

EIP Agriculture and Environmental Group reply to Irelands CSP.

The EIP Agriculture and Environmental Group is made up of 15 EIP projects all with an agri-environment theme. These projects are located across the country and reflect a range of farming systems and land types. The projects have a considerable degree of success with measurable results on the ground. The design of these projects, with a local project team targeting specific habitats and/or species, is a good template for some of the proposed actions within Ireland's CAP Strategic Plan (CSP) for the period 2023-2027. In light of this experience, this reply is focussing on the Agri-environment-climate Measures AECM with the Co-operation measure but with comments on the Eco-scheme proposal.

Overall summary

The three main components of the new proposals (baseline conditionality, eco-schemes and AECM), gives opportunities for policy support that recognises and rewards the presence of biodiversity on farms with a results-orientated approach.

For the Pillar I Eco-scheme, we feel that in the longer term, Eco-schemes must deliver to justify continuation in future rural development programmes and not just be a follow on from the Greening payments with low thresholds ensuring automatic eligibility. Therefore higher baselines for areas of biodiversity (referred to erroneously as non-productive areas) should be considered.

For the AECM, the General option and the Co-operation option will allow a more targeted approach. The General option can be considered a GLAS replacement and gives options in more intensive farmland to improve farm biodiversity. The Co-operation option is ambitious and should build on the work of the EIP projects. However, there are concerns on the scale of these projects in relation to the budget and the omission of some habitats/species and historic monuments which could fall outside proposed delineated areas for the Co-operation options but lack appropriate actions in the General option.

Within the Co-operation option, we have concerns that it may be financially advantages for farmers always to choose the General options leaving the project with limited tools to successfully implement necessary actions. Likewise, at the next level, recruiting a management body to implement a Co-operation project could result in the management body taking a purely financial approach and choosing the easiest implemented actions. The tender process must ensure this threat is anticipated and there will need to be both clear targeting and clear metrics set by DAFM within the specifications for a Co-operation management group.

In respect to different actions, from the experiences of the EIPs it is vital that Co-operation projects have flexibility on different actions (within Articles 70, 73 and 77) and will need a wide suite of measures to implement necessary works. The CSP should not limit this process in the early stages.

Eco-schemes

It is likely that all farmers within HNV areas will automatically qualify for the Eco-scheme due to low stocking rates and/or high level of semi-natural vegetation on the farm. For more intensive farms composed mainly of agricultural improved grasslands, a higher level of ambition should be considered with a minimum qualifying area to ensure measurable improvements.

AECM with the Co-operation Measure

Strengths

- Co-operation projects (CP) are ambitious and a positive step. They can allow:
- Locally led approaches to scheme operation
- Targeting towards a species/habitat within a CP area
- Local Project team within a CP area can build on success of existing EIPs and offer a way of continuing the work with the farming community
- The Cooperation option within the AECM measure (above the General option) allows for the development of targeted schemes with a results based element
- Use of the AECM NPI will allow actions to be completed on ground, identified as needed by a project team

Weaknesses

- Scale for the AECM Co-operation Option is identified as 20,000, which doesn't reflect the number of farmers in areas where the Co-operation action would have effect
- Finance available is more suited to 15,000 farmers for full delivery
- Absence of suitable Wader/Curlew and historic monument actions from both options.
- In light of the significant carbon emissions from agricultural grasslands on drained peat soils and the need for appropriate actions it is difficult to see where the necessary actions for the protection of peat soils fits into the proposal
- Presently a lack of clarity in the range of actions available in the Co-operation action and the different Articles they are funded under (Article 70, 73 and 77). Availability and flexible use of actions is vital to success of the Cooperation action

Opportunities

- The Co-operation action approach will give opportunities for:
Targeting specific actions both between and within areas allowing better results
Allowing EIP projects to continue work and feed into CP action plans
- Opportunity for large thematic EIPs (like the Hen Harrier and Pearl Mussel) to fill the gaps in the General AECM outside the delineated Co-operation project areas
- The approach can provide evidence for a more widespread roll out in future RDPs
- Facilitate a landscape approach where required.

Threats

- The CP action plans are developed with a business approach to tendering, allowing a project team to select the easiest implementable measures and not the most suitable
- Preference in a Co-operation project by farmers for the General options rather than the Co-operation actions leading to lower funds available for the project team to implement Co-operation actions leading to status quo
- Delineated areas too large for allocated budget, with higher number of farmers within an area than what the Co-operation actions can deal with, leading to a disgruntled farming community
- Areas with specific requirements outside a Co-operation project unable to access EIP funding due to innovation definitions or insufficient funding available within the EIP measure
- Capping of payments, or low proposed averages leading to a poor uptake or implementation on some farms (Based on average anticipated annual payment €4,600 CP actions, €800 NPIs and the €1,600 landscape).
- Breeding waders including Curlew are not adequately provided for leading to further population losses, site extinctions, and national population extinctions within the lifetime of this plan