

# Observations on Draft CAP Strategic Plan 2023-2027

## Opening Paragraph

The Sustainable Uplands Agri-environment Scheme (SUAS) Project is a European Innovation Partnership (EIP) funded by the Department of Agriculture, Food, and the Marine (DAFM) under the Rural Development Programme 2014-2020.

The key objective of the five-year project, started in 2018, is to develop practical and innovative solutions that will address the complex agricultural, environmental, and socio-economic challenges associated with the land management of commonages and hill farms in the Wicklow/Dublin uplands. The project has published numerous reports and guides, which are available on its website <https://wicklowuplands.ie/suasproject/>. It is overseen by an Operational Group consisting of relevant stakeholders, academics and farmers (Appendix 1.)

The SUAS Operational Group welcomes the opportunity to contribute to the consultation process make our submission on the Draft CAP Strategic Plan 2023-2027. Our submission is based on the four years of results and learning in delivering the project.

## Pillar I Proposals

### Eligible Hectare

The definition of eligible hectares should include land that is managed for habitats as well as Agricultural Activity. This will allow farmers receive payment on areas that may be fenced off from grazing livestock for environmental management purposes and will encourage farmers to be more open to this type of management. This situation occurs on our upland areas where habitat improvement on some areas requires the removal of grazing animal for a period of time (may be a number of years). The proposed definition will exclude these areas, creating resistance among farmers to get involved in such habitat restoration projects.

Allowing 30% of a parcel to consist of features “that may be beneficial to water protection, climate or biodiversity to be considered eligible”, will create issues where these features occur within relatively small parcels or areas that have been previously marked off as separate plots. It may also result in farmers trying to join up LPIS parcels to keep within the 30% limit, as often the location of current parcel boundaries was an arbitrary decision. If these features that are beneficial to water,

biodiversity & climate are deemed important, then they should be eligible regardless of what percentage of a parcel area they make up.

### **Active Farmer**

The minimum stocking rate requirement may be an issue for a number of farmers who are farming large upland areas/commonages. Where these farmers have a small area of green land, they may not be able to carry the minimum number of stock on the upland/ commonage area and so fail the definition of active farmer.

A solution would be to allow this requirement to be waived on land that is farmed in an AECM scheme where a management plan requires a lower stocking rate, or on target land where NPWS can confirm the requirement for a lower stocking rate.

### **Conditionality**

Scrub should be included in the list of areas classed as non-productive features under GAEC 8, as part of the 4% requirement. Scrub is a valuable habitat and, in most cases, if left to develop naturally will evolve into a wooded habitat. Their inclusion will help safeguard against removal.

### **Eco-scheme**

The introduction of Eco-schemes as part of the pillar 1 payment structure is a welcome development and introduces an incentive for all farms in the country to deliver environmental and climate improvements.

The targeted actions proposed are all based on lowland farming areas and practices. Where individuals have a high proportion of their holdings on either upland or commonage areas, they will easily qualify for the limited chemical nitrogen measure and the extensive livestock production measure without any change to existing farm practices (stocking rates and fertiliser are divided over the whole farm). As these farmers are receiving a large portion of their BISS payment on these upland areas, they should have to select a proposed practice that will deliver the targeted outputs on their upland/commonage area, but such practices are not even on offer.

## **Pillar II Proposals**

### **Commonage Groups**

Commonage Groups (CG) are one of the main outputs of the SUAS Project to date. It involves commonage shareholders forming a group for the collaborative planning and management of their commonage. The groups formed during the project show that farmers are very positive towards the group structure for joint planning and decision making, resolving issues and providing a framework for delivering commonage management that is not possible for individual shareholders operating independently.

We suggest that shareholders formally establishing a Commonage Group is a prerequisite for joining an upland AECM scheme. To compensate for the time involved, shareholders will each receive a payment of €500 for their efforts in establishing the CG and an annual payment of €500 for running them. However, very small commonages with many shareholders may need a per hectare cap on these payments.

### **Local Project Team**

In all current EIP projects, the Operational Groups brought together farmers, NPWS, researchers, advisors, NGOs, and community groups that built relationships and trust amongst participants and benefited project delivery and outputs. To maintain this trust and build on these relationships, efforts should be made to have continuity from the current EIP Operation Groups to the new Local Project Teams. The Local Project Teams should have some autonomy in deciding what actions and measures are appropriate for their region and the most appropriate delivery methods.

### **Landscape Level Plans**

The SUAS project identified the need for Landscape Level plans for the uplands. They are large, unfenced areas with a mosaic structure of habitat types, conditions, and pressures.

Individual LPIS plots can be planned more effectively from landscape-level plans rather than the previous unsuccessful approach where all LPIS plots were planned individually, hoping to deliver the required landscape outputs.

### **Training**

The SUAS project identified the need and benefit for habitat and upland farm management training for farmers in advance of drawing up management plans. Most farmers are unaware of the type and condition of their upland habitats or the management required to deliver good quality habitats. The SUAS project developed and implemented a training template. The evidence to date demonstrates the need to provide the training before the management plans are developed to ensure farmer engagement and the delivery of high quality plans.

### **Stocking Rates**

Getting the grazing management right is crucial for any upland habitat management. Our work has demonstrated the complexities involved highlighting that sites are individual and stocking plans need to be developed for each individual site rather than using generic stocking rates.

### **Habitat Management Plans**

Management plans need to be for longer than 5 years. Given the slow response rates of the habitats, the need to space out works over a number of years, the need for follow-up works and the evolving grazing management required, management plans should not be limited to a 5 year RDP programme.

### **Results-based Payments**

Paying farmers only for completing actions did not encourage participation in habitat management. There needs to be some form of additional payment to farmers to encourage engagement. In 2021, SUAS introduced a results-based payment system (RBAPS) for the uplands to evaluate its impact on farmer engagement and habitat improvement.

- Payment rates based on habitat quality were designed to incentivise habitat improvement.
- There were also payments for measures or capital work actions to kick start or improve habitat quality.
- The payment rates were in-line with those used in the other upland EIP projects.

Our experience to date indicates that the following issues need to be addressed in developing a RBAPS model for upland & commonage areas;

- In the uplands, habitat response to measures to improve them is long-term, and can vary widely between sites (up to 15-20 years in some cases). Habitat score improvement alone will not incentivise farmers in undertaking habitat improvement measures.
- RBAPS has not encouraged the CGs and individual farmers to deliver the measures designed to address the more challenging habitat issues. When given a choice, they generally pick measures

that promote production over habitat improvement. The management plan must include agreed (between CGs and planners) mandatory habitat improvement measures linked to the score payment.

- Applying maximum payment rates removes the incentives for habitat improvement where a farmer reaches their max payment rate. Under current proposals, where a farmer is under the maximum payment rate on their target area, they can choose lowland measures to increase their payments. A farmer with a large upland area may also reach the maximum payments at poor habitat scores due to scale. The use of digressive payments and having defined budgets for the target areas could be used to resolve this issue.
- If habitat score payments are to reward habitat management, the payment should be calculated over entire plots regardless of the number of people farming it. In our current GLAS scheme, due to individual payment calculations & maximum payment rates, commonages similar in size and condition with more shareholders can receive higher total payments than those with less shareholders or farmed by an individual.
- If habitat score payments are to reward habitat management, then the payments on commonages should go to those who actually deliver the required management rather than be based on area claimed for pillar 1 payments. Our commonage groups have demonstrated alternative payment mechanisms are possible and should be further explored on commonages.
- Some of our most vulnerable habitats are in poor condition and will score very low. There needs to be sufficient payment for these sites to encourage participation or they will be excluded from AECM schemes and the risk of further deterioration increased. (Minimum payment rates may be a way to address this).
- There is currently a lack of knowledge & research into the management of our uplands. There is a lack of knowledge about habitat responses to certain management practices, timeframe and follow-up treatments required; the practicality of farmers being able to carry out some actions; health & safety issues; availability of contractor capacity for works farmers can't carry out themselves, required grazing management, etc.

There is a need to develop an RBAPS model that is suitable for the uplands and commonages, based on the work of the various EIP projects and taking into account the issues raised above. Such a model needs time to evolve and be critically evaluated to ensure it will deliver in the long-term.

## Appendix 1. SUAS Operation Group members

[REDACTED]: Project chair. Farmer, Wicklow Uplands Council (WUC) member, former IFA National Hill Chair

[REDACTED]: Teagasc Drystock Adviser in Wicklow for 20 yrs. On secondment from Teagasc to the role of Project Manager,

[REDACTED]: Farmer & former chair of WUC

[REDACTED]: Farmer, Current Chair Wicklow IFA , former chair of WUC,

[REDACTED]: Divisional Ecologist with the National Parks and Wildlife Service (NPWS), former District Conservation Officer with NPWS based in Wicklow Mountains National Park

[REDACTED]: Farm Landscape Ecology and Agri-Environment Policy Lecturer in UCD, school of Agriculture and Food Science

[REDACTED]: agricultural extension and innovation lecturer in UCD, School of Agriculture and Food Science

[REDACTED]: Independent consultant. Has extensive experience in the agri-environmental sector including research, research management, administration, operations, policy development, Foresight, and change management.

[REDACTED]: Community Water Officer, Local Authority Waters Programme

[REDACTED]: Teagasc Countryside Management Specialist

[REDACTED]: Coordinator of Wicklow Uplands Council

[REDACTED]: Former Teagasc Regional Manager, covering both Wicklow & Dublin at various times. Former ASA President