

# Submission to the Department of Agriculture, Food and the Marine in relation to the Public Consultation Process on the Draft CAP Strategy 2023-2027.

December 2021

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## Introduction to an Fóram Uisce

An Fóram Uisce | The Water Forum was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. The Water Forum is the national statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. The Water Forum consists of 26 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and public water consumers. Approximately 50 different organisations were involved in the nomination of members.

The role of the Forum is that of a strong independent stakeholder body contributing to water policy, which supports public and stakeholder engagement on all matters relevant to water. One of the strategic themes of the Forum is reviewing and advising on the implementation of Ireland's River Basin Management Plan, which sets out Ireland's requirements and objectives to meet the EU Water Framework Directive.

### 1. Background to the submission

The Water Forum welcomes the opportunity to respond to the Public Consultation on the Draft Common Agricultural Policy (hereafter CAP) Strategy. The Water Forum welcomes the 'Green Architecture' outlined in the new CAP, which proposes to address the climate, biodiversity and environmental crises through the enhanced conditionality, the Eco Scheme Intervention of Pillar 1 and the range of climate/environment interventions of Pillar 2. The Forum is supportive of the proposal that both CAP Pillars 'will work together in a complementary way'.

This submission will focus first on the AECM of Pillar 2, as all members of the Forum have an agreed position on the proposed recommendations (Section 2) and feel they will have greatest benefit for water quality protection, with co-benefits for climate and biodiversity. The second part of the submission will address Pillar 1, where proposed recommendations were also largely agreed by all members, with one exception, which will be outlined (Section 3).

### 2. Recommendations for AECM of Pillar 2

The Forum welcomes the proposal that *"the underpinning principle for the (Pillar 2 AECM) scheme will be 'right action in the right place' in order to ensure effective targeting of measures to deliver biodiversity, water and climate action in an integrated manner on farms"*. The Forum supports this proposal for targeted measures for optimum environmental outcomes, which is a significant improvement relative to previous AECM schemes of CAP.

In 2020, the Water Forum adopted the Framework for Integrated Land and Landscape Management (FILLM)<sup>1</sup>, as the overarching framework for not only catchment management, but also environmental management, (see additional document attached), or downloaded at this link: [Framework for Integrated Land and Landscape Management](#). The FILLM encourages multidisciplinary and multi-organisational approaches, as well as environmental policy coherence, policy integration and policy implementation.

The view of the Water Forum is that the national CAP Strategy would similarly benefit from the conceptual framework provided by FILLM, as a means of optimising efficiency and effectiveness in achieving environmental outcomes for climate, biodiversity, water quality and soil enhancement. The Forum believes that while designing actions/measures to be included in the new CAP Strategy or

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<sup>1</sup> The Water Forum, A Framework for Integrated Land and Landscape Management; [TWF-FILLM-Report-Feb21-v9WEB.pdf \(thewaterforum.ie\)](#)

assessing applications for various CAP interventions, that emphasis is placed on those with a range of co-benefits for water, climate, soil and biodiversity to maximise capacity and resource efficiencies (see Table 1, Page 20, FILLM report). The implementation of the new CAP will require cross-component planning where disciplines and organisations from multiple Government departments and agencies should work together in a co-ordinated manner to achieve climate and environmental targets.

## 2.1 Prioritisation of land with higher environmental priorities

The Forum supports the proposal that *“to qualify for the higher payments, farmers must have land with higher environmental priorities”*. There is some concern that these areas are still currently being defined, therefore the Forum proposes some recommendations in relation to the prioritisation for the AECM scheme;

- The Forum agrees with the 3-tiered approach as a means to ensure that the AECM can be used to target measures on farms which will have the greatest benefits for water quality, biodiversity or climate.
- The Forum supports the proposal that Priority Areas for Action (PAAs) are included as a criterion in Tier 1, where farms within Tier 1 will get first priority access to the AECM scheme. The Forum recommends that all 500 PAAs outlined in the draft River Basin Management Plan (RBMP) 2022 - 2027<sup>2</sup> are considered, but only where agriculture has been identified as a significant pressure.
- The Forum recommends that these PAAs are ranked highest within Tier 1, as targeted measures implemented in these areas have the potential to have significant improvements in water quality, along with co-benefits for biodiversity and climate.
- Furthermore, due to ongoing catchment assessments by LAWPRO in these areas, along with targeted advice for farmers being provided by ASSAP, there are already significant supports within PAAs to successfully develop targeted measures and provide the advice and supports for farmers to implement mitigation measures. The draft River Basin Management Plan (RBMP)<sup>2</sup> recommends *“capitalising on the existing river basin management governance and implementation structures (e.g. Regional Operational Committees, LAWPRO and ASSAP) to support the effective implementation of the Green Architecture measures at regional and local level”*.
- In an interim review of ASSAP<sup>3</sup>, the adoption of implementation measures by farmers was reviewed; the costs of the proposed mitigation measures was consistently the largest obstacle for implementation; *“The greatest level of non-implementation of measures for the 20 high risk issues identified in table 13 is in actions that require capital investment by farmers.”* If PAAs are prioritised within the AECM scheme, it will ensure farmers are supported to implement the targeted measures that will have the most effective outcomes for water quality.
- The Forum recommends that the definition of ‘Vulnerable water area’ (currently proposed for Tier 2) should be *“any water body where agriculture has been identified as a significant pressure”*, and priority should be given to those identified as having a critical source area (supported by EPA PIP maps).
- The Forum recommends that the proposed ‘vulnerable water area’ eligibility criterion should be included within Tier 1 (not Tier 2 as currently proposed), to allow farmers in these areas to get priority access to the AECM scheme.

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<sup>2</sup> [gov.ie - Public Consultation on the draft River Basin Management Plan for Ireland 2022-2027 \(www.gov.ie\)](https://www.gov.ie/public/consultation-on-the-draft-river-basin-management-plan-for-ireland-2022-2027)

<sup>3</sup> [2021 - ASSAP Interim Report #2 - Teagasc | Agriculture and Food Development Authority](https://www.teagasc.ie/publications/2021-assap-interim-report-2)

- The draft RBMP states that 2500km of riverside interception measures (equivalent to 3% length of all river channels) will require targeted mitigation measures to significantly improve water quality. This information is based on the EPA’s Pollution Impact Potential (PIP) maps<sup>4</sup>, or critical source area maps, which combine the soils and the DAFM farm data to show, on a relative risk basis, where these hotspots, or critical source areas, are within the landscape, and also where the quickest response will likely be seen in the river if measures are implemented.
- The Forum recommends that farms with a ‘vulnerable water area’, identified by EPA PIP maps as being a critical source area, should be prioritised to receive AECM payments; as targeted measures within these catchments have the potential to have significant improvements in water quality, along with co-benefits for biodiversity and climate.
- Supporting farmers to implement targeted mitigation measures in both PAAs and water bodies where agriculture is identified as a significant pressure, will ensure that the CAP aligns with the national Food Wise 2030 Strategy (Mission 1, Goal 3) and contribute to Ireland meeting its requirements of the EU Water Framework Directive.
- The Forum is concerned that the proposed limit of 50,000 farmers for the AECM will not be sufficient to support all farmers who are either in a PAA or a ‘vulnerable water area’. The Forum recommends that the Irish government provide additional supports if required to ensure funding is sufficient to provide supports to reduce the threat of agricultural pressures in these catchments. This is particularly applicable to supporting farmers to establish spatially targeted extended buffer zones in certain areas (see section 2.2).
- When assessing applications for the AECM, after giving priority to farmers within a PAA and vulnerable water area within a critical source area, farmers who proposed mitigation measures within their farm sustainability plans with a range of co-benefits for water, biodiversity, soil and climate, should be ranked higher than those addressing only one problem. See Table 1 Page 20 of FILLM report<sup>1</sup>, as an example of assessing co-benefits for a range of mitigation measures. This also aligns with the draft River Basin Management Plan which proposes that “*priority should be given to measures that achieve multiple environmental benefits, where possible*”.

#### Key Recommendations for Prioritisation of Land

1. The Forum recommends that PAAs, where agriculture has been identified as a significant pressure, are ranked highest within Tier 1, as targeted measures implemented in these areas have the potential to have significant improvements in water quality, along with co-benefits for biodiversity and climate.
2. The Forum recommends that the definition of ‘vulnerable water area’ currently proposed for Tier 2, should be “any water body where agriculture has been identified as a significant pressure”
3. The Forum recommends that the proposed ‘vulnerable water area’ eligibility criterion should be included within Tier 1 (not Tier 2 as currently proposed), to allow farmers in these areas to get priority access to the AECM scheme, with additional priority given to those identified as having a critical source area (supported by EPA PIP maps); targeted measures within these catchments have the potential to have significant improvements in water quality, along with co-benefits for biodiversity and climate.

<sup>4</sup> EPA Pollution Impact Potential Maps; [EPA Maps](#)

4. The Forum recommends that in addition to PAAs and vulnerable water areas, applications for AECM payments which propose measures with multiple co-benefits for water, soil, climate and biodiversity, should be prioritised for eligibility for the scheme.

## 2.2 Mitigation measures within the AECM

### Spatially targeted extended buffer zones

Buffer zones are one of the most common and important measures used to mitigate impacts of farming on water quality from a large range of pollutants and significant issues such as phosphate, total phosphorus, sediment, nitrate, ammonium, pesticides and microbial pathogens<sup>5</sup>, with multiple co-benefits such as enhanced aquatic and terrestrial biodiversity. It is important however, to consider that effectiveness of buffer zones for mitigating impacts on water quality will be dependent on the permeability of the soil, subsoil and bedrock, and on the topography. Therefore, the Forum recommends that greater consideration be given to requiring spatially targeted extended buffer zones, whereby they are added as a mandatory measure within Tier 2 for vulnerable water bodies in poorly draining areas where runoff of pollutants is posing a threat to watercourses.

In freely draining areas, a high proportion of rainfall infiltrates vertically underground to the water table, thereby flowing underground and bypassing much of the nearby buffer zones. Buffer zones in freely draining areas therefore provide less protection for water quality from nutrient pollution, although they still have many environmental benefits for biodiversity and hydromorphological integrity. In contrast, in poorly draining soils, a high proportion of effective rainfall must 'run off' either as overland flow or shallow subsurface flow. Buffer zones in poorly draining soils enable interception of runoff and are therefore more effective at protecting local watercourses relative to freely draining soils.

Utilisation of spatially targeted extended buffers need not increase the area of buffer zones as some of the area allocated to uniform width buffers (their width could be decreased) could be repositioned to the water and pollutant flow delivery paths and zones and could be designed and shaped to suit the local topography, thereby getting optimum benefits from the area allocated to buffer zones. Utilisation of the new EPA Pollution Impact Potential (PIP) maps would aid location of the flow delivery paths and points.

Due to the major environmental benefits buffer zones could have in critical areas, the Water Forum recommends that the Irish Government should supplement CAP payments to ensure sufficient coverage in critical source areas and should be seen as a more cost-effective policy tool to achieving national water quality and biodiversity targets. See Appendix 1 for more detailed discussion on spatially targeted buffer zones.

### Recommendations for AECM Measures

1. The Forum recommends that an additional mandatory action is added to Tier 2; whereby in areas where Phosphate and sediment have been identified as a local water quality issue, that spatially targeted extended buffer zones must be established along the water course.

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<sup>5</sup> NFGWS Handbook of Source Protection and Mitigation Actions for Farming at this link: <https://nfgws.ie/nfgws-source-protection-publications/>

2. The Forum recommends that where CAP payments are insufficient to support the implementation of spatially targeted buffer zones in poorly draining soils identified as having critical source areas, the Irish Government should supplement CAP payments to ensure sufficient coverage of these measures, which could be classified as a more cost-effective policy tool to achieving national water quality and biodiversity targets.
3. In relation to the proposed measure of *'Planting of Tree Belt for Ammonia Capture at farmyard'* (proposed for Tier 2); this should also be available to intensive poultry and pig farmers, either under Tier 2 or Tier 3, and not only eligible for beef, dairy or sheep farmers as currently proposed.
4. The Forum supports the proposed actions that are listed under Tier 3 *'General Actions'* and emphasise the need to ensure these are targeted to local conditions such soil types, critical source areas and local pressures.
5. The Forum recommends that the following additional actions are added as individual or co-operative actions;
  - Incorporating spatially targeted buffer zones along water courses where appropriate, e.g. riparian zones, grass margins
  - Protecting and re-establishing native woodlands
  - Protection and re-establishment of wetlands
  - Restricting livestock access to water courses
  - Actions to mitigate invasive species on their lands, e.g. alongside water courses and draining ditches, and who participate in local biosecurity programmes.
6. In relation to the *'Assessment of water pollution pathway'* currently proposed as an action for Co-operative AECM, the Forum recommends updating this to *"Assessment of water pollution pathway and subsequent implementation of protection measures"*, to ensure there are water quality benefits from this measure.
7. The draft CAP proposes there will be a local co-op project team to manage the Co-operative AECM schemes; the Forum recommends that a water expert is included in the team to ensure water quality protection is a key focus in the scheme.
8. The Forum supports that *"There will also be a focus on Continuous Professional Development (CPD) for Agricultural Advisors, given that they will play a central role in communicating with farmers and facilitating them to address key challenges facing the agri-food sector as well as in assisting in the implementation of the range of interventions that will be rolled out under the Plan."* The Forum recommends that the Irish Government ensure sufficient resources are allocated to training to ensure the effective development and implementation of these CAP agri-environment interventions.
9. The Forum supports that all farmers receiving AECM payments will have to do mandatory agri-environment training, which will be essential to understand local pressures and conditions and the need for targeted mitigation measures.

## 3. Recommendations for Pillar 1

### 3.1 Conditionality; GAEC 2

The Forum recommends that the proposal for the protection of wetland and peatland under GAEC 2, would be better placed as an option for Eco Schemes, as it will not relate to all farmers and therefore difficult to address under CAP's conditionality. Furthermore, the Forum is of the view that that a dedicated strategy will be required for peatland re-wetting, which is properly funded, with inter-department collaboration across Government and transitional supports for farmers, as it has mutual benefits for water quality, climate and biodiversity.

The importance of addressing peatlands for the protection of water, along with climate mitigation and protection of soil and biodiversity was clearly illustrated in the research commissioned by the Water Forum, carried out by Pschenyckj et al., 2021<sup>6,7</sup>, 'Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity'. Some key recommendations from this research in relation to agriculture, are that incentives should be provided for farmers to rewet agricultural peat soils and that rewetting of nutrient-rich organic soils that act as hotspots for CO<sub>2</sub> and N<sub>2</sub>O should be prioritised. Emissions from grassland on peat soils is very high, 8 million tonnes per year out of a total of 30 million<sup>3</sup>. Under GAEC 2, the proposed protection target for wetlands and peatlands is 2025, the Forum recommends more urgent action is taken to protect wetlands and re-wet peatlands for water quality, climate and biodiversity outcomes.

When concern was raised by the agricultural sector that rewetting peatlands could cause flooding on neighbouring farms, Dr. Florence Wilson who lead this Peatlands Research<sup>4</sup> responded that *"it is difficult to identify the fields that need these measures; to block drains you need to know where they are and rewet successfully rather than flood. Rewetting seeks to make moist they should not be flooded"* (taken from discussion between lead researchers and Forum members). A report published by the Department of Culture, Heritage and Gaeltacht, called "Best practice in raised bog restoration in Ireland"<sup>8</sup>, also indicates that blocking drains can slow the flow of water off the bog thereby potentially reducing the frequency and magnitude of flood events by restoring the hydrological function of the bog. Furthermore, buffer zones can further protect neighbouring farms from the risk of floods. The Forum recommends that when developing plans for rewetting peatlands, that support is sought from those with expertise in successfully rewetted peatlands in Ireland.

*'Working with farmers is key to delivering better ecosystem services from peatlands through rewarding good practice but also incentivising actions for improvements where ecosystem services are poor'*, as stated by Derek McLoughlin, at the Forum's webinar on Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity' 21/5/21. Derek has 20 years' experience working with farmers on results-based-projects and currently of the Wild Atlantic Nature LIFE project.

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<sup>6</sup> Pschenyckj, C. et al. 2021. Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity. [Peatlands Full Report Final March2021b.pdf \(thewaterforum.ie\)](#)

<sup>7</sup> Pschenyckj, C. et al. 2021. A Synthesis Report; Optimising Water Quality Returns from Peatland Management while Delivering Co-Benefits for Climate and Biodiversity. [Peatlands Synthesis-Report Final April2021.pdf \(thewaterforum.ie\)](#)

<sup>8</sup> Mackin, F. et al., (2017). Best practice in raised bog restoration in Ireland. Irish Wildlife Manuals, No. 99. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland. [Best Practice in Raised Bog Restoration \(bordnamona.ie\)](#)

Furthermore, the Water Forum recommends that a landscape-based approach (rather than a farm-based approach) is adopted by the DAFM when developing this measure, which will address farmers concerns about potential impacts of measures being adopted in neighbouring farms. A landscape-scale approach was also recommended by Professor Alan Matthews, an expert on agricultural economics, at the Forum's Peatlands webinar (4/12/20) who stated that '*Widespread implementation of successful pilot results-based projects could be highly relevant to future agri-environment schemes. One approach to the next CAP might be to put greater emphasis or premium on collective actions by farmers. Instead of focusing on individual farms, there are greater environmental benefits with landscape scale changes not just on a farm scale. Farmers can support each other and learn from each other. That way pilot schemes could be brought towards mainstreaming*'.

#### *Recommendations for GAEC 2;*

1. The Forum recommends that the proposed intervention for the protection of wetland and peatland under GAEC 2 should instead be an option under Eco Schemes rather than conditionality, as it will not relate to all farmers.
2. The Forum recommends that more urgent action is taken to protect wetlands and re-wet peatlands rather than a target of 2025 as currently proposed.
3. The Forum recommends that a dedicated strategy will be required for peatland re-wetting, which is properly funded, with inter-department collaboration across Government and transitional supports for farmers, as it has mutual benefits for water quality, climate and biodiversity.
4. A landscape-based (rather than a farm-based approach) should be adopted by the DAFM when developing this intervention, which will address farmers concerns about potential impacts of measures being adopted in neighbouring farms.

### 3.2 Conditionality; GAEC 4

While the Forum acknowledges the ambition of GAEC 4 and the establishment of 3m buffer zones along water courses, members would like to reiterate the requirement for spatially targeted extended buffers as water quality measures in certain catchments (see Appendix 1). Buffer zones in poorly draining soils can result in significant water quality protection from a large range of pollutants such as phosphate, total phosphorus, sediment, nitrate, ammonium, pesticides and microbial pathogens<sup>9</sup>. In poorly draining soils, there may requirements for an extended buffer zones to adequately absorb pollutants before entering water courses. The location and width of these buffer zones will have to be designed based on local conditions, with supports from EPA PIP maps. Buffer zones in freely draining soils offer less water quality protection due rainwater infiltrating deeper into the soil and therefore bypassing the buffer zones. It should be noted that while the effectiveness of buffer zones as a water quality protection measure will depend on local soil and topography, buffer zones in all soils types will offer multiple co-benefits such as carbon sequestration or enhanced aquatic and terrestrial biodiversity. While the Pillar 2 AECM has taken a targeted, 'right measure right place' approach, the Forum recommends there is greater emphasis on targeted measures within Pillar 1 for greater alignment with Pillar 2, and increased environmental outcomes from the CAPs Green Architecture.

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<sup>9</sup> NFGWS Handbook of Source Protection and Mitigation Actions for Farming at this link: <https://nfgws.ie/nfgws-source-protection-publications/>



#### *Recommendation for Conditionality*

1. The Forum recommends there is greater emphasis on targeted measures within Pillar 1, such as consideration of spatially targeted buffer zones in poorly draining soils, which would increase the ambition and environmental outcomes from the CAPs Green Architecture.

### 3.3 Eco Schemes

#### Soil Sampling Eco Scheme Measure

The Forum supports the amended proposal for *'Soil Sampling and, where appropriate, Liming on all eligible hectares'*, where the frequency will be in line with Teagasc guidelines. The Forum understands that while soil fertility is a key component to minimise nutrient losses to the environment, the Forum recommends there should also be an emphasis on understanding local conditions, such as soil type and topography. There will be certain landscapes where the conditions are not appropriate to achieve optimum fertility levels. An alternative approach might be to associate 'optimum soil fertility' to being the optimum for the level of farming intensity, e.g. a suckler farmer with 1.0 LU/ha may not need to have the soils at P Index 3 and therefore would apply less P, while still liming to achieve the optimum pH. The Forum proposes that 'optimum fertility' could instead be considered as 'appropriate soil fertility'.

The Forum is aware that the Government have invested €10million into a scheme of soil testing; it is important that there is no overlap of resources in relation to this scheme and the new proposed Eco Scheme interventions. If farmers have already received supports under the Government's soil testing scheme, they should not be eligible to select this as an option under CAP Eco Schemes.

#### *Recommendations for Soil Sampling Measure*

1. In relation to soil fertility, there should also be an emphasis on understanding local conditions, such as soil type and topography, incorporating right measure right place into Pillar 1.
2. 'Optimum fertility' could be instead considered as 'appropriate soil fertility', where not all farms are suitable for achieving optimum fertility levels.
3. The Forum recommends that there is follow up with those who avail of the soil tests, to ensure they are being used for more effective/efficient fertiliser use.

#### Sowing of a Multi Species Sward Eco Scheme Measure

The Forum supports the proposed measure of *"Sowing of a Multi Species Sward on at least 6% of eligible hectares in the year"*, as this measure could also have benefits for water quality, biodiversity, soil and climate. The Forum recommends that this 6% of land should be in addition to any land devoted to non-productive land in other CAP interventions.

#### Limiting Chemical Nitrogen use Eco Scheme Measure

The Forum supports the measure of limiting Chemical N use as a proposed Intervention for Eco Schemes. The Forum recommends that any reduction in the use of chemical N for Eco Schemes is in addition to the proposed reduction of 10% chemical nitrogen (and up to 15% in some areas) outlined in the draft Nitrates Action Programme.

The EPA have developed maps of the critical source areas for nitrogen, identifying the high-risk areas where N from agriculture leaches to water (i.e. in freely draining soils with higher intensity farming). In a 2021 EPA report<sup>10</sup> which assess the nitrogen reductions required to achieve water quality objectives, presented annual nitrogen load reductions needed to achieve the Environmental Water Quality Standard of 2.6 mg/l N in the downstream estuary, which provide an indication of the relative scale and range of actions needed in different catchments to achieve water quality targets.

The Forum recommends that this Eco Scheme intervention takes a targeted approach when deciding the required annual nitrogen load reductions, whereby catchments with freely draining soils with higher intensity farming will require larger reductions in nitrogen to protect and restore water quality from nitrogen pollution. This would ensure that this CAP Eco Scheme intervention aligns with the draft RBMP which aims to reduce *“excessive agricultural nitrate losses from high-risk free draining soils to groundwater in agriculturally intensive areas (reduce N losses by up to 50%)”*. It would also align with the draft Nitrates Action Programme, which proposes *“tighter controls on the use of chemical fertilisers focussed on critical source areas”*.

If the N reduction requirements for this Eco Scheme are based on this EPA report and PIP maps, the Eco Scheme measure will have a more targeted, ‘right measure right place’ approach, to target and prioritise actions in the catchments that need nitrogen reductions, and as a preventative measure in catchments that currently have satisfactory nitrogen concentrations. While this will add some complexity to the scheme, where some areas may need more actions than others depending on farm practices, targeted N load reductions will maximise environmental outcomes from the scheme.

#### *Summary of recommendations for Limiting Chemical N Use*

1. Any reductions in nitrogen under this Eco Scheme should be additional to the required reductions in nitrogen under the Nitrates Action Plan, where the table with proposed reductions will take account of the NAP requirements
2. The Forum recommends that the table outlining the graduated reductions in nitrogen for this Eco Scheme, should not be uniform across the country, and should instead have varying degrees of nitrogen reduction required, whereby critical source catchments for nitrogen leaching will require higher reductions in nitrogen relative to other areas, in line with the EPA report outlining N reductions required to meet water quality objectives.

#### Additional Measures for Eco Schemes

The Forum recommends that an additional option is included within Eco Schemes for the ‘establishment of fencing along water courses to prevent livestock access as an option for water quality protection’. While the Forum recommends that this should be included in the potential list of Pillar 2 AECM actions (and farmers should not receive double payment for this), however the Forum is concerned that Pillar 2 AECM will not be available to all farmers. This measure would not be eligible for derogation farmers who already have to fence water courses under the GAP regulations.

The Forum recommends that any farmer who will receive Eco Scheme payments, must also be offered a number of voluntary training opportunities to increase understanding of local conditions and pressures, EPA PIP maps and targeted measures, along with national and EU legislation requirements

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<sup>10</sup> EPA, 2021. [Assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives - Catchments.ie - Catchments.ie](https://catchments.ie/catchments)

for water and climate. While the Forum supports that mandatory training will be required for recipients of AECM payments, there should be opportunities for all farmers to avail of this training and knowledge exchange.

#### 25% Allocation for Eco Schemes

The Water Forum commissioned research in 2020 on 'Optimising Water Quality Returns from the Reform of CAP'<sup>11</sup>, which was carried out by Dr. Charles Larkin, University of Bath. A key recommendation from this research was that both Pillar 1 and Pillar 2 must complement each other and include coherent measures to address the climate, environment and biodiversity crises. Please find attached a Discussion Paper<sup>12</sup> prepared by Dr. Alec Rolston which summarises this research. Pillar 1 payments allocated for Eco Schemes are to be reduced, there is the potential for the two Pillars to contradict one another, potentially limiting the chances of reaching the essential national and EU climate and environmental targets. The CAP research commissioned by the Water Forum in 2020<sup>1</sup> is supportive that at least 25% of direct payments under Pillar 1 should be allocated for Eco Schemes and the flexibility in the regulations should not be used to reduce this percentage.

#### *Key Recommendation for Eco Schemes*

At least 25% of direct payments under Pillar 1 should be allocated for Eco Schemes to ensure Pillar 1 and Pillar 2 complement each other to meet water, climate and biodiversity targets.

\*Note that the recommendation regarding the 25% allocation for Eco Schemes was not agreed by all members of the Forum, where individual organisations will submit their own positions to the consultation outlining their reservations.

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<sup>11</sup> Larkin, C. "Optimising Water Quality Returns from the Reform of the Common Agricultural Policy (CAP): A Rapid Assessment Report," An Foram Uisce, 2020. [CAP-Reform-Report-to-An-Foram-Uisce\\_FINAL-3.pdf \(thewaterforum.ie\)](#)

<sup>12</sup> Rolston, A., 2020. Discussion Note: CAP Reform and Ireland's Water Environment. [An-Foram-Uisce-Discussion-Note\\_CAP-REFORM.pdf \(thewaterforum.ie\)](#)

## Summary of Recommendations for the CAP Strategic Plan

### *Recommendations for Prioritisation of Land*

1. PAAs, where agriculture has been identified as a significant pressure, should be ranked highest within Tier 1 for priority access to Pillar 2 AECM scheme.
2. The definition of 'vulnerable water area' currently proposed for Tier 2, should be "any water body where agriculture has been identified as a significant pressure".
3. The proposed 'vulnerable water area' eligibility criterion currently proposed for Tier 2, should be included within Tier 1 to allow farmers in these areas to get priority access to the AECM scheme, with additional priority given to those identified as having a critical source area (supported by EPA PIP maps).
4. In addition to PAAs and vulnerable water areas, applications for AECM payments which propose measures with multiple co-benefits for water, soil, climate and biodiversity, should be prioritised for eligibility for the scheme.

### *Recommendations for AECM Measures*

5. An additional mandatory action should be added to Tier 2; whereby in areas where Phosphate and sediment have been identified as a local water quality issue, that spatially targeted extended buffer zones must be established along the water course.
6. Where CAP payments are insufficient to support the implementation of spatially targeted buffer zones in poorly draining soils identified as having critical source areas, the Irish Government should supplement CAP payments to ensure sufficient coverage of these measures
7. The proposed measure of '*Planting of Tree Belt for Ammonia Capture at farmyard*' (proposed for Tier 2) should also be available to intensive poultry and pig farmers
8. The Forum supports the proposed actions that are listed under Tier 3 '*General Actions*' and emphasise the need to ensure these are targeted to local conditions such soil types, critical source areas and local pressures.
9. The following additional actions should be added as individual or co-operative actions;
  - Incorporating spatially targeted buffer zones along water courses where appropriate, e.g. riparian zones, grass margins
  - Protecting and re-establishing native woodlands
  - Protection and re-establishment of wetlands
  - Restricting livestock access to water courses
  - Actions to mitigate invasive species on their lands, e.g. alongside water courses and draining ditches, and who participate in local biosecurity programmes.
10. In relation to the '*Assessment of water pollution pathway*' currently proposed as an action for Co-operative AECM, the Forum recommends updating this to "*Assessment of water pollution pathway and subsequent implementation of protection measures*", to ensure there are water quality benefits from this measure.
11. The draft CAP proposes there will be a local co-op project team to manage the Co-operative AECM schemes; the Forum recommends that a water expert is included in the team to ensure water quality protection is a key focus in the scheme.
12. The Forum supports that "*There will also be a focus on Continuous Professional Development (CPD) for Agricultural Advisors*" and recommends that the Irish Government ensure sufficient resources are allocated to training to ensure the effective development and implementation of these CAP agri-environment interventions.
13. The Forum supports that all farmers receiving AECM payments will have to do mandatory agri-environment training

#### *Recommendation for Conditionality*

14. The Forum recommends there is greater emphasis on targeted measures within Pillar 1, such as consideration of spatially targeted buffer zones in poorly draining soils under GAEC 4.

#### *Recommendations for GAEC 2;*

15. The proposed intervention for the protection of wetland and peatland under GAEC 2 should instead be an option under Eco Schemes rather than conditionality, as it will not relate to all farmers.
16. More urgent action is taken to protect wetlands and re-wet peatlands rather than a target of 2025 as currently proposed.
17. The Forum recommends that a dedicated strategy will be required for peatland re-wetting, which is properly funded, with inter-department collaboration across Government and transitional supports for farmers, as it has mutual benefits for water quality, climate and biodiversity.
18. A landscape-based (rather than a farm-based approach) should be adopted by the DAFM when developing this intervention, which will address farmers concerns about potential impacts of measures being adopted in neighbouring farms.

#### *Recommendations for Soil Sampling Measure*

19. In relation to soil fertility, there should also be an emphasis on understanding local conditions, such as soil type and topography, incorporating right measure right place into Pillar 1.
20. 'Optimum fertility' could be instead considered as 'appropriate soil fertility', where not all farms are suitable for achieving optimum fertility levels.
21. The Forum recommends that there is follow up with those who avail of the soil tests, to ensure they are being used for more effective/efficient fertiliser use.

#### *Sowing of a Multi Species Sward Eco Scheme Measure*

22. The Forums supports the proposed measure of "Sowing of a Multi Species Sward on at least 6% of eligible hectares in the year".

#### *Summary of recommendations for Limiting Chemical N Use*

23. Any reductions in nitrogen under this Eco Scheme should be additional to the required reductions in nitrogen under the Nitrates Action Plan.
24. The table outlining the graduated reductions in nitrogen for this Eco Scheme, should not be uniform across the country, and should instead have varying degrees of nitrogen reduction required, whereby critical source catchments for nitrogen leaching will require higher reductions in nitrogen relative to other areas, in line with the EPA report outlining N reductions required to meet water quality objectives.

#### *Additional Measures for Eco Schemes*

25. An additional option should be included within Eco Schemes for the 'establishment of fencing along water courses to prevent livestock access as an option for water quality protection'.
26. Voluntary agri-environment training should be offered to all farmers that avail of Eco Schemes (e.g. soil types, EPA PIP maps and targeted measures)

#### *Recommendation for Allocation of Eco Schemes*

27. At least 25% of direct payments under Pillar 1 should be allocated for Eco Schemes to ensure Pillar 1 and Pillar 2 complement each other to meet water, climate and biodiversity targets.  
\*This recommendation was not agreed by all members of the Forum.