference to both throughout the draft CSP document.

Our overall conclusion is that the SWOT and needs assessment constitute a solid and strategic analysis of Plan context and priorities, are a thorough and transparent basis for Plan decisions and priorities, and together form a bedrock on which the Plan can be finalised and implemented.

6. OBJECTIVES, COHERENCE, AND INTERVENTION STRATEGY

6.1 Introduction

This chapter assesses the CSP's objectives, its coherence and its underlying intervention strategy. As described in Chapter 3, the draft CSP Regulation sets out nine SOs and one CCO, towards which CAP supports must be directed across the EU. Section 6.2 addresses the nature and extent of such alignment at both the level of the overall plan and in respect of its proposed interventions. Section 6.3 addresses both the internal coherence of the plan and its consistency and coherence with wider policies, strategies and instruments. Section 6.4 assesses the degree to which the plan follows a clear intervention strategy, including with respect to linkages and chains of anticipated effects, appropriate indicators, and clear targets and milestones.

6.2 CSP and Intervention Objectives

The preparation of the CSP has responded to the EU SOs set out in Article 6 of the CSP Regulation from the outset, with the SWOT analysis and needs assessment each designed and framed very explicitly according to the nine SOs and the CCO therein. As shown in Figure 4.1, a total of 37 prioritised needs were identified which were aligned and related to the 9 SOs and the CCO both clearly and directly.

The suite of interventions included in the plan responds to those needs (and the SWOT analysis which determined them), and each intervention contributes to one or numerous SOs/CCO, again both directly and explicitly within the CSP's intervention strategy and logic. Figure 6.1 illustrates this framework of relationships between CSP interventions and the SOs/CCO to which they contribute.

A number of the interventions have wide-ranging goals which support or have the potential to support many SOs/CCOs simultaneously, such as AECM, CIS, OFS, EIPs, Knowledge Transfer, and CPD for Advisors. Another set most directly support only 1-2 SOs/CCO (Apiculture, ANC, Straw Incorporation, SIS, Collaborative Farming Grant), although in several cases they may make indirect contributions to other objectives. Other interventions have goals which simultaneously relate to 2-4 SOs/CCO.

A comparison to the financial plan (shown in Tables 4.2 and 4.3) indicates that the draft CSP is likely to contribute most significantly to SO1 (income support), as well as SO4 (climate), SO5 (natural resources) and SO6 (biodiversity and ecosystems) due to the focus and resourcing of the Eco-Scheme and AECM interventions.

Table 6.1 assesses the objectives of the interventions individually.

Figure 6.1 Alignment of CSP Interventions to CAP Specific Objectives

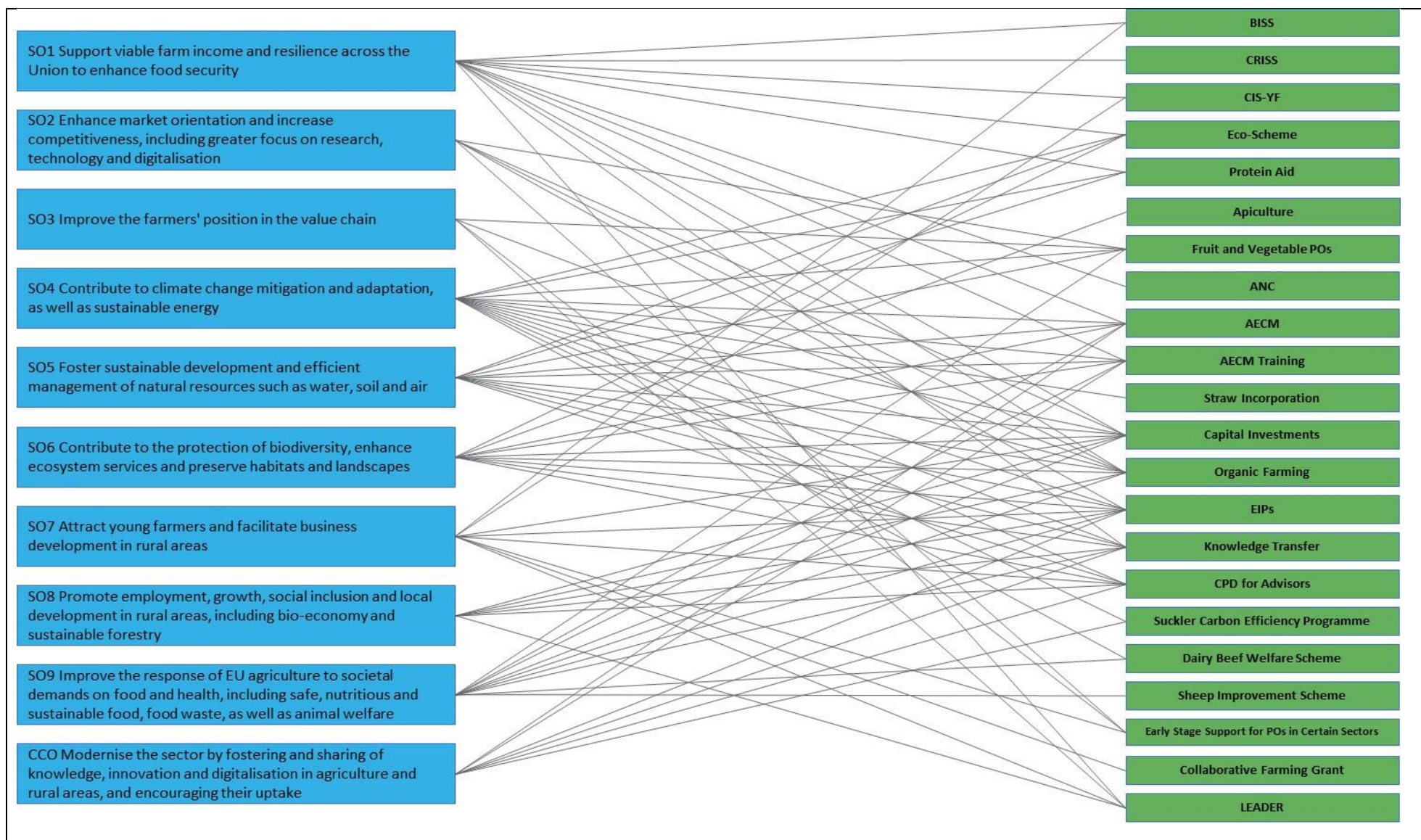


Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
Pillar I Interventions	
BISS	The BISS objective as stated in the draft CSP is clearly aligned to SO1 as per the CSP Regulation, i.e., supporting viable farm income and resilience across the Union to enhance food security.
CRISS	While the CSP Regulation objectives do not articulate any overt redistributive objective in favour of small and medium farmers, the intervention is supportive of the general CAP objective to strengthen the socio-economic fabric of rural areas. SO1 is also relevant, and it is cited as the main related SO for the intervention, though it does not provide a very strong or direct basis for an intervention logic leading to redistribution. However, this is a feature of the CSP Regulation, not of the draft CSP for Ireland per se.
CIS-YF	CIS-YF is designed to support appropriately educated young farmers, who are entering the agriculture sector in the early years, in cases where they have set up as head of a farm holding, either solely or jointly. The scheme is also intended to provide certainty, in terms of the level of income support, for eligible applicants for up to five years, which is seen as an important factor in financial planning in respect to young farmer businesses. It therefore relates the Scheme to both SO1 and SO7 (attract young farmers and facilitate business development in rural areas), with the latter arguably being a more directly linked objective than the former. A challenge for the scheme, however, is that it approaches the core issue of inter-generational movement relatively subtly. This is in part based on experience of previous schemes, which dealt with it more overtly, e.g., early retirement schemes. In particular, the new scheme allows in principle for younger farmers to take over as joint heads, although this latter concept could also potentially have other non-generational uses, e.g., facilitating joint ownership by siblings or life partners. Any potential ambiguities about ownership will therefore be managed via a focus, as in all direct payments, on the “herd number” as the delineator of ownership, i.e., this would need to be jointly held.
Eco Scheme	The scheme directly addresses three SOs as per the CSP Regulation, i.e.: SO4 (contributing to climate change mitigation and adaption, as well as sustainable energy); SO5 (fostering sustainable development and efficient management of natural resources such as water,

Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
	soil and air); and SO6 (contributing to the protection of biodiversity, enhancing ecosystem services and preserving habitats and landscapes).
Protein Aid	<p>The intervention is intended to provide direct support for Irish farmers growing protein crops, thus providing greater certainty for growers of these crops in the face of identified sectoral difficulties and challenges. This aim, in turn, is intended to contribute to the SO1 of the CSP Regulation.</p> <p>The intervention is therefore clearly related to an appropriate SO, and its appropriateness is well articulated. However, the intervention strategy also points to its relevance in addressing the needs to reduce GHG emissions, improve air and water quality, and improve soil health, which are identified in the CSP as being needs to address under both SO4 and SO5. The potential contribution of the intervention in addressing these SOs could thus be more explicitly identified in the intervention template.</p>
Fruit and Vegetable Producer Organisations	<p>Objectives for this intervention appear to be reasonably clearly stated and aligned to SOs in the CSP Regulation. In this regard, the objectives of the intervention are stated to be as per the nine fruit and vegetable sector objectives outlined in Article 42 of the CSP Regulation, which in turn contribute to SO1, SO2 (enhancing market orientation and increasing competitiveness, including greater focus on research, technology and digitalisation), SO3 (improving farmers' position in the value chain), SO4, SO5, SO6 and SO9 (improving the responses of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare).</p> <p>The CSP does not appear to specify the types of actions to be funded in order to address these objectives, as per the list of actions outlined in Article 43 of the CSP Regulation. However, all OPs that are implemented by recognised and funded POs must at least include actions that address sectoral objectives for: planning of production and adjusting production to demand; boosting products' commercial value and quality; and promotion and marketing of products in the fruit and vegetables sector.</p> <p>At least 15% of aid must also be used to address environmental or climate change mitigation and adaptation measures, while at least 2% of aid must be used to promote R&D and innovation.</p>
Apiculture	National Apiculture Programmes that are funded by the EU have the overall objective to improve the general conditions for producing and marketing apiculture products in the EU. In this regard, the planned intervention in Ireland for the 2023-27 period intends to deliver

Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
	<p>three of the eight different types of action in the apiculture sector that are listed in Article 49 of the CSP Regulation, namely: technical assistance to beekeepers and beekeepers' organisations (through advisory services, training, information and exchange of best practice); actions to combat beehive invaders and diseases, in particular varroasis; and co-operation with specialised bodies for the implementation of research programmes in the field of beekeeping and apiculture products.</p> <p>These actions, in turn, are intended to contribute to addressing SO1, SO2 and SO9. Also, given the SWOT analysis emphasis on the sectoral weakness and threat posed by declines in pollinator species, the intervention would appear to potentially contribute to SO6.</p>
Pillar II Interventions	
ANC	<p>The objective of the ANC scheme is to support farmers who face natural and other constraints to maintain a viable farm income, maintain the landscape and protect against the abandonment of agricultural land. It therefore relates most directly to SO1, but also to SO6. The intervention is appropriately linked to these two SOs in the draft CSP.</p> <p>The scheme very clearly and unequivocally supports farm incomes, while in doing so it seeks to maintain sensitive and sustainable farming in areas, many of which have the potential to be HNV farmland, of high biodiversity value that may frequently support species of conservation concern. Maintaining typically low intensity farming in such areas, and incentivising farmers to maintain such practice, is the means by which the scheme supports SO6.</p>
AECM	<p>This AECM General option consists of actions to address the issues listed in the SWOT analysis and needs assessment, such as a need for a reduction in fertiliser use, improved land management to address water quality and soil fertility issues, and measures to restore and maintain habitats and species to halt the further decline of biodiversity. However, this option does not clearly state its objectives in the current draft intervention.</p> <p>The objectives of the Co-operation option are, on the other hand, clearly articulated and related to the needs identified in the SWOT analysis and needs assessment, though the objectives for the Co-operation project teams are not clearly identifiable.</p> <p>The draft intervention suggests that it aligns with SO4, SO5, SO6, SO9 and the CCO to modernise the sector by fostering and sharing knowledge, innovation and digitalisation in agriculture and rural areas, and encouraging their uptake by farmers, through improved</p>

Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
	access to research, innovation, knowledge exchange and training. While the Co-operation option makes it clear how the interventions' objectives will contribute towards these, this is less clear for the AECM General option.
AECM Training	<p>The objectives of the intervention are clearly stated and contribute towards SO4, SO5, SO6 and the CCO to foster and share knowledge, innovation, and digitalisation in agriculture and rural areas.</p> <p>The intervention thus contributes to much of the same SOs as does the AECM scheme. This is logical, as this intervention is designed to enable farmers to deliver the actions outlined in the AECM. In addition to this, the intervention forms a core component of the CSP's knowledge transfer and training activities.</p>
Straw Incorporation Measure	<p>The draft CSP states that the purpose of this intervention is to encourage tillage farmers to increase soil organic carbon levels by chopping and incorporating straw from cereal crops, in order to sequester carbon in tillage soils and thereby reduce GHG emissions. It will also have a beneficial impact on soil biology and workability.</p> <p>The intervention therefore links clearly to SO4, while it will also contribute to SO5 and SO6, and these links are clearly stated and acknowledged in the draft CSP.</p>
Capital Investment Scheme	<p>This intervention supports farmers to invest in capital projects on their farms. It will include support in a wide variety of areas as identified, with four different categories of grant rates. As well as supporting the diversity of the sector and of farmers themselves, some investments will aim to contribute to additional areas including climate change mitigation; addressing key environmental issues such as biodiversity, water quality and climate related challenges; and increasing energy efficiencies on farms through the adoption of new technologies and more efficient energy use practises.</p> <p>The intervention is thus intended to contribute towards SO1, SO2, SO4, SO5, SO6, SO7, SO8 (promoting employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry) and SO9.</p>
Organic Farming Scheme	The overall objective of the intervention is to deliver enhanced environmental and animal welfare benefits and to encourage producers to convert from conventional farming methods to organic farming methods to respond to the market demand for organically produced food.

Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
	<p>The scheme offers a higher payment for conversion to organic farming and a maintenance payment to encourage ongoing commitment to organic production, and it supports actions such as a minimum stocking density requirement to ensure the supply of organic produce, elimination of chemical fertiliser and chemical pesticide application on organic land, use of organic and green manures to improve soil organic matter, improved crop rotation, and adherence with organic legislative requirements pertaining to animal housing, compulsory access to open area areas, stocking rate, feed, controls on veterinary treatments and animal health management.</p> <p>Objectives are clearly stated and aligned to the SOs listed in the CSP Regulation, they appear to be in line with the needs and aims derived from the SWOT analysis and needs assessment, and the actions supported by the intervention will directly contribute towards SO1, SO3, SO4, SO5, SO6 and SO9.</p>
EIPs	<p>The overarching objective of this intervention is to enable a range of actors including farmers, researchers, advisers, businesses, environmental groups, consumer interest groups or other NGOs to come together as an Operational Group. They will then collaborate to develop and test innovative solutions to challenges in the agricultural sector. It hopes to establish a strong sustainable base for Irish natural capital, agriculture, food production, and the bio-economy that respects the environment and shows itself capable of responding effectively to a range of environmental challenges, with support targeted at EIPs that aim to resolve a broad range of challenges relating to: competitiveness, modernisation, and animal health; or the environment, biodiversity and climate change.</p> <p>The proposed intervention will significantly contribute towards SO4 and SO5, although there is potential to address all the general objectives set out in the CSP Regulation as well as contributing to the CCO set out in Article 5. This intervention has also been designed in a manner coherent with the arrangements for the national AKIS and will address needs under the AKIS objective.</p>
Knowledge Transfer	<p>This intervention seeks to build on the Knowledge Transfer Groups scheme under the 2014-20 Rural Development Programme (RDP) by providing support for high quality and targeted advice to farmers, delivered by professional agricultural advisors with the appropriate experience and expertise. Knowledge transfer activities are to incorporate a mix of priority topics (which will be common to all groups), plus activities that are targeted at meeting local knowledge transfer needs, with indicative priority topics to include: climate change mitigation and adaptation strategies; farm health, safety and wellbeing; biodiversity conservation; farm management strategies; water</p>

Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
	<p>quality; soil quality and grassland management; energy efficiency on farms; animal health and welfare; and digital and smart technologies and tools.</p> <p>Objectives at the intervention level therefore appear to be reasonably clearly stated and aligned to relevant SOs, including SO1, SO2, SO4, SO5, SO6, SO8, SO9 and the CCO of modernising the sector through fostering and sharing of knowledge, innovation and digitalisation in agriculture and rural areas.</p>
CPD for Advisors	<p>The draft CSP anticipates that participation in CPD will allow advisors to <i>“enhance their knowledge base on an ongoing basis and ensure that they are familiar with the latest techniques, technologies, and regulatory and scheme requirements in a rapidly changing agri-food sector”</i>. It further states that participation <i>“will promote the development of knowledgeable, professional and competent advisors; and will thereby enhance the quality of service provided to farmers. This in turn will underpin more efficient and effective practices, feeding into more competitive and environmentally efficient farming”</i>.</p> <p>The intervention is therefore expected to support the cross-cutting SO to modernise the sector by fostering and sharing of knowledge, innovation and digitalisation in agriculture and rural areas, while also having the potential to address all of the SOs set out in the CSP Regulation. At a general level, the intervention is therefore aligned and related appropriately to the SOs, although there will be scope to sharpen the articulation of objectives and the programmed CPD’s contribution to various SOs when it is specified and designed in more detail.</p>
Suckler Carbon Efficiency Programme	<p>The overall aim of the scheme is clear and well-articulated. It aims to build on and accelerate the gains delivered through earlier BDGP and BEEP-S schemes and continue the trajectory of improving economic and environmental sustainability and efficiency of the Irish suckler herd. Additionally, it intends to improve the genetic merit of the Irish suckler herd and reduce the GHG intensity of Ireland’s beef production.</p> <p>The scheme works toward the overall need to reduce GHG emissions from agriculture and is thus aligned to SO4 as per the CSP Regulation.</p>
DBWS	<p>The objectives of the intervention are to improve the welfare and viability of male calves from the dairy herd in locally based production systems, and to reduce GHG emissions. This relates to SO9 as per the CSP Regulation.</p>

Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
	<p>The intervention also aligns with the European Commission’s stated aim of improving animal welfare and health, as expressed in the communication, “The CAP Towards 2020: Meeting the Food, Natural Resources and Territorial Challenges of the Future”.</p> <p>While the intervention proposes action that directly relates to improving animal welfare, it could be improved upon by stating how the action is likely to be followed up by farmers in order to further strengthen the case that the intervention will contribute to its related objective.</p>
SIS	<p>Overall, the SIS aims to improve the welfare of sheep through actions that relate to SO9.</p> <p>In terms of results and outputs, the scheme is clear and has indicators that relate strongly to the related SO9 (number of livestock units supported by health or welfare measures, improvement in animal welfare).</p> <p>The scheme could benefit from noting specific targets for each action, for instance by clarifying how many livestock units are expected to be covered by each action. However, this may not be feasible, it does not appear to be an imperative at this stage, but it may be worthy of consideration in the early implementation phase.</p>
Early-Stage Support for POs in Certain Sectors	<p>DAFM aims to increase competitiveness in the beef sector, and it sees support for co-operation at the producer level as being a means to achieve increased sustainability and competitiveness. Through the draft intervention, DAFM aims to underpin farm income and sectoral resilience by providing financial support for the set up and administration of POs in the beef and sheep sectors. Following stakeholder feedback support has been expanded to include the amenity, tillage, potato and fruit and vegetable sectors.</p> <p>POs are intended to help to reduce costs of market transactions by spreading and sharing costs of investing in steps to achieve and meet market specifications and requirements. This increases competitiveness, including for smaller producers, so the intervention thereby addresses three SOs – SO1, SO2 and SO3.</p>
Collaborative Farming Grant	<p>This intervention is focused on boosting generational renewal by encouraging land mobility and succession planning. A recent EU study, ‘Evaluation of the Impact of the CAP on Generational Renewal, Local Development and Jobs in Rural Areas’, sets out the context across Europe²⁸, and included some specific recommendations for Ireland, such as: supporting succession-based partnerships;</p>

²⁸ <https://op.europa.eu/en/publication-detail/-/publication/4bd0b0a2-0503-11ea-8c1f-01aa75ed71a1>

Table 6.1 Review of Objectives – Proposed CSP Interventions

Intervention	Comment
	<p>creating a “farm development team” with integrated support units to help farms through the transition; and developing a structure where young farmers receive direct support (such as installation aid) in the beginning, but very little of the farm profit, and then gradually rebalance this support over time, with the older farmer gaining retirement support whilst foregoing profits</p> <p>The intervention is intended to contribute towards SO7 as per the CSP Regulation.</p> <p>The addition of financial support towards professional costs for older farmers is also an example of incentives that were previously missing. This can support older farmers while also indirectly supporting the objective of generational renewal by navigating farmers to retirement.</p>
LEADER	<p>The objective of LEADER is to fund initiatives emerging from a CLLD approach at a local level, which aims to address the challenges and needs of individual sub-regional areas, including supporting private enterprises and communities to improve quality of life and economic activity in rural areas; and creating and sustaining employment in rural Ireland, with a focus on social inclusion and climate change mitigation.</p> <p>The intervention will contribute towards SO8, alongside needs relating to SO1, SO3 and SO7. The SOs outlined in draft intervention strategy therefore appear relevant and appropriate.</p> <p>The intervention’s objectives also reflect the findings of the SWOT analysis and needs assessment, which were the basis for indicative LEADER themes outlined in the draft intervention.</p> <p>Broad themes have been used to capture a wide range of projects and to encourage innovation. Specific actions to be carried out to achieve objectives are unclear, but this is because the precise configuration of sub-measures supported in a particular area will be based on an LDS prepared in advance of the local LEADER programme being developed.</p> <p>Also, it has been made clear that there is a requirement for the “smart villages” concept, climate change mitigation and Sustainable Development Goals (SDGs) to be over-arching elements of LEADER interventions, alongside adherence to the LEADER themes.</p>

6.3 Coherence

The strong alignment of the draft CSP to the Regulation, its SOs, and its detailed provisions, ensures strong coherence with key wider strategies at EU level, including the Green Deal, Farm to Fork Strategy and Biodiversity Strategy. Such links are direct and clearly evident across the scope of the plan.

Similarly, there are very clear links with wider national policies and strategies, most obviously with respect to Food Vision 2030, Ag Climatise, Our Rural Future, the National Biodiversity Plan, and the River Basin Management Plans. Direct links and synergies are also evident with wider sectoral policies and strategies with narrower focuses (such as the Organic Farming Strategy, the All-Ireland Pollinator Plan (A-IPP) and the SBLAS).

Since the draft CSP has been prepared, the Irish Government has published the Climate Action Plan 2021, as described in Chapter 3. This contains a range of explicit targets and goals for achieving a 51% reduction in overall GHG emissions by 2030 and a roadmap for reaching net-zero emissions by no later than 2050. It includes a broad suite of targets and interventions for the agriculture sector, and states that *“the CSP will be an integral delivery mechanism to achieve our climate ambition”*²⁹. As the Climate Action Plan had not been drafted or published before the draft CSP, the latter’s coherence with it was not possible to demonstrate before now. While there are many actions proposed to which the CSP will clearly and evidently progress as currently constructed, there are many areas of activity in which progress will need to be outside the scope of the draft CSP (such as in numerous research initiatives).

The internal coherence of the CSP is also reasonably strong and identifiable. There are many areas of self-contained activity which have neither synergy nor overlap with others (such as sectoral interventions and landscape interventions, knowledge or advisory supports and LEADER, or between income supports and livestock improvement measures), while there are other areas of clear cross-referencing and avoidance of duplication (such as between supports for mixed cropping under the OFS and the Protein Aid Scheme, and the activities supported under the Straw Incorporation Measure and their distinction from soil protection activities required under conditionality). Care will nonetheless be required to ensure relationships and boundaries are clearly determined between enhanced conditionality requirements, Eco-Scheme activities, AECM, and elements within other schemes such as OFS and CIS.

Table 6.2 assesses coherence across the CSP interventions individually.

²⁹ Climate Action Plan 2021, page 162. Available here [gov.ie - Climate Action Plan 2021 \(www.gov.ie\)](https://www.gov.ie/en/publications-and-resources/documents/2021-03-29-climate-action-plan-2021/)

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
Pillar I Interventions	
BISS	<p>Lessons from previous periods, at both EU and Irish level, are evident in the CSP. This is so at both policy and operational level, where previous experience in terms of what works or does not work, in an EU and Irish context, is evident.</p> <p>This includes a move towards “convergence” of payment levels, to better definitions of “active farmers” and to changes in definitions of eligible hectares.</p> <p>The operational and financial details of BISS have been developed jointly with those of the other direct payment schemes, and have been subject to detailed modelling of alternative outcomes by the Department.</p> <p>The intervention is therefore closely related to the other direct payment interventions, and together they constitute a carefully planned and closely related “suite” of interventions. In particular, eligibility for the BISS is a precondition for participation in the other three interventions (CIS-YF, CRISS and Eco-Scheme).</p>
CRISS	<p>CRISS is designed to ensure redistribution of direct payments from larger to smaller and medium-sized holdings by providing for redistributive income support in the form of an annual decoupled payment per eligible hectare to small and medium-sized farmers, who are also entitled to a payment under the BISS. A number of aspects of the new intervention are therefore very clearly linked to, indeed intertwined with, BISS.</p> <p>By supporting the survival of small and medium farms, the intervention supports rural development objectives in other parts of the CSP Pillars I and II, and wider rural development and environmental policies more generally.</p> <p>Against that, the intervention could be said to act against farm efficiency and ultimately financial viability by potentially helping to retain otherwise financially non-viable farms. In this regard, the intervention faces the perennial dichotomy between equity and efficiency (i.e., the need to support smaller and less commercial farms and the need to encourage farm efficiency often which is often enabled by scale). The scheme aims to strike a reasonable balance in this regard.</p>
CIS-YF	<p>The new scheme is a direct successor the earlier YFS in the 2015-20 period, which has been available to the planners in devising this scheme. In this regard, the draft plan text states that <i>“the payment amount will build on the significant progress made since 2015 under the YFS”</i>. Regarding budget the proposed level of support will build upon the experience since 2015 in providing support in the crucial</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>years immediately following the young farmer setting up within the holding. The estimated number of beneficiaries in 2023, and further increase in the number of beneficiaries over the life of the new scheme to 2027, is based on trends in the number of students enrolled on relevant agricultural educational courses delivered by the main course provider in Ireland. It is thus anticipated that the level of payment under the scheme will attract an increasing number of young farmers into the sector.</p> <p>Coherence with other direct payments interventions includes a shared basic eligibility criteria (eligibility for BISS) and adherence to the shared minimum standards of the as a whole.</p> <p>The scheme operates in the context of a range of other supports to young farmers in Pillar II, for which young farmers are eligible applicants, and more widely in the form of tax reliefs and access to finance. Young farmers will typically be aware of such other supports via DAFM, Teagasc and farm advisory services.</p> <p>The scheme also has coherence and potential synergy with the Collaborative Farming Scheme in Pillar II which can support elderly farmers considering retirement.</p>
Eco Scheme	<p>Regarding co-ordination within Pillar I, this scheme is purposely designed to operate as a part of, and in addition to, the overall basic direct payments system, and with clear provisions which aim to ensure environmental additionality over and above the basic conditions of BISS.</p> <p>Regarding Pillar II, there may be potential for overlap between the Eco-Scheme and environmental projects implemented on some farms. We understand that in practice, however, the respective monitoring under the two Pillars, including the shared IACS system, will be capable of identifying potential cases where this might occur, and hence of avoiding or otherwise dealing with such cases</p> <p>Regarding non-CSP interventions, the scheme is closely aligned to national and EU policies in the environment and climate-change “space”.</p>
Protein Aid	<p>The intervention accounts for a very small share of the total budget for the overall plan, being equivalent to less than 0.6% of the total Pillar I budget or less than 0.4% of the total CSP budget. At the same time, it is one of a number of direct financial supports that Irish farmers can potentially avail of under the CSP (alongside financially bigger schemes like BISS, CRISS or CIS-YF), and it also provides funding on a per hectare basis like these other supports. However, its explicit aim to sustain and grow protein crop production in Ireland,</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>and thereby contribute to greater farm diversification and improved resilience in the agri-food sector, makes it more complementary to such schemes' aims and objectives, while its higher planned unit payment per hectare (when compared to these other schemes) should help to increase its attractiveness to farmers as a means of diversifying on-farm operations.</p> <p>In addition, the activities supported under this intervention are generally complementary to activities in other larger schemes in both Pillar I and Pillar II, such as the Eco-Scheme (Pillar I), AECS and the Organic Farming Scheme (OFS) in Pillar II, which <i>inter alia</i> fund initiatives to improve crop rotation, limit chemical nitrogen fertiliser usage, increase the use of organic fertilisers, provide fallow land incentives, and improve soil health and water quality.</p> <p>In terms of wider policies, the intervention appears to be coherent with the recently published "Food Vision 2030"³⁰, the new 10-year strategy for the Irish agri-food sector, and "Ag Climatise", the Department's roadmap towards climate neutrality. For example, Food Vision 2030 proposes expansion in tillage, horticulture, organic farming and agro-forestry, including a plan to reduce Ireland's dependence on imported protein crops, while Ag Climatise supports increased production of home grown proteins in livestock rations as a means of reducing the level of crude protein in animal diets (thereby reducing environmental pressures due to the ammonia loss associated with livestock manure).</p>
Fruit and Vegetable Producer Organisations	<p>The intervention is a relatively stand-alone measure within the wider CSP, which is generally not related to or closely linked to other supports and interventions within the plan. Support under the intervention is also provided to the activities of POs, rather than directly to farmers.</p> <p>The intervention is a mandatory requirement for CSPs in all EU member states under the latest CSP Regulation, and it accounts for a very small share of the total budget for the overall plan, being equivalent to less than 0.7% of the total Pillar I budget or 0.4% of the total CSP budget.</p>

³⁰ See Food Vision 2030: A World Leader in Sustainable Food Systems, Department of Agriculture, Food and the Marine, 2021.

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>Furthermore, the intervention provides supports for a sector that has limited eligibility for CAP funding through other sources. Only field crop growers, for example, are eligible for direct income payments (see Section 3.4 of the CSP), and such producers only account for about 26% of total output from the fruit and vegetable sector in Ireland³¹.</p> <p>At the same time, PO activities related to organic production are eligible for support under the intervention, which might offer some potential for synergy and complementarity with the OFS (Pillar II), while tillage farmers and organic farmers can potentially access direct support under the CIS (Pillar II). In addition, financial support for the fruit and vegetable sector is included in the early-stage support for PO scheme which will facilitate the creation of new POs in the fruit and vegetable sector.</p> <p>In terms of wider policies, the intervention appears to be coherent with Food Vision 2030, as one of its main missions is to support <i>“viable and resilient primary producers with enhanced well-being”</i>, and to achieve this it advocates action to promote POs as a means to deliver a <i>“more equitable distribution of value within the food system”</i>.</p>
Apiculture	<p>The intervention is a relatively stand-alone measure within the wider CSP, which is generally not related to or closely linked to other supports and interventions within the plan. Support under the intervention is also provided to the activities of research institutions, rather than directly to producers.</p> <p>The intervention is a mandatory requirement for CSPs in all EU member states under the latest CSP Regulation, and it accounts for only a tiny share of the total budget for the overall plan, being equivalent to about 0.01% of the total Pillar I budget or 0.006% of the total CSP budget.</p> <p>Intervention actions that seek to address decline in pollinator species, moreover, make it complementary to other CSP interventions that seek to enhance biodiversity (though on a much smaller scale, which might reduce the scope for synergies with other interventions). Such interventions would include, in particular, interventions such as the Eco-Scheme (Pillar I), ANC, the Agri-Environment Climate Measure, the On-Farm CIS and the OFS (Pillar II). In addition, it complements some of the Good Agricultural and Environment Conditions (GAECs) that are applied to income support schemes, e.g., GAEC9, GAEC10.</p>

³¹ See *Producer Organisations in the Fruit and Vegetable Sector: National Strategy for Sustainable Operational Programmes 2017-2022*, Department of Agriculture, Food and the Marine, 2017.

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	In terms of wider policies, the intervention is coherent with Ireland's current National Biodiversity Plan 2017-21, which sets out a vision <i>“that biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society, and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally”</i> . In this regard, this plan also explicitly references the threat to bee species in Ireland, and it recommends the implementation of A-IPP, prepared by the National Biodiversity Data Centre (NBDC), including making the Irish countryside more pollinator friendly; raising awareness of pollinators; supporting beekeepers and growers; and expanding knowledge of pollinators.
Pillar II Interventions	
ANC	<p>Operating as a simple income support, the scheme compensates farmers for the economic effects of their farming in areas with constraints not at play everywhere (or for all farmers). Such effects are currently calculated using the 2010 Census of Agriculture, along with DAFM datasets, which arrive at average output levels in such designated areas as against levels elsewhere.</p> <p>The ANC scheme for 2023-2027 is modelled identically to the existing counterpart scheme, which has operated since a re-designation of disadvantaged areas (or areas deemed to be facing natural constraint) occurred in 2019. Other than in this redesignation, the scheme has operated in different forms over many years and over numerous multi-annual funding programmes.</p> <p>While it is a large scheme with high numbers of participating farmers, and among the highest levels of anticipated expenditure, the scheme is not complex in its objectives or implementation (beyond the definition and designation of areas of constraint), it has a self-contained role and function within the wider CSP, and it is generally coherent within it.</p> <p>To be eligible, farmers only need to be farming at defined minimal but genuine levels, on designated parcels of land. To receive the payments, they must meet conditionality requirements and be farming designated areas in the year of payment.</p> <p>There are no cross-dependencies with other schemes that affect eligibility or payment levels, and participation doesn't affect eligibility for or participation in other schemes for farmers, nor the obligations any other intervention may impose.</p>
AECM	The intervention appears to have a good overall level of coherence, where lessons from previous programmes have been incorporated. It complements other interventions and supports other key policies and programmes.

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>Lessons from the Burren Programme and the EIP-Agri have been applied to the design of the Co-operation option, which will operate as a hybrid results-based model. However, this is no more than a brief mention of how these previous programmes have contributed towards the design of the draft intervention, specifically the Co-operation option. Therefore, it is difficult to have a full understanding of what specific elements were taken from these previous programmes and how they were applied in the current intervention.</p> <p>The AECM is supported by the AECM Training intervention, which provides training to all farmers registered under the AECM to help them successfully implement the suite of actions offered under the AECM. Attending this training is a mandatory part of the first year for all AECM participants, which can help to ensure this intervention is delivered as effectively as possible to maximise impact.</p> <p>The intervention also complements several other interventions, namely the Eco-Scheme, the SCEP and the OFS. EIPs with environmental themes will also complement some of the priorities and themes addressed in the main AECM, such as innovative approaches to farming and sustainable development.</p> <p>There are no overlaps between actions proposed under the Eco-Scheme and the flagship AECM, however some costings under both interventions cover the same issue. If a participating farmer selects actions in both schemes, where costings take account of the same issue, they will receive a reduced payment under one of the schemes to avoid a farmer being overcompensated.</p> <p>Food Vision 2030 aims to reduce biogenic methane levels, reduce ammonia emissions, reduce nutrient losses to water, increase biodiversity and increase area that is farmed organically, and while the scheme does not directly contribute to some of these, it does complement the other interventions mentioned above in addressing the overall the Food Vision 2030 strategy. In addition, the intervention is coherent with the National Forestry Programmes (NFPs), as the scheme includes significant tree planting measures, and the “Our Rural Future 2021-2025” policy, which supports just transition for farmers in meeting environmental and climate change related challenges. Other relevant policies and programmes that are referenced by the intervention, meanwhile, include the Water Framework Directive, Natura 2000, the Birds Directive, the Priority Action Framework, the European Green Deal and Ag Climatise.</p>
AECM Training	<p>The intervention is closely related to the AECM, where the eligibility criteria dictate that farmers and advisors involved in the AECM will take part in the mandatory training provided by this intervention. It therefore complements the AECM and is coherent in providing a curriculum that explains the wider context of the AECM and the actions that the AECM will deliver, and there are clear and expected synergies in place between this and the AECM.</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>It is not clear whether the lessons from existing or historical programmes have been applied to the design of the intervention, and there is no reference in the CSP to other key policies or programmes. However, since the intervention is specifically tied to the AECM, it may not be related to any other key policies or programmes that are not already covered by the AECM.</p>
Straw Incorporation Measure	<p>The proposed intervention is intended to mirror a pilot scheme currently operating within the transition period, with the same rules and payment rates. While full lessons have yet to be learned from the pilot, uptake and demand is reported by DAFM as having been high, especially from exclusive tillage farmers (with approximately 85% of the available budget having been subscribed). The Department expects both the number of participating farmers and the land area covered to increase under the new scheme.</p> <p>The scheme is coherent with wider schemes and interventions within the CSP. It provides a specific support for tillage farmers, which requires their going beyond minimal requirements under conditionality (whereby GAEC 5, 6 and 7 are relevant, but clearly give rise to different requirements related to soil erosion, seasonal soil coverage and crop rotation). Participation has no effect on eligibility for other schemes or programmes, nor does it conflict with practices promoted elsewhere, such as crop diversification within the Eco-Scheme, nor the participating actions most likely to occur on tillage farms under the AECM.</p> <p>Care will need to be taken, however, to ensure the volumes of straw incorporated are balanced against wider sectoral needs for straw (such as for animal bedding, fodder and in some areas of horticulture), which in the past have had supply problems brought around by adverse weather and other factors.</p>
Capital Investment Scheme	<p>The wide range of target areas for this intervention means that it will relate to a number of other measures within the CSP. This will likely include CIS-YF, the Eco-Scheme, AECM, AECM Training, the OFS, the SCEP, the DBWS, the SIS and Knowledge Transfer.</p> <p>While there is an obvious overlap regarding the areas that these interventions are working in, however, the other interventions largely operate in different ways, i.e., the CIS offers targeted grants for specific capital investment projects, while the other interventions offer support in other forms, whether that be in the form of training, sharing of knowledge, or income support for particular target groups.</p> <p>Notable complementarities with other schemes include the OFS, given that organic applicants qualify for a higher grant aid of 50% and can also exclusively apply for specialised machinery and equipment. Funding for LESS equipment may coincide with support for the action of spreading slurry with LESS equipment in the new AECM, as was the case in the previous similar schemes (TAMS II and</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>GLAS). Likewise, the proposed inclusion of GPS controller fertiliser in the CIS may complement the Eco-Scheme, where a measure is being considered to reward farmers for using a GPS controller spreader to spread fertiliser. Animal handling equipment, weighing equipment and calf feeding equipment will also complement applicants wishing to apply to other schemes that involve this equipment, including the DBWS and the SCEP.</p> <p>Investment levels are expected to be similar to TAMS II and expected figures have been based on experiences with this programme. It is expected that some substitution of investment will occur between the two programmes, with a higher uptake in animal welfare investments expected instead of investments in dairy equipment and LESS equipment.</p>
Organic Farming Scheme	<p>This intervention is a relatively integrated measure within the wider CSP, which is generally related to other interventions. OFS will work alongside AECM, the Eco-Scheme, the SCEP and EIPs to meet targets outlined in Food Vision 2030, which aims to deliver a climate-neutral food system by 2050. The scheme will also work in parallel to the DBWS, the SIS, and the Eco-Scheme to achieve the Food Vision 2030 mission for “food that is safe, nutritious and appealing, trusted and valued at home and abroad”.</p> <p>The intervention provides support for a sector that has limited eligibility for CAP funding through other sources. Many interventions highlight active farmers as beneficiaries, but make no distinction for organic farmers or those in conversion to organic farming, despite the 74,000 ha under organic production in Ireland (according to the SWOT analysis).</p> <p>The Department also aims to increase the synergies that exist between organics, AECM and the Eco-Scheme, and thus make organic farming a more attractive option. This will involve the scheme implementing results-based actions and pushing for organic farmers to qualify for the Eco-Scheme, which is still a work-in-progress. However, there is support for organic production available within the Sectoral Intervention in the Fruit and Vegetable Sector, which is part of Pillar I, offering some potential for synergy (though not in the form of direct supports for farmers).</p> <p>The intervention also aims to build on the progress made in the development of the organic sector in the previous programme period, and is reflective of stakeholder consultation, with lessons drawn from the previous interventions including continuation with the same general scheme structure and implementation/administration, use of grant aid mechanisms to avoid over-complication and encourage participation, and establishment of scheme targets for land area under organic production.</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>Finally, in terms of wider policies, the Department will continue to implement the actions as set out in the National Organic Strategy for the development of the organic food sector up to 2025, these actions are expected to remain similar after 2025. The intervention appears to be coherent with Food Vision 2030, as it will directly assist in meeting its objectives by increasing the area of agricultural land farmed organically and by enhancing consumer trust in the food production system by ensuring high animal welfare standards.</p>
EIPs	<p>The intervention accounts for a small share of the total budget for the overall plan, being equivalent to 0.9% of the total Pillar II budget, but it is a relatively integrated measure within the wider CSP. It includes addressing identified gaps within the AECM Co-operation measure by implementing general EIPs that cover a broader range of projects. It also has indicative themes that align to the aims of other measures and facilitates results-based EIPs that will encourage continued learning and improvement-seeking by farmers in a range of relevant areas, and the scheme's bottom-up approach is similar to the locally led approach within the LEADER Programme. However, support under the intervention is provided to Operational Groups, unlike many interventions that solely support farmers. In addition, the intervention provides support to a range of actors that have limited eligibility for CAP funding through other sources. Little to no reference is given to researchers, advisers, businesses, environmental groups and consumer interest groups as beneficiaries of most interventions, despite the significant role they can play in developing solutions to challenges faced in rural Ireland.</p> <p>At the same time, the Draft CSP relates the intervention to animal welfare standards and responsible use of pesticides, which might offer some potential for synergy and complementarity with the OFS, while it also has a focus on climate change challenges, which may correspond and complement similar over-arching objectives of interventions such as CPD for Advisors and AECM.</p> <p>As the intervention was in its infancy in the previous funding period, it is expected to expand as it becomes a more established part of this CSP. It builds on the previous EIPs by acknowledging that a bottom-up approach encourages higher engagement levels, while the Department is also aware that increased training of farmers and the use of results-based payments are elements that should be continued in the upcoming funding period, albeit with the benefit and insight of learning gained from both the AECM (Co-operation) and the REAP pilot exercise.</p> <p>This intervention has also been designed in a manner coherent with the arrangements for the set up and development of the CCOs under the national AKIS. For example, this intervention will increase farmers' and advisors' understanding of agriculture-related issues</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>and opportunities and provide support for research and innovation in the agri-food sector and encourage the application of findings at farm level.</p> <p>Finally, in terms of wider policies, the intervention appears to be coherent with Ireland's Climate Action Amendment Bill 2020. This intervention expects to support 30 operational groups to implement projects related to environmental, biodiversity, and climate change challenges, which will offer some alignment to the Government's objective to achieve a climate neutral economy by the end of 2050. In addition, the intervention may work in parallel with a number of other initiatives, including the Teagasc Animal and Grassland Research and Innovation Programme, which conducts research dedicated to improving the sustainability of Irish animal production systems through improved nutrient use, reduced GHG emissions and addressing ammonia emissions from grassland sources.</p>
Knowledge Transfer	<p>The intervention accounts for a small share of the total budget for the overall plan, being equivalent to 1.8% of the total Pillar II budget or 0.7% of the total CSP budget. At the same time, it is a programme that is probably of greater importance relative to its budgetary size, given that its planned topic areas are relevant to numerous other programmes and schemes in the CSP. In this regard, it is generally complementary to other programmes and schemes in the wider plan, since it seeks to provide targeted knowledge and skills to farmers in support of achieving SOs, which in turn might assist in the implementation of other interventions or supports, e.g., by providing knowledge and skills to enhance farm efficiency, viability and diversification, or improve environmental performance.</p> <p>Other programmes or schemes within the CSP that potentially involve some degree of direct knowledge transfer or training/skills activity include the Sectoral Intervention in the Fruit and Vegetable Sector and the Sectoral Intervention for the Apiculture Sector (Pillar I), plus the AECM and EIPs (Pillar II). Facilitators that organise groups under Knowledge Transfer must also participate in CPD for Advisors (Pillar II). Nonetheless, potential for overlap and duplication between programmes and schemes appears limited, as interventions under these other cases are either more sectorally-based or less directly targeted at individual farmers. Still, good communication between implementing divisions will be important so as to ensure that overlap or duplication does not occur between programmes and schemes.</p> <p>Finally, in terms of wider policies, the intervention appears to be coherent with Food Vision 2030, one of the main missions of which is to support “<i>an innovative, competitive and resilient agri-food sector, driven by technology and talent</i>”, with associated goals that include the development of a dynamic knowledge exchange environment and the enhanced use of technology and data. Similarly, the Ag Climatise roadmap towards climate neutrality cites a need for a functioning, adaptable and inclusive agricultural knowledge and</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	innovation system, including enhanced knowledge flows and stronger links between research and practice, stronger farm advisory services and support for enhanced digital transition in agriculture.
CPD for Advisors	<p>Agricultural advisors play an important role in the AKIS and in ensuring that policy interventions and supports attract participants and are implemented as intended. According to DAFM, a very high proportion of Irish farmers engage agricultural advisors, so this intervention will provide specific training modules to approved advisors, which will supplement other training delivered as part of normal FAS operations. The specific training topics and themes have not yet been determined, but may, according to the draft CSP, include <i>“climate change (both mitigation and adaptation) and sustainable energy, air, soil and water quality, biodiversity conservation, and the adoption of new technologies and best practice”</i>.</p> <p>At a broad level the intervention has the potential to be highly coherent with the wider programme. In affecting and benefiting farmers indirectly rather than directly, it has no explicit interfaces with interventions to which farmers themselves apply, and no cross-dependencies or eligibility relationships. More importantly, however, its subject matter is likely to be relevant to many or perhaps all wider programme interventions, and across all SOs as well as the cross-cutting goal.</p> <p>At the same time, theme and content selection will need to complement wider FAS training to ensure the greatest degree of both additional relevance and impact.</p>
Suckler Carbon Efficiency Programme	<p>The intervention complements several other interventions within the CSP. The AECM, the Eco-Scheme, and the OFS all contribute towards meeting the targets outlined for a climate-neutral food system by 2050, to reduce biogenic methane levels, reduce ammonia, reduce nutrient losses to water, prioritise biodiversity on farmed areas, and increase the area of agricultural land farmed organically. In addition, DAFM officials stressed that the DBWS is complementary to this scheme, as both target improved animal health.</p> <p>The scheme has been developed from and will build upon the lessons learnt from the BDGP and BEEP-S, including: improving the genetic merit of the Irish suckler herd, which will have a knock-on impact of reducing GHG emissions; weighing animals for improved genetic evaluations, through the collection of cow and calf live-weight data, that has improved maternal efficiency metrics; and complementary animal welfare actions, including the vaccination of calves at weaning time, meal feeding in advance of weaning, and continuing after weaning to reduce animal stress. These lessons are evident in the design of the actions under the scheme. The actions</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>include: a Genotyping Programme, where the animals must be genotyped each year; a Weighting Measure, where the suckler cow and calf pair are weighed prior to the calf being weaned; and Data Recording, where participants must record a range of data.</p> <p>Beyond the CSP, the intervention appears coherent with several key policies, including Ireland’s Climate Action Amendment Bill 2021, Our Rural Future 2021-2025 and the SBLAS. The SBLAS in particular was developed in response to marketplace demands for proof that meat is produced in a sustainable way on farms, which follow sustainability principles incorporating environmental, social, and economic aspects. This scheme complements the SCEP, as the intervention is intended to further develop the environmental sustainability of the suckler herd.</p>
DBWS	<p>The intervention is coherent with the Food Vision 2030 mission to produce food that is safe, nutritious and appealing, trusted and valued at home and abroad, given its focus on improving animal welfare.</p> <p>In addition, the SBLAS (as noted above) was developed in response to marketplace demands for proof that meat is produced in a sustainable way on farms, following sustainability principles incorporating environmental, social, and economic aspects. As animal welfare is a component of sustainability and quality assurance under the SBLAS, the DBWS is therefore directly related to and coherent with the SBLAS.</p>
SIS	<p>This intervention draws lessons from and builds upon the activities of the earlier SWS. The “BETTER Farm Sheep” programme run by Teagasc³² comprises elements that are similar to the draft intervention, including faecal egg counts and monitoring of lambs and ewes. Within the draft CSP, there are also other animal welfare interventions, such as the DBWS. While the draft intervention does not note other interventions explicitly, they work towards the same animal welfare objectives (though for different animal species) and relate to similar strengths, weaknesses, threats, and opportunities.</p> <p>Furthermore, the SIS also relates to Food Vision 2030, specifically that strategy’s mission to produce food that is safe, nutritious and appealing, trusted and valued at home and abroad, given its focus on improving animal welfare.</p>

³² [BETTER Farm Sheep - Teagasc | Agriculture and Food Development Authority](#)

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
Early-Stage Support for POs in Certain Sectors	<p>While there are other interventions that also support the beef and sheep sectors in the CSP, support under this intervention is provided solely to the activities of POs, rather than directly to farmers, and for different purposes than those targeted in other interventions.</p> <p>In terms of lessons learned, the current draft intervention adds additional support for the establishment of POs by providing €10,000 per annum for three years for administrative costs, in addition to a one-off €3,000 payment in Year 1 to pay for facilitators to support the set-up of the PO. It also reflects feedback from other sector stakeholders to expand the scope of coverage into the sheep, potato, tillage, amenity and fruit and vegetable sectors.</p> <p>The intervention sits alongside the Food Vision 2030 strategy, and supports its goals, particularly its mission to support viable and resilient primary producers.</p>
Collaborative Farming Grant	<p>Other schemes that offer support to young farmers are the CIS-YF and the On-Farm CIS. However, this intervention is complementary to these interventions, with key differences is the activities being funded, with the Collaborative Farming Grant exclusively focusing on farm partnerships and supporting generational renewal.</p> <p>The scheme also builds on the previous iteration of the Collaborative Farming Grant by offering the additional support for older farmers to assist in their pathway to retirement. This puts a greater focus on older farmers in particular, with the same level of support available for older farmers as there is for establishing farm partnerships. The amount of support is calculated on the basis of costs incurred under the previous iteration of this scheme.</p>
LEADER	<p>LEADER is an important component of the wider CSP, but it is quite unique in terms of its objectives. It largely impacts on SO8 and does not have much cross-over with the rest of the plan. In particular, LEADER is different in offering animation support through the work of project officers within the community to facilitate capacity building. Support under the intervention is also provided to the activities and operations of LAGs, whereas many interventions support farmers directly. The intervention is also a mandatory requirement for CSPs in all EU member states under the CSP Regulation.</p> <p>LEADER support for the 2023-2027 period proposes to build on the current LEADER programme, utilising similar mechanisms while applying lessons learned, and this will also take account of an ongoing review of the previous delivery structures. This review will assess the effects of the 2014 changes to LEADER's delivery structure from LDCs to LCDC-LAG models. The review, which is due for</p>

Table 6.2 Review of Coherence – Proposed CSP Interventions

Intervention	Comment
	<p>completion at the end of 2021, is expected to inform the delivery structure of the new programme and ensure that delivery is as effective as possible.</p> <p>The draft CSP relates this intervention to objective three which involves supporting locally produced food, including organic produce. While little information is available regarding the actions LEADER will take to address this need, coherence with the OFS seems likely although not expressed in any current documentation.</p> <p>Finally, in terms of wider policies, the intervention is coherent “Our Rural Future 2021-2025. Suggested themes for LEADER correspond with this policy’s core objectives, and Ireland also has a number of national initiatives targeted at rural and community development that work in conjunction with LEADER to develop Ireland’s rural areas. In addition, LDSs will be required to give consideration to key policy documents in their areas, such as Local Economic and Community Plans as well as other relevant regional, national and EU policies.</p>



6.4 Intervention Strategy

The over-arching intervention strategy is clearly demonstrated in the framework of prioritised needs, their relationship to objectives, the suite of interventions selected, the proposed budgetary allocations (see Section 4.7, Table 4.2 and Table 4.3), and in the framework of output and result indicators, targets and milestones developed alongside these. Together they illustrate a logical and coherent chain of relationships, although one which by necessity is detailed and multi-layered. It is also heavily influenced by the overall regulatory requirements, including budget limits and obligations. As well as the chain of effects across these different dimensions, the plan is underpinned by clear definitions, an explicit conditionality framework, and in many cases clear targeting, e.g., of beneficiaries, of farmer categories, of sub-sectors.

These various aspects of the intervention strategy are discussed as they relate to individual interventions in Table 6.3.

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
Pillar I Interventions	
BISS	<p>In terms of strategy, BISS is presented as a direct response to SO1. It also relates to a number of other parts of the CSP Regulation, including Article 14(1), which lists the direct payments required, and which includes the BISS as one of these. The intervention strategy regarding BISS is therefore in effect embodied in, and “handed down” by EU policy, as reflected in the Regulation.</p> <p>This vital role that direct payments play in supporting viable farm incomes, however, is evidenced in the annual Teagasc NFS data, cited in the SWOT analysis and needs assessment. The 2019 survey, for example, shows that on average direct payments made up 78% of family farm income in that year, while preliminary results for 2020 show the share as 70%. Furthermore, this share varies widely across farming types, rising from 28% in dairying up to 157% in cattle rearing. Two other sectors (other cattle and sheep farms) also show a direct payment share of over 100%.</p> <p>It could be argued that a more detailed intervention strategy (or theory of change) would be desirable, e.g., whether there is any aspiration that supported farms would become financially viable themselves, and if so when and how. However, this is not anticipated or required by the CSP Regulation, as the BISS intervention is mandatory. BISS support is also based on payment entitlements in accordance with Articles 20-24 of the CSP Regulation. Support is thereby based on the size of a holding (the number of eligible hectares) and the number and value of entitlements held. In relation to “convergence”, the value of payment entitlements received will have a value of at least 85% of the planned average unit amount by 2026.</p> <p>Regarding budget, the BISS budget is essentially the Pillar I budget less the amounts prescribed for the other direct payment interventions. The planned minimum, average and maximum unit amounts are justified on the basis of the economic and income challenges as set out in the SWOT analysis and needs assessment. The planned average unit amount under this intervention is €165.30 per payment per activated entitlement. Taking the number of expected activated payment entitlements as 4,407,042, at an average planned unit amount of €165.30, would lead to an annual financial allocation of €728,494,838. A lower rate of payment, down to the minimum unit amount of €131.66 per activated entitlement, may be utilised in some years, where necessary to prevent an excess of the financial allocations for types of interventions in the form of direct payments referred to in Article 81(1) of the CSP Regulation, while a higher rate of payment, up to the maximum unit amount of €198.95 per activated entitlement, may be utilised in years where necessary to avoid unspent funds.</p>

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>The CSP Regulation (Annex 1) also sets out a series of predefined indicators for SO1, to which direct payments respond. In this regard, the draft CSP proposes result indicator R.4 relating to “linking income support to standards and good practices”, i.e., the share of UAA covered by income support and subject to conditionality. Based on the anticipated number of eligible beneficiaries and their land holdings, the share is estimated at 97.6% annually over the five years of the plan, with the associated number of eligible beneficiaries being 127,000. Regarding outputs, the CSP Regulation specifies, for decoupled direct support such as BISS, the number of hectares subject to decoupled support as an output indicator.</p>
CRISS	<p>The CRISS is re-distributive in nature and effect. Its contribution to wider CSP objectives is that it helps short-term survival of vulnerable farms. However, in itself it does not contribute to their improved viability, except in the immediate financial sense or in contributing to the other parts of the plan objectives.</p> <p>Regarding targets and indicators, the defined indicators as taken from the CSP Regulation (Annex 1 of the Regulation) involve four result indicators, plus an output indicator, namely R4, R6 and R7, and output indicator 07. These all measure the sub-set of BISS participants that are also in receipt of CRISS, which is logical within the structure of CRISS.</p> <p>Regarding participation levels, across the full UAA in Ireland, some 67,000 farms are under 30 ha, while a further 55,000 are also eligible for support on their “first” 30 ha.</p> <p>DAFM thus estimates that 2,750,000 ha will be eligible for support. Combining this with an average per hectare payment of €43.14 gives a total annual budget of €188,628,200. On this basis, the total number of hectares in receipt of this decoupled payment will be 2,750,000 annually, or 60.9% of the full national UAA of 4,516,040.</p> <p>CRISS targets are therefore realistic and follow the regulatory requirements.</p>
CIS-YF	<p>The intervention potentially contributes to multiple aims and objectives of the CSP as a whole. In particular, encouraging and supporting a lowering of the age profile of Irish farm “heads” contributes to a range of wider positive outcomes for the sector, e.g., more innovation, more use of IT, more positive attitudes towards the environment. An assumption, for example, that younger farmers are likely to be more progressive is supported in the SWOT analysis by survey evidence, e.g., a European Council of Young Farmers (CEJA) survey found that about 90% of all young farmers felt responsible for ensuring a sustainable agricultural sector and are concerned about the</p>

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>natural environment. Similarly, a UCD study on innovation in the Irish agri-food sector found that <i>“highly innovative farmers are more likely to be younger than less innovative farmers and are likely to have higher farm incomes and larger farms, resulting in them being more competitive. Therefore, the decline in young farmers risks a decline in innovation and this will reduce the overall competitiveness of the Irish agri-food sector”</i>.</p> <p>Following from the above, a clear intervention logic is evident. By making the transition to becoming head of a holding more attractive for younger farmers, and by helping to ease financial concerns, the benefits of a younger profile among farm managers can flow through to these other desirable outcomes.</p> <p>Some caveat might be added to this, however, as evidence in support of the positive relationship between age and progression is survey-based, while some practical on-the-ground evidence would also be desirable, e.g., from follow-up inspections. Also, generational change could have unintended consequences, e.g., more part-time farming by younger farmers heads could lead to less attentive farm management.</p> <p>Regarding budget, the maximum indicative financial allocation is €179.9mn over the 2023-27 period. Reflecting the anticipated trend in cumulative annual beneficiaries, this will grow from €32.3mn in 2023 up to €39.3mn in 2027. Projected participation levels are based on likely numbers of graduates from the relevant education courses, while the experience of the Young Farmer Scheme since 2015 suggests that each active beneficiary received an annual amount of about €2,300, or about €11,500 over a five-year period.</p> <p>Regarding uncertainties, the assumption that more youthful farm heads contribute to better farm management is perhaps not as well evidenced as might be expected, and the motivations of young Irish farmers in the uncertain years ahead may be less explored than would be desirable. There are also risks of deadweight, while evidence of apparent pent-up demand for the YFS could be caused by delayed farm takeovers in anticipation of grant support.</p> <p>Regarding indicators, the draft CSP currently adopts output indicator O6 (numbers of hectares subject to complementary income support for young farmers) and result indicator R4 (linking income support to standards of good practices), though we understand this matter to be subject to Commission clarification. Target values, however, appear soundly based.</p>
Eco Scheme	The intervention is clearly aligned with national and EU environmental strategy and aims to contribute to national targets and actions in this regard. It involves a clear intervention strategy, namely that farmers already in receipt of BISS/CRISS direct payments will, for an

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Intervention	Comment
	<p>additional payment, “go the extra mile” in terms of exceeding the basic environment, climate change and other related standards, with which they are already complying.</p> <p>Regarding budget allocation, the budget is “top-down” in nature, and follows from the decision to allocate 25% of the Pillar I budget to this intervention, i.e., a total of €1,482.9mn over five years, or an indicative annual allocation of €296.6mn.</p> <p>The scheme aims to compensate, wholly or partially, the relevant costs borne by the participants, including actual outlays plus income foregone, based on Teagasc NFS data. On DAFM estimates, if all eligible farmers participate in the Eco-Scheme (i.e., about 129,000, based on 2021 applications for the Basic Payment Scheme) and bring in all their eligible lands (4,698,000 ha), the average payment per hectare would be €63. If uptake was only 50% of this, the rate would be €126 per hectare. On an assumption of 85% participation, however, DAFM estimates a planned average payment rate of €74 per hectare. In terms of payments per farmer, the full annual budget of €296.9 mn per annum and participation by all eligible farmers gives an average of €2,299, rising pro- rata if participation is less.</p> <p>Farmers will not receive more than the maximum costings. By selecting two actions under the scheme, the combined costings will also give the Department flexibility to compensate farmers up to the maximum rate if uptake is low, whereas if uptake is extremely high, applicants will be partially compensated. Unlike Pillar II, however, any allocated expenditure under Pillar I must be spent in the year in question or it risks being lost. This is a risk in this new scheme, and we understand was a significant issue in negotiations with the Commission. Some level of flexibility in the first two years (2023/24), including learning periods, were included in the political agreement.</p> <p>Regarding performance indicators, the draft CSP cites indicators from the CSP Regulation (Annex 1 of the Regulation), as they relate the relevant objectives, i.e., R12, R17, R21, R31 and R34. These refer to shares of the UAA under supported commitments to improve the underlying physical feature, depending on the particular farming practice involved. Target levels are also presented, which are shown as largely constant over the five years. There may be a case to show some build-up of participation, but DAFM is reasonably confident of such levels of participation, on the basis that many farmers may already be at or above the target farming practice levels required under the Eco-Scheme.</p> <p>In this regard, however, farmers would still receive a payment in recognition of income foregone, but there may be no additionality arising from scheme payments, which would award existing good behaviour rather than motivate good new behaviour. This, perhaps, throws up issues regarding both the objective and the intervention logic for the scheme.</p>

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Intervention	Comment
	<p>Also relevant to performance, finally, is the welcome attempt to set concrete (and in some cases quantitative) targets for improvements in most of the eight specific sub-schemes, over and above relative GAEC requirements.</p>
Protein Aid	<p>The intervention supports domestic production of protein crops, which can then be used to supply a greater proportion of the feed materials included in animal feed rations, ultimately reducing Ireland's reliance on imported feed materials. At the same time, it provides greater certainty to farmers in the sector in the face of uncompetitive economic returns, while also promoting farm diversification in ways that can lower the carbon intensity of farming.</p> <p>The logic underlying the intervention strategy therefore seems reasonably clear, linking to needs identified through the SWOT analysis and needs assessment, and it clearly relates to a number of SOs outlined in the CSP Regulation.</p> <p>Also, feedback from Department officials suggests that the new intervention is designed to build on the achievements of and lessons learned from the previous scheme, i.e., the Voluntary Coupled Support Scheme for Protein Crops 2015-2020. Prior to that scheme, the total land area under protein crops in Ireland was at just 3,500 ha in 2014, whereas the equivalent figure for 2020 was about 13,700 ha. However, lower annual rates of payment per hectare under the earlier scheme, at between €215 and €365, did not appear to provide a sufficiently stable rate of payment to encourage farmers to sustain investment in protein crops (such as where crop yields were affected by adverse weather conditions), with the result that total land area covered by the scheme fluctuated from a high of 14,000 ha (in 2017) down to a low of 8,400 ha (in 2018). Under the new scheme, therefore, higher rates of payment are expected to encourage more sustained investment in protein crops, even where crop yields vary, as is targeted in the indicators below.</p> <p>In terms of indicators, anticipated outputs and results arising from the intervention (and their link to the common indicators outlined in the CSP Regulation) are described as follows: number of hectares benefitting from coupled income support – projected to increase from 14,000 ha in 2023 up to 20,000 ha in 2027 (indicator O9); share of UAA covered by income support and subject to conditionality – projected to increase from 0.31% in 2023 up to 0.44% in 2027 (indicator R4); share of farms benefitting from coupled income support for improving competitiveness, sustainability or quality – 0.87%, from 2023 through to 2027 (indicator R8); and share of UAA under supported commitments to reduce emissions, maintaining and/or enhancing carbon storage – projected to increase from 0.31% in 2023 up to 0.44% in 2027 (indicator R14).</p>

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Intervention	Comment
	<p>Result indicators R4 and R14 are directly related to output indicator O9, i.e., they refer to the targeted output in hectares as a share of total UAA. Related to this, the underlying target to increase land area covered from 14,000 ha to 20,000 ha over five years appears ambitious but reasonable, given: the progress made in promoting protein crops under the previous scheme; the higher rate of payment to farmers to be offered under the new scheme; expected increases in fertiliser prices, which might encourage a shift towards more farming of protein crops; and increased focus on providing advice on best agronomic practice to farmers, plus continued investment in variety trials to identify the best varieties suitable for Irish conditions³³. Also, increased output is targeted to be delivered by a static cohort of 1,200 eligible farms between 2023 and 2027 (result indicator R8), but this in itself represents an increase from about 1,000 farms growing protein crops in 2021.</p> <p>Finally, the budget allocation for the intervention, at €35mn over five years, or €7mn per annum, is an increase of €4mn per annum over the budget provided for the Voluntary Support Scheme for Protein Crops 2015-2020. The budget is based on a lower yearly output of 14,000 ha, providing unit support of €500 per hectare, and a higher yearly output of 20,000 ha, providing unit support of €350 per hectare.</p>
Fruit and Vegetable Producer Organisations	<p>The logic underlying the intervention strategy is reasonably clear, as it is very much guided by the sectoral objectives outlined in the CSP Regulation, which in turn seem appropriate given the need identified through the SWOT analysis and needs assessment.</p> <p>The mechanism for support, through funding the activities of POs, also follows the requirements of the CSP Regulation, with funding to be provided up to a maximum of 4.1% of combined VMP, at a maximum EU co-funded rate of 50%, with at least 15% of aid to be used to address environmental or climate change mitigation/adaptation measures, and with at least 5% of aid to be used to promote R&D and innovation. In this regard, in particular, the level of aid to address environmental or climate change mitigation/adaptation measures is higher than it was under the intervention's predecessor scheme, which required 10% of aid to be used to address environmental actions.</p> <p>Eligibility conditions determine that applicants must include a minimum number of five members and have a minimum combined VMP of €2.5mn in order to establish a PO. According to Department officials, POs would need to achieve this minimum size in order to</p>

³³ According to Department officials, the absolute maximum level of land area that could be covered by protein crops in Ireland, based on the need for crop rotation, would be about 50,000 ha.

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Intervention	Comment
	<p>achieve a sufficient concentration of supply to make a PO cost-effective (in terms of its administrative capacity or its attractiveness to retailers), with the Department pointing to IFA estimates which suggest that only 240 out of more than 1,100 fruit and vegetable producers in Ireland (or about 22%) would be of sufficient size to join a PO. For comparison, the POs that are expected to seek support under the new scheme are expected to include close to 50 members in total, with the smallest annual VMP among these POs expected to be about €9mn. This might suggest, therefore, that eligibility conditions under the new scheme are unlikely to exclude would-be POs, should others emerge.</p> <p>In terms of indicators, anticipated outputs and results arising from the intervention (and their link to the common indicators outlined in the CSP Regulation) are described as follows: number of producer groups/organisations (or associations of producer organisations) setting up an operational fund programme – five, from 2023 through to 2027 (indicator O33); share of farmers participating in supported producer groups, producer organisations, local markets, short supply chain circuits and quality schemes – 4.2%, from 2023 through to 2027 (indicator R10); and share of value of marketed production by producer organisations with operational programmes – 63%, from 2023 through to 2027 (indicator R11).</p> <p>Indicator targets on balance appear reasonable, based on the likely scope for PO membership among fruit and vegetable producers, cited earlier. The output indicator, for example, targets support for one additional PO (plus continued support for two well-established POs and two other existing POs that are only recently established). The first result indicator (share of farmers participating in supported producer groups, producer organisations, local markets, short supply chain circuits and quality schemes) refers only to the share of farmers participating in POs, and not the other types of groupings listed, while the second result indicator (share of value of marketed production by producer organisations with operational programmes) assumes 2% growth per annum in VMP across the fruit and vegetable sector, including PO members and non-PO members, but with PO share of total VMP growing from 50% in 2021-22 up to 63% thereafter.</p> <p>Finally, the budget allocation for the intervention, at €39mn over five years, is based on the levels of support that were provided to the four existing POs in the fruit and vegetable sector (allowing for the fact that two of these POs had also only been formed in the last couple of years), plus allowance for the expected funding of an additional fifth PO in the sector. The budget allocation would therefore appear to be reasonable and appropriate.</p>

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Intervention	Comment
Apiculture	<p>The logic underlying the intervention strategy is guided by the sectoral objectives outlined in the CSP Regulation, and these are intended to contribute to addressing a number of SOs. Yet, the intervention’s rationale for addressing some more economically oriented objectives (such as supporting viable farm incomes, enhancing market orientation and increasing competitiveness) is not clearly demonstrated through any reference to SWOT analysis or needs assessment in either the intervention template or the CSP, whereas its basis for addressing other more environmentally oriented objectives (such as contributing to the protection of biodiversity) is more clearly illustrated.</p> <p>In terms of lessons learned from previous National Apiculture Programmes, however, discussions with Department officials suggest that the actions proposed under the new programme will build on the activities funded under the previous programmes. So, national surveillance programme testing for bee-related disease is being introduced as a follow-on to previous activities to combat disease, the continued need for the monitoring of colony losses means that support for international collaboration with COLOSS is to be continued, while the provision of more advisory resources to disseminate and communicate programme results reflects stakeholder feedback regarding the need for same³⁴.</p> <p>In terms of eligibility, all research institutions that can demonstrate the necessary research capabilities, including universities, Institutes of Technology, Teagasc or DAFM’s own laboratories, will be eligible to submit proposals for funding. In this regard, the decision to award funding under the intervention as a single contract is consistent with the approach adopted in previous programmes, and it reflects the very small scale of the funding available, which Department officials suggest would be more administratively challenged and less cost-effective if administered through multiple contracts.</p> <p>In terms of indicators, there is a single output indicator for the intervention, which is for the number of actions for beekeeping preservation/improvement supported (indicator O35). The target for this indicator is one, from 2023 through to 2027, and it refers to the single contract to be adopted with a research institution in order to implement the programme. While this may be acceptable as an output indicator for CSP purposes, it will nonetheless still be important that progress towards achievement of the agreed “sub-actions”</p>

³⁴ For references to earlier apiculture programmes, see the National Apiculture Programme for the 2020-22 period, which is available at https://ec.europa.eu/info/food-farming-fisheries/animals-and-animal-products/animal-products/honey/national-apiculture-programmes_en.

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Intervention	Comment
	<p>of the programme, as per the intervention description and subsequent programme contract, is properly monitored as it progresses, so as to ensure that the intended outputs of the programme are achieved.</p> <p>Also, there is no result indicator for the intervention. Originally, an earlier draft of the intervention template had proposed to track the intervention's contribution to the <i>“number of persons benefitting from advice, training, knowledge exchange supported by the CAP and related to environmental-climate performance”</i> (indicator R24), but this was later deemed inappropriate (with Commission approval) because beekeepers are not direct beneficiaries of the intervention. At the same time, it might still be useful if the intervention adopted some means to track the level of beekeeper engagement with the new National Apiculture Programme (such as through existing sectoral surveys), even if this is done outside the formal indicator system for the CSP.</p> <p>Finally, the budget allocation for the intervention, at just over €616,000 over five years (with 50% EU co-funding), is pre-defined in the CSP Regulation, with EU funding based on the number of beehives in each member state. The budget is therefore higher than under previous National Apiculture Programmes, and this is probably justified, as funding is to be provided on a five-year rather than a three-year basis on this occasion.</p>
Pillar II Interventions	
ANC	<p>The intervention strategy and logic within the ANC Scheme is similar to that which has applied to existing and past similar schemes – namely the compensation of farmers whose activities are constrained by virtue of natural features of their farmland, resulting in the continuation of viable farming in such areas, the maintenance of farming practices thereon that meet minimal standards of environmental and land use sensitivity, and the avoidance of land abandonment. The scheme delivers on increased environmental ambition under the 2023-2027 programme, however, by requiring compliance with the enhanced conditionality that it brings, and by ensuring that the intervention is resourced so as not to reduce the level of incentive or likely breadth of participation achieved, compared with its predecessors.</p> <p>Needs are reasonably well established in the SWOT and needs assessment, however the scheme maintains a simple definition of need, with three core categories of “disadvantage”, and a tiered payment structure that seeks to genuinely reflect only income foregone and/or additional costs incurred, but calculated at a very aggregated and assumed level, with no reference to individual farmers’</p>

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Intervention	Comment
	<p>practices nor more detailed sub-categories of farmers or land. At the same time, this approach has been followed over a long period, ensures simplicity which encourages participation, and meets EU regulatory requirements.</p> <p>Output indicators relate only to the number of hectares of farmland receiving support, which is easily known in advance based on designations and past implementation.</p> <p>Two result indicators are relevant – R4 (linking income support to standards and good practice) and R7 (enhancing supports to farms in areas with specific needs). In the case of the former, a stable annual target of 49% of UAA is set, simply reflecting that proportion of total UAA against which payments are anticipated. However, at the time of writing, no targets had been established for R7, with DAFM awaiting clarification on how this indicator should be measured.</p>
AECM	<p>The intervention strategy is relatively clear. needs are well articulated in the draft interventions across each strand of the AECM, with the specific actions to address these clearly set out. Objectives are also well defined, with the objectives for the General option, Co-operation option and the Non-productive Investments all established. It is less clear what the relevant SOs for the Local Co-operational Project teams and the Bespoke Farm Supports are, however.</p> <p>The draft intervention demonstrates a strong link between the actions and their contributions towards environmental and climate related objectives. In the General option, each action is matched against both the relevant SMRs and the GAECs. However, there are some actions where SMRs and GAECs are listed as being “not applicable”, including rye grass seed set for birds, conservation of rare breeds and planting a traditional orchard. It is not clear as to why these are marked as not applicable, though written responses from DAFM highlighted that SMRs and GAECs do not cover all environmental priority areas, hence some AECMs actions do not have a relevant SMR/GAEC. So, while the actions listed as not applicable do not fall within an SMR or a GAEC, they are still considered as merited and beneficial.</p> <p>The outputs of the General option and the Co-operation options are provided, which are the expected number of hectares covered by environmental or climate commitments that go beyond mandatory requirements, and the number of operations or units that support genetic resources. However, this does not include a measure of the uptake of non-mandatory requirements.</p>

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Intervention	Comment
	<p>The intervention is clearly linked to a long list of result indicators. Each of these result indicators has corresponding outputs to be measured, with the CSP providing a target value against each result indicator for 2023-2027. However, what each of the result indicators are measuring could be made clearer, as it is difficult to interpret what these numbers mean in practice, and applies to both the General and the Co-operation options. Also, description of the intended impact of each of the actions is provided in the draft intervention, but it only provides a narrative overview, with no deeper analysis of the expected impact of the actions against specific metrics.</p> <p>The budgetary allocation has been tailored to different farmers falling into distinct categories throughout the intervention. For the AECM General, the intervention does appropriately provide both fixed and variable rates for different actions in the intervention, where there are variable rates for commonage, results based low input grassland, sustainable grazed pasture, and the protection of rare breeds. The planned intervention amounts and the indicative financial allocation for each of the actions contained in the intervention is well established, with indicative amounts of support provided on a yearly basis, and for certain actions, the amount of support per unit is established. The total financial allocation for the General option is €750,000,000, including €126,000,000 for non-productive elements over the five-year period, while the Co-operation option allocation is €740,000,000 including €80,000,000 for the non-productive investments over the five-year period. The justification for the budgetary amount is also articulated for the Co-operation option, where payments are designed to ensure that farmers are actively incentivised to improve the landscapes and catchments within which they farm, so the higher the result indicators, the higher the resulting payment will be, but only after a significant contribution to the local ecosystem has been made.</p> <p>Finally, it is not clear whether costs have been updated from the previous iteration of the programme, or if they are the same unit costs as the previous intervention. The costs of the interventions themselves, however, are well detailed in the draft AECM costs document.</p>
AECM Training	<p>AECM Training has a mostly clear intervention strategy. The actions taken by the intervention are tied to the needs that were identified by the AECM, and the objectives of the intervention are clearly laid out. However, there could be more information provided on how the number of outputs were reached, and the likely impact of the intervention is not clearly articulated, beyond providing participants with the knowledge they need to participate in the AECM.</p> <p>The intervention is clearly linked to two result indicators: R1 (number of persons benefitting from advice, training, knowledge exchange, or participating in EIP operational groups supported by the CAP to enhance sustainable economic, social, environmental, climate and</p>

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Intervention	Comment
	<p>resource efficiency performance); and R24 (number of persons benefitting from advice, training, knowledge exchange or participating in EIP operational groups supported by the CAP related to environmental-climate performance. It should be noted, however, that the CSP only references R1 in the draft Section 2.2 of the Intervention Logic and Strategy, and it is not fully clear how the intervention is linked to the second result indicator.</p> <p>In terms of the target values, the justification for the target values does not appear to be particularly strong. The target value is based on a figure of 55,000 farmers taking part in the mandatory training in the first two years of programme delivery, which then drops to 16,500 from 2025-26, which will comprise the voluntary training element, where it is expected the total number of participants will reduce. However, the number of initial attendees does not appear to align with the expected number of applicants that were recorded in the AECM General and Co-operation options. The total number of applicants in the AECM intervention is expected to reach 50,000 (30,000 in the General option, and 20,000 in the Co-operation option), whereas the total number of applicants participating in the mandatory training is 55,000 in total. Unless there is an unstated assumption that 5,000 may need to repeat the training, this is a gap that should be clarified.</p> <p>Also, it is unclear what the justification is behind the assumption that the numbers requiring the voluntary training in 2025-26 will decrease to 16,500, while there is no identified difference between the General option and the Co-operation option training requirements, unless these will be the same. Therefore, the budgetary allocation does not appear to reflect different categories of farmer, where any potential differences in training requirements for the two options is not addressed, nor provided as a different budgetary allocation.</p> <p>The budgetary allocations appear to be appropriate and are justified to an extent. The total amount payable per attendee at the training courses is €246, comprising of €90 per attendee for the trainer and €156 for the farmer in respect of his/her costs for attendance at the training. The total cost remains the same across the duration of the intervention, which results in a total financial cost of €6.765 mn for the first two years of the intervention and €4.059mn for the final two years of the intervention, based on a simple calculation of the number of participants multiplied by defined cost.</p>

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Intervention	Comment
Straw Incorporation Measure	<p>The intervention seeks to encourage a specific practice on tillage farms, which has proven benefits for the maintenance of soil organic matter and the capacity of soil to sequester carbon. Such practice will go beyond basic conditionality requirements and will complement soil quality supports elsewhere in the CSP.</p> <p>There is a single result indicator to which the measure is expected to contribute – R14 (share of UAA under supported commitment to reduce emissions and/or enhance carbon storage) – where the total anticipated land area against which payments are expected to be made (40,000 ha) is the fixed, annual target. This same quantity of land also represents the single output indicator earmarked for the scheme.</p> <p>The level of anticipated take-up and activity is reflected in the annual expenditure plan, and both activity and expenditure seem realistic based on experience with the pilot project.</p>
Capital Investment Scheme	<p>The draft intervention strategy highlights the different areas that funding will be targeted towards, the benefits that will come from investments in these areas, along with the specific related EU objectives that the intervention will contribute to. This provides a detailed and clear intervention strategy, since funds are being directly targeted to where the needs have been identified. Further detail is provided in the CSP, which elaborates on how the intervention can contribute to each of the needs identified in the needs assessment.</p> <p>The intervention is clearly linked to seven result indicators: R3, R9, R15, R16, R26, R32 and R44. The indicators of most relevance will vary for each grant awarded, with many of the indicators only applying to grants awarded in particular sectors. It will therefore be important for Departmental teams to monitor this closely alongside grant awards made.</p> <p>Target values are based on the investment grant aided under the previous TAMS II scheme and the experience of this programme. €264.4mn was grant aided in TAMS II by the end of 2020, over 52,305 investments, which leads to an average unit amount of €5,055 per investment. Since similar investment levels are expected, the same average planned unit amount is being used for CIS.</p> <p>CIS will only offer funding from 2026, which is why figures are only given for 2026 and 2027. Before then, grants will be allocated from the transitional RDP. However, there is no explanation given in the intervention strategy as to why this is the case. Discussions with DAFM have highlighted that, while the funding will only change to the new programme in 2026, informal amendments to the RDP will allow the changes between TAMS II and CIS to take effect from 2023, though this is not clear from the plans that have been set out.</p>

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Intervention	Comment
	<p>10,000 on-farm productive investment operations are the planned outputs each year in 2026 and 2027. These 10,000 total units per year, along with the average planned unit amount, leads to an annual indicative financial allocation of €50mn per year for both 2026 and 2027. The basis for these figures is the previous TAMS II scheme, and this experience is also the basis for an expected 8,500 investments of grant aid less than €5,000, 7,500 investments between €5,000-€20,000 and 4,000 investments of more than €20,000. The draft intervention strategy states that a similar level of investment is expected to TAMS II. However, given the scheme is covering similar areas to TAMS II, it is unclear whether DAFM has considered how previous uptake of investments may change investment needs. There is a brief reference to how some substitution of investment is expected, but there is no clear rationale provided for why this would be the case.</p> <p>There has also been a high rate of non-completion in TAMS, with 6,987 approvals having expired at the time of writing (November 2021), and a non-completion rate of 27%, with a value of €74.5mn. This creates a significant budgetary burden, since a budget needs to remain in place until approvals expire, and this has been considered when redesigning the ranking and selection for this scheme. Other measures to be considered, such as application fees and reducing points on subsequent investments for farmers who fail to complete, are still under review, with no workable solution found as yet.</p> <p>Related to this, it was noted that the TAMS II schemes saw 25 categories of investments account for 97% of applicant costs, with the remaining 74 investments accounting for less than 3% of applicant costs, which means that there is a significant administrative burden maintaining the large list of investments, and so options are still under consideration to withdraw some investments. This is likely to be done based on the internal TAMS II review carried out by DAFM, which saw each investment scored and ranked based on a number of factors, including environmental benefits, uptake and expenditure. Withdrawal, therefore, may be particularly likely for investments that score poorly for environmental benefit, or for potential for new environmentally beneficial investments or for adapting the specifications of existing investments to make them more efficient and environmentally friendly.</p>
Organic Farming Scheme	The logic underpinning the intervention strategy is reasonably clear, as it is guided by the SOs outlined in the CSP Regulation, which in turn seem appropriate given the need identified through the SWOT analysis and the needs assessment.

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>The mechanism for support, through funding the activities of farmers, is designed to encourage increased intervention participation, and an increase in the budget will also provide scope for more farmers from a wider range of enterprises to enter the scheme. In this respect, the level of aid to address the intervention's measures is higher than it was under the intervention's predecessor scheme, in the form of higher rates per hectare for each type of farmer. With the national target for UAA under organic production increasing significantly, from below 2% to 7.5%, the intervention's additional contribution to the environment will transpire by facilitating more conversion to organic farming.</p> <p>In addition, anticipated outputs and results arising from the intervention are described as follows: number of hectares or number of other units with support for organic farming – 100,200 ha in conversion by 2027, with 237,300 ha in maintenance; share of UAA covered by supported specific commitments which lead to a sustainable use of pesticides in order to reduce risks and impacts of pesticides such as pesticides leakage – gradually increasing from 3.04% to 7.50% between 2023 and 2027; share of UAA supported by the CAP for organic farming, with a split between maintenance and conversion – increase in conversion from 1.11% to 2.23% between 2023 and 2027, and increase in maintenance from 1.93% to 5.27% between 2023 and 2027; and share of livestock units covered by supported actions to limit the use of antimicrobials (prevention/reduction) – gradually increasing from 3% to 7% between 2023 and 2027.</p> <p>The impacts of an increase in the number of farmers converting to organic farming methods should also include increased biodiversity, improvements in both water and air quality and a greater level of animal welfare. Therefore, the logic model is relatively clear regarding the needs, objectives, outputs and results and impacts of the intervention.</p> <p>Finally, the budget allocation for the intervention, at €256mn over five years, is based on the calculation of planned outputs multiplied by unit amounts for each year. While the justification of annual planned outputs is not disclosed, the unit amounts are derived from DAFM's review of costings pertaining to organic farming, based on the NFS data. Costings are based on modelling and comparative analysis, taking account of additional costs incurred and revenue foregone for organic production systems compared to conventional sectors, and Teagasc has been asked to independently confirm the adequacy and accuracy of the calculations. In arriving at the proposed payment rates, due consideration is also given to other topical aspects, such as participation by sector in the current OFS, the market for organic product and EU policy. Budget allocation would therefore appear to be reasonable and appropriate, assuming</p>

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	that planned outputs are based on previous experience and knowledge, though it is unclear if any potential risks and uncertainties that might be associated with the budget allocation have been assessed.
EIPs	<p>The logic underlying the intervention strategy is reasonably clear, as it is very much guided by its identified objectives, which seem appropriate given the need identified through the SWOT analysis and needs assessment. The actions of the intervention provided in Section 2.2 of the Draft CSP, and the indicative themes provided in the draft intervention strategy also provide a good basis.</p> <p>The mechanism for support, through the funding of Operational Group plans, is the same as for the 2014-2020 RDP, whereby support is available for the development and implementation of the plans. However, the volume of support differs to the previous intervention, as 30 environmental EIP Operational Groups of various sizes are targeted for 2023-2027, as opposed to the 22 groups in place under the 2014-2020 programme. This demonstrates an increased ambition regarding the environmental and climate-related objectives set out in SO4, SO5 and SO6, though the intervention will also support six non-environmental EIPs.</p> <p>In addition, the anticipated outputs and results arising from the intervention are described as follows: number of EIP operational group projects –12 in 2023, 6 in 2024 and 0 in 2025-2027 (Stream A)/60 in 2023, 30 in 2024 and 0 in 2025-2027 (Stream B); number of persons benefitting from advice, training, knowledge exchange, or participating in EIP operational groups supported by the CAP in order to enhance sustainable economic, social, environmental, climate and resource efficiency performance – 30 each year from 2024-2027 (Stream A)/1,500 each year from 2024-2027 (Stream B); and number of operations contributing to environmental sustainability, climate mitigation and adaptation goals in rural areas –30 each year from 2024-2027 (Stream B).</p> <p>The strategy linking needs, objectives, outputs and results is relatively clear. Justification has been provided for output in year 2024 onwards being reduced, on the basis that only 50% of the projects will move to full implementation (Phase 3). Further explanation regarding the basis of the target values for six EIP groups with an average of five participants per group, and for 30 EIP groups with an average of 50 participants per group, would provide further context on the values regarding how ambitious and achievable they are, although it might be assumed that this is based on insights from the previous funding period.</p> <p>The budget allocation, at just over €36mn over 5 years, is based on the calculation of planned outputs multiplied by unit amounts for each year, and is calculated for Stream A and B independently. The planned unit amounts are also based on the experience of the</p>

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>implementation of EIPs in the 2014-2020 RDP programming period. However, for the upcoming intervention, the amount of support available will be dependent on the outcome of the various calls for proposals implemented, alongside a value for money assessment inherent in all proposals, carried out by the expert evaluation committee. The justification of the annual planned outputs is not disclosed, but it is assumed that justification has been made in relation to the number of outputs reducing over the time period, indicating that experience from the previous programme has also guided these values. Budget allocation would thus appear to be reasonable and appropriate, although evidence of calculations and justification of annual planned outputs alongside clarity on any potential risks and uncertainties associated with the budget allocation would be useful.</p>
Knowledge Transfer	<p>The logic underlying the intervention strategy for Knowledge Transfer seems reasonably clear, linking to needs identified through the SWOT analysis and needs assessment, and it clearly relates to multiple SOs outlined in the CSP Regulation.</p> <p>Also, feedback from Department officials suggests that the new intervention is designed to build on the lessons learned from the previous scheme. In particular, the move away from sector-specific groups, in favour of groups that are formed according to local needs, is intended to make it easier to set up and organise groups than under the previous scheme. Similarly, the removal of the requirement for farmers to produce a Farm Improvement Plan addresses concerns regarding the burden that these plans placed on participants, and the resulting quality of the plans themselves, with the new scheme instead opting for a mix of more group-based knowledge transfer sessions each year (8)³⁵, plus periodic one-to-one sessions (3) that farmers will engage in with their advisors/facilitators.</p> <p>The implementation strategy for the new scheme thus seeks to introduce a greater degree of flexibility regarding scheme content, with more realistic expectations about participant outcomes. At the same time, however, the requirement for all groups to engage with a minimum number of priority topics each year (4) provides scope to ensure that the scheme remains clearly linked to the SWOT analysis and needs assessment, while also providing the opportunity to update priorities as the scheme progresses. The list of priority topics can, in turn, also be used to ensure that groups sufficiently cover both economically oriented and environmentally oriented topics as part of their activities.</p>

³⁵ Participants were required to attend five sessions each year under the previous scheme, in addition to the requirement to produce a Farm Improvement Plan.

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>In terms of indicators, anticipated outputs and results arising from the intervention (and their link to the common indicators outlined in the CSP Regulation) are described as follows: number of training and advice operations or units (farmers) supported by EAFRD – 18,960, from 2024 through to 2026 (indicator O29); and number of persons benefitting from advice, training, knowledge exchange, or participating in operational groups in order to enhance sustainable economic, social, environmental, climate and resource efficiency performance – 18,960, from 2024 through to 2026 (indicator R1). The result indicator is directly related to the output indicator, as both reflect the target number of participants (farmers) under the intervention. In addition, this target is based on the number of farmers that participated in the previous scheme, plus allowance for a slight increase in participants. Target-setting, therefore, also appears to have drawn on lessons from the previous scheme, which originally had a target of 26,000 participants but which ultimately delivered participant numbers that were well below this target.</p> <p>Similarly, the budget allocation for the intervention, at just over €71mn over three years, is a reduction of nearly €30mn on the budget provided for under the previous scheme. Again, this reflects the lower targeted participation level, with payment levels to both advisors/facilitators and farmers remaining unchanged. The lower target for participation should, in turn, also help to focus on the delivery of quality outcomes for farmers from their engagement with Knowledge Transfer.</p>
CPD for Advisors	<p>Widening the scope of CPD for Advisors, as is proposed in moving from existing transitional arrangements to the new multi-annual programme, seeks to widen the capability and knowledge of agricultural advisors, and have this enhanced knowledge benefit farmers. While content is not yet determined, indications in the CSP are that it will be in key areas related to the environment, climate and biodiversity. Effective delivery and tangible impacts within the advisor cohort are, in turn, likely to translate into a range of positive outcomes at farm level and in the knowledge and skills of farmers.</p> <p>One result indicator is selected – R1 (number of advisors receiving support to be integrated within Agricultural Knowledge and Innovation Systems) – under which a total of 1,200 advisors per annum are expected to receive CPD training. The target does not vary year-on-year.</p>

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>There is also one output indicator selected – O33 (number of supported training, advice and awareness actions or units) – where the annual target is two (2), reflecting an intention that two annual CPD actions/modules are deemed feasible and appropriate (in addition to other training activities of advisors).</p> <p>Financial provision is made both for the delivery of training content and the development and operation of online delivery platform(s), which have proven very effective during the transition period (forced, in part, by social distancing requirements arising in the COVID-19 pandemic).</p> <p>Training providers will also be selected following a competitive tendering process, which has been a feature of previous advisor CPD provision.</p>
Suckler Carbon Efficiency Programme	<p>The SCEP's strategy is relatively clear. The intention of the intervention and the proposed actions make explicit what the scheme will do. Outputs and results are detailed, though their precise impact is not made clear, and actions will contribute to reducing the age at which animals are ready for slaughter, thus reducing overall emissions from the suckler herd.</p> <p>The scheme is clearly linked to results indicator R13, and the scheme's actions are directly related to and support this results indicator. The budgetary allocation provided is similar to that of the previous interventions. In total, the budgetary allocation is €260mn, or €51.2mn per year. Budgetary allocation per hectare is provided, as the scheme anticipates that 256,667 ha will be covered annually (indicative and dependent on participation levels). While it is not immediately clear what the basis for the unit cost or the annual planned output is, DAFM officials explained that the basis for the calculations is a reasonable expectation, based on previous experience of uptake from similar measures. Each of the four scheme actions also has specific expected targets.</p>
DBWS	<p>The intervention strategy is reasonably clear, but omits some specific details. The SOs that the intervention relates to are also noted, and the intervention is linked directly to two needs that the SWOT analysis and needs assessment highlighted as relevant.</p> <p>Furthermore, the intervention sets out clear activities (weighing calves), outputs and output targets (150,000 LUs/250,000 calves per annum), and annual indicative financial allocations, and it highlights a related result indicator (R44 – share of livestock units covered by supported action to improve animal welfare), with a target of 4.7% of all livestock units nationally to be covered by the action under the intervention each year.</p>

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>It is not immediately clear whether target values are realistic, as there is a lack of detail on how target values are justified. By way of comparison, the previous BDGP scheme genotyped about 300,000 cows per year in 2015 and 2016³⁶, which compares to more than €6mn cows in Ireland, according to a 2020 Assessment of Irish Beef Industry³⁷. This draft intervention targets 250,000 young male calves per year, so referencing data such as this could improve the justification of target values.</p> <p>Based on a unit cost of €20 per weighed calf, the intervention has a draft budget allocation of €25mn from 2023 to 2027. However, the calculations that support these costs are not provided. A brief, general justification is provided that “the amount of support is calculated on the basis of costs incurred and income foregone”. It is not clear how these unit cost calculations relate to the result indicator, though it is reasonably clear how they relate to the overall cost estimate.</p> <p>Also, it is not clear how the action of weighing calves will lead to improved animal health or welfare. This can be addressed by providing a brief outline of the actions that farmers are likely to take, should issues become apparent through the weighing process, and why it is reasonable to assume they will do so.</p>
SIS	<p>This intervention has a strong and coherent strategy, including justifications for targets. It has clear related objectives and a set of actions that have been used previously under the earlier SWS. Some lessons from the SWS have also been reflected in the SIS, including the reduction in expected annual outputs and costs, based on previous uptake data.</p> <p>The intervention's result indicator is to improve animal welfare, with a target of 170,000 LUs per year, equivalent to about two-thirds of the national flock of ewes. Each LU represents 10 ewes, meaning that the intervention targets €1.7mn ewes per year.</p> <p>The output indicator is "number of livestock units covered by support for animal welfare, health or increased biosecurity measures", with the same aforementioned target of 170,000 LUs per year.</p> <p>All proposed activities relate directly to animal health and well-being. The link between activities, outputs and results, and the specific related objectives, appears clear and reasonable.</p>

³⁶ See The 2017 Evaluation on the Implementation of Ireland's Rural Development Programme 2014 -2020, available at [gov.ie - Rural Development Programme \(RDP\) 2014-2022 \(www.gov.ie\)](http://gov.ie - Rural Development Programme (RDP) 2014-2022 (www.gov.ie))

³⁷ An Independent Assessment of the Irish Beef Industry, Report to the IFA, Jim Power Economics, March 2020, available at [Beef doc V2 fixed Proof.pdf \(ifa.ie\)](http://Beef doc V2 fixed Proof.pdf (ifa.ie))

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	The scheme proposes to pay €12 per ewe (€120 per LSU), with a planned annual financial allocation of €20mn. Based on the target output values, this allocation appears appropriate. The intervention notes how unit costs are calculated, and also includes a 20% transaction cost, while DAFM officials have noted that all actions have been costed in developing the payment of €12 per ewe.
Early-Stage Support for POs in Certain Sectors	<p>The intervention strategy is ambitious, as it aims to establish 45 new POs by 2027, in a number of sectors, and provide up to €33,000 to each PO. It addresses both set-up and administrative costs, and by adding payments in support of administrative costs, the intervention addresses a need that was identified following the beef sector POs' support under the 2014-20 RDP.</p> <p>POs appear to have the potential to address the identified needs, assuming that the desired target number of POs can be established and supported.</p> <p>Additional budgetary measures (€10,000 payments per annum to support administrative functions for three years) have been included compared to previous support for POs in the beef sector. This means that a total of €33,000 is available for each of the 45 POs. Annual financial allocations are also commensurate with the number of POs that are expected to be supported by the intervention.</p>
Collaborative Farming Grant	<p>The intervention is clearly linked to result indicator R36 on generational renewal – number of young farmers benefitting from setting up with support from the CAP.</p> <p>The key output indicator is O30, the number of supported operations or units for generational renewal (excluding installation support).</p> <p>The annual planned outputs for the indicator is 267 participants per annum from 2023-2027. This corresponds to an annual indicative financial allocation of €400,000 over the same time period.</p>
LEADER	<p>The logic underlying the intervention strategy is not currently clear, as more information needs to be developed regarding the actions and impacts of the proposed new LEADER programme. However, it is apparent that actions will be guided by the SOs outlined in the CSP Regulation and the need identified through the SWOT analysis and needs assessment.</p> <p>The mechanism for support, through funding the activities of LAGs, is the same as the 2014-2020 RDP, but is spread over five years and delivered by the Department of Rural and Community Development. The LEADER themes have also been presented at a higher level compared to the previous programme. For the 2023-2027 programme, themes include: Sustainable Development of Rural Environment; Climate Change Capacity Building; and Climate Change Mitigation.</p>

Table 6.3 Review of Intervention Strategy – Proposed CSP Interventions

Intervention	Comment
	<p>The different articulation of LEADER themes and sub-themes for the proposed intervention compared to the predecessor programme creates some ambiguity around the additional contribution of this intervention. However, having less prescriptive themes should allow for a broader range of environmental projects to be supported. Alongside this, the intervention strategy document emphasises that there is a requirement for climate change mitigation to be an over-arching element of LEADER local development strategies/interventions, implying that a greater contribution is to be made in the upcoming programme.</p> <p>In addition, anticipated outputs and results arising from the intervention are described as follows: number of supported local development strategies (LEADER) or preparatory actions – 29, from 2023 through to 2027; and share of rural population covered by local development strategies.</p> <p>The intervention strategy document also lists other potential result indicators that have been set on the basis of the 2014-2020 programme. These will be reviewed and amended where appropriate following the LDS selection process. Upon the completion of LDS selection, a more thorough and complete logic model and understanding of the intervention will be available.</p> <p>Finally, the budget allocation for the intervention, at €180mn over five years, is based on an estimate of the percentage expenditure per year from 2023 to 2027. This percentage expenditure is based on the actual percentage expenditure per year for the previous LEADER programme, except for the 2027 indicative amount, which is based on the actual percentage expenditure figure for the same period of the 2014-2020 programme plus the funding expected to be spent during the period. It is calculated via (planned output (LDS)*unit amount) whereby 29 LDSs will be supported at a unit amount of €6,210,000. The budget allocation would therefore appear to be reasonable and appropriate, although potential risks and uncertainties have not been identified, with possible ambiguity regarding changes to LAG structure and sub-regional areas.</p>

6.5 Summary of Findings

The draft CSP is strongly aligned to the EU SOs. All of its interventions relate clearly and demonstrably to one or a number of the SOs, and all of the EU SOs are supported by the draft plan. However not all interventions have their objectives as clearly set out as others.

Many interventions are likely to address numerous EU objectives. In some cases, those they are likely to most strongly support is clear, while in some it is less clear, and in others it will depend on participation patterns and options selected by farmers, participants, or intermediaries involved in implementation (e.g., local action groups delivering LEADER).

The plan's external coherence with key EU policies and strategies is strongly evident, including the Green Deal, Farm to Fork Strategy and Biodiversity Strategy. It similarly displays close coherence with a range of national plans, policies and programmes, however the Climate Action Plan was published at a very late stage of CSP preparation, and its alignment and interrelationships were not possible to fully reflect in the draft CSP.

There is also a high degree of internal coherence and consistency within the draft CSP, with many elements unrelated to others in respect of eligibility, rules, objectives, and participation, and reasonable boundaries evident where elements have similar objectives or types of activities. Achieving optimum internal coherence will depend on implementation processes ahead (e.g., on detailed scheme guidance, or on types of activities supported).

There is also commendable clarity and evidence of the CSP's underlying intervention strategy, and of logical relationships between objectives, inputs, outputs and anticipated results, albeit with impact targets not yet having been established. In the case of some interventions there is scope for greater clarity to be provided on the basis for targets and the assumptions which underly them.

7. MANAGEMENT, MONITORING AND EVALUATION

7.1 Introduction

This Chapter assesses proposals for management, monitoring and evaluation of the CSP. Section 7.2 considers management and monitoring arrangements. Section 7.3 addresses the consideration of administrative burden within the plan, while Section 7.4 provides a summary of key findings.

7.2 Management, Monitoring and Evaluation

Review of General Proposals for Management, Monitoring and Evaluation

Section 7.1 of the CSP outlines its governance arrangements. The main responsibility for governance and management will rest with the CAP Rural Development Division of DAFM, which will act as the Competent Authority, the Managing Authority, the Co-ordination Body and the Certification Body for the plan. It will therefore have primary responsibility for management, monitoring and evaluation, while the Finance Division in DAFM will act as the Paying Agency.

The Department of Rural and Community Development (DRCD) will also act as Delegated Paying Agency for the LEADER Programme. It will have primary responsibility for management, monitoring and evaluation of the LEADER elements of the CSP, but its monitoring and evaluation will be integrated with the overall monitoring and evaluation for the wider plan, and the DRCD will consult with DAFM in this regard.

Table 7.1 Overview of Governance Bodies for CSP


Body	Department	Division
Competent Authority	Agriculture, Food and the Marine	CAP Rural Development
Managing Authority	Agriculture, Food and the Marine	CAP Rural Development
Paying Agency	Agriculture, Food and the Marine	Finance
Delegated Paying Agency	Rural and Community Development	-
Co-ordinating Body	Agriculture, Food and the Marine	CAP Rural Development
Certification Body	Agriculture, Food and the Marine	CAP Rural Development

In practice, however, DAFM responsibilities regarding management, monitoring and evaluation (outside the Paying Agency role) will be co-ordinated across numerous different divisions of the Department, which reflects the multiple different interventions that are to be funded under the plan. The CAP Rural Development Division,

therefore, plays the main co-ordinating role, which includes co-ordination of intervention design by line divisions, co-ordination of complementarity between interventions and central co-ordination of monitoring and evaluation (including data collection). Line divisions are chiefly responsible for the design and implementation of individual interventions on a day-to-day basis, and for data collection and reporting for monitoring and evaluation, while the Department's IT Division develops the IT systems necessary to support the implementation of the plan. Finally, the Economics and Planning Division within the Department contributes to the design and targeting of interventions at the planning stage, and it will provide expert advice and wider learning on monitoring and evaluation issues.

Table 7.2 Overview of Management and Monitoring Responsibilities

Division	Responsibilities
CAP Rural Development	<ul style="list-style-type: none"> • Co-ordination of intervention design by line divisions • Co-ordination of complementarity between Pillar I and Pillar II interventions in the context of the overall CSP • Central co-ordination for monitoring and evaluation of CSP • Co-ordination, with assistance from line divisions, of the process of identifying, capturing and managing the appropriate amount of data required for monitoring and evaluation
Line Divisions	<ul style="list-style-type: none"> • Design and implementation of individual interventions, including requirements related to statistical information for monitoring and evaluation purposes • Implementation of systems for collection and reporting of monitoring and evaluation data for the CSP
Information Management and Technology	<ul style="list-style-type: none"> • Responsible for development of the IT systems necessary to support the implementation of the CSP • Providing systems for capture and interrogation of statistical information and monitoring and evaluation data from both internal and external sources
Economics and Planning	<ul style="list-style-type: none"> • Contribution to the optimum design and targeting of interventions under the CSP • Incorporation of CSP interventions into the DAFM value-for-money review process, as per previous RDPs • Provision of ongoing expert advice and input into evaluation issues during the CSP • Feedback on wider learning into the CSP monitoring and evaluation process



Experience in running previous CAP rounds and previous RDPs, including experience in running many of the interventions/schemes that are proposed, would suggest that the Department is capable of marshalling the human resources and administrative capacity needed to manage the new CSP. At the same time, however, there are some significant interventions in the plan, or parts of interventions, which are not successors to earlier schemes (such as the Eco-Scheme or elements of AECM) and will therefore present new management and administration challenges. Ensuring that such schemes are adequately resourced, both from a human resources and wider administrative perspective, will therefore be crucial.

In regard to monitoring and evaluation, member states are required, under the Regulation's new Performance Monitoring and Evaluation Framework (PMEF), to establish a performance framework that allows reporting, monitoring and evaluation of the performance of the CSP during its implementation, and this framework is expected to include:

- a set of common context, output, result and impact indicators (including those referred to in Article 7 and Annex 1 of the CAP Regulation), which will be used as the basis for monitoring, evaluation and the annual performance reporting;
- targets and annual milestones established in relation to the relevant SO using result indicators;
- data collection, storage and transmission;
- regular reporting on performance, monitoring and evaluation activities;
- mechanisms for rewarding for good performance and for addressing low performance; and
- ex-ante, interim, and ex post evaluations, and all other evaluation activities linked to the CSP.

In the CSP for Ireland, the performance framework provides output and result indicators for each intervention (though there is no reference to impact indicators), alongside targets and annual milestones. Details regarding data collection, storage, transmission and reporting for the plan remain generally unclear, however, though the draft plan notes that the Department is cognisant of the need to take into account the experience gained in monitoring and reporting in the previous programming period, including issues to be addressed in the plan design process such as:

- the clear identification of responsibilities in divisions across the Department and the identification of the required resources to support monitoring and evaluation;
- the need to put in place an efficient and co-ordinated approach to the collation of data for reporting requirements across the Department; and
- the benefits to be derived from designing a common electronic system for identification and recording of required data at an early stage, e.g., through the Department's CSP Reporting and Analytics IT project, which is referred to in the draft plan.

In addition, as set out in Article 111 of the CAP Regulation, the Monitoring Committee will have a role in monitoring of the performance of the CSP, including consideration and approval of Annual Implementation Reports and reviewing of the implementation of the plan and of progress made towards achieving its objectives. The Committee will comprise a balanced representation of the relevant public authorities and intermediate bodies and will include representatives of the other essential partners as listed in Article 94(3) of the CAP Regulation. Alongside this, the proposed National CAP Network (NCN) is intended to play an

instrumental role in facilitating the increased involvement of a range of stakeholders in improving the quality of the implementation of interventions outlined in the plan.

Lastly, DAFM's proposed evaluation activities include an ex-post evaluation of the RDP 2014-2022 and a mid-term evaluation of the CSP 2023-2027, and activities are expected to be augmented by the engagement of external evaluation assistance on tasks such as the measurement of progress against result indicators and the preparation of the Annual Implementation Reports throughout the period of the application of the plan, and will be reviewed by the Monitoring Committee as required under the CSP Regulations. In all cases the work of such evaluators will be overseen by steering committees comprised of representatives from relevant line divisions. Again, the detail regarding proposed evaluation activities for the plan is generally unclear, though it should be noted that Article 126 of the CAP Regulation requires the Department to prepare an Evaluation Plan, which details intended evaluation activities over the course of the programming period, and which must be submitted to the Monitoring Committee no later than one year after the adoption of the plan.

Review of Management, Monitoring and Evaluation – Specific Interventions

Table 7.3 provides commentary on the management, monitoring and evaluation arrangements across each of the individual interventions supported under the CSP. Some key over-arching points that can be summarised from the review of arrangements at the intervention level are as follows:

- arrangements for management, monitoring and evaluation present an overall mixed picture across different interventions;
- there are clear management systems available to a lot of interventions, derived from predecessor schemes, which suggests that DAFM is well placed to be able to roll out much of the activity being supported under the CSP. At the same time, there are also some newer interventions being funded under the plan (such as the Eco-Scheme), which are of a scale and complexity that will require significant resourcing, over and above the activities of existing schemes;
- plans for monitoring and evaluation also vary across interventions. Planning and procedures for monitoring and evaluation already being prepared for some interventions, for example, but are still awaiting action for others, and evidence of the existence of well-developed monitoring and evaluation plans is at this stage limited. Also, there appears to be potential for confusion between the separate needs for both compliance-based monitoring and performance-based monitoring and evaluation (though there are in some cases crossovers between the two), which may need to be clearly addressed in monitoring and evaluation planning; and
- indicators for monitoring and evaluation appear to be mainly targeted at meeting the basic output and result indicators provided for in the CAP Regulations, with targets for output and result indicators mostly appearing reasonable. However, the plan's ambitions for monitoring and evaluation do not, at this stage, seem to go much beyond this, e.g., in terms of assessing how the plan might contribute to addressing impact.

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
Pillar I Interventions	
BISS	There is a clear management system in place, built up from previous experience of predecessor schemes. Mechanisms are being put in place to implement a monitoring/reporting, and indicators have been defined for data collection. Annual reporting is also planned in accordance with regulatory requirements.
CRISS	The management system will be closely related to the direct payments system that is already in operation. Monitoring will involve the assembly of data on participating hectares and assumes a 100% check on eligibility.
CIS-YF	The management system will be closely related to the direct payments system that is already in operation. Proposed performance indicators are as defined by the Commission for this intervention, though only two seem relevant to the intervention (R4, which relates to the UAA covered, and R36, which relates to generational change). Absent is any effort to capture real impact (such as trends in farm standards post-change, or age profile of the farm population), though such types of indicators are not specified in the CAP Regulation.
Eco-Scheme	The Eco-Scheme will be operated as a core component of the direct payments system for the new strategy period, which will build on the existing online application system, and the existing management and monitoring systems. DAFM expresses confidence that there is sufficient capacity, including from the agricultural advisor sector, to support farmers in adopting the scheme and in drawing down the funding. Unit costs to the Department are clear, and the broad outline of payments to farmers is clear, but with some uncertainty because of uncertain participation levels.
Protein Aid	Management systems for the intervention are already in place, based on the experience of predecessor schemes, and monitoring of the intervention will be facilitated through the identified output and result indicators, which are clearly related to the operations and objectives of the intervention, and aligned with the relevant EU Specific Objectives (SOs). Collection of data for monitoring of outputs and compliance under the scheme will be facilitated through a mixture of Checks by Monitoring (CbM) and administrative checks.

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
	<p>CbM is a new automated and continuous process, which uses satellite data, along with other data sources, to determine the agricultural activity on all the declared land parcels under the scheme, and the eligible crops planted. In cases where CbM identifies any non-compliance with scheme requirements, it also provides applicants with the opportunity to amend their claim accordingly without penalty. Administrative checks will examine applications for issues such as: late application/amendment; area over-claims; overlaps; dual claims; compliance with the definition of an “active farmer”; circumvention; or repeat applications.</p>
Fruit and Vegetable Producer Organisations	<p>Management systems for the intervention are already in place, based on the experience of predecessor schemes, and monitoring of the intervention will be facilitated through the identified output and result indicators, which are clearly related to the operations and objectives of the intervention, and aligned with the relevant EU SOs.</p> <p>There is little information provided in the CSP on the mechanisms and processes that will be in place to collect indicator and monitoring data, though discussions with Department officials suggest that mechanisms and processes in this regard will roll over from the previous scheme, whereby POs were required to report annually on the implementation of OPs, with the reports to include a measurement of the progress achieved using prescribed indicators, and with the reasons for success/failure in achieving targets to be provided. This includes monitoring of the effectiveness of the scheme through the information provided in the annual reports, having regard to the extent to which OPs achieved their stated objectives; changes in VMP and unit value changes; changes in recognition and membership patterns; changes in PO market share; and effects on the environment.</p> <p>Each OP will also be assessed in advance by DAFM to ensure that it will meet its objectives, and as part of the approval process, POs must supply a completed survey of each active farm, including details of environmental measures currently in place, which in turn is to be updated annually as part of each PO’s claim for funding for their OP. In addition, compliance and verification checks and inspections will be conducted as part of the PO payment claims process, and POs will be subject to audit every 1-3 years, depending on the size of their OP.</p>
Apiculture	<p>Management systems for the intervention are already in place, based on the experience of predecessor schemes, and monitoring of the intervention will be facilitated through the identified output indicator, which is related to the operations and objectives of the intervention, and aligned with the relevant EU SOs.</p>

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
	There is very little information provided on the mechanisms and processes that will be in place to collect indicator and monitoring data for the National Apiculture Programme. However, Department officials indicate that the service provider for the new programme will be required to provide progress reports on a six-monthly basis, including a technical report and details of financial expenditure incurred, while a comprehensive final report will also be required at programme end, in addition to the final progress report. In this regard, progress reports that were required for the National Apiculture Programme for the 2019-22 period sought information on progress and outcomes/milestones/deliverables for each programme task, plus information on a range of indicators (across publications, industry indicators and “public good” indicators) and details of financial expenditure. In addition, the Department indicates that inspectors will conduct at least two on-site scientific inspections under the National Apiculture Programme, with subsequent inspections possible if problems are detected during the two initial inspections.
Pillar II Interventions	
ANC	<p>The management and implementation of the scheme will continue to use the well-established system that it currently does. Applications use the same online system as operates for the existing basic payments scheme, eligibility is assessed, and payments are subject to a controls and inspection system to ensure compliance with scheme rules. DAFM has also indicated that historic levels of non-compliance or errors have been consistently low, and where identified it has related to questions of land eligibility.</p> <p>Data to record output, and one of the result indicators (R4 – share of UAA covered by income support and subject to conditionality), is generated automatically from records of the land against which payments are made, and the systems to have this recorded are in place.</p> <p>The means to measure the second result indicator (R7 – enhancing support to farms in areas with specific needs) is unclear, however.</p> <p>There are no proposals for in-depth evaluation of the scheme beyond the requirements for overall Plan evaluation.</p>
AECM	The monitoring process within the intervention itself is not made specifically clear. However, the penalties and control systems that specifically relate to the AECM are defined, including over-declaration of area (especially relevant to the intervention as it is mostly results-based payments based on area measurements); and late application or amendments.

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
	<p>The control system that is in place for the AECM will be based on administrative checks, on-the-spot checks (OTSC) and CbM, with a range of controls aligned to each of these, though it is not clear how frequently this monitoring process will take place.</p> <p>The draft intervention does provide some information on how the interventions will collect indicator data, the IT systems that will be used and how outputs will be verified, though it is unclear on precisely how each of these will be achieved.</p> <p>Unit cost calculations underlying the budget, meanwhile, seem likely to be based off the numbers involved in predecessor schemes, but there is no solid indication that this is the case, or discussion on whether these number have changed.</p>
AECM Training	<p>The management, monitoring, and evaluation process for the intervention is reasonably clear, though without providing many specifics that are applicable to the intervention.</p> <p>The draft CSP (Section 2) notes that the roll-out and content of the training programme will be continually monitored by DAFM and is subject to change. However, the process by which this monitoring is to be completed is not made clear.</p> <p>The intervention will also be subject to administrative checks, where 100% of participants are checked for the prepayment validation process (proof of participation), with a proportion checked based on risk analysis (attendance, quality, content).</p>
Straw Incorporation Measure	<p>Applications for the Straw Incorporation Measure are made as part of the online system of application for basic payments (such as BISS), and as such present to additional management challenge for DAFM. Similarly, capturing the CSP indicator data will happen automatically based on applications and approved payments.</p> <p>The total annual expenditure anticipated (€10m) corresponds to the maximum payment of €250 for the 40,000 ha.</p> <p>Monitoring will also need to extend to any impacts the scheme has on straw supply for other sectoral requirements and needs.</p>
Capital Investment Scheme	<p>There is limited information provided on the mechanisms and processes that will be in place to collect indicator and monitoring data for this intervention, though the intervention has clear outputs, with the number and value of grants awarded reflecting clear outputs which should be straightforward to collect.</p> <p>An IT system is to be designed to capture necessary information per investment item applied, approved and paid for, with work commenced on the necessary systems, some of which will be retained from the previous TAMS II scheme and some of which will be added. However, there is still a lack of information on how impact data will be processed and shared.</p>

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
	<p>Target values have a clear basis in previous experience with TAMS II, which means they are informed by relevant evidence and therefore realistic. However, the draft intervention would benefit from greater detail on how the CIS differs from TAMS II and how this may impact the level of investment, or how previous investment uptake may impact demand for the new scheme.</p>
Organic Farming Scheme	<p>For the OFS, a similar approach will be taken to monitoring and evaluation as under the previous scheme, which used a combination of EU common indicators and additional indicators to evaluate the scheme's progress and analyse the farms participating in the scheme. There is little information provided in the draft CSP on the mechanisms and processes that will be in place to collect indicator and monitoring data. Further clarification on how planned arrangements for monitoring under the new CSP differ from the arrangements under the previous scheme, would be welcome.</p> <p>However, all organic farms will be subject to annual inspections by delegated Organic Control Bodies, which will carry out controls and ensure adherence with organic production legislative requirements. DAFM will also undertake inspections in accordance with control requirements for Pillar II schemes, including administrative checks, OTSCs and CbM.</p>
EIPs	<p>Monitoring of the intervention will be facilitated through the identified output and result indicators, which are clearly related to the operations and objectives of the intervention and are in line with the relevant EU SOs.</p> <p>There is little information provided in the Draft CSP on the mechanisms and processes that will be in place to collect indicator and monitoring data. However, it is envisaged that one element of DAFM's overall data management system will involve capturing and processing monitoring and evaluation data from external sources, such as EIP Operational Groups. Participant opinion questionnaires will be carried out as a part of project plans, and a final report of all project findings will also be prepared for the Department.</p> <p>The control system that is in place for the EIPs will be based on administrative checks and OTSCs, with a range of controls aligned to each of these. However, it is not mentioned how frequently this monitoring process will take place or the methods that will be used to facilitate these, and there are no plans at present regarding IT systems.</p>
Knowledge Transfer	<p>Management systems for the scheme will be able to draw on the experience of its predecessor scheme. However, the intervention will run for three years, starting in 2024 rather than 2023, and this timeline has been chosen so as to allow for set-up of the systems for running the intervention, and to allow time for advisors/facilitators to apply to the scheme and set up their groups.</p>

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
	<p>Alongside the monitoring of the output and result indicators for the intervention, which are related to the operations and objectives of the intervention and are in line with the relevant EU SOs, scope for further evaluation will be integrated with the one-to-one meetings between advisors/facilitators and farmers, which will occur at the end of each year. As part of their engagement with these meetings, farmers will be required to complete an online survey, which will include evaluation-related queries.</p>
CPD for Advisors	<p>The management of the intervention is unlikely to present challenges. An evolving register of approved agricultural advisors is maintained by DAFM, and its predominant wider management role will be in the specification and procurement of training providers, in the monitoring and oversight of delivery, and in the general management of providers' contracts. The capturing of result indicator data should be a routine matter related to training provision and participation, while the output indicator is simple to capture and too basic to involve any degree of close monitoring.</p> <p>CPD provision should be evaluated as a matter of routine and participant evaluation mechanisms should be written into tender specifications, and their results reported on to DAFM. The means of evaluating impacts, for both advisors and ultimately farmers, may also warrant consideration in the formulation of CSP-wide evaluation plans.</p>
Suckler Carbon Efficiency Programme	<p>No specific information about the management, monitoring or evaluation of the intervention is provided, and there is little information provided on the mechanisms and processes that will be in place to collect indicator and monitoring data. However, management systems for the intervention can draw on the experience of predecessor schemes, while DAFM officials noted that detailed monitoring plans are in development.</p> <p>Monitoring of the intervention will be facilitated through the identified output and result indicators and aligned with the relevant EU SOs. Data recording will capture a range of data through animal events records and surveys, including for: calves (ease of calving, quality and docility, size, vigour/vitality, scour and pneumonia); cows (milking ability and docility, culling reasons); and stock bulls (docility and functionality, culling reasons). However, it is not clear how this data recording links to the result indicators, as there is no data recording that links to reducing emissions. It is also not stated how this data should be recorded or the format that recording will take.</p> <p>While evaluations of predecessor schemes were carried out, DAFM has not finalised plans for evaluation under the new scheme.</p>

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
DBWS	<p>At present, there is little information provided in the CSP on the mechanisms and processes that will be in place to collect indicator and monitoring data. While the intervention has clear output and result indicators and targets (albeit with limited justification and explanation), it is not clear how data will be collected, processed and shared. However, given that data points relate to numbers of cows weighed this should be straightforward in terms of annual reporting once clarified.</p> <p>There are no verification processes in place, and it is unclear how impact will be measured in practice. However, DAFM anticipates that IT infrastructures put in place for the predecessor scheme will be adequate for this intervention, with minor adjustments.</p>
SIS	<p>Result and output indicators are clearly defined. There is potential value in detailing targets for each action under the intervention, as it could improve evaluations in the future if there are clearly formulated targets for every action, but this may not be feasible. The draft intervention does not specify that an evaluation of the SIS will take place.</p> <p>While there are no specific verification processes that are detailed in the draft intervention, the following checks will be applicable: 100% of applicants will be checked for eligibility criteria, late application/amendment and active farmer status; and a sample of applicants will be subject to administrative checks for action completion (record book and associated documents) and animal numbers underpinning payment rates. Each participant in the intervention will also be required to submit data using a sheep census return on an annual basis. As long as all annual returns that participants are required to complete include all details on each action, the data collection approach is likely to be sufficient to enable reporting on outputs and results indicators. According to DAFM officials, SI's database will also be used to support data collection and verification processes on the Scheme.</p> <p>DAFM officials stated that an external evaluation is intended to take place, though plans for this have not yet been drawn up.</p>
Early-Stage Support for POs in Certain Sectors	<p>Output and result indicators are very logical and relate to the EU SOs for this intervention. While the overall results indicator target of 0.01%/0.02% of farms in Ireland being covered by the intervention appears low, it nonetheless represents an ambitious increase compared to the current number of POs in the beef and fruit and vegetable sectors.</p> <p>It is unclear how the PO intervention is intended to be monitored, and there is a lack of detail on what data will be collected or analysed. There is also no information on the verification processes for outputs and results. However, DAFM officials are developing detailed</p>

Table 7.3 Management, Monitoring and Evaluation – Proposed CSP Interventions

Intervention	Comment
	<p>plans and approaches, and it was noted that POs provide annual reports on their activity, while also being asked to provide feedback on the intervention at the end of Year 1 and Year 3.</p> <p>There are no current evaluation proposals, although DAFM officials explained that plans are in development.</p>
Collaborative Farming Grant	<p>There is limited information detailing the mechanisms and processes that will be in place to collect indicator and monitoring data for this intervention. However, the output of supported operations should be reasonably simple and easy to collect. The amount of support has a clear basis in previous iterations of the scheme.</p>
LEADER	<p>Monitoring of the intervention will be facilitated through the identified output and result indicators, which are clearly related to the themes and objectives of the LEADER programme and aligned with the relevant EU SOs.</p> <p>The draft CSP does not directly describe monitoring mechanisms for the intervention, but it has been noted that the arrangements will be similar to the current programme, i.e., where LAGs/IPs were responsible for the monitoring of strategies to ensure that LAGs were on-target to meet the objectives set out in their strategies.</p> <p>Progress must be recorded in the LEADER's ICT system. The existing system was developed in 2016 specifically for the 2014-20 programme. A new ICT system will be developed for the 2023-27 programme which will be similar to the previous system and will operate alongside it. The updated system will use a more modern platform and will cater for the specific themes/sub-themes, financial arrangements and indicators relevant to the new programme, and its development will commence in 2022.</p> <p>The planned unit amounts for the intervention are calculated via indicative overall allocation divided by outputs. This is based on 29 local development strategies or preparatory actions being supported by the programme, which is likely based on the number involved in the previous intervention. The unit cost calculations have therefore been outlined clearly and appear to be based on previous experience, implying that they are appropriate.</p>

7.3 Administrative Burden

Review of General Proposals

As part of the CSP intervention design process, DAFM has sought to take steps to simplify and reduce the administrative burden that will be associated with the CSP. In this regard it suggests that its co-ordinated approach to overseeing the design and implementation process across interventions has facilitated the inclusion of a number of factors which will assist in alleviating the administrative burden for applicants, including:

- facilitation of more common and consistent approaches to the development and issuing of intervention application forms;
- continued roll-out of electronic application facilities across interventions; and
- examination of the potential to increase the use of simplified cost options (SCOs).

The online application processes should facilitate early pre-checking of applications, which provides the opportunity to rectify errors without penalty. It is also expected to lead to more effective and efficient processing of applications, resulting in the timely issuing of payments under measures. In addition, electronic submission can help improve efficiency in resolving queries, while increased flexibility to amend applications, and the facility to take action or submit evidence in response to “early warnings”, should lead to less penalties being imposed on farmers.

DAFM has also promoted the development of the geo-tagged AgriSnap photograph app, for use on smartphone and mobile devices, which will enable farmers and advisors/consultants to take geo-tagged photographs and submit them securely to DAFM in an efficient and seamless manner. This, in turn, is intended to facilitate a faster turnaround of queries by DAFM, enabling payments to be expedited and decreased administrative costs, as previously many of these query cases required physical inspection.

In addition, the Department has introduced Checks by Monitoring (CbM) for the Protein Aid Scheme in 2021, as a first step in the implementation of the Area Monitoring System (AMS) that will be compulsory in the new CSP. CbM is an automated and continuous process, which will use satellite data along with other data sources to determine the agricultural activity on all land parcels declared by farmers under the Protein Aid Scheme in 2021. It facilitates prior notification for Protein Aid Scheme applicants of non-compliance concerning crop type, and provides the applicant with the opportunity to amend their claim accordingly without penalty. Also, DAFM is developing a new Land Parcel Identification System (LPIS) to underpin payments to farmers under area-based schemes, which is intended to give farmers a more accurate representation of land parcel boundaries, based on the most up-to-date technologies.

Lastly, as part of the intervention design process, the potential to increase the use of SCOs, where appropriate, has been examined. SCO should simplify requirements for beneficiaries as well as providing increased efficiencies for the administration of interventions, and it is intended that they will be introduced in line with Commission guidance, where appropriate, for example under the Knowledge Transfer or LEADER interventions. In the context of the LEADER measure, it is further expected that streamlined processes will be implemented to ensure that administrative burden is minimised for beneficiaries. For example, the new implementation system proposes to address issues around audit compliance, which will place the burden for

ensuring such compliance on a competent body that will work constructively with the LEADER funded groups and beneficiaries to ensure the simplest application and payment processes possible.

Review of Proposals – Specific Interventions

Table 7.4 provides commentary on the nature of the administrative burden across each of the individual interventions supported under the CSP, and plans to address the burden for different interventions. Some key over-arching points that can be summarised from the review of arrangements at the intervention level are as follows:

- the level of administrative burden on beneficiaries and the Department itself seems to vary depending on the intervention concerned. On the plus side, developments in recent years to introduce electronic and online application and processing systems for direct payment schemes, plus development of other scheme-specific electronic systems, has reduced the administrative burden associated with several of the planned interventions under the CSP, especially Pillar I interventions (with some exception) and a smaller number of Pillar II interventions. On the minus side, the administration related to other interventions can remain burdensome, particularly in the case of some Pillar II interventions; and
- while steps to reduce the administrative burden for other interventions are still largely at an early planning or development stage, further development of electronic and online application and processing systems appears to be the most likely solution to be used.

Table 7.4 Administrative Burden – Proposed CSP Interventions

Intervention	Comment
Pillar I Interventions	
BISS	<p>The BISS's predecessor, the current Basic Payments Scheme, moved to a 100% online application system in 2018, and the BISS will continue to use this online process, which has significantly reduced the administrative burden associated with processing applications. Additional initiatives such as an "early warning system" (for potential errors), in the form of preliminary checks and more recently CbM, has further automated the application process and provided for timely resolution of land errors, ensuring a high percentage of advance payments each year. Features such as the new Area Monitoring System/new performance reporting for BISS, however, may create extra administrative burden for the Department as it becomes mandatory in the new programming period.</p> <p>Into the future, further automation of processes and inter-operability of functionality will be used to reduce the administrative burden for both the Department and the applicant where possible, and these developments will also spill over into the application processes for other associated area-based schemes.</p>
CRISS	<p>A feature of the proposed CRISS is that it minimises the additional administrative burden on the Department and on applicants, as applications are made online through the BISS system, and at the same time as the BISS application. Eligibility decisions are made on the basis of the information provided in that application system.</p> <p>No spot checks of other checks are required beyond those carried out for BISS purposes.</p>
CIS-YF	<p>Since the application system is integrated with the application system for the other direct payment schemes, there is no additional administrative burden placed on beneficiaries over and above that which applies to other Pillar I payments.</p>
Eco Scheme	<p>Due to its level of administrative integration with other payments in the direct payments system, the proposed scheme should not place a significant additional burden on beneficiaries, though its status as a new scheme may affect management and administrative requirements and burden on Departmental resources.</p> <p>Some additional external support can also be drawn on, including with regard the unit costs and income forgone being claimed.</p>

Table 7.4 Administrative Burden – Proposed CSP Interventions

Intervention	Comment
Protein Aid	<p>Discussions with Department officials suggest that there is no significant administrative burden associated with the intervention, with applications to be integrated with the wider direct payments application system.</p> <p>While the pilot roll-out for CbM in 2021 did cause some administrative burden for farmers and the Department, it is still expected that the learnings from the pilot will reduce any associated administrative burden in future.</p>
Fruit and Vegetable Producer Organisations	<p>Discussion with Department officials indicates that there is a sizeable administrative burden associated with the intervention, which is related to the EU legislative requirements for operating POs and OPs, and the administrative burden associated with operating a PO is thought likely to continue to be sizeable under the new scheme. Indeed, the administrative burden that is associated with the scheme is believed to be a disincentive in trying to encourage more fruit and vegetable producers to consider forming POs.</p> <p>Proposals that are planned to help to reduce the administrative burden, however, include steps to simplify the form-filling associated with the scheme and reduce its dependence on paper-based administration, though possible improved use of IT and digitisation within the scheme.</p> <p>Management of POs also appears to involve a mix of internal resources from within PO members and externally contracted assistance (such as use of marketing agents). In this regard, it is notable that a recent evaluation of previous schemes³⁸ has suggested that an over-reliance on the use of marketing agents may reduce the level of expertise being developed within POs, and that it might therefore be prudent to develop more internal expertise within POs for roles that are currently undertaken by agents.</p>
Apiculture	<p>Discussions with Department officials suggest that there is no significant administrative burden associated with the intervention, with experience from the administration of previous programmes indicating that the level of administrative burden is both reasonable and justified so as to ensure that adequate controls are in place.</p>
Pillar II Interventions	

³⁸ See Bogue, P. and Hackett, R. (2021), Evaluation and Reporting on the National Strategy 2013-2018 of the Sustainable Operational Programme in the Fruit and Vegetable Sector.

Table 7.4 Administrative Burden – Proposed CSP Interventions

Intervention	Comment
ANC	<p>Participation in the scheme presents a very minimal administrative burden on farmers. Applications are simply submitted by ticking a box on the online system for basic payment applications.</p> <p>If not automatically eligible (for example, by not meeting minimal stocking levels), or where non-typical livestock is in place (such as horses or donkeys), there can be a degree of administration to move to or confirm eligibility (such as having correct animal passports and identification records in place). However, this is unusual, minimal and unlikely to be burdensome.</p>
AECM	<p>While there is no specific information provided in the CSP about administrative burden or dedicated simplification processes for this intervention, written responses from DAFM have highlighted that relevant data will be provided to planners in advance to assist them in making informed decisions as regards most appropriate actions and their locations.</p> <p>As for the Department itself, the administrative burden is significant, in particular due to the IT resources needed to process applications and ensure that payments are issued on time and consistently. However, the system will build on the experience of the earlier GLAS scheme and the REAP project to try and minimise this burden.</p> <p>DAFM officials noted that they try to take into consideration the burden on farmers, which arises from the AECM, and there are now over 400 planners trained within results-based scoring from the REAP project, which should help to streamline the process.</p> <p>The Department also stated that it was conscious of the need to strike a balance between over-design of the intervention, which might lead to potential bottlenecks, and under-design, which may undermine outcomes.</p>
AECM Training	<p>While there are no specific details on any plans to reduce administrative burden for the intervention, parts of the training will be made available online, which should help to reduce administrative burden on participants</p>
Straw Incorporation Measure	<p>There is no risk of participation adding significantly to the administrative burden on farmers. The online application process and its integration with the wider basic payment system, ensures minimal additional requirements.</p>
Capital Investment Scheme	<p>There are no details within the CSP regarding the administrative burden for this intervention, or how any burden may be minimised. However, discussions with DAFM highlight that the system for online application and payment claim submission, which has operated</p>

Table 7.4 Administrative Burden – Proposed CSP Interventions

Intervention	Comment
	<p>under the earlier TAMS II scheme, has reduced the overall administrative burden relative to previous farm investment schemes, and this is proposed to be continued.</p> <p>A key change from TAMS II is also the introduction of one overall scheme for with four different grant categories, replacing seven separate schemes where applicants would have to choose which specific scheme to apply to. This should help to simplify the process for farmers, while also reducing the administrative burden associated with necessary computer systems.</p> <p>DAFM has also been looking at alternatives to inspections to allow payments to issue, such as the use of geotagging photos to verify completed investment. This will be dependent on the development of a user-friendly programme that allows applicants to capture and upload photos of completed investments.</p>
Organic Farming Scheme	<p>Prior to 2015, the OFS was largely a manual application scheme, which has been simplified in recent years. In particular, the administrative burden on participants in the scheme has been significantly reduced by switching to an online process, whereby payment levels are determined by the land parcels declared annually through the direct payments application system.</p>
EIPs	<p>The intervention is based on competitive calls and drawing up detailed operational group plans, which can involve significant administrative work on behalf of participants.</p> <p>The Department has noted the struggle, particularly among smaller projects, with regards to the administrative burden and are considering how this could be reduced, while highlighting the need to continue to respect all necessary financial and regulatory controls. In terms of the farmer participants, a simple scheme design that minimises administrative burden/paperwork as much as possible was proposed by the participating operational groups.</p>
Knowledge Transfer	<p>It is expected that the administrative burden associated with Knowledge Transfer will be reduced in comparison to its predecessor scheme. The removal of the need for farmers to produce a Farm Improvement Plan, for example, is expected to reduce the administrative burden on advisors/facilitators and farmers, while the simplification of the scheme (such as removal of the sector-specific element that was part of the previous scheme) will reduce the administrative burden for the Department.</p>
CPD for Advisors	<p>There is little scope for advisor CPD to present any administrative burden on farmers, and it is intended to provide little significant administrative burden on advisors themselves beyond the basic administration involved in registration and completion. Furthermore,</p>

Table 7.4 Administrative Burden – Proposed CSP Interventions

Intervention	Comment
	the further availability of online delivery models will represent substantially less participation burden than would have historically accompanied CPD or training requirements involving exclusively face-to-face delivery.
Suckler Carbon Efficiency Programme	<p>There is currently not a section dedicated to describing what the administrative burden of the intervention will be in the draft intervention document. However, DAFM expects that within the department, staffing levels will need to be maintained to develop, deliver and administer the programme over its lifetime. A new monitoring and delivery system will be put in place to ease administration and applications.</p> <p>DAFM's plans to implement a new administration system should reduce the burden on farmers as it is expected to offer increased integration of services while allowing for effective remote working. Training for participants may be conducted online, further reducing the burden for participants.</p>
DBWS	DAFM officials stated that they believe the IT infrastructure in place for the predecessor Dairy Calf Beef Programme provides a basis upon which IT systems for this intervention can be built. The Department's intention is that this system will ease the burden for departmental staff and participants, while DAFM also intends to provide participants with data from the intervention so that they can learn about emerging findings throughout the scheme's duration.
SIS	No specific approaches or suggestions to reduce the administrative burden are noted for this intervention. However, DAFM officials explained that the department intends to use electronic application facilities to ease the burden on farmers. Online systems are also intended to be put in place to submit sheep census returns, and where possible, the Department intends to develop inter-operability between different online systems, such as sheep census and inspections systems. The aim of doing so is to reduce the burden on both the Department and on applicants.
Early-Stage Support for POs in Certain Sectors	<p>This intervention intends to support POs' administrative efforts through the provision of three annual grants of €10,000. It aims to reduce the administrative burden on individual farmers and producers by sharing the administrative responsibilities, and DAFM will only review applications to the intervention that are complete, which is expected to reduce the burden on DAFM officials.</p> <p>Further plans to reduce the burden on participants are under discussion.</p>

Table 7.4 Administrative Burden – Proposed CSP Interventions

Intervention	Comment
Collaborative Farming Grant	There are no details within the draft intervention strategy regarding the administrative burden of the intervention or how any burden may be minimised. This could be made clearer, particularly since there are various different professional costs for which farmers could be eligible to claim financial support.
LEADER	<p>Administration of LEADER elements will be delegated to DRCD, and it will ensure that simplification is a key consideration for LEADER 2023-2027 administrative systems and will work constructively with the LAGs and beneficiaries to ensure the simplest application and payment processes possible.</p> <p>The LEADER intervention will continue to examine the possibility of introducing more streamlined processes to ensure the administrative burden is minimised for beneficiaries. The current ICT system caters for the uploading of all project and payment documentation to a dedicated project repository. These files are readily available with viewing permissions restrictions limited to the relevant users. A new ICT system will be introduced to cater for the requirements for the new 2023-2027 Programme.</p> <p>The use of a simplified cost option (SCO) is also under consideration to reduce the administrative burden, however plans in this regard are currently at a crossroads due to a number of issues, such as finding a “one size fits all” option that suits the diverse base of costs across LDCs and the configuration of direct costs of the intervention.</p> <p>Under the mid-term evaluation of the previous LEADER Programme, 31 actions were taken to reduce the administrative burden and a recommendation was made to monitor the impacts of these. All these actions were implemented and have resulted in a streamlining of the administrative process, with strong project approvals across each LAG area, and DRCD has introduced greater flexibilities which have further reduced the administrative burden.</p>

7.4 Summary of Findings

- The main responsibility for governance and management will rest with the CAP Rural Development Division of DAFM, which will act as the Competent Authority, the Managing Authority, the Co-ordination Body and the Certification Body for the plan. In practice, however, DAFM responsibilities regarding management, monitoring and evaluation (outside the Paying Agency role) will be co-ordinated across numerous different divisions of the Department, which reflects the multiple different interventions that are to be funded under the plan, with the CAP Rural Development Division playing the main co-ordinating role.
- Experience in running previous CAP rounds and previous RDPs, including experience in running many of the interventions/schemes that are proposed, would suggest that the Department is capable of marshalling the human resources and administrative capacity needed to manage the new CSP. At the same time, however, there are some significant interventions in the plan, or parts of interventions, which are not successors to earlier schemes (such as the Eco-Scheme or elements of AEEM) and will therefore present new management and administration challenges. Ensuring that such schemes are adequately resourced, both from a human resources and wider administrative perspective, will therefore be crucial.
- In terms of monitoring and evaluation, member states are required to establish a performance framework that allows reporting, monitoring and evaluation of the performance of the CSP during its implementation. In the CSP for Ireland, this performance framework provides output and result indicators for each intervention (though there is no reference to impact indicators), alongside targets and annual milestones. Details regarding data collection, storage, transmission and reporting for the plan remain generally unclear, however, though the draft plan notes that the Department is cognisant of the need to take into account the experience gained in monitoring and reporting in the previous programming period. Issues to be addressed in the plan design process include clear identification of responsibilities in divisions across the Department; an efficient and co-ordinated approach to the collation of data for reporting requirements; and the need to develop a common electronic system for identification and recording of required data at an early stage. In addition, the need to develop an Evaluation Plan, subsequent to the adoption of the CSP, is also noted.
- At the intervention level, meanwhile, arrangements for management, monitoring and evaluation present an overall mixed picture across different interventions, with clear management systems available to a lot of interventions, versus additional resourcing requirements needed for newer interventions, while plans for monitoring and evaluation across interventions are still largely in development.
- Finally, efforts to reduce administrative burden associated with the CSP are principally focused on increased use of electronic or online application and processing systems. Recent development of such systems has already paved the way for a reduced administrative burden under several of the plan's interventions (where they have already been operationalised under predecessor schemes), with further investigation of the potential for similar reduction in burden being planned for others.

8. CONCLUSIONS AND RECOMMENDATIONS

8.1 Introduction

This chapter presents the evaluation conclusions and recommendations. It begins with overall conclusions, both general and in respect of each of the requirements of the ex-ante evaluation as set out in the draft Regulation. Section 8.3 then presents summary conclusions regarding each of the proposed CSP interventions. Section 8.4 turns to recommendations, similarly beginning with those relevant to the overall CSP, before setting a number of recommendations regarding specific interventions in Section 8.5.


8.2 Overall Conclusions

General Conclusions

The draft CSP has been prepared thoroughly and carefully and complies with all of the critical requirements set for it as such in the CSP Regulation. It was built from a detailed SWOT and needs assessment which drew on extensive evidence, and it was subsequently built around a clear intervention logic linked explicitly to the EU-wide objectives for the CAP in the period 2023-2027. Preparation involved widespread, open and recurrent consultation processes, and the analysis of needs and identification of responses involved open communication and stakeholder engagement. In Ireland the plan will exemplify, albeit to varying degrees, the reforms to the overall CAP agreed within the EU for the period, including in relation to simplification, modernisation, subsidiarity, environment and climate ambition, and performance.

The plan is to be implemented over a shorter duration than was expected towards the end of the previous programming period, now to extend over five rather than the seven years as anticipated. Nevertheless, it is a period during which environmental and climate challenges will be severe, and during which formal responsive policies and policy targets point to a need for immense change within the sector. So, while the draft CSP responds fully and commendably to the EU CSP Regulation and integrates new dimensions of environmental ambition and change, important aspects of the full policy machinery which will be needed to drive such change are either outside the programme or will need to be highly effective if within it. The specific contribution the CSP is to make within this wider policy framework is not as clear as might be desirable. The CSP does not seek to provide the bulk of agricultural research funding and support in Ireland, yet the Climate Action Plan points to a substantial role for research in addressing the climate agenda within the sector. The Climate Action Plan determines that GHG emissions from agriculture must decline by between 20% and 30% by 2030, however the 2023-2027 CSP has not yet been required to establish targets for impact indicators, including one for that very metric. The plan is not yet required to include a detailed evaluation plan, yet the importance of understanding the impact and contribution its numerous interventions make, from an early stage, is clear and pressing.

We recognise that the Climate Action Plan has only been very recently published, and that the CSP Regulation does not require evaluation metrics and plans to be fully developed and included until after CSP approval. However more explicit framing of the plan against the national climate, environmental and biodiversity challenges and targets to be met over its lifetime, and in preparation for the journey and challenges that will still remain thereafter, is desirable. This should cross-reference to the wider policy actions planned outside



the CAP, along with greater reference to the higher importance of measuring and understanding impacts, in evaluation, in learning, in maintaining scope for significant changes to priorities and for renewed ambition, and in stakeholder understanding and buy-in. Improved clarity on the role other policies and programmes are to play, as well as on ensuring the impacts of the CSP itself are measured, understood, and acted upon, would strengthen the draft CSP as a key strategic programme making a defined contribution to the wider change agenda over the period.

Contribution to Specific Objectives

The draft CSP contributes directly to and broadly across the nine CAP SOs, with the means by which it does so clearly referenced and evident, and the relationship between SWOT, needs, interventions and SOs also clearly mapped. The SWOT analysis is detailed and structured in accordance with each of the SOs, and draws widely on evidence and data. Nevertheless, how lessons from previous programming periods have informed either needs or intervention selection or design are not always made explicit or clear. This is particularly so beyond high profile but broad evaluations such as the 2014-2020 RDP Mid Term Evaluation, where more basic implementation lessons, uptake data, participation feedback and participant profiling data, could inform plan design, or at least more explicitly so.

Coherence

Internal coherence and external relationships between the plan and other policies and instruments are relatively strong. Alignment to wider EU policies and instruments results from how closely the plan embraces the CAP SOs, as well as its relative simplicity in funding structure and national coverage. Clear linkages and synergies are also evident in relation to the most relevant wider national policies and programmes, including the key sectoral, environmental and rural development policies and strategies in place.

Good degrees of internal coherence are also evident, with clear demarcation between many elements, mutuality in many eligibility requirements, and more detailed boundaries and cross-referencing identified where actions have similar objectives or take similar forms.

More explicit specification of how the draft plan relates to and will operate to support the national Climate Action Plan, as described already, would provide some further helpful evidence of its external coherence, while internally, care will be needed to maintain appropriate boundaries and relationships between interventions with similar objectives or those with similar target groups.

Budgetary Consistency

The budgetary profile of the draft Plan is also very clearly consistent with the CAP SOs. As shown in Chapter 6, the numerous interventions selected contribute directly to all the SOs and to the CCO, and most contribute to many of these simultaneously.

While the bulk of funding across both Pillars is directed towards income support, this is a function of the differing roles and national allocations from the EAGF and EAFRD (as well as the exchequer co-financing under Pillar II). The plan also has new dimensions which distribute such supports more equitably and links

them with new environmental standards, and also represents no significant departure from the historical pattern of overall CAP funding.

Outputs, Results and Targets

The relationships between outputs and results, as they are specified in the common indicators and transcribed into the draft CSP, are in many cases clear and uncontroversial. This is a reflection of how they are defined, with both often simply a numeric account of levels of participation or coverage (whether farmers, land, advisors, groups, events, sales or jobs), or the shares of different specifications of these which relate to a scheme's scope and/or activity. This means that both output and result indicators for most schemes are more a logical function of their activity and financial resourcing, and targets can be expected to occur automatically assuming there is demand for participation, rather than resulting from more nuanced implementation performance and operational success. This also means that targets, where expressed only in respect of result indicators, are also generally realistic given the parameters and financial resourcing allocated to individual interventions. At a general level the output and result indicators and targets are logical and likely to be met if assumed levels of participation materialise.

Management and Administrative Capacity

The past record of DAFM (and other implementing organisations), the degree of continuation of existing interventions and consistency between the new plan's requirements and existing delivery mechanisms, and the degree to which administrative systems have become automated and IT-based in recent years, all provide a strong basis to suggest the management and administrative capacity is in place to deliver the plan effectively.

However, there are new challenges in this regard. The plan has elements which are entirely new, complex, and likely to attract very high levels of participation, including the enhanced conditionality requirements, the Eco-Scheme, and elements of the AECM, on top of new features of smaller interventions. The challenges involved in clearly specifying environmental, landscape and biodiversity actions appropriate to individual farms, having these applications administered, and the delivery verified, as required under the new AECM for example, should not be underestimated.

With the widened complexity of eligibility and detailed specifications of supported activity, will come additional challenges in the inspection and controls function. There are also new challenges in relation to mapping and digitising administrative features of CSP implementation, for example in relation to GAEC 2 wetlands and peatlands. And further challenges will likely accompany the specification of impact indicators, the means of recording and collecting them, and in the specification of ways of identifying, verifying and rewarding good performance, as required in the performance framework. Work to ensure the alignment of management and administrative capacity to these implementation challenges will need to feature strongly in 2022.



Monitoring

As noted above, there is much “built in” capacity to capture and record output and result indicators for monitoring purposes, which simply reflects how those indicators have been defined and how closely they reflect core levels of activity rather than any more complex implementation dynamics. However, impact indicators and targets have yet to be determined for the draft CSP, as have the overall approach to evaluation and any specification of more detailed evaluation objectives and plans. The procedures necessary for this more comprehensive monitoring function will need to be designed and established as more detailed evaluation and performance measurement plans evolve.

Milestones

At a general level the milestones included in the plan (i.e., the intermediate targets for years 2023-2026 for the relevant result indicators), simply reflect levels of activity in each of those years (which itself may be a function of the annual funding now planned). Many such milestones are stable throughout the entire period as stable levels of participation and funding are expected and give rise directly to related levels of results. We do not therefore see weaknesses in the setting of milestones but note that they generally follow directly from other features of the plan.

Administrative Burden

The draft CSP describes various processes and initiatives which are likely to effect ongoing administrative burden reduction and administrative efficiency in the roll-out and implementation of the interventions, and these are likely to build on much progress that has already occurred under existing and past programmes. However, the plan incorporates a spectrum of interventions which have widely varying administrative requirements for beneficiaries and support recipients, from some which are automatic and based on simple eligibility grounds, to complex projects requiring detailed bespoke applications. While the progress is likely to be positive at an overall level, it will therefore depend on steps being taken to lighten administrative burden where it arises for individual interventions, which is not explicitly addressed in the main plan documentation.

Financial Instruments

The plan does not propose the use of financial instruments.

8.3 CSP Interventions - Conclusions

Table 8.1 sets out our conclusions as they relate to each of the interventions included in the draft plan.

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
Pillar I Interventions	
BISS	The BISS intervention is very much driven by EU policy and requirements, including EU-determined budgetary emphasis. It puts resounding emphasis on income support as a cornerstone of the CSP. The intervention is also very broad-brush, with little variation in response to differing needs, e.g., farmer, market, location, or profitability. Nevertheless, the move towards a more balanced payment distribution is positive. While conditionality links such income support to standards and good practices, it is unclear how such standards and good practices will bring about change in farming activity for recipients or provide support in lieu of existing farming approaches. Despite the emphasis on results, the new “performance” orientation is only as strong as conditionality requirements which determine BISS (and wider) eligibility represent satisfactory or enhanced “performance”.
CRISS	CRISS is a welcome feature of the direct payments framework within the new programme, which brings an explicit mechanism for a more equitable distribution of supports. It needs to strike a difficult balance between those most in need of support and those most active in the farming sector and hence in activity deemed to warrant it, but an appropriate balance appears to have been struck. There are no additional impacts, results or outcomes anticipated beyond BISS, other than in how income is distributed.
CIS-YF	This intervention is generally sound and based on an established DAFM track-record. Some greater tracking of participants and their progress in the sector following receipt of benefits would be desirable, as the future involvement, performance and impact of younger farmers in the sector underpins the scheme’s policy rationale.
Eco-Scheme	As an entirely new, potentially challenging, and financially very significant new scheme within the overall CSP, the Eco-Scheme intervention has been well designed and carefully planned in practice. It is designed to be relatively simple to operate for both DAFM and participants and is likely to attract high levels of uptake. This has potential advantages and disadvantages. The simple and very standardised approach is likely to incentivise high participation, and therefore good or improved environmental practices on the highest number of farms possible. Against that, the scheme framed in that way does not and cannot diagnose and prescribe the most

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
	appropriate environmental practices appropriate for individual farms, those most in need on such farms, those that would have the greatest positive environmental impact, or those that carry the greatest urgency. As a new and large scheme, and one on which many farmers are likely to financially depend, this was an appropriate approach, but flexibility going forward and building in the mechanisms to properly evaluate this versus alternative approaches, will be important.
Protein Aid	This intervention is justified for inclusion. It has a sound rationale that provides direct financial support for Irish farmers growing eligible protein crops, giving greater certainty to growers in the face of sectoral difficulties and challenges, and thus aiding the competitiveness, sustainability and quality of the sector. It also has a well presented and clearly articulated evidence base that supports the need for the intervention, which is clearly aligned with appropriate EU SOs, and which clearly seeks to build on the achievements of its predecessor scheme.
Fruit and Vegetable Producer Organisations	While this intervention is mandatory for all EU Member States under the latest CSP Regulation, it also appears to be justified for inclusion based on a clear need identified and a clear alignment with key EU SOs. Supporting POs should assist to improve joint marketing and promotion of product among fruit and vegetable producers, improve product quality, increase market orientation, increase producer competitiveness, encourage R&D and innovation and address environmental aspects of fruit and vegetable production, including climate change mitigation/adaptation. The design of the intervention strategy, in turn, also seeks to ensure that supported POs will address such activities.
Apiculture	The intervention is mandatory for all EU Member States under the latest CSP Regulation, though its clear alignment with key EU SOs also supports its rationale for inclusion in the CSP. While funding levels are very small, it can nonetheless build on the achievements of previous National Apiculture Programmes, which have been funded by the EU.
Pillar II Interventions	
ANC	The ANC scheme has clear objectives which align closely to one of the EU SOs and indirectly to a second, and it operates in a standard and simple way with an identifiable and clear logic. The scheme is appropriate for inclusion and will contribute strongly to the SO of supporting farm incomes, and also to incentivising responsible and sensitive farming on many landscapes and locations most requiring it.

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
	<p>It operates prescriptively, in that all national farmland is designated as having or not having natural constraints, which essentially deems all farmers either eligible or non-eligible, and payments are calculated at an aggregate level which applies presumed levels of income foregone or costs incurred for different categories of eligible farmland. While such a prescriptive approach is probably necessary to ensure simplicity and participation, as well as efficiency in implementation, there is a case for closer research or examination of the degree to which participation changes practices or behaviour, improves environmental or biodiversity protection, improves viability, or generates positive landscape conservation.</p>
AECM	<p>The intervention is appropriate for inclusion. It represents the continuation of previous eco-schemes. Its actions cover a wide variety of areas that contribute towards multiple EU SOs. The development of a general and a cooperation option means that a variety of farmers facing different environmental challenges and constraints can participate in the scheme. The cooperation option also provides additional support mechanisms to farmers involved in the scheme. Finally, it ensures that farmers are still incentivised to make environmental improvements to their land, even if there is no financial incentive to do so.</p> <p>The intervention is well defined within the CSP. The actions of the intervention clearly link back to the needs identified and each of the actions has result indicators and outputs detailed. Whilst some further definition of the actions and their expected impact would be useful in providing a clearer intervention strategy, the intervention does have a logical specification within the CSP.</p> <p>The intervention makes a good contribution towards the EU SOs. None of the objectives are out of place and the CSP shows how each action contributes towards each of the identified objectives. However, ambition must be managed and while the AECM is a flagship programme that will make important contributions, it will not be able to solve every problem and is likely to be subject to a number of resource constraints.</p>
AECM Training	<p>The intervention's inclusion is appropriate. The AECM is a complex intervention, with multiple options and a range of different actions that farmers can choose to be involved in. Each of these actions have their own outputs and result indicators. Providing dedicated training for the AECM, that has both a mandatory training and voluntary training components is clear and logical. It ensures that farmers and advisors have the knowledge necessary to be involved in the AECM and provides further learning opportunities for participants should they wish to be involved.</p>

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
	<p>The intervention is well specified in the CSP and follows some of the same Objectives and needs identified in relation to the AECM, as well as AKIS objectives.</p> <p>The intervention is focused on improving knowledge transfer and training, where it specifically compliments the AECM. It therefore contributes to several areas of relevant EU objectives and does so in a clear way.</p>
Straw Incorporation Measure	<p>The Straw Incorporation Measure will provide a stand-alone payment for tillage farmers to incorporate straw from cereal crops back into the soil, with positive results for soil quality and carbon sequestration. It is the only scheme aimed exclusively at tillage farmers and will contribute significantly to the Plan's achievements with respect to S04 – the objective relating to climate change, mitigation and adaptation.</p> <p>The intervention will be relatively new when implemented in full, it having evolved from a pilot project currently being implemented in the transition phase.</p>
Capital Investment Scheme	<p>Based on the review of this intervention, there is a clear evidence base for its inclusion in the CSP.</p> <p>The SWOT and needs assessment highlight the wide variety of areas that this intervention will be contributing to, while the intervention strategy is clear on the areas being targeted and the potential benefits that could come from investment. Many of these are similar investment areas to the previous TAMS II scheme, highlighting their continued importance to the Irish agricultural sector. However, the demand-led nature of the scheme means that the needs and opportunities that are addressed will depend on the uptake of different investments.</p> <p>The intervention also contributes to a significant number of EU SOs, along with having a wide range of result indicators on which to judge success. Once again, the extent to which the EU objectives will be addressed will be dependent on the uptake of grants in different areas.</p> <p>While there are clear outputs to the scheme, the general monitoring and evaluation process is not clear, with a lack of information on the mechanisms and processes. There are also no details on how the intervention will look to reduce the administrative burden for applicants.</p>

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
Organic Farming Scheme	<p>The Intervention SOs and the Result Indicators have a robust evidence basis in the needs assessment and from previous evaluations, alongside evidence from the SWOT. The Intervention has a basis in prior interventions and takes forward elements from the previous programme.</p> <p>The need for this intervention has been clearly outlined in the CSP, particularly within the Need's assessment and has strong links to the EU SOs. There is mention of organic produce/farming related weaknesses and opportunities within the SWOT but the direct connection to the intervention hasn't been provided in the intervention strategy document. The targets and actions of the OFS have also been specified clearly.</p> <p>The aims of the Intervention support a majority of the related EU SOs. The Intervention is structured around encouraging producers to convert to organic farming methods. Organic production thus responds to consumer demand for sustainably produced agricultural products and also contributes to environmental, animal welfare and rural development issues through provision of local supply to assist in developing local markets.</p>
EIPs	<p>This intervention seems appropriate for inclusion due to its basis in the needs assessment and the SWOT Analysis. It initially saw low take up in the previous funding period but had success towards the end implying that it will continue to succeed in the upcoming RDP by building on lessons learnt from the previous intervention.</p> <p>The need for this intervention has been clearly linked in the CSP to a number of the EU SOs in particular relating to climate change and efficient management of natural resources. However, note that some inconsistency exists across documents regarding the SOs addressed by the intervention. No direct connection has been provided to points in the SWOT, although it is evident that weaknesses and opportunities in the SWOT Analysis will be supported by EIP Operational Groups through its targets and indicative themes which have been detailed in the intervention strategy document.</p> <p>Although coherent with other interventions within the CAP, the distinction and overlap between the general EIPs in this intervention and the EIPs involved with the co-operation element of AEEM is not clear. Clarity around what type of projects and EIPs are in scope under this measure would be beneficial.</p> <p>Given the nature of EIPs and the interventions approach to implementation, this intervention has the potential to address all of the general objectives set out in Article 6, as well as contributing to the CCO set out in Article 5. The intervention is structured around</p>

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
	encouraging a range of actors to assemble to develop innovative solutions to challenges in rural Ireland and aligns to other Government programmes and wider environmental targets.
Knowledge Transfer	This intervention is justified for inclusion. The need for the intervention is clear as knowledge transfer and related issues are pervasive across multiple EU SOs, and intervention objectives appear to be clearly aligned to those SOs. In addition, the intervention addresses lessons learned from predecessor schemes in order to improve the flexibility of the scheme to meet the knowledge transfer needs of farmers, while at the same time ensuring that activities stay focused on CAP-related priorities.
CPD for Advisors	The CPD for Advisors intervention is an appropriate measure included in the draft CSP, and one with the potential to play a very significant role in the overall success of the programme and the smooth implementation of many of its elements. Advisory services are just one part of the AKIS, and the CPD programmed within this intervention is not the only training agricultural advisors must take up. However, the thematic approach planned widens the scope of advisor CPD to important general subject matter highly relevant to EU and national priorities, and potentially above matters strictly related to participation in various schemes. As such it can play a very important role in generating and transferring important knowledge throughout the sector in furtherance of the widest set of EU and national objectives.
Suckler Carbon Efficiency Programme	There is strong evidence to support the inclusion of the SCEP in the CSP. The scheme supports clearly defined EU SOs. It addresses needs and strengths, weaknesses, opportunities, and threats identified in the SWOT analysis and needs assessment. The actions that are available in the scheme can reasonably be expected to contribute to the identified needs and objectives. Furthermore, the scheme builds on previous programmes and complements other interventions in the CSP. Budgetary allocations are provided and appear to be based on previous experience but could benefit from a clearer justification concerning unit costs. The actual unit cost base unit needs to be clarified.
DBWS	Based on this review of the intervention and its related objectives, there is a clear rationale for inclusion. The Objectives and Results indicators have a strong evidence base in the SWOT and needs assessment. There have also been prior and ongoing, similar interventions and actions. There is a risk that this intervention duplicates BEEP-S or the Dairy Beef Calf Programme. The draft intervention does not reflect this.

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
	<p>The CSP notes that this intervention relates to Objective 9 and Objective 4, but the draft intervention itself only references Objective 9. If Objective 4 is indeed relevant to this proposal, as DAFM officials have confirmed, then the draft intervention should be updated to reflect this.</p> <p>This intervention is mostly focused on animal health and wellbeing, specifically that of dairy beef. It therefore contributes to a specific part of relevant EU objectives but does so strongly and clearly.</p>
SIS	<p>There is clear rationale for the inclusion of the SIS in the CSP.</p> <p>The needs and SWOT analysis include relevant needs, strengths, weaknesses, opportunities, and threats, which this draft intervention supports and reacts to. There is therefore a strong evidence base to support its inclusion.</p> <p>The draft intervention addresses a related specific EU objective. This Scheme is a continuation of a scheme under the previous RDP with clearly formulated actions, outputs and results and a strong internal cohesion.</p> <p>The monitoring arrangements appear to be mostly strong. Through the Sheep Census return, the Scheme should provide data needed to monitor outputs and results. Assumptions and justifications for targets and for unit costs are mostly clear.</p>
Early-Stage Support for POs in Certain Sectors	<p>Based on an identified stakeholder need and similar PO interventions, this intervention is appropriate for inclusion.</p> <p>It addresses a variety of needs that relate to specific EU Objectives. It also builds on, addresses, and supports numerous strengths, weaknesses, opportunities, and threats which the SWOT analysis has identified. There are clear and logical links between the outputs, financial allocations, and results which this intervention works towards. However, the proportion of farmers which will be supported through this intervention is low, although the output indicators does represent a significant increase in the number of POs that currently exist in the Beef sector while introducing POs into the Sheep sector.</p>
Collaborative Farming Grant	<p>The SWOT Analysis and Needs Assessment both highlight the key areas the intervention will be addressing regarding generational renewal. This is a major area of concern identified by the EU that is having an impact across many member states. It is also clear how the intervention has been improved from previous iterations based on EU recommendations on the need for greater incentives for older farmers.</p> <p>While the benefits of forming farm partnerships have been highlighted by DAFM, it is not clear to what extent farmers themselves are aware of these benefits and how DAFM may look to ensure that this information reaches farmers. With the scheme only supporting up</p>

Table 8.1 Evaluation Conclusions – Proposed CSP Interventions

Intervention	Comments
	to 50% of vouched professional costs, farmers themselves will have to be convinced of the benefits if they are going to take on the other 50% of the costs that will be incurred.
LEADER	<p>This intervention is appropriate for inclusion as the SOs and the Result Indicators have an evidence basis in the SWOT Analysis, needs assessment and previous programmes.</p> <p>The need for this intervention is abundantly clear with regards to the SWOT and needs assessment, although articulation in the intervention strategy was not comprehensive. The LEADER themes provide clarity on intervention objectives and focus areas but are stated with no justification. Detailed actions are also excluded most likely due to the LDSs not being selected.</p> <p>The structure of the Intervention supports most of the related EU SOs. The Intervention is structured around rural development through job creation, social inclusion, and climate action.</p>

8.4 Overall Recommendations

We make a number of cross-cutting recommendations below. These are organised under a set of thematic headings.

CSP as a Strategy

- Further clarity should be provided on the role the CSP is to play in addressing the targets set out in the Climate Action Plan 2021, alongside the other policies and programmes expected to contribute.
- Some further clarifying statements should be included on the boundaries between key features of the green architecture, as regards definitions, additionality, and the avoidance of duplication. In particular, the conditionality requirements, Eco-Scheme actions, AECM obligations, and other land-use interventions.
- Statements should be included regarding plan flexibility and change during its implementation, in light of the requirements to achieve stringent sectoral climate targets over the course of its duration.

Performance Management and Monitoring

- The draft CSP sets out a detailed structure and arrangements for the Plan oversight and implementation, including managing and monitoring performance. We propose that these include:
 - preparation of an ambitious Evaluation Plan that will not just meet but exceed Commission requirements for performance management and monitoring, and will include a real focus on tangible outcomes and impacts on the agricultural, rural development and environmental aims of the CSP;
 - a strong central unit responsible for this on a day-to-day basis, building on the plans already in place, and involving close cooperation between the relevant DAFM Divisions but also potentially other public and private institutions and advisory organisations;
 - an early inventory of all performance-related data currently and potentially available to support the tracking, monitoring and measurement of results;
 - strong commitment to more regular surveying of farmers and to applying behavioural economics in evaluating agricultural and CSP interventions and performance;
 - initiation of some early evaluation of proposed or recent predecessor initiatives that would inform the new CSP implementation, e.g., Eco-Scheme, ANC, Young Farmer supports, AECM
 - a commitment to carry out a deep and evidence informed Mid-Term review of the CSP in 2025, and with an openness to make major alterations to the CSP at that time, especially in the context of the evolving external environment.

Human Resources and Administrative Capacity

- In the period immediately ahead, and alongside the plan's further development and Commission approval, DAFM will be required to finalise implementation plans, promote and launch interventions, prepare for their management and monitoring, and ensure all other structures and resources are in place for effective programme delivery. To help ensure these the capacity and resources are planned and in place to do this, we propose:
 - preparation of a systematic inventory of the human resource requirements by Intervention, the availability of this, and the readiness of the personnel involved;
 - consideration of the timing and build-up of activity, and the usefulness of possible staggering some of the schedules;
 - potential outsourcing of the management/implementation of some schemes to relevant partners;
 - consideration of a potentially greater role for public and private research and advisory organisations in implementing and supporting delivery within the new plan.

Co-ordinated Oversight and Information Sharing

- Mechanisms should be considered for co-ordinated CSP delivery, monitoring and data sharing regarding CSP implementation and impacts across DAFM, the Department of Environment, Climate and Communications, the National Parks and Wildlife Service, the Environmental Protection Agency, the National Biodiversity Centre, and others with a role in mapping and monitoring agricultural activity and its effects.

Capturing Lessons

- Where lessons from previous or other programmes have informed specific needs or scheme specification for 2023-2027, these should be more clearly referenced.
- Similarly, the plan could more explicitly discuss its scope and process for future potential change, in light of lessons from early and ongoing implementation and delivery.

8.5 Intervention-Specific Recommendations

BISS

- Following a sufficient initial period of implementation, the distribution of BISS payments (and all direct payments) should be modelled using de-facto recorded data, to compare actual outcomes as against the estimated impacts modelled prior to CSP roll out.

Complementary Redistribution Income Support for Sustainability

- Similarly, following a sufficient initial period of implementation, the distribution of CRISS payments (and all direct payments) should be modelled using de-facto recorded data, to compare actual outcomes as against the estimated impacts modelled prior to CSP roll out.

Complementary Income Support for Young Farmers

- Consideration should be given to reducing the age threshold from 40 years at a future point if the impacts of the intervention are positive and resources allow.
- DAFM should collect and monitor data on the numbers of annual new young entrants to farming, alongside the stock of successful applicants to young farmer supports.

Eco-Scheme

- The scope to introduce multi-annual as opposed to single year Eco-Scheme requirements should be considered as the initial model makes progress and becomes established.
- Monitor the interface between conditionality requirements and Eco-Scheme participation obligations and provide additional interpretation and guidance where required.
- Examine Eco-Scheme participation on samples of farms to understand the drivers for option selection and the resulting actions and their impacts.

Protein Aid

- The intervention's relevance to multiple SOs should be more explicitly stated in the draft CSP.
- Further development of the controls for the implementation of mixed cropping under the intervention should take place.

Fruit and Vegetable Producer Organisations

- A brief overview of the main points arising from the SWOT analysis and needs assessment, which are relevant to the Sectoral Intervention in the Fruit and Vegetable Sector, should be referenced.
- Continued efforts should be made to reduce the administrative burden associated with the scheme, while being cognisant of the scheme's legislative requirements.

Apiculture

- A brief overview of the SWOT analysis and needs assessment, as relevant to the Sectoral Intervention for the Apiculture Sector, should be incorporated within its sections of the CSP.
- It would be useful if the intervention adopted some means to track the level of beekeeper engagement with the new National Apiculture Programme (such as through existing sectoral surveys), even if outside the formal indicator system for the CSP.

ANC

- Definitions, targets and the means of monitoring Result Indicator R7 need to be clarified and established as it may relate to the ANC Measure.
- Consideration should be given to sample-based research and evaluation of the environmental, biodiversity, conservation and farm viability effects of ANC participation on individual farms to inform an understanding of the scheme's impacts and the case if any for alternative implementation models.
- Payment rates should be re-examined in light of the results of the 2020 Census of Agriculture, when published.

AECM

- Actions that contain results-based metrics require further definition. It is not clear whether a farmer will still receive payment for an action that was implemented, but the result indicator could not be achieved.
- The Cooperation option could make its evidence basis more explicit. For example, are there elements other than the hybrid results-based model used that have been informed by the Burren Programme or EIP-Agri programme?
- Beyond budgetary reasons, it is not made clear why a target of 50,000 farmers was set for this scheme. Further explanation of this point would be of benefit.
- A definition of what the result indicators are measuring in each instance would improve understanding.
- Greater detail on the monitoring for the scheme should be included. The ADAS review of GLAS identified a greater degree of monitoring as a lesson to be taken forward for subsequent iterations of the scheme. Effective monitoring, particularly given the multi-faceted nature of this intervention, will be critical to ongoing management, lessons learned and adaptation where needed.
- Ambitions for the scheme should be managed, with communications to the public and wider stakeholders needing to be clear on the scale of the scheme and appropriate expectations of it.

AECM Training

- There is no indication provided of whether any elements from previous iterations of the training programme, or lessons learnt, have been reflected in the design. It is recommended that the intervention provides some detail on whether the lessons learnt from previous programmes or evaluations have been incorporated into the design.
- The number of participants in the AECM does not appear to align with the expected numbers taking place in the mandatory training element of the AECM training. How the numbers of participants were reached could be made more explicit.
- The unit cost calculations should be provided in more detail as it is unclear precisely how this was reached.
- A more detailed description, if available, should be provided on how the training will cover each action provided in the AECM General and the Cooperation Options.
- There is no distinction or acknowledgement provided that some participants will be in the General Option and others will use the Cooperation Model and whether the training needs of participants will

change based on the option that they will use in the AECM. This could be made clearer within the plan.

Straw Incorporation Measure

- More specific reference to the opportunity presented by straw incorporation should be made in the SWOT analysis.
- Monitoring will need to cover wider impacts of the intervention on straw supply elsewhere in the sector to avoid any negative downstream effects.
- Full implementation should be reviewed and evaluated at appropriate stages, and payment rates should be reviewed at appropriate intervals.

Capital Investment Scheme

- More information could be provided to detail how the intervention will be monitored and evaluated, with details regarding how impact will be measured and how any data will be collected.
- Further justification as to why similar investment levels to TAMS II are expected would also help support the intervention strategy, along with explaining why the investment substitution which was identified is expected.
- The draft Plan should clarify why funding is only being allocated in 2026 and 2027.

OFS

- The intervention draft should establish/outline frequent monitoring processes of the payment rate to review its ability to meet the 7.5% target which is a significant increase from previous funding period.
- The measure could benefit from clearly setting out the role of ICT systems in administration of the intervention and detail how indicator data will be collected to ensure that reporting systems are robust.

EIPs

- Further explanation regarding the basis of the target values would provide context on the expected output values and allow judgements to be made on how ambitious/reliable these are.
- Provide more detailed and specific eligibility requirements to prevent a similar low success rate as in the previous programme
- Clarify the EIPs that are in scope for this intervention, and potential overlaps with the co-operation measure of AECM. This is not fully clear at present and may create confusion between this intervention and what is proposed under AECM.

Knowledge Transfer

- The description of the intervention would be improved with the provision of a brief summary regarding the main knowledge transfer related issues arising in the SWOT analysis and needs assessment.

- The list of priority topics should be used to ensure that groups sufficiently cover both economically oriented and environmentally-oriented topics as part of their activities over the course of the three-year operating period.

CPD for Advisors

- CPD for Advisors should be evaluate distinctly, and the ongoing routine evaluation of training as delivered should be written into the specification for training providers.
- The thematic approaches selected should carefully complement and add value to mainstream farm advisor training.
- Consider explicit training needs analysis across the advisor cohort and keep a degree of future CPD open and flexible, to be specified as needs dictate.

SCEP

- The new monitoring and administration system should be subject to ongoing review of its efficiency, especially in the first year of implementation. Any issues encountered should be corrected as soon as possible to ensure the new system reduces administrative burdens and eases reporting and analysis.

DBWS

- The draft intervention should be updated to reflect SO4, as this is one of the related objectives but is not referenced specifically.

SIS

- While perhaps beyond the requirements for result indicator monitoring as applicable to the entire CSP, consideration should be given to establishing targets and recording outputs across different actions within the intervention as a means of supporting more detailed monitoring and evaluation.

Early-Stage Support for POs in Certain Sectors

- The decision, at an advanced stage of CSP planning, to widen the scope of this scheme from supports in the beef and sheep sectors to a wider set of sectors, should be explained in the CSP.

Collaborative Farming Grant

- Any additional details on the administrative burden associated with this scheme should be included.
- Greater information may need to be provided on how farmers may be encouraged to form partnerships and how they may be convinced of the benefits.
- More information could be provided in the plan on the structure and governance of these partnerships, including their use of a common framework or a local contextual structure.

LEADER

- Further explanation regarding the potential result indicators that are dependent on the LDS selected and how they have been selected would give a better insight into the performance framework/logic model of the programme.
- The measure could benefit from clearly setting out in more detail the role of ICT systems in the monitoring/administration of the intervention.
- Provide more detail on actions that LEADER will take to address the gender equality aspect of SO8. to ensure that the measure thoroughly addresses the EU SO.

RSM Ireland Business Advisory Limited

Trinity House
Charleston Road
Ranelagh
Dublin 6
Ireland
T +353 (0)1 496 5388
www.rsmireland.ie

RSM UK Consulting LLP

Number One
Lanyon Quay
Belfast
BT1 3LG
www.rsmuk.com

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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made.

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