

Farming For Nature Technical Group (FFNTG) response to public consultation on Proposed Interventions Ireland's CSP 2023-2027

Summary

AECMs need to ensure fairness and efficacy of implementation, particularly in terms of coherence between measures and sub-measures. This coherence is vital to build on successful programmes such as the Burren Programme and many of the EIPs, and to avoid backsliding. The delivery of higher level environmental ambition through the proposed Cooperation Projects requires meaningful budget allocation that becomes an attractive package to farmers. This ensures a fair distribution of funds that are targeted towards those that are either delivering more, or seek to deliver more. The careful design of AECM sub-measures is essential and must involve experts in all aspects of the design. In addition, the timing of implementation of AECM sub-measure will also be crucial to their success. In the instance of the Cooperation Projects, these should be fully in place well in advance of January 2023.

The key theme of this submission is coherence and consistency across all aspects of the interventions, building on excellent examples of successful programmes, and ensuring we deliver on climate, biodiversity and water targets.

Background

The Farming for Nature Technical Group was convened by the Heritage Council as part of its ongoing High Nature Value (HNV) Farming Ireland work, in association with GMIT and the EFNCP. Together, we offer many years' worth of experience of working directly with HNV farmers across Ireland, including through EIP AGRI Groups, and with a range of other partners including the Heritage Council, DAFM and NPWS. Full details on the group are available at <https://www.heritagecouncil.ie/projects/farming-for-nature-technical-group>

We previously have produced detailed proposals for the CAP green architecture and its implementation in Ireland which was submitted to DAFM in 2020. This document is available [here](#). A infographic summary is provided at the end of this document.

The following are the group's comments on DAFM's proposed interventions with a particular focus on the green architecture elements that our work has concentrated on.

Pillar 1 (Comments):

Definitions/Eligible hectares:

All features on farmland that are contributing to the CAP objectives, including environment and climate objectives, and which require farming intervention of some kind, are eligible for support.

A critical component of the CAP are the eligibility criteria for the Basic Payment, which are linked to the definition of "agricultural land" to be specified at MS level within the context of "framework definitions" set at EU level. It is critical that the definition of "agricultural activity" and "agricultural land", including "permanent grassland and permanent pasture" (together referred to as "permanent grassland") do not

hamper but rather assist the delivery of policy outcomes on Irish farms. That means that they should reflect local conditions in Ireland and convey a coherent message. The new flexibility in the framework must be utilised to ensure that all features on farmland that are contributing to the CAP objectives, including environment and climate objectives, and which require farming intervention of some kind are eligible for support.

The definitions of agricultural activity and agricultural area need to be carefully considered and updated to ensure coherence across CAP objectives and in particular the guidance for their implementation needs to be updated. Need to have clarity on agricultural activity and this needs to include environmental management activities undertaken by the farmer under AECM contracts. As an example there may be a need to exclude livestock from certain areas to allow recovery following certain events (natural/manmade) e.g. landslides and fire. Areas where livestock need to be excluded for environmental purposes, for example to allow recovery of upland veg after fire/historic fire, erosion or landslide event and management of habitats for the attainment of specific environmental objectives, should be considered eligible.

In relation to agricultural areas, in allowing additional eligible features we welcome that features that may be beneficial to water protection, climate and biodiversity will be considered eligible. A list of proposed environmentally beneficial features should be drafted by DAFM and this should be taken into account and be consistent with the list of features in GAEC 9 and where appropriate the list of current eligible landscape features should also be updated.

It was highlighted in the townhall meetings that “converted land” will no longer be eligible-this is an important signal on land reclamation.

Conditionality:

Baseline conditionality requirements should secure a minimum quantity of green infrastructure on farms and ensure no net loss. Baseline conditionality in Pillar 1 needs to acknowledge the ecosystem services provided by non-farmed and farmed semi-natural areas in farmland landscapes. The value of these areas must be clear to the farmer: retaining them should not result in a reduction in payments but instead should attract enhanced support under the eco-schemes and AEC measures.

GAEC 9: List of non-productive features needed for GAEC 9; we agree with the 5% proposal and welcome ambition above regulatory text which is only targeted at arable farmers. The DAFM proposal is fairer and has greater environmental ambition and it is achievable in an Irish context given the existing cover of semi-natural features on farms. However, the inclusion of nitrogen fixing crops and catch crops, will, as shown in greening, water down env ambition and will lead to a greater administrative burden and a need for additional monitoring to ensure that these areas are managed without chemical inputs. All semi-natural vegetation on farms should contribute to the 5% target.

GAEC 2: without appropriate definition nothing to comment on here, a definition is urgently required. These areas are important C stores with significant sequestration potential. They need to be maintained as eligible features which will allow for targeted support and rehabilitation via CAP supports particularly in pillar 2.

Eco-schemes:

Eco-schemes give MS much more autonomy in defining the environment and climate actions that are supported under Pillar I. As a minimum, we feel that this instrument should put a value on semi-natural features on farms and must build on and exceed the requirements of GAEC 9 in particular. It should set clear environmental targets for all farms. It should maintain and expand semi-natural vegetation to a defined minimum cover on all farms, this will deliver benefits for biodiversity, climate, water and landscape.

We recommend a point-based system for the implementation of eco-schemes where farmers are awarded points for specific eligible features/actions which have direct environmental and climate benefits. Farmers would be eligible for payments when they have achieved 100 points for example. If a farm is below 100 points, farmers would have the option to build up points by undertaking a limited number of actions that would increase the proportion of eligible features on their farm e.g. hedgerow planting, riparian buffer zone creation, field margins, tree planting, pond creation etc. Crucially, these equivalent actions should have clear environmental benefits and no chemical inputs should be permitted with any of them.

It is important that these should be simple measures, easy to verify and monitor using remote sensing techniques e.g. aerial/satellite imagery. Eligible areas could be pre-populated on BPS applications accompanied by self-declaration/verification by farmers. Remote sensing should be supplemented by simple tech solutions where farmers can 'self-declare' their eligible habitats. Where a farmer exceeds 100 points then additional funding should be available through AEC measures (to which such farmers could be given priority access based on their points) which are designed to enhance the quality of semi-natural features/habitats on farms.

Most importantly, the scope of the requirement should be clearly stated ensuring that there is full complementarity with both the demands of conditionality in the lower Tier and the possibility of support in the higher Tier. The eco-schemes points should be integrated with industry sustainability programmes such as Origin Green to reduce the administrative burden on farmers, improve overall integration and coherence in communications on environment standards.

Due to the scale of challenges in Ireland and the declared biodiversity and climate crisis, the FFNTG have concerns about the use of eco-scheme rebate associated with AECM commitments to reduce eco-scheme allocation and we would not recommend the use of the rebate.

Eligible actions/features for the eco-scheme should be restricted to those with direct measurable environmental benefits that contribute to specific objectives. The scheme must be meaningful and not include indirect actions that may or may not be beneficial.

Pillar 2 (Comments):

AECM:

We welcome the integration of results-based AECM and the locally led approach in the design of the agri-environment scheme. Both of these approaches to AECM in Ireland have proven very effective across a range of farming systems and landscape types. We have learnt valuable lessons about the efficient implementation of this approach from the Burren Programme and various EIP-Agri operational groups across the country. Cooperation and a farmer-centred model together with an evidenced based approach have been key elements of the success of these programmes. We welcome the proposal to use a landscape approach and the proposal to identify landscapes with higher environmental priorities for cooperation actions. Given that a one size fits all model has proven ineffective given the diversity of the agricultural landscape in Ireland, this bespoke approach is the logical evolution of our approach to improving the efficacy of AECM. More details on how this approach can be implemented is available [here](#).

In addition we wish to make the following comments in relation to a potential application process to streamline the administration of this new approach based on experiences in The Burren and EIP projects.

Critical to the success of this new approach will be adequate preparation, we propose an intake process starting with an expression of interest in 2022 followed by initial selection, completion of necessary preparatory tasks, a contract offer to the farmer and contract acceptance. This call for EOIs should typically include outline information of the programme. The advantage of this step is that a clear business and administrative assessment can be completed well in advance of farmer intake and appropriate preparation may be completed. The second step will be formal offers of places to join the programme.

The proposed system should have a number of stages

1. Outreach and consultation with the Farming Community in each Cooperation Project Area.
2. Preparation of Local Area Plans identifying local priorities and objectives in each Cooperation Project Area.
3. Submission of Expressions of Interest.
4. Selection of successful candidates.
5. Preparation of maps and associated materials in respect of each selected candidate and issue of a contract offer.
6. Selected farmers formally accept a contract through an online portal in the Spring of 2023. If appropriate, they could also select from a limited number of other actions, e.g. conservation of rare breeds of livestock at this stage

The advantages of this approach include;

- Improves administrative processes, allows a phased approach to entry which will reduce risk (e.g. around potential capacity issues), improve programme performance and enable better budgeting.

- It reduces application risk for the farmer, the initial expression of interest does not include any transaction cost. As a result the farmer is not exposed to paying an advisor for an unsuccessful submission.
- It ensures that the intake process addresses priorities within cooperation/landscape areas. This is particularly important in priority catchments where the involvement of as many farmers as possible at an early stage is necessary for the achievement of defined objectives.
- Allows initial baseline assessments in the summer of 2023. In parallel with the use of apps on mobile devices for reporting, this approach ensures that the productivity of the advisor resource is maximised.

AECM training:

Training in the Agri-Environment Climate Measure is essential to deliver the desired objectives by the programme participants. Training in cooperation project areas must be focused on local objectives and cognisant of local farming systems and conditions. It must equip farmers to deliver solutions to these challenges on their farms. A generic national syllabus is inappropriate and cannot cover the relevant issues in the detail required.

Training must address the particular challenges faced by farmers in a specific area and assist farmers with developing strategies to meet these challenges and deliver objectives. A landscape level, solutions focussed approach requires coordination of the delivery of training. The local coordination team is best placed to do this. The actual delivery of training in higher environment priority areas (as proposed in the draft intervention document) is best done through a partnership approach between local advisors and Cooperation Projects/local project team.

The Project Team should approve advisors for training aimed at specific objectives, e.g. Freshwater Pearl Mussels, Machair, Upland Commonages etc. Training for advisors and in some cases appropriate training aides, e.g. training films, presentations would be supplied by the Cooperation Project Team. It is essential that advisors successfully complete comprehensive training in advance of commencement of participation in any results-based programme. An approved advisor could then organise training on specific topics that they are qualified in. The Project team would assist them by directing farmers who would benefit from the course to the advisor and if necessary, provide a staff member to speak or demonstrate at the event.

As it is vital that participants in schemes have a clear understanding of objectives and targets, the course should be attended within the first full calendar year of the farmers contract. Analysis of the data collected during baseline assessments will play an important role in determining local training needs. Collating and interpreting this data is a necessary part of a local training plan, allowing time for this to be completed will not permit the commencement of training before the winter of 2023/2024. As a consequence an insistence on the delivery of training within 12 months of the commencement of a farm contract would compress the time available for the first training course to a 5 or 6 month window. In our opinion this is not realistic. Allowing the course to be completed in the first full calendar year of the farmers contract, i.e. before the end of 2024 for the first tranche of farmers (assuming a June 1st contract commencement)

would ensure that training is better focused on meeting farmers needs and is more likely to achieve results.

EIP-AGRI operational Groups

Members of the FFNTG have produced a report on the EIP operational groups implementation in Ireland with detailed recommendations for future implementation which is available [here](#).

The larger themed EIPs (e.g. Hen Harrier and Pearl Mussel projects) in the previous RDP have been particularly successful and have provided significant lessons for future implementation of agri-environment schemes both in Ireland and internationally. We would recommend the use of themed EIPs again to complement the competitive call approach particularly for specific challenges or areas of the country that are not included in proposed local cooperation areas or advanced enough in development to allow for full implementation of the landscape/cooperation approach to combat agri-environment challenges. The Shannon Callows and Hen harrier wintering areas along the South East coast would be good candidates for such themed EIPs. There could also be provision for targeted EIPs for water-specific priority catchments, and other priority environment challenges.

On-farm Capital investment Scheme

We welcome the continued inclusion of environmental investments in this scheme. We would like to note that there is an opportunity here to design an element within this scheme to support the implementation of ASSAP activities on farms. There should be some ring fencing of resources that could be drawn down by farmers engaged with the ASSAP programme. This would be for specific targeted environment investments identified by ASSAP in collaboration with participating farmers.

Another aspect that should be considered for eligibility for capital investments is the reuse and renovation of existing facilities e.g. traditional farm buildings. Retaining a farm building in use avoids the mining, quarrying, felling and manufacture of a new building, this is true for all the parts of a building as well as the structure. Building conservation and adaptive re-use are strategic, up-stream methods of avoiding fresh carbon emissions. The EU Green Deal and Ireland's commitment to cutting CO2 emissions from buildings means that new rules may be in place for all building projects. An existing building is a host of embodied carbon and the more farm buildings we renovate and adapt for use on the farm, the less new-build will be needed, this is Climate Change mitigation. This can be supported through the retention and enhanced provision of the Traditional Farm Buildings Grants Scheme, so long as this retains a conservation ethos. These buildings are not only cultural resources, but also environmental ones, through their embodied energy and in their role as important wildlife habitats. The conservation of our farm inheritance – sending it into the future – includes making modifications to it that are necessary for it to remain useful and relevant to the working farm. A conservative approach, begins with appreciating and making full use of the assets that we have – ecosystems, buildings, landscapes, infrastructure, and communities.

CPD for advisors

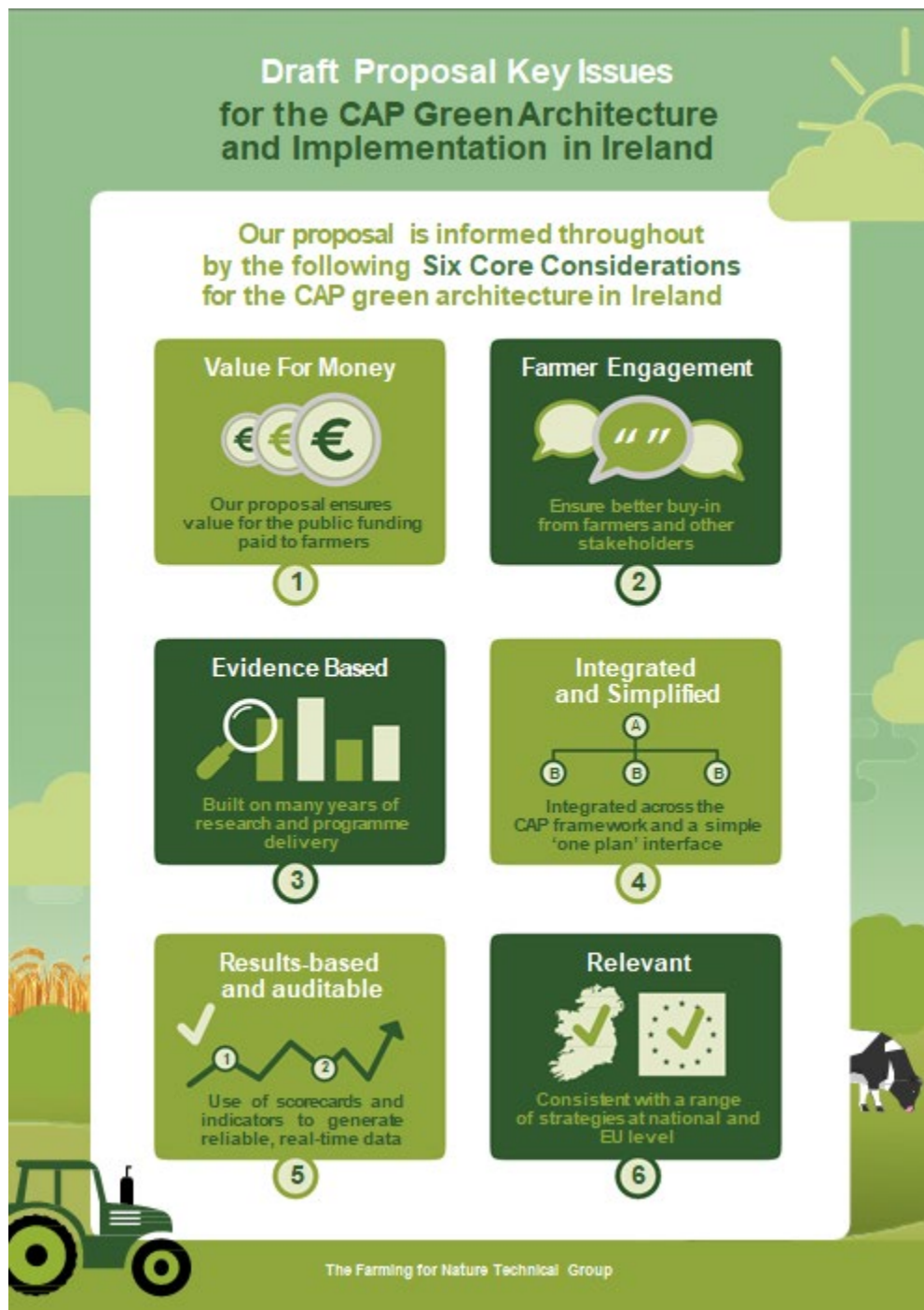
The FFNTG welcomes the provision for Continuous Professional Development of Advisors. This must be designed around equipping advisors to assist farmers addressing challenges on their farms. CPD programmes should contain multiple modules from which advisors could select topics appropriate to the needs of their clients. Allied to this there is a need to broaden the skills base within the Farm Advisory

Service. The current restriction to Agricultural Science graduates with certain production related modules in their degree course does not provide for a pool of new entrants with the environmental science, ecology or hydrology skills that will be needed to meet the aims of the CAP. We recommend widening the eligibility criteria for FAS advisors to recognise the evolving role of advisors in the provision of agri-environment advice.

KT programme

The continuation of the Knowledge transfer programme is welcome. However within cooperation/local project areas KT facilitators should be obliged to work closely with the local Cooperation Project Team to ensure that the KT programme contributes to meeting local objectives. The review of Priority KT tasks in each area should have input from the local Cooperation Project Team. As part of the approval process for KT facilitators operating in these areas, there must be a requirement for them to attend and pass a course of training provided by the local Project team. The Project team should also provide training for facilitators on relevant Priority KT tasks and where appropriate provide training aides. Project teams could also present on certain topics at meetings or demonstrate at national events held as part of the KT programme.

Summary of CAP green architecture proposal submitted to DAFM in 2020 with full details available to download at <https://www.heritagecouncil.ie/content/files/Proposals-for-the-CAP-Green-Architecture-and-Implementation-in-Ireland-Farming-for-nature-task-group.pdf>



Draft Proposal Key Issues for the CAP Green Architecture and Implementation in Ireland

We propose Three Tiers in this green architecture

With increasing levels of environmental ambition and delivery
as you progress from Tier 1-3

Tier 1 Enhanced Baseline Conditionality

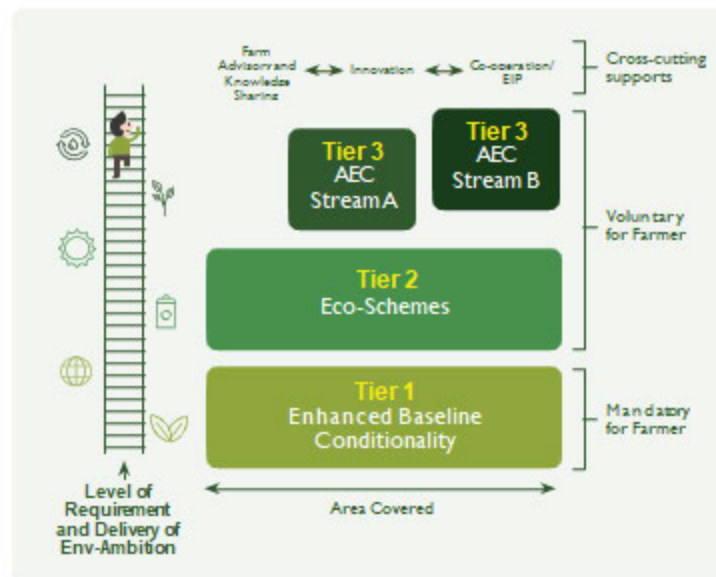
Minimum standards to keep agricultural land in GAE

Tier 2 Eco-schemes

Practices that are beneficial to the environment and climate

Tier 3 Agri-Environment Climate Measure

A national agri-environment scheme and a locally-adapted
farming for nature scheme



We propose that the Tier3 AEC measure be divided into 2 streams

Tier 3 Stream A Builds on Ireland's 25 years of experience with national agri-environment schemes

Tier 3 Stream B Builds on 10 years of experience with locally-adapted, hybrid results based agri-environment payments.