

Burren Programme Response to Draft CAP Strategic Plan 2023-27

December 8th, 2021

Dear Sir/Madam,

We welcome this opportunity to respond to the call for consultation regarding the Draft CAP Strategic Plan (CSP) 2023-27.

I am responding on behalf of the Burren Programme, having consulted with farmers, advisors, staff and Steering Group in doing so. Our response focusses on the AECM Co-operation Project (CP) element of the CSP as this appears to be the likely future home for the Burren Programme. We are offering this feedback without prejudice as to the future management of the Burren Programme and in a spirit of open, honest and constructive engagement.

First and foremost, we welcome the commitment to expanding the approach piloted by the Burren Programme (2010 -) and further developed under the EIP-AGRI projects (2016 -); we congratulate DAFM on showing leadership and ambition in this regard, as is necessary at a time of Biodiversity and Climate emergency.

In particular, we welcome:

- The move to a whole farm approach (Whole Farm Sustainability Plan (FSP));
- The simplification of AECM for farmers (integrating both GLAS and CP actions);
- The proposed use of Article 77 for landscape-level interventions;
- The integrated, partnership-based approach to help address a wide range of challenges and opportunities at a landscape level (biodiversity, water, climate etc).

We would like to make the following points:

- We urge that the funding allocated is sufficient to ensure that no 'backsliding' in payments occurs from the current *average* payment (BP plus GLAS) of c. €10k (potentially €12k in future if the increased AECM General funding of up to €7k is factored in). Rather, funding should be increased to reflect the additional commitments/risks entailed for farmers (whole-farm approach, more targeted actions, higher level of oversight etc).
- We urge that no ceilings on farmer payments are applied, rather that a system of banded, degressive payments is used so that smaller farmers benefit more, while larger holdings are rewarded for all of their high nature value farmland and its management.
- We ask that the funding package for CPs will be attractive enough to ensure strong uptake within the CP areas. This will be particularly important under the new CSP as, in a 'designated' CP area, a farmer will only be able to avail of the AECM-CP option and have no access to the AECM General, meaning many farmers in these high priority areas may not feel it worthwhile to join the CP while neighbours outside of the CP area may have access to a less demanding AECM General.
- We ask that greater clarity be provided in distinguishing between options available for CP farmers from Articles 70, 73 and 77 as the current draft is somewhat unclear; for example, funding for scrub removal and access provision appears to be available only through the co-operative measure under Article 77 whereas most of these actions are typically most relevant at an individual farm level.
- We ask that all actions currently funded under the BP continue to be funded under the CP - such as habitat restoration, supplementary feeding equipment, gates, animal handling facilities etc. Currently, none of these actions are listed in the Draft CSP;

- We ask that payment levels for results-based options in AECM General are consistent/equivalent with those in the BP (e.g. max payment for grassland under BP is €315/ha, under REAP it is listed as €450/ha), and that further consideration is given as to how to integrate REAP (AECM general) with habitat-specific CP scorecards (winterage, lowland grassland, wet grassland) at farm level;
- We ask that the funding for CPs is as flexible as possible – over time, across measures, between farmers and, ultimately, across CPs - to ensure that the budgets allocated are fully spent and achieve maximum impact;
- We suggest that, when defining indicators for the CPs, consideration should be given to the use of more meaningful indicators based on results (field scores) rather than indicators based on numbers of contracts/expenditure/areas receiving support.
- We support the proposal to phase entry into the CPs, as a way to improve budgetary planning and to manage CP workloads; priority entry should be given to those farmers currently in the Burren Programme to ensure a smooth transition between CAP cycles
- We ask that more consideration be given to dealing with farmers who have part of their holding within a CP area and part outside.
- We would appreciate greater clarity on how it is anticipated that Natura 2000 and the Organic Farm Scheme will be accommodated within the new CP structure (to avoid double payments etc).
- We suggest that the marketing opportunity afforded by having 15-20,000 HNV farmers participating in CPs and delivering *measurable* results be fully grasped, and discussions with Bord Bia and others be initiated as soon as possible.
- We ask that the flexibility to target local issues and circumstances is retained by all CPs: the ability to shape a bespoke response is central to the success of the BP and many of the EIP-AGRI projects and this must be sustained. This point applied to funding mechanisms such as the BP's 'inverted' results-based payment system (which targets poorest scoring fields for action), our co-funding mechanism for farm works, as well as the scorecards we have developed for local habitats.
- We suggest that where possible, areas of overlap between CPs (e.g. audit systems, permission protocols, cybersecurity, the need for specialist advice etc) be identified and supports implemented at a shared-services level.
- We further ask that DAFM apportion sufficient in-house staff to support the eight CPs and optimise their impact.
- We urge that the time between now and the start of the new CSP (1/1/23) is used wisely and with urgency, to get systems in place and fully tested, especially IT systems (incl. field apps) which will be critical to the success of the expanded CPs; Under the current CAP, the BP was effectively unable to function properly for 2 years due to delays in the development of GLAM. Time will also be needed to develop FSPs which will determine the commitment, and reward, that farmers will make.

Finally, based on our experience under the BP, over which time we have been inundated with interest from farmers across Ireland who want to develop their own local approach for their farmed landscape, we urge DAFM to increase funding for the EIP-AGRI measure with a view to it informing the next CSP, as indeed the current round of EIPs have done so successfully for this CAP.

Yours sincerely,

Programme Manager.