



Mountaineering Ireland's response to consultation on Ireland's CAP Strategic Plan 2023-2027 – 8th December 2021

Context

As the representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland has an interest in the protection and sustainable management of Ireland's mountains, hills, bogland, forests, cliffs and coastline. We also have an interest in promoting understanding of, and care for, these cherished natural landscapes. Mountaineering Ireland has over 13,600 members, comprising 200 clubs and 2,600 individual members (October 2021).

Farmers play a vital role as managers of ecosystems, habitats and landscapes, particularly in the mountains and areas of (High Nature Value (HNV) land. It is welcome that the Draft CAP Strategic Plan (CSP) for the period 2023-2027 signals greater support for environmental protection and enhancement than heretofore. This is essential and urgent in the context of the climate and biodiversity emergencies.

Mountaineering Ireland offers the following observations and recommendations in response to Draft CSP:

1. Incorporation of outdoor recreation in CSP

Farmers across the country facilitate recreation activity on their land, through waymarked trails and informal access for a range of activities including hillwalking, rockclimbing and kayaking. Such activities take place due to the goodwill and tolerance of landowners; they are part of our cultural heritage and an important cultural ecosystem service. In acknowledgment of the public benefit provided, Mountaineering Ireland proposes that farmers should have the option to have their contribution to outdoor recreation recognised in the CSP, on the basis that this enhances an ecosystem service, as per Article 6(1)(f).

This could be achieved through the following:

Pillar I – New or existing recreational trails or paths to be included / allowed in the list of non-productive features for conditionality in GAEC 8, and also as non-productive areas for eco-schemes.

Pillar II – New or existing recreational trails or paths to be included as an optional measure under Agri-Environment Climate Measure (AECM).

2. Stocking rates and fencing in upland areas

Mountaineering Ireland is concerned that the revision of the definition of an ‘active farmer’ to include a minimum stocking rate may lead to further fencing in upland landscapes to enclose livestock that are not hefted to the hill. We welcome the provision for a lower stocking rate where there are grazing restrictions (Section 4.1.4, Draft CSP).

Current stocking rates are a factor in high grazing pressure and consequent biodiversity loss in many upland areas. Mountaineering Ireland recommends that the requirement for minimum stocking levels for farms in ANC areas should apply only to permanent grassland and cultivated land. In accordance with the higher level of environmental ambition in the Draft CSP, maintaining and promoting sustainable farming systems in ANC areas and maintaining the countryside should take precedence over the continued use of agricultural land.

Mountaineering Ireland urges that grant aid should be available under the next Targeted Agricultural Modernisation Scheme (TAMS) for virtual fencing, such as the use of Nofence GPS collars. This would be in keeping with the scheme’s modernisation objective, it would also support targeted grazing to benefit habitat condition, and would maintain the integrity of currently unfenced mountain landscapes, in accordance with Art 6 (f).

In addition, Mountaineering Ireland recommends awareness raising activity amongst farmers and advisors regarding the fact that stock proof fencing is not required to access direct payments on exclusively owned hill lands, provided the lands continue to be farmed in the traditional manner in compliance with the requirements of the EU regulations (Guide to Land Eligibility for Direct Payment Schemesⁱ, section 1, page 4). Mountaineering Ireland members have commented on increased fencing in previously unfenced mountain areas, this detracts from the relatively wild character of upland landscapes, and in the absence of stiles, fences present a physical barrier to recreational enjoyment of upland areas, especially for those who are less agile. We understand the role of fences in livestock management, but it is disappointing to hear of situations where farmers have been poorly advised to fence mountain land against their better judgment on the basis that this is required to meet DAFM requirements.

3. Landscape scale management

Mountaineering Ireland welcomes the interventions under Article 77 (AECM Co-operation Measure) which are designed to address biodiversity, water and climate challenges on a landscape/catchment scale in high priority areas. The piecemeal nature of previous CAP interventions has constrained the potential for landscape scale management, an approach which is essential to achieving improvement in upland and peatland environments. Consideration should be given to extending funding for the current EIP-Agri projects, so as to prevent a break between the current projects and the potential for follow-on through the new Cooperation Projects.

A recent socio-economic evaluation of the Kerry LIFE projectⁱⁱ showed that discontinuity between the LIFE project and the Pearl Mussel EIP (which some of the farmers were eligible to join) affected relationships and diminished farmer support for agri-environment schemes. Avoiding, or at least minimising, any hiatus between the current upland EIPs and the Cooperation Projects is advocated.

Response to Draft CAP Strategic Plan from Mountaineering Ireland – December 2021

4. Archaeological monuments

We note that Page 386 of the Draft CSP sets out proposed financial contributions for protection of archaeological monuments on grassland and tillage land. We presume that grassland in this context includes rough grazing land, however if it doesn't, this protection should extend to monuments in woodland areas, in upland areas and on mountainsides.

We trust that you will take these views into account in finalising the next CSP.

Should you require further information please contact:

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ⁱ <https://www.gov.ie/en/publication/1fbaa-a-guide-to-land-eligibility-direct-payment-schemes/>

ⁱⁱ <https://www.southkerry.ie/kerrylife-socio-economic-evaluation-report/>