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Margaret Murphy	Member of the Public		as an individual	My name can be published	I would like to see proper scientific and ecological management of Farm Hedgerows incentivised. This will encourage farmers in hedge laying, coppicing and cutting in a way that preserves habitats and biodiversity as well as carbon sequestration					

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Michael J. O'Mahony	Farmer – part time		as an individual	My name can be published						<p>Eco-scheme:<input type="checkbox"/></p> <p>Re: Public Consultation on the Environmental Assessment of the draft CAP Strategic Plan 2023-2027 <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>"draft Environmental Report"<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Eco-Scheme Practices for CAP<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>I would like to propose an additional Eco-Scheme Practices for CAP.<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Proposal:<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Improved tracking of movement of organic manures between farms has also been raised as an issue for review by the Water Framework Directive National Technical Implementation Group, which is chaired by the Agency. (EPA submission on the 4th review of Ireland's Nitrates Action Programme – 2nd consultation, Fourth review of Ireland's Nitrates Action Programme – 2nd stage consultation).<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>My proposal is that a database be established where by farmers wishing to impart or export organic manure can register their interest. This would allow importing and exporting farmers to enter into agreements that would allow both to plan their manure handling/storage/application plans. It is currently difficult to link up with farmer who wish to export/import organic manures. Farmers have a natural disinclination to go "cap in hand" to their neighbour asking for organic manures as they may be refused and this could lead to social awkwardness in the future.<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>The environmental benefits include the following:<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>1.Reduction in Nutrient Balances on intensive dairy farms:<input type="checkbox"/></p> <p>Nutrient balances and use efficiencies have the potential to be used as key agronomic and environmental performance indicators and benchmarks to rate the performance of a farm and encourage improvement in nutrient management (Developing the EU Farm Accountancy Data Network to derive indicators around the sustainable use of nitrogen and phosphorus at farm level, Cathal Buckley, David P. Wall, Brian Moran, Paul N.C. Murphy)<input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Nitrogen balances were between two and four times higher#across specialist dairy farms compared to livestock rearing and specialist tillage systems. (Ibid)<input type="checkbox"/></p> <p>2.Reduction in the organic Nitrogen application level on intensive dairy farms.<input type="checkbox"/></p> <p>3.Reduction in the artificial Nitrogen requirement/use on less intensive farms.<input type="checkbox"/></p> <p>4.Application of organic manure to a larger geographical area, thus reducing the well documented impact of intensive fertilizer application. (https://www.epa.ie/publications/corporate/submissions-position-papers/EPAC-3621-submission-on-the-review-of-the-Nitrates-Action-Programme.pdf).<input type="checkbox"/></p> <p>5.Improving the documentation and transparency of farm to farm movements of organic manures.<input type="checkbox"/></p> <p>6.Generation of a database of organic manure application location related to LPRIS.<input type="checkbox"/></p>

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	Representative of a civil society/NGO, Researcher/Academic, Member of the Public		as an individual	I do not wish to have my name published	<p>Comment 1 <input type="checkbox"/></p> <p>The basis of excluding Section 1, Section 2, Section 3, Section 6, Section 7 and Section 8 of the CAP has not been properly outlined. Why have these sections been excluded? Saying this has 'provided background information' is not good enough. Removing for example Section 7 on the Government systems and Coordination systems and Reporting and Monitoring Systems does not make sense as these systems will have an overall effect on the measurement of the performance of the CSP and ultimately on the success of the CSP, including its ecological and biodiversity impacts. This will have land-use impacts going forward with the overall evaluation of the CSP. <input type="checkbox"/></p>		<p>Comment 2 <input type="checkbox"/></p> <p>In the 'Baseline Context' – what has not been included is the features of the landscape (rivers and banks, hedgerows, small wetlands and woodlands) which are of major importance for wild fauna and flora for functions such as migration, dispersal and genetic exchange OUTSIDE of the Natura sites as given by Article 10 of the Habitats Directive. <input type="checkbox"/></p> <p>Article 10 of the Habitats Directive states that; Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species. <input type="checkbox"/></p> <p>If these are not considered necessary, then the reasons must be clearly outlined. Ecologists would argue that these features are essential to the ecological coherence of the Natura 2000 network and many are of major importance for wild fauna and flora. For example, the importance of the small streams network for water quality downstream – potentially in an SAC site or for a protected species e.g. Atlantic salmon and sea lampreys. <input type="checkbox"/></p> <p>Comment 3 <input type="checkbox"/></p> <p>"Given that the CAP Strategic Plan aims to provide support for continued agricultural land use activities with a new focus on undertaking such activities in an environmentally sustainable manner and in light of the absence of existing threats or pressures from agricultural to these features of interest, they are not considered to be at risk of likely significant effects from the land use interventions of the CAP Strategic Plan. As such further detailed examination of agricultural-related threats/pressures to these features of interest is not required and they are not considered further in this Natura Impact Statement."<input type="checkbox"/></p> <p>Just because there has been no research or "in light of the absence of existing threats or pressures from agricultural to these features of interest" – this does not mean these features are not at "risk of likely significant effects from the land use interventions of the CAP Strategic Plan". Take for example Harbour and Grey seals, Seal Rescue Ireland are accumulating evidence that deteriorating river water quality is impacting on the health of these seals downstream and in the coastal waters, with nutrient enrichment (reducing fish numbers) and bacterial contamination (increasing disease) being two of the factors. <input type="checkbox"/></p> <p>Comment 4 <input type="checkbox"/></p> <p>"The aims and objectives of the GAECs and the Pillar I Eco-Scheme and the Pillar II Interventions is to support agricultural in ways that contribute to improvements in environment conditions and climate action," The problem is both the Pillar I eco-schemes and Pillar II intervention are voluntary schemes and there is not landscape approach in designing and applying the CAP measures. <input type="checkbox"/></p> <p>Some of the rationale does not reflect all possibilities such as "The restriction of changes agricultural land use from grassland to arable will limit ploughing and thereby limit losses to water-depend habitats." Firstly, if the land is no where near a water source, this will not be an issue. Secondly, buffer zones can be created to limit losses before change of land-use. Thirdly, there are other land-uses which will do not involve changing grassland to arable. Also, how can "most eligible wetlands and peatlands identified under this GAEC are managed as permanent grassland" - as grasslands are usually drained and are usually not managed as wetlands and peatlands, unless they are Turfoughs. More qualification is needed on what is a grassland-wetland and grassland-peatland. Buffer strips have a proven to have a positive impact and should be compulsory and not mandatory in Natura sites and also near rivers and watercourses in areas where water quality has significantly deteriorated. <input type="checkbox"/></p>	<p>Other comments: <input type="checkbox"/></p> <ul style="list-style-type: none"> <input type="checkbox"/> GAEC schemes are voluntary and adhoc – planting for example only '3 native trees per hectare per year' or '1 metre of hedgerow per hectare per year' does not consider the potential of creating these linear corridors as required by Article 10 of the Habitats Directive. <input type="checkbox"/> <input type="checkbox"/> Under AECM general or other measures, planting of trees – native trees and the appropriate location needs to be considered and that these measures do NOT incentivise afforestation of high nature value less intensive farmland with non-native conifers. <input type="checkbox"/> <input type="checkbox"/> Non-productive Investments should consider 'rewilding' and the benefits to the overall ecology and biodiversity of Natura sites and other landscape features important for wild flora and fauna. <input type="checkbox"/> <input type="checkbox"/> Many farm buildings applications should undergo adequate ecological assessment before being screened out for AA. <input type="checkbox"/> <input type="checkbox"/> Management Issues need to be incorporated – such as the management (and not just 'planting') of Hedgerows, Trees and Woodlands or areas of Afforestation. <input type="checkbox"/> <input type="checkbox"/> Organic Farm Schemes – assessment needs to be made on making payments for existing organic farms and the effect it will have on ecology and biodiversity and not just on new organic farms. 	<p>Baseline studies need to be undertaken for proper mitigation/monitoring measures. This should be done in conjunction with the Water Framework Directive and the National Biodiversity Action Plan. For example, the latter calls for a nationwide assessment of Ireland's Hedgerows. <input type="checkbox"/></p>	<p><input type="checkbox"/> "The aims and objectives of the GAECs and the Pillar I Eco-Scheme and the Pillar II Interventions is to support agricultural in ways that contribute to improvements in environment conditions and climate action." The problem is both the Pillar I eco-schemes and Pillar II intervention are voluntary schemes and there is not landscape approach in designing and applying the CAP measures.</p>

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Derry O Donnell	Member of the Public		as an individual	My name can be published	I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.□					

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Enda Gilrane	Farmer – part time; Agriculture Advisor; Ecologist		as an individual	My name can be published	<ul style="list-style-type: none"> · CDP for advisors and farmers. <input type="checkbox"/> · A proper funded KT. <input type="checkbox"/> · Inclusion of forestry and our forestry members in all tree related objectives. <input type="checkbox"/> · Additional recommendations on Organic farming. <input type="checkbox"/> · A reformed AKIS to rightly include the private advisory service and our clients in national and EU policies. <input type="checkbox"/> · A CAP funded Head Office in ACA with additional staff including professional advisors that will develop presentations, material, research for the use of all members and our clients. It will also provide all levels of support to you as a private consultant/advisor. <input type="checkbox"/> 					

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Brendan McSherry	Member of the Public		as an individual	My name can be published	<p>It is unrealistic to rely on a large number of mitigation measures. Some of the measures suggested are conditional i.e. they MAY be implemented IF certain problems arise. Some people MIGHT be given further training etc.</p> <p>As things stand, Irish agriculture, though perhaps much better than in e.g. Brazil, which is often used as the bogeyman, is depleting, polluting, dependent on imports of fertilisers and feedstock. It is focussed on cash exports to other countries in order to earn cash and is continually, in most cases, degrading the biosphere on which we all depend for survival.</p>	<p>It is about trying to minimise potential harm caused by an ill-founded Plan. We need radical change in how we manage our countryside. It shouldn't just be about maximising profits for corporations.</p>	<p>The Natura Impact Statement seems to have been done thoroughly but there is only so much that mitigation measures can do to prevent potential damage arising from a bad project. Mitigation is very much second best and it would be better to change the entire CAP so that problems did not arise, rather than trying to prevent them causing damage.</p>			<p>The CAP should be a vision for a healthy countryside. It is not just a device to pour public money into the coffers of international corporations which manufacture agricultural machinery, fertilisers and herbicides, via the banks which allow Irish farmers purchase these. <input type="checkbox"/></p> <p>Our agriculture is still based on a colonial model. Ireland's landscape is over-exploited by the drive to produce vastly more food that its people need, in order to export this produce. Irish agriculture is an extractive, linear industry, which degrades the natural environment and exploits farmers, in order to boost the profits of international corporations. <input type="checkbox"/></p> <p>Water quality continues to decline across almost the whole country. Just 20 surface water catchments now achieve HIGH water quality, despite the requirements of the WFD. <input type="checkbox"/></p> <p>Biodiversity, including most notably farmland birds, especially lowland breeding waders, is being squeezed out by an unsustainable system. These might not matter in and of themselves but they show that we are mining the land and gradually destroying it. We are not living in balance with nature. <input type="checkbox"/></p> <p>We talk about rain-fed grass and grass-fed animals, yet we rely on the importation of artificial fertilisers made with Russian natural gas and animal feed made from maize grown in North America. None of this is sustainable, as we will probably be made very clear in the near future. <input type="checkbox"/></p> <p>Ireland is still England's larder. Yet we also export vast quantities of milk powder, so-called baby formula, to Third World countries, while encouraging Irish women to breastfeed their children. I think that this will be held as shameful crime by future generations. <input type="checkbox"/></p> <p>Meanwhile farmers work harder and harder, ever longer hours and their income from each unit of production continues to fall. Large supermarkets, such as Tesco, decide how much farmers are paid for their produce. Meanwhile other large corporations decide how much the farmers pay for the chemicals and the machines to spread them and the sheds that house these machines. And the banks get rich on lending the farmers the money they need to buy more and more machinery and inputs. <input type="checkbox"/></p> <p>We need a complete rethink of Irish agriculture. It should become circular, quasi-naturalistic, organic and sustainable. We should plan to use our countryside for many purposes, all of which should be sustainable. We need more hedge, more meadows, more woods and clean, sparkling streams full of fish and wildlife. We should aim to have happy, healthy farmers and rural dwellers and lift some of the pressure to be big business men and women off our farmers. We need to value food, the countryside and farmers more, as ends in themselves and not just as means to increase shareholder value.</p>

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Andy Dunne	Farmer – part time; Agriculture Advisor		as an individual	My name can be published						<ol style="list-style-type: none"> 1. Given the extent of change proposed in the CAP, there must be adequate CPD for advisors and farmers. <input type="checkbox"/> 2. This should include a KT programme that is properly resourced and for the full term of the CAP. <input type="checkbox"/> 3. Forestry on farms needs to be fully integrated into CAP and forestry must be considered a farming activity. <input type="checkbox"/> 4. A reformed AKIS must meaningfully include the private advisory service with existing anti-competitive and <input type="checkbox"/> discriminatory practices and resourcing being brought to an end. <input type="checkbox"/> 5. As part of the provisioning of 'back office' support, ACA Head Office should be supported appropriately to <input type="checkbox"/> meet all the support needs of the c.200 professional advisory in ACA. <input type="checkbox"/>

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Alan Moore, Hedgerows Ireland	Representative of a Community based group		an organisation	My name can be published	<p>Hedgerows Ireland greatly welcome and endorse the following extract: <input type="checkbox"/></p> <p>5.3.5 Ecological Corridors: Woodlands, Trees and Hedgerows Hedgerows are a valuable component of Ireland's cultural and natural heritage. Old hedgerows made up of native trees and shrubs tend to have a greater value in terms of heritage and wildlife, having larger banks and ditches and being richer in floral species diversity. Hedgerows are an essential component in a range of ecosystems and provide valuable services to agricultural activities, such as habitats for pollinators, flora and fauna, prevention of soil erosion, interception of water flows and the sequestration of carbon <input type="checkbox"/></p> <p><input type="checkbox"/> and our main contribution to the draft CAP is on this subject of recognizing and rewarding good management and maintenance of existing hedgerows (see in later boxes)</p>	<p>Hedgerows Ireland submission to the Draft Environmental Report on the Environmental Assessment of the Draft CAP Strategic Plan 2023-2027</p> <p>Hedgerows Ireland have already made a detailed submission to the consultation process for the CAP Strategic Plan earlier this year and now welcome the opportunity to contribute to this final phase of the consultation process.</p> <p>General comment on Pillar 1 Eco Schemes: We are concerned at the lack of environmental equivalence between the currently proposed Pillar 1 Eco Schemes and as a result recommend that this is addressed in the final draft to ensure that optimal environmental benefits are achieved.</p> <p>Section 3.9 GAEC 8 P252, and Introduction 'Conditionality' We propose that the concept of hedgerow quality and maintenance is included in GAEC 8. Current knowledge about the contribution of hedgerows to carbon sequestration, both above ground biomass and soil organic carbon, clearly indicates that taller, wider denser hedges have much higher values. Ongoing research, including Teagasc research by Lillian O'Sullivan, Stuart Green et al, using drone/LIDAR, alongside international work will soon provide accurate on farm carbon figures. We believe that the concept of bigger better maintained hedges should be written into the 2023-2027 CAP in anticipation of this new area of carbon accounting. There will be an associated and commensurate benefit to biodiversity.</p> <p>Section 5.1 Direct Payments Eco Scheme P-332 The current draft Eco Schemes including the recently announced added schemes do not make reference to the quality, condition or maintenance of existing hedgerows. The opportunity to exploit the carbon, water, biodiversity and many other values of the c. 700,000km of hedgerows in Ireland is thus lost.</p> <p>Given that a third or less of these hedgerows are in good condition, (Duggan, O. Birdwatch Ireland https://www.irishtimes.com/news/environment/biodiversity-is-in-a-e-says-birdwatch-ireland-1.4145577 -and given the known potential of good quality hedgerows to help us meet our goals, (Lanigan, G. Teagasc https://www.agriland.ie/farming-news/teagasc-outlines-carbon-value-of-hedges-and-grassland/, data) --the potential for improvement in meeting our carbon and biodiversity goals through hedgerow quality improvement is evident.</p> <p>We therefore propose that improvement should be incentivised in three ways.</p> <p>1.An added hedgerow maintenance/quality Eco Scheme in Pillar 1.</p> <p>2.Basic quality criteria included in the 'Space for Nature' Pillar 1 Eco schemes/Non productive areas/landscape features.</p> <p>3.Pillar 2 Agri- Environmental schemes which complement the Pillar 1 Schemes above and assess and reward hedgerow quality in more detail.</p> <p>1.An added Hedgerow Maintenance and Quality Eco scheme in Pillar 1</p> <p>Suggested elements to include:</p> <ul style="list-style-type: none"> Existing hedgerows to be retained, and maintained with either side cutting only, or no cutting of internal/non roadside boundaries. Minimum height 2m (except where coppicing or hedgelaying). 3 metre buffer strip to be maintained free of fertiliser and chemical weed control. Basic quality measure to ensure that gappy hedges are not rewarded. <p>2. Quality criteria for existing hedgerows to be included in Pillar 1 'Space for Nature/Non productive areas, landscape features' schemes.</p> <p>Good quality hedgerows have the potential to provide a massive contribution to climate and biodiversity services, yet while hedgerows are referenced under GAEC8 ('non productive features'), hedgerow quality and management are not included. There is only mention of avoiding cutting in nesting season. Carbon sequestration and biodiversity values are directly related to width, height and biomass of hedgerows for example. So there is huge potential to increase the contribution of both existing and new hedgerows towards our targets.</p> <p>We recommend that this omission is remedied by a simple, easy to administer measure:</p> <ul style="list-style-type: none"> Existing hedgerows to be retained, and maintained with either side cutting only, or no cutting of internal/non roadside boundaries. Minimum height 2m. (except where coppicing or hedgelaying). <p>3. Pillar 2 AECM (Agri Environmental Climate Measures) Tier 3 'Boundary Actions'</p> <ul style="list-style-type: none"> Results based payments for hedgerows using recognized measures of quality (height, width, species, diversity etc.) 	<p>Suggested template for results based hedgerow quality scheme:</p> <p>Objective: To reward farmers with hedgerows of highest environmental value, while encouraging ALL farmers to maintain and improve all existing hedgerows. https://www.gov.ie/en/consultation/d5d37-public-consultation-on-proposed-agri-environment-results-based-pilot-project/ See Results of Survey Q. 19: 76% of respondents favour 'Maintenance and Enhancement of existing environment' as priority for result based scheme.</p> <p>http://www.woodlandsofireland.com/sites/default/files/hedgerow-survey.pdf</p> <p>Our proposal is to pay all single farm payment applicants for hedgerows on each Land Parcel, based on length and quality. We recognise 3 main 'types' of hedgerow: Internal Hedgerow: Landowner has 100% control, payment rate is 100% of relevant quality payment category (see below). Farm Boundary Hedgerow: Landowner has 50% control (i.e. neighbouring property or roadside), payment rate is 50% of relevant quality payment category. Heritage Hedgerow: Townland, parish, DED, county, and barony boundaries, payment rate is 150% of relevant quality payment category (due to cultural and historical importance). Claims can be indicated on application maps submitted by the farmer or his agent/planner. To qualify for a particular Quality Category, the length of hedgerow must meet the minimum requirements in all 5 quality sub-categories outlined below. The scheme must have a 5-15 year target, allowing farmers to move up to higher quality categories over time. Higher Quality Category claims must be supported by geo-tagged photos, and will be subject to inspection by ecologists to confirm suitability.</p> <p>Quality Category 3: Lowest payment per metre claimed, ~20% of budget. Applicant must carry out a baseline hedgerow survey. Complete moratorium on hedgerow removal. Cutting and trimming of interior hedges on a 3-5 year rolling cycle, minimum height 1.5m and specimen trees to be retained. Roadside cutting allowed annually. No artificial nitrogen, slurry, FYM or pesticides within 5m of hedgerow base. Tillage parcels (except Organic) must have a 5m 'buffer zone' between hedge and crop area. Width: Less than 3m average Height: Less than 2m average No. of 'mature' trees: Less than 5 per 100m hedgerow (farm average) Biodiversity Index: Lowest 25% [Methodology to be used? e.g. Hedgerow Appraisal Systemii]</p> <p>CO2 Sequestration Index: Lowest 25% [Methodology to be determined by consultation with experts] Quality Category 2: Mean payment per metre claimed, ~47% of budget. Applicant must carry out Category 3 above, plus specific regeneration projects subject to planner /ecologist/botanist/ survey and requirements. May include but not restricted to coppicing, laying, infill, native tree planting and new hedgerow establishment.</p> <p>Objective is to upgrade hedgerows to Category 1 maximum payment for subsequent schemes. [Greening payments? Optional or compulsory ?]</p> <p>Width: Minimum average 3m wide Height: Minimum average 3m high No. of 'mature' trees: Minimum 5 trees per 100m (farm average) Biodiversity Index: Middle 50% CO2 Sequestration Index: Middle 50% Quality Category 1: Highest payment per metre claimed, ~33% of budget. Applicant must meet all of Category 2 & 3 requirements, having mature hedgerows with specimen trees. Width: Minimum average 5m wide Height: Minimum average 5m high No. of 'mature' trees: Minimum 10 trees per 100m (farm average) Biodiversity Index: Top 25% CO2 Sequestration Index: Top 25%</p>	<p>Section 5.3 P388 'AECM Training' and Section 5.3 P454 'Knowledge Transfer'. <input type="checkbox"/></p> <p>We propose that hedge management including hedgcutting techniques are included in training modules to include all relevant aspects of this subject. <input type="checkbox"/></p> <p><input type="checkbox"/> Section 4.1.1.2 Agricultural Activity <input type="checkbox"/></p> <p>We are concerned at the inclusion of burning and spraying in this category. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p>Please see our separately emailed proposal document.</p>	<p>Hedgerows Ireland submission to the Draft Environmental Report on the Environmental Assessment of the Draft CAP Strategic Plan 2023-2027 Hedgerows Ireland have already made a detailed submission to the consultation process for the CAP Strategic Plan earlier this year and now welcome the opportunity to contribute to this final phase of the consultation process.</p> <p>General comment on Pillar 1 Eco Schemes: We are concerned at the lack of environmental equivalence between the currently proposed Pillar 1 Eco Schemes and as a result recommend that this is addressed in the final draft to ensure that optimal environmental benefits are achieved.</p> <p>Section 3.9 GAEC 8 P252, and Introduction 'Conditionality' We propose that the concept of hedgerow quality and maintenance is included in GAEC 8. Current knowledge about the contribution of hedgerows to carbon sequestration, both above ground biomass and soil organic carbon, clearly indicates that taller, wider denser hedges have much higher values. Ongoing research, including Teagasc research by Lillian O'Sullivan, Stuart Green et al, using drone/LIDAR, alongside international work will soon provide accurate on farm carbon figures. We believe that the concept of bigger better maintained hedges should be written into the 2023-2027 CAP in anticipation of this new area of carbon accounting. There will be an associated and commensurate benefit to biodiversity.</p> <p>Section 5.1 Direct Payments Eco Scheme P-332 The current draft Eco Schemes including the recently announced added schemes do not make reference to the quality, condition or maintenance of existing hedgerows. The opportunity to exploit the carbon, water, biodiversity and many other values of the c. 700,000km of hedgerows in Ireland is thus lost.</p> <p>Given that a third or less of these hedgerows are in good condition, (Duggan, O. Birdwatch Ireland https://www.irishtimes.com/news/environment/biodiversity-is-in-a-e-says-birdwatch-ireland-1.4145577 -and given the known potential of good quality hedgerows to help us meet our goals, (Lanigan, G. Teagasc https://www.agriland.ie/farming-news/teagasc-outlines-carbon-value-of-hedges-and-grassland/, data) --the potential for improvement in meeting our carbon and biodiversity goals through hedgerow quality improvement is evident.</p> <p>We therefore propose that improvement should be incentivised in three ways.</p> <p>1.An added hedgerow maintenance/quality Eco Scheme in Pillar 1.</p> <p>2.Basic quality criteria included in the 'Space for Nature' Pillar 1 Eco schemes/Non productive areas/landscape features.</p> <p>3.Pillar 2 Agri- Environmental schemes which complement the Pillar 1 Schemes above and assess and reward hedgerow quality in more detail.</p> <p>1.An added Hedgerow Maintenance and Quality Eco scheme in Pillar 1</p> <p>Suggested elements to include:</p> <ul style="list-style-type: none"> Existing hedgerows to be retained, and maintained with either side cutting only, or no cutting of internal/non roadside boundaries. Minimum height 2m (except where coppicing or hedgelaying). 3 metre buffer strip to be maintained free of fertiliser and chemical weed control. Basic quality measure to ensure that gappy hedges are not rewarded. <p>2. Quality criteria for existing hedgerows to be included in Pillar 1 'Space for Nature/Non productive areas, landscape features' schemes.</p> <p>Good quality hedgerows have the potential to provide a massive contribution to climate and biodiversity services, yet while hedgerows are referenced under GAEC8 ('non productive features'), hedgerow quality and management are not included. There is only mention of avoiding cutting in nesting season. Carbon sequestration and biodiversity values are directly related to width, height and biomass of hedgerows for example. So there is huge potential to increase the contribution of both existing and new hedgerows towards our targets.</p> <p>We recommend that this omission is remedied by a simple, easy to administer measure:</p> <ul style="list-style-type: none"> Existing hedgerows to be retained, and maintained with either side cutting only, or no cutting of internal/non roadside boundaries. Minimum height 2m. (except where coppicing or hedgelaying). <p>3. Pillar 2 AECM (Agri Environmental Climate Measures) Tier 3 'Boundary Actions'</p> <ul style="list-style-type: none"> Results based payments for hedgerows using recognized measures of quality (height, width, species, diversity etc.)

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Aileen Eglinton	Other (please specify in box below)	Marketing consultant specialising in travel and tourism in Ireland and beyond, particularly Rural Tourism	as an individual	My name can be published	<p>My key observations are in the area of Leader Funding and the fact that the figures do not clearly say that we will have a huge deficit in funding if we do not speak up. <input type="checkbox"/></p> <p>We were already on the back-foot when Leader did not effectively start until 2016. <input type="checkbox"/></p> <p>We cannot allow more decreases in funding. We need increased funding to deliver on what Rural Ireland needs with a growing population, to be sustainable.</p>		My comments specifically relate to	<p>Yes I am very concerned about the percentage of only just over 50% funding. This must be increased to up and close to permitted EU levels - particularly after the devastation to businesses and community groups due to Covid. <input type="checkbox"/></p> <p>We must help to build capacity as well as sustainability and resources are depleted yet the will is there. <input type="checkbox"/></p> <p>So we must look at up to 80% support.</p>	My proposals are below.	<p><input type="checkbox"/> I write as someone who runs a business in the rural area of Dublin, and who also acts as a marketing consultant and business adviser to businesses around Ireland in the rural area. In fact many businesses with whom I work, who are either non for profits, small rural businesses diversifying, and community/social enterprises have benefited from Leader in a very positive way over the years. <input type="checkbox"/></p> <p><input type="checkbox"/> I believe that I am well placed to have a very key personal view on this as follows: <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>•I am Chair of the Rural Task Force in DLR. <input type="checkbox"/></p> <p>•I am outgoing President and director/board member of DLR Chamber which is the biggest representative body in DLR <input type="checkbox"/></p> <p>•My company has assisted many local businesses in getting Leader Funding which was and is invaluable from a capital and support perspective in driving their initiatives forward <input type="checkbox"/></p> <p>•I am a travel and tourism expert and have that expertise outside of Ireland as well – I know what has been, and can be achieved by good use of Leader. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>So the fact that Leader Funding appears to be effectively reduced is simply not good enough. At a time where business has been decimated by Covid, rural businesses must diversify, and when our population is growing, and where we can encourage support of rural businesses as we improve quality of life, sustain employment, and encourage diversification. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>This is simply not good enough. And we must do more as Ireland, to ensure that Leader Funding is not reduced for the period of 2023 onwards. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>My points are as follows: <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>•The budget for Leader for 2023-2027 has already been cut due to late implementation of previous Leader. <input type="checkbox"/></p> <p>•A further cut of this budget to €180 million now proposed is simply not on. Effectively this is a 40% reduction, with a growing population. And at a key time. This is a huge proposed cut. And is not acceptable. <input type="checkbox"/></p> <p>•I believe that we should be looking at around €400 million for The Leader Programme for the coming years, to work in rural Ireland, Rural Tourism, Rural Sustainability and Rural Employment in order to drive and sustain enterprise within our businesses and communities. <input type="checkbox"/></p> <p>•We must have a sustainable budget for Ireland, driven by each local Development Company from this. <input type="checkbox"/></p> <p>•The co-funding element must also be looked at. Under EU regulations up to 80% is permissible. Yet we are now looking at a proposed 56.72%. This shows no concept of what has gone on, last 2 years, and what is needed to grow our rural economy and kick-start it again. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Ireland must protect its share of Leader Funding. And we must have adequate funding, certainly up around the €400 million mark, to deliver a real difference over this crucial 2023-2027 period. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Kind regards <input type="checkbox"/></p>

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	Agriculture Advisor		as an individual	I do not wish to have my name published						<p>Ongoing CPD for Advisors and farmers so ever-evolving best practice disseminated to advisors and subsequently to their farmer clients. In my opinion, farmers will endeavor to do the right thing. As part of the education piece, a properly funded KT is vital to achieving success.□</p> <p>In the reform of AKIS it is important that private advisors are included in all stages of the process.□</p> <p>A CAP funded Head Office in ACA, is vital, with additional staff including professional advisors that will develop presentations, material, research for the use of all members and our clients. It will also provide all levels of support to you as a private consultant/advisor.</p>

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	Agriculture Advisor	Forester	as an individual	I do not wish to have my name published	Advisors must be facilitated in delivering new proposed schemes. Training of trainers required. Need to address unfair competition & equality in the marketplace between Ag. Advisors and Tesgasc counterparts.	CPD for private advisors vital.	AECM tree planting & tree belt page 152. Normal woodland planting involves 2,500 trees/ha. 3 trees/ha is extraordinarily few trees. The quality of tree and proposed maintenance as well as the tree species needs consideration. <input type="checkbox"/> Space for nature at 7% of holding will be easily achieved on most farms. More needed here.	There has been significant negative impacts on commercial forestry as a result of what has been recently described as the forestry omnishambles. Delays in licencing and processing forestry applications has all but brought the sector to a standstill. Ash dieback has had significant impact on ash forests but has also effected almost every farm in the country and future environmental measures need to address this through enrichment planting of existing hedgerows with viable replacement trees. <input type="checkbox"/> Knowledge Transfer (KT) for forestry should be resourced and regulated the same way as all KT programmes. KT is specific terminology used within all sectors in agriculture and has taken on a particular meaning across the EU. The most recent Forestry KT delivered in 2017 to 2019 (none in 2020 & 2021 due to covid.) was structured very differently to other KT's with 50% of funding going to Producer Groups (even though EU regulation 1395_2013 states clearly that the knowledge transfer provider should be the beneficiary of the support). There was less remuneration for attendees (€70 per meeting as opposed to €150 for ags.) delivery of 7 events/classes as opposed to 5 in Ag., etc.. It is important to acknowledge this transgression in delivering this program and to rectify it in future plans for the sector. <input type="checkbox"/>	Incorporate Forestry advisors in Agricultural KT Programmes. <input type="checkbox"/> <input type="checkbox"/> More support for advisors. Peer to peer learning between agricultural consultants association advisors and state funded advisors <input type="checkbox"/> <input type="checkbox"/> Dissemination of latest research. <input type="checkbox"/> <input type="checkbox"/> Improved communication from the Forest Service in the DAFM with less reliance on using 'circulars' to communicate change and subsequent penalties.	Resource private advisors to allow them to work on a level playing pitch with state advisors.

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Martin Heffernan ACA	Farmer – part time		as an individual	My name can be published	Private farm advisors in Ireland such as the ACA are being discriminated against as the state subsidizes our largest competitors to the tune of €40ml each year. Also, we are not given access to the latest research as Teagasc does not give us free access to this information. Our clients are also at a disadvantage as they also cannot access this research.	Advisory tools PG. 184 says Teagasc is to be tasked with providing an NMP type tool. It is unfair that I have to pay Teagasc to access this resource when Teagasc advisors can use this for free. <input type="checkbox"/> <input type="checkbox"/> CDP for advisors pp 180-181: I should be compensated for upskilling myself and my staff as this is a considerable expense and my competitors in Teagasc are subsidized for this.	Pg. 153 Farm Sustainability Plan (FSP): <input type="checkbox"/> This should be mandatory for all AECM participants	The FES survey should be undertaken on every farm in Ireland and this information should form the basis of all new ACEM schemes in the future.	The Knowledge Transfer program needs higher funding levels. Facilitators would need €1300 per client to make the scheme viable.	ACA should receive funding for the back office to ensure information is disseminated quickly and efficiently.

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Dónal McCormack	Representative of a Community based group	Community Gardens Ireland	an organisation	My name can be published	See below.	See below.	See below.	See below.	See below.	<p>Introduction: Currently no specific mention of urban agriculture schemes such as city farms, allotments, community gardens or urban orchards are included in Ireland's draft CAP Strategic Plan 2023-2027. The proposed Eco-schemes in the draft CAP Report (Section 5.1) should include the provision of agricultural land for use as community gardens, allotments, city farms and urban orchards in urban areas.</p> <p>Urban Agriculture, Climate Change and Biodiversity: A large argument in favour for the provision of more community growing spaces is that the spaces assist in the reducing of greenhouse gases emissions, improving urban food security, improving biodiversity and adapting to climate change impacts. In 2019, the IPCC released a report which included Urban Agriculture initiatives, as follows: "Urban and peri-urban agriculture reduces the food carbon footprint by avoiding long distance food transport. These types of agriculture also limit GHG emissions by recycling organic waste and wastewater that would otherwise release methane from landfills and dumping sites (Lwasa et al. 2014). Urban and peri-urban agriculture also contribute in adapting to climate change, including extreme events, by reducing the urban heat island effect, increasing water infiltration and slowing down run-offs to prevent flooding, etc. (Lwasa et al. 2014, 2015; Kumar et al. 2017a1209). For example, a scenario analysis shows that urban gardens reduce the surface temperature up to 10°C in comparison to the temperature without vegetation (Tsilini et al. 20151210). Urban agriculture can also improve biodiversity and strengthen associated ecosystem services (Lin et al. 20151211)." "In summary, urban and peri-urban agriculture can contribute to improving urban food security, reducing GHG emissions, and adapting to climate change impacts (robust evidence, medium agreement)." Ref: https://www.ipcc.ch/srccl/chapter/chapter-5/ Sustainable Development Goals: Community growing spaces also clearly help contribute towards some of the UN's Sustainable Development Goals, for example goals 3, 11 and 12: Good Health and Well-Being, Sustainable Cities and Communities, and Responsible Consumption and Production.</p> <p>European Commission: The European Commission also acknowledged the contribution of community gardens and allotments to the conservation of pollinators and wider biodiversity, as well as to quality of life, learning and social interaction. They can thus provide essential building blocks of green infrastructure in urban areas. https://www.europarl.europa.eu/doceo/document/E-9-2019-003594-ASW_EN.html Farm to fork: The EU Farm to Fork Strategy 2020 highlighted that "even as societies become more urbanised, they want to feel closer to their food." Also, in terms of enabling the transition, urban food systems are called out as a key area of research. Ref: https://ec.europa.eu/food/system/files/2020-05/f2f_action-plan_2020_strategy-info_en.pdf Support for Small-Scale Farming: The European Coordination Via Campesina (ECVC) have called out how "Many small-scale farmers are still fighting for survival, while wholesalers profit from the food supply chain. At the same time, local markets have dwindled and often farms do not even play a role in feeding their communities. Similarly, cities are dependent on large food supply chains." Ref: https://viacampesina.org/en/wp-content/uploads/sites/2/2018/06/2018-05-EN-ECVC-CAP-and-NEW-ENTRANTS.pdf The ECVC have called out how "small-scale farming also helps to sustain the production model, increase security within the agrifood chain, drive the economy as well as territorial and social cohesion within the EU." Ref: https://viacampesina.org/en/the-future-of-the-cap-small-scale-farmers-speak-out-from-the-european-parliament/ Conclusion: In conclusion, Ireland's draft CAP Strategic Plan 2023-2027 should include as an eligible Eco-Scheme the provision of agricultural land for urban agriculture initiatives, such as city farms, community gardens, allotments or urban orchards.</p>

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michael j ryan	Agriculture Advisor		as an individual	My name can be published	need to have the farmers/owners agricultural adviser involved in the process and fully trained as this person is most likely to have the greatest influence on the farmers/owners behavior in terms of the necessary adaptation to the new environmental practices and behaviors required.	aasap needs to involve the farmers own adviser who is probably best positioned to know the farming system and to recommend and influence change. <input type="checkbox"/> cpd: required for advisers and farmers, needs to be properly resourced. Also access to research and high level adviser training is required. This to be on an equal basis to the state funded service. <input type="checkbox"/> Organic farming p 170, same cpd and training models required on the same equal basis funding. Formal training required. Also a reduced inputs system needs to be looked at which while not strictly organic, has big potential to reduce inputs but required a very high level of understanding and management. <input type="checkbox"/> Adviser tools: need to be made available to all on an equal basis and controlled by the state, not another competing organisation. <input type="checkbox"/>	There needs to be a recognition that the private advisory service has a far greater reach than the state service but needs to be involved with the many state bodies already working to improve the environment. Formal links and involvement needs to be established.	A complete overhaul of what and how climate mitigation measures are viewed and counted is required, and less terms and conditions are required where the stated environmental objectives are being delivered even if informally. The current forestry service needs to be disbanded and re established with private input into its operation and effectively made into a commercial operation to force decision making.	no	overall there is a need to have a proper and equally resourced advisory service, supported by high level advisory support state funded, with access to research results. This needs back office support. CPD for advisers and farmers is crucial and agency coordination is required to need specific local and national objectives. Organic farming is a niche market, too much supply will destroy any necessary premium from the market and seriously will undermine irish farming and agribusiness as the reduced food supply will be replaced by imports produced with a higher carbon footprint. <input type="checkbox"/> When the advisory service was free and well resourced in the 1960's, farmers embraced it well and transformed agriculture from a victorian subsistence industry into a modern efficient industry in the timespan of about 20 years overall. A similar challenge is now required to move to a carbon neutral, or as near to neutral as possible system within the next 20 years or so. It is possible, but only with the same effort as was made in the 1960's to 1980's in terms of resources employed. <input type="checkbox"/>

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Annika Berglund	Other (please specify in box below)	representative of Craft Guild Feltmakers Ireland	an organisation	My name can be published						<p>DRAFT SWOT Analysis <input type="checkbox"/></p> <p>Preparations for Ireland's CAP Strategic Plan 2023-2027 <input type="checkbox"/></p> <p>Obj1.O3: Development of the circular and bio-economy - page 42 <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Feltmakers Ireland is an organisation aimed at supporting and promoting the craft of feltmaking in Ireland. We have just under 100 members across the country. It has been obvious to us for some time that the majority of Irish Feltmakers use predominantly imported wool in their craft. This is a pity both regarding air miles (most of the wool comes from Australia or South America) and because it does nothing to support local sheep farmers. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>From our perspective we identified a few reasons that our members might not always see local wool as their first choice for felting. The first two that are not relevant to this submissions but i am including them for context for this submission. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>First of all many of us are not used to using local wool. Most courses are taught using merino. We are trying to expand our understanding of the felting characteristics of different breeds reared in Ireland and sharing the results with our members. We are currently running a project where our members are testing a variety of wool breeds sourced from locally reared sheep. We hope to have this study finished in the new year and have plans to publish a book with our results. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>The second issue was to make it easy for felters to connect with producers to source local wool. <input type="checkbox"/></p> <p>There has been some progress on this issue from local framers and we have plans to expand the information we make available to our members regarding how to find and contact suppliers of local wool. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>The third issue is the biggest issue with promoting local wools to our members and the members of our sister organisation: The Irish Guild of Spinners and Dyers as well as a large number of craft shops and craft people in Ireland. The main issue we had in sourcing local wool for our research project mentioned above was the fact that most of the sheep farmers that were interested in supplying us with wool could only supply us with entire fleeces of raw wool. This was not sufficient for our purposes. We needed washed and carded wool. Eventually we found some individuals who offered to hand wash and hand card the wool for us to use in the project. This was by necessity only possible for small amounts of wool. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Our experiences around our project and discussions with our members, point clearly to the need for an the establishment of a facility to get whole fleeces washed and carded to be ready for sale to the public and craft suppliers.</p>

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	Agriculture Advisor		as an individual	I do not wish to have my name published	The role of the Agricultural Advisor is clearly a huge part in influencing the behavioural change of farmers into the future, and this is well acknowledged in the report. However the role of the Advisor must be backed up considerably by support in the areas of quality CPD training, access to up to date tools and research, time allocated to engage with farmer clients and a general levelling of the playing field between the public and private Advisory sectors.	CPD for Advisors Pg180-181. <input type="checkbox"/> Equal funding and opportunities to private advisors for regular and specific training. <input type="checkbox"/> Pg184 <input type="checkbox"/> Access to the tools needed to engage with clients at an equal cost to all Advisors. <input type="checkbox"/> Pg170 <input type="checkbox"/> If the ambition to vastly increase the number of Organic Farmers in the country is to be realised, there will have to be extra funding available for costs incurred by the farmer for training, certification and applications. <input type="checkbox"/> Being an Organic farmer should also fulfill the entire eco scheme requirement going forward. <input type="checkbox"/>	Pg146 <input type="checkbox"/> Advisor training specifically on implementation and goals of the new AECM. <input type="checkbox"/> Pg152 <input type="checkbox"/> Tree Planting. <input type="checkbox"/> The advice of Professional Foresters to be sought for actions involving tree planting so as to have the correct species in the correct area without affecting the biodiversity in that area. <input type="checkbox"/> Pg 153. <input type="checkbox"/> The Farm Sustainability Plan is a great initiative.	Ash Dieback and the biodiversity consequences is a huge issue in Irish forestry and the shape of the countryside. The role of Foresters in mitigating this is crucial and could be addressed in some way by the launch of Forestry KT Groups. <input type="checkbox"/> Where tree planting actions are to be considered in the Eco Scheme or AECM, the advice of a professional Forester should be sought and incorporated into the compliance for the action carried out.	I think the Farm Environmental Survey should be broadened to eventually cover all farms in Ireland. It is only then that one can truly get a baseline measurement to work from. Measure first, what you intend to manage. <input type="checkbox"/> Otherwise how can any benefits be properly calculated. <input type="checkbox"/> Better funding for Advisors running KT Groups. <input type="checkbox"/> Annual/Biannual training for farmers on the basics of climate mitigation measures, conditionality etc. poor knowledge of this evident during Glas training courses in the past. <input type="checkbox"/>	Funding for an ACA back office over the lifetime of the next CAP that would be invaluable to all its members and private Advisors in general. The public Advisory receives government support and now is the time to support ACA and their 55,000 farmer clients if the proper messaging and measures are to be disseminated. This is an opportunity that should not be missed.

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James Carton	Farmer – part time; Agriculture Advisor		as an individual	My name can be published	Implement conclusions and resultants decisions taken ASAP to give advisors time to disseminate information to farmers.	The Agricultural Sustainability Support and Advisory Programme -pages 43-45 The Agricultural Sustainability Support and Advisory Programme (ASSAP) should involve private Agri-environmental advisors and not just Agricultural Advisors from Teagasc. <input type="checkbox"/> Organic Farming pg. 170. Provide financial support for upskilling advisors through CPD Programme and upskilling farmers in organic farming principles and obligations thru funding for completing Organic Farming course and conversion plan completion				

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	Agriculture Advisor		as an individual	I do not wish to have my name published	The Grassland scorecard may not be sufficient to cover the level data capture required for Natura areas . A grassland scorecard may have potential negative impacts on Breeding Waders . A bespoke plan for these areas would be more suitable with specific aims for each habitat and how it should be managed rather than using Generic data .	All advisors need the relevant training to provide advice from the ASSAP model and this should be rolled out at a National level to all Teagasc and Private advisors <input type="checkbox"/>	To ensure the correct actions are selected in AECM all farms participating should undergo the Farm Environmental Survey and should have a Farm sustainability plan completed. These plans should also be open to editing if required . This will limit the potential risks to some habitats where AECM actions may be detrimental.	Department Approved environmentalists similar to the REPS programmes should have equal standing with ecologists in the management of these habitats . This can be further improved through additional training	A central office for all private advisory staff where consistent data can be disseminated to all practitioners to reduce mixed messaging and where frequent training and upskilling can be coordinated with . <input type="checkbox"/> The Department of Agriculture should provide the platform <input type="checkbox"/> for the Farm Sustainability Plan which should include the Nutrient Management element and the associated costs to ensure fertiliser usage regulations are adhered too. Proper consistent advice will have a huge impact in the management of High Nature Value Farmed Areas reducing potential damage to habitats .	N/A

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	Farmer – full time		as an individual	I do not wish to have my name published	1Extra measures in the proposed Eco scheme that are more workable to commercial farmers. <input type="checkbox"/> <input type="checkbox"/>	New REAPS scheme is far short in numbers that can apply & €10,000 should be available to all farmers that was promised in program for government		Good commercial farming practices.		Money taken from farmers that worked and built good entitlements & given to farmers that do very little. <input type="checkbox"/>

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	Agriculture Advisor		as an individual	I do not wish to have my name published	With 3 FAS approved advisors in this office dealing with some 1200 farmers we are operating with our hands tied behind our back at some times. We are find that we are spending more and more time at the office desk doing paperwork rather than out on the ground with the farmer clients. It is an unfair system at present where the state advisory service is heavily subsidised. We have to pay for certain services to Teagasc and they hold information on our clients which we feel is not right under the GDPR rules.	ASSAP 43-45 Despite this office dealing with the largest number of darmer clients of any office (state and Private) in Donegal we are not involved in this program. Our clients want to work with us but we are prevented from working in this area.□ CPD 180-181 We have to fund our own CPD whereas the State advisory service receives a state subsidy.□ Organics 170 Cost of participation is too high and previously even with the expenditure farmers were not accepted in to the scheme. The stocking rate requirement of 0.5LU/Ha needs to be reduced.□ Advisor tools 184: Currently we pay teagasc €1400 per annum and in return for this we get very little. We are all for computer systems to ease workload, but why have we to pay and not everyone else.	Capacity building and training 155/156□ There is basically no CPD on this under the current FAS system. I understand that training is provided to the state sector but ehy are we excluded.□ FSP 153. This tools for this needs to be provided free of charge to all FAS advisors.□ LAWPRO and ASSAP. We as private FAS advisors are not included in these programmes, WHY	All publically funded research needs to provided free of charge to all FAS advisors	The old KT programme should never have stopped mid-stream, just as it was getting really bedded in. It must be reinstated with less paperwork and a realistic payment for the facilitator. The old paymnet rate of €500 per participant resulted in us part funded the scheme as this in no way cover the costs involved and no doubt if the scheme is reintroduced which seems likely and is welcomed the costs will have risen substantially over the last few years.□ The ACA office deals with the vast majority of private advisors in Ireland and it receives no state support despite Teagasc getting massive state support. A fair playing field is required.	ACA needs a properly funded back office.

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Rory Harrington	Family farm member, Other (please specify in box below)	Wetland and Ecosystem Scientist	as an individual	My name can be published	<p>Agriculture and its associated land uses have a long record of direct and indirect impact on Ireland's social, economic and environmental dependencies. However, appreciation of its two major default ecologies; forest cover and its receiving waters/wetlands are poor. The biogeography of the Country is and has been, central to its ecological development and its agriculture. Ireland's capacity to favourably support agriculture, in particular cattle-based husbandry, is well documented. Palaeobotanical studies and archaeology confirm this.</p> <p>Since the first post-glacial arrival of humans into Ireland about 12,000 ago, humans have profoundly influenced the structure of Ireland's ecology – through the use of fire. Uplands, once dominated by Scots pine and heath, were repeatedly burnt, accelerating nutrient release, which subsequently flowed down-gradient to shallow depressions and lakes. The consequence of this was to induce ecological transition to that of peatlands and heaths. Commencing about 6 thousand years ago or earlier, the Country was subject to generally moist temperate climatic conditions that further promoted these changes. Paleo botanic studies have shown that Ireland was not alone amongst European countries responding to human induced fire and associated dependent grazing – the loss of forest and woodland cover and its replacement by grasses and dwarf shrubs was widespread across Europe. Paradoxically, this dynamic also gave rise to many habitat types and associated ecologies now valued today.</p> <p>None of the proposed recommendations in the draft presented address the inherent nature of the Country's fundamental ecological disposition. If nature-based improvements are to be made, key changes in land management are required in particular reanimating lost ecologies.</p> <p>SUGGESTED ADDITIONS:</p> <p>Water management as a land use The accelerated, near catastrophic loss of the water quality of the Country's receiving waters; streams, rivers, lakes, ponds and inshore waters (and its dependent ecologies) in relatively recent times are primarily due to land management. Demonstration of how this might be effectively addressed has been demonstrated repeatedly throughout the Country by intercepting polluted water with appropriately scaled, configured and helophyte vegetated wetlands. This approach was first started more than 30 years ago it has been presented in scientific peered reviewed papers – some are presented in pdf format below. The fundamental determinant of water quality (and its management) is controlled and secure water interception and its flow within conditions that facilitate processing by microbial biofilms. Retention-time, structured vegetative interception and compartmented flow management are critical.</p> <p>Demonstrations demonstrating land based management of water started 33 years ago in Dunhill, Co. Waterford. It was inspired by earlier ecosystem-based studies in the Hubbard Brook catchments of New Hampshire, USA in the 1960's. The reanimation of water-retentive infrastructures have been internationally and nationally shown to effectively treat intercepted water, attenuate flow and provide substantial improvements for rural infrastructure. The application termed 'Integrated Constructed Wetland' (ICW) has been widely and successfully applied for the management of polluted water sources ranging from overland runoff, farmyard soiled water, piggyery manure, mine and quarry drainage, industrial water and combined municipal waste waters. When scaled and constructed appropriately they have proven most effective in protecting all receiving waters.</p> <p>Combined woodland and shelter</p> <p>Woodland is an essential component of the Irish countryside. Appropriately configured, it can provide essential shelter for livestock and a wide variety of wildlife, plant and animal. Shelter is essential for the wellbeing and performance of livestock through reducing metabolic losses to exposure. As greater emphasis is placed upon grass-fed livestock production in Ireland, effective shelter is required. As such shelter is a function of height and structural composition, trees of appropriate species and their management are required.</p> <p>Ireland has a many centuries-long record of pastoral woodland management. It would be profitable for farmer and society and 'nature' that it is facilitated.</p> <p>This recommendation is based upon first-hand professional engagement in farm-forestry for more than 40 years and includes professional work undertaken in New Zealand and familiarity with forest/tree management, especially in The Netherlands.</p> <p>References:</p> <p>Everard, M., Harrington, R. and McInnes, R.J., 2012. Facilitating implementation of landscape-scale water management: the integrated constructed wetland concept. <i>Ecosystem Services</i>, 2, pp.27-37.</p> <p>Scholz, M., Harrington, R., Carroll, P. and Mustafa, A., 2007. The integrated constructed wetlands (ICW) concept. <i>Wetlands</i>, 27(2), pp.337-354.</p>				Implement the Department of Environment 2010 Guidance Manual for the use of Integrated Constructed Wetlands for the treatment of soiled farmyard waters.	

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Marie Comerford	Farmer – part time		as an individual	My name can be published	<p>a)2050 is too far off. Target for achievements should be 2030 at latest. The participation-times (e.g. 2 years) for schemes are inadequate to turn anything around, to assess results, to measure.□</p> <p>b)The proposed streams of payments is ridiculous. It perpetuates the stereotype of "poor farmer". Farmers are not poor. They are forced by Government agricultural policies to work in unsustainable, unprofitable fashion.□</p> <p>c) This muddled 'best-bet-piecemeal' Proposal is unlikely to be engaged with either at this formative stage OR in whatever/whenever it is implemented. There are far too many "ifs" and "buts" "caveats" and "exemptions" as well as (most importantly!!!) conflicting aims of different parts of the Proposal. The myriad ambitions of the Proposal result in EVERY farmer/farm profile being unique. How shall THAT be assessed and finance allocated?□</p> <p>d) If monetary reward continues to be linked (and stated to be dependent on) short-term participations in the bewildering array of "schemes" this obscures and weakens the important task.....halting climate change and environmental (especially soil) destruction through current farming practices.□</p> <p>□</p> <p>It would make more sense, be more effective, to simply pin those objectives to the mast, announce and nationally-publicise the "large pot of incentive funding" for changing practice, train up a very large cohort of Educator/Warden/Assessors working AT A NATIONAL LEVEL, NATIONALLY DEPLOYED who would sign off successful transitions to sustainable practice and give the entire shebang 10 years. The plethora of "schemes" and funding-streams, the absence of clarity as to how, by whom and when the actual fields/crops/flocks/herds/bogs can be reliably said to meet regenerative, carbon-neutral status, and the (unworkable!.....I guarantee you!!!) intention of trainers and educators to farmers, will NOT ACHIEVE THE STATED - AND DESPERATELY-NEEDED - AIMS. □</p>	My overview (box Q1) covers ALL of the Proposal material. It would be redundant to repeat, nor do I have the time.	As per response in Q2. My Q1 response covers ALL of the document.	There is no time for wandering around in labyrinths or ending up in dead ends in this year 2021. Climate change and regenerative sustainable production of nutritious food are urgent issues, inextricably linked. No Grand Design is required. All that is needed is Clear Statement of Intent, Clear target for achievement (2030 at latest).	Monitoring of contamination of our waters and depletion of soil-organisms by glyphosates and artificial additives needs to be followed by imposition of hefty fines and publicity of perpetrators. The same applies to individuals and groups who persist in unlawful hunting and/or destruction of beneficial wildlife/avians. The loss of our dry stone field-walls which have massive ecological and climate-mitigation roles as well as aesthetic importance should be monitored, maintenance and restoration supported and publicity of their importance to raise consciousness of the effect of their loss on rural Ireland.	

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	Family farm member; Representative of a civil society/NGO; Ecologist		as an individual	I do not wish to have my name published	<p>Seeing the very large number of International, European and National plans and programmes that have competing objectives and the CAP needs to integrate with concerns me. Which one carries the most weight when hard decisions need to be made? <input type="checkbox"/></p> <p>My biggest desire is to see a halt to water, soil and biodiversity decline, and to see resources given to farmers for them to protect existing good habitats and implement practical measures that will improve habitats. <input type="checkbox"/></p> <p>I grew up on a farm and still work on it intermittently. I understand the need to ensure farm incomes so people/families can have a decent living. Producing food costs money and it needs to be paid for. <input type="checkbox"/></p> <p>I agree with the EPAs state of Ireland's environment recommendation.</p>	<p>SOE 6 & 7 Nature and Water Quality. <input type="checkbox"/></p> <p>The EIPs are doing good work but what is the longevity of the programmes? <input type="checkbox"/></p> <p>If the payments/incentives stop will the good practices stop too? <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>Will the new CAP have the resources to incorporate all the recommendations of the EIP findings?</p>		<p>The impact of alien invasive species on our environment, particularly or rivers is getting worse. <input type="checkbox"/></p> <p>Whether it is ash die back decimating our hedgerows or Giant Hogweed, japanese knotweed and Hymalan balsalm spreading along our rivers banks. These need to be controlled as they impact biodiversity, soil erosion water quality. Who has the responsibility to do the control? Are there supports and resources available to the landowners?</p>		

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Fintan Veale	Family farm member; Member of the Public		as an individual	My name can be published	Cap payments should allow for rewilding to be included as a means to access payments. This will have positive benefits for rural communities and the environment.					

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	Ecologist		as an individual	I do not wish to have my name published						<p>I am happy to see that the draft CAP Strategic Plan 2023-2027 includes provision to reduce the use & risk of chemical pesticides by 50%, pg 71, section 1.2.3.4. However I think the CAP's target could be 100% i.e. ban the use of all pesticides which are endangering public health, soil, water and nature. <input type="checkbox"/></p> <p>I would like to recommend that the draft CAP Strategic Plan 2023-2027 include rewilding as an option for farmers who are in receipt of CAP payments. Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly needed for restoration of peatlands, river flood plains and native forests and farmers should be paid for this. <input type="checkbox"/></p>

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denis flannery	Family farm member; Member of the Public		as an individual	My name can be published	I would like to see farmers have the option to be paid to rewild their land as part of CAP reform please.					

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Suzanne Brady	Farmer – part time		as an individual	My name can be published				<p>Holistic Land Management as per 3LM the network founded by Alan Savoury needs to become an integral part of the CAP Strategic Plan. The four principles of Holistic Management are the management by the farmer of the Energy Cycle, the Mineral Cycle, the Water Cycle and Community Dynamics. Holistic Planned Grazing works on building soil health and structure and by improving soil fertility, soil structure is improved leading to improved mineral cycle, water cycle, energy cycle etc. This in turn ensures the soil sequesters more carbon, flooding is reduced and there is a significant improvement in biodiversity. Farms are an ecosystem and each one is different depending on the land, climate, the wildlife, domestic animals and people living on the farm i.e. the community dynamics. <input type="checkbox"/></p> <p>Surely the objective of CAP is to encourage farmers to farm to create wealth for themselves and their families while protecting the ecosystem and encouraging wildlife and biodiversity? Ultimately farmers should not be dependent on subsidies to make a living. Holistic Management can help farmers become independent of subsidies https://www.fwi.co.uk/livestock/how-an-upland-farm-is-adapting-to-survive-without-subsidies <input type="checkbox"/></p> <p>"We want a scheme to fit the farm rather than a farm to fit a scheme," <input type="checkbox"/></p> <p>Regenerative farming is what consumers want e.g. Vogue Business differentiates conventionally grown from regeneratively grown leather. As we learn to regenerate Earth, rather than degrade Earth, it is vital for consumers to understand this difference. <input type="checkbox"/></p> <p>https://www.voguebusiness.com/.../inside-hermes-where... <input type="checkbox"/></p>	<p>For any scheme to improve biodiversity and the environment there should be a way of tracking progress with payments linked to Ecological Improvements over five years or more. Holistic Ecological Monitoring has very clear procedures and a one page form to capture results on how this should be done. Its a very easy system and could be used by all farmers looking to improve the biodiversity on their farm. Please contact 3LM for further information. <input type="checkbox"/></p> <p>The growing of trees needs to be less prescriptive there are many ways trees can be incorporated with farming. https://www.3lm.network/holistic-management-in-hungary <input type="checkbox"/></p> <p>The current CAP payments in Ireland stipulate that trees must be grown in specific areas on the farm and not integrated into grassland in the form of silvopasture. There are many new ways of integrating woodland with livestock grazing and tillage. These practices need to be encouraged and facilitated. I would suggest that all farms should have a target number of trees to be planted over a period of five years which is linked to the number of hectares farmed. <input type="checkbox"/></p> <p>Arable farmers need incentives to grow multi species crops in the one field at the one time - phased in over 4-6 years with the number of companion plantings increasing each year as the optimum is six species! (Again its scientifically proven that the more species are grown in the one field the better the cumulative yield compared to having each plant species grown by itself on the same area of ground).</p>	

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Paula Roseingrave	Member of the Public	Member of the Green Party and psychologist	as an individual	My name can be published				I feel strongly that farmers should be given the option of rewilding land as part of the CAP agreement, such that we restore natural ecosystems, and meet emissions and biodiversity targets as set out in Ireland and EU.		

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Margaret Murphy	Representative of a Community based group; Member of the Public		an organisation	My name can be published	In relation to the CAP Strategic Plan, I feel that agricultural practices under the Eco Scheme should include the option of re-wilding. This would contribute to the mitigation of climate change and help to reverse biodiversity loss. Improving biodiversity and providing habitats will allow the return of native fauna and flora, which is critical for sustainability and resilience in the face of severe climatic events. Farmers deserve proper funding to encourage them in restoration of peatlands and native forests					The draft Environmental Report

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	Member of the Public		as an individual	I do not wish to have my name published	Please do more to protect nature and habitats as urged by Irish Wildlife Trust and SWAN Ireland. □ Please pay farmers to re-wild land and protect water quality and biodiversity. □ Do not get a derogation from the nitrates directive - we need to cut the Nitrates in our rivers.				Integrate monitoring with the EPA RBMP national water monitoring.	

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DFBA Community Enterprises CLG	Representative of a Community based group		an organisation	My name can be published	<p>Beekkeepers strongly believe that the list of trees that farmers are required to plant as part of the Farm Payments and other programmes should be expanded to include trees (important sources of pollen and nectar) that have been naturalised in the Irish countryside for ca.800 years.</p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>The arguments to date against this proposal are proven to be false. It demonstrate prejudice winning out over rationality. The future prospects for beekeeping in Ireland is at stake. The Green Deal proposals from Europe are a great way forward, but this misguided national self-damaging policy seems crazy and should be reviewed. Other voices in the this field of expertise should be considered.</p>	<p>The demise in the quality of water and aquatic life in our water courses throughout the country since intensive farming and chemically fueled agriculture expanded in recent decades is an issue of concern. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>From experience on the ground and credible technical advice, I can recommend a tool that helps to address water purification, carbon sequestration and biodiversity issues. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>There are numerous technical papers on (ICW's) integrated constructed wetlands. There are many practical demonstrations and a multitude of case studies that underpin the science. This ecological approach to managing water quality has been recognised at home and abroad including by municipal authorities, the food industry and many intensive farming operations. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>This ecological technology has proved on many occasions to be a highly effective tool for managing farm run-off and farm waste. Furthermore it has proven useful in preventing damage after slurry spreading and could be an integral element in buffer areas protecting water courses. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>It would be a major omission if such a tool was not promoted as one of the mitigation techniques in managing the quality of water in our streams. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>I am mystified why this remedial technology has been passed over. It will be a disgrace if your document goes to Europe without reference to this tool as part of the solution to Ireland's very embarrassing water quality record. <input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p>There should be zero tolerance for large intensive farming operations that regularly pollute water courses. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>This is particularly important as low cost remedial solutions are available for even the most difficult problems in the form of integrated constructed wetlands (ICW's) and well planted buffer areas. <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>This ICW technology is an opportunity for effective carbon capture and a significant support for biodiversity.</p>			

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Lorraine Reilly	Member of the Public		as an individual	My name can be published				Please integrate rewilding into the CAP system for farmers who are in receipt of payments.		

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Donal Letane - Federation of Irish Beekeepers' Associations CLG	Representative of a Community based group	National Heritage & Craft organisation	an organisation	My name can be published	<p>Submission to Department of Agriculture in relation to the review of the regulations for the Farm Payment scheme.</p> <p>The Federation of Irish Beekeepers' Associations proposes that the farm payments scheme be modified to encourage and support the creation of a more bee friendly and biodiverse landscape rationally.</p> <p>In particular we would like to see positive discrimination in favour of more naturalised Irish tree species, for example: Lime, Chestnut, Maple etc. that provide nectar and pollen for bees and other important insects. Such trees have played a major role in the Irish landscape since early in the last millennium by supporting a wide range of wild life including the honey bee. One mature lime tree is worth a hectare of ground to bees.</p> <p>Diverse planting of bee loving hedging should be selectively rewarded to encourage best practice. Nature requires variety and a seasonal supply nourishing food sources. We suggest at least 7-12 different complementary species in a 100 m hedge. Good examples are: crab apple, cherry, damson, elderflower, guelder rose, holly, hawthorne, blackthorns etc.</p> <p>We believe credits and penalties are necessary to achieve best practice standards in hedgerow management. Maintenance should include a three year clipping rota that allows most of the hedge to flower annually. Rejuvenating of established hedges and gap filling exercises are opportunities to introduce additional pollen and nectar producing species.</p> <p>For optimum payments hedges should be 3m high plus have occasional mature specimen trees.</p> <p>Benefits</p> <ol style="list-style-type: none"> 1. This provides valuable shelter for animals and crops. 2. The root system and the associated fungi will deliver fertility to commercial crops in their vicinity. 3. Birds like to nest 2m from the ground, unavailable to the fox and hidden from the hawk 4. Increased transpiration due to extra foliage helps to dry saturated land 5. Significant extra carbon sequestration above, below adjacent ground. 6. Average land temperature is increased due to reduced and wind chill, resulting in earlier and later grazing opportunities and reduced costs for animal husbandry enterprises. <p>Other features that deserve consideration are micro-forests and individual hectares of land dedicated totally for nature in each town-land. Every farm has locations that suit integrated constructed wetlands, shelter belts and awkward patches where small groves of valuable bee-loving trees can be grown and managed.</p> <p>Management of spraying – certain practices should be prohibited under the scheme</p> <ol style="list-style-type: none"> 1. Herbicide use on the bottom of ditches and hedges as this interphase area is critical for the survival of important wild life critical for sustainability 2. Herbicide use on edges and centres of on farm roads and tracks. These areas are essential for dandelions, primroses, daisies etc, are important food sources for insects at critical times during the year. 3. We must learn to enjoy our native wild flowers in areas where they do not impact on productivity. 4. Provision should be allowed to operate 'Smart Farming' methods that challenge some current bad practices and poor behaviour in relation to the environment. 5. A cultural change is required that can be delivered through education, demonstration projects and promotional campaigns. (examples: dandelions are the new daffodils, do not spray them, no mow in May) 	<p>Economic:</p> <p>Historically Ireland was a significant exporter of honey. This could be feasible again in a new 'Green Deal' environment. Currently bee numbers are decreasing due to intensive, chemically driven monoculture farming practices, lack of biodiversity and poor management of hedgerows, meadows and woodlands. However the possibilities for the future are bright. Such initiatives as introducing clover as a replacement for nitrogen, biological control of pests instead of pesticides, improved biodiversity, selective planting of bee friendly trees and hedges, a new respect for a synergistic environment where food producers work with rather against nature, could create fresh possibilities and a significant apiculture economy. Current beekeepers could produce much more honey and many thousands of new beekeepers could be attracted to the industry if appropriate policies are followed as part of the Green Deal initiative. More pollinators also benefit other food producers.</p> <p>Climate Change:</p> <p>Bees are important sentinels of environmental health as they are sensitive to biological changes in our environment. They are important pollinators that significantly affect yields in food production. As we plant more trees for commercial timber and carbon sequestration, judicious choices of species can result in benefits for bees. The Chestnut, Lime, Maple and Plane trees are of great commercial value in addition to being remarkable sources of pollen and nectar for bees. Proper maintenance of hedgerows help address climate change issues while adding greatly to the flora that support bees and honey production.</p> <p>Social:</p> <p>Community Apiaries are feasible in every rural village in Ireland. These social enterprises can be a new source of income and produce a 'terroir' specialty food that adds value to the tourism offering. Each location produces a unique honey specific to the flora available in that area.</p> <p>Multigenerational family farms are the ideal base for a new expansion in apiculture. The craft of beekeeping can involve all the family and become a new source of sustainable income for families.</p> <p>Beekeeping is a social undertaking that requires shared values and collaboration between stakeholders.</p>	<p>Naturalised Irish bee loving trees and shrubs:</p> <p>The permitted tree species in the Farm Payments Scheme should be expanded beyond the term 'Native Irish Trees' to include important commercial trees that have been naturalised in Ireland during the last millennium. Such trees have been important in our landscape and should continue to be an element in any land use plan. The consequences if this issue is not addressed will be damaging for bees and other pollinators. It will also impact on the commercial future of beekeeping in Ireland.</p> <p>Buffer areas are urgently needed to protect our streams and rivers from run off / surface water pollution. These areas are ideal opportunities to plant a diverse range of bee friendly trees, shrubs, herbs and flowers. An integrated approach is required to optimise the commercial and the ecological benefits. Such developments create three dimensional nature corridors that add greatly to biodiversity and nutrition for bees, if suitably planted and managed.</p> <p>Micro-forests (~100 sq m) and constructed wetlands can be highly productive and valuable if properly designed to purify waste water from farmyards, improve biodiversity, support flora and fauna, nourish bees and insect life, while producing a commercial timber crop.</p>	<p>Biodiversity, flora and fauna + other issues:</p> <p>Many of our ditches and hedgerows are part of our archaeological and architectural heritage and are valuable assets that support our flora and fauna, feed our bees, reduce the wind chill of soil, crops and animals and capture carbon, ammonia and prosperous adding humus to the soil. It takes more than 50 years for a new hedge to evolve into the organism that is the heritage hedge. Their potential for carbon sequestration is great.</p> <p>Incentives for landowners should focus on bringing hedgerows up to a rounded standard by filling gaps with a diverse selection of bee loving shrubs and trees. A rota for clipping must be put in place, that ensures flowers are allowed to bloom as much as possible, while contractors and farmers operate to best practice principles.</p> <p>Multi species swards are particularly supportive for bees. In particular white clover produced major honey flows in Ireland before the liberal use of nitrogen fertilisers became fashionable.</p>	<p>The Federation of Irish Beekeepers' Associations proposes that the farm payments scheme be modified to encourage and support the creation of a more bee friendly and biodiverse landscape rationally.</p> <p>In particular we would like to see positive discrimination in favour of more naturalised Irish tree species, for example: Lime, Chestnut, Maple etc. that provide nectar and pollen for bees and other important insects. These trees have played a major role in our landscape since early in the last millennium by supporting a wide range of wild life including honey bees.</p> <p>One mature lime tree is worth a hectare of ground to honey bees.</p> <p>Diverse planting of bee loving hedging should be selectively rewarded to encourage best practice. Nature requires variety and a seasonal supply nourishing food sources. We suggest at 7-12 different complementary species in a 100 m hedge. Good examples are: crab apple, cherry, damson, elderflower, guelder rose, holly, hawthorne, blackthorns etc.</p> <p>We believe credits and penalties are necessary to achieve best practice standards in hedgerow management. Maintenance should include a three year clipping rota that allows most of the hedge to flower annually. Rejuvenating of established hedges and gap filling exercises are opportunities to introduce additional efficient pollen and nectar producing species.</p> <p>For optimum payments hedges should be 3m high plus have occasional mature specimen trees.</p> <p>Benefits</p> <ol style="list-style-type: none"> 1. This provides valuable shelter for animals and crops. 2. The root system and the associated fungi will deliver fertility to commercial crops in their vicinity. 3. Birds like to nest 2m from the ground, unavailable to the fox and hidden from the hawk. 4. Increased transpiration due to extra foliage helps to dry saturated land. 5. Significant extra carbon sequestration above and below ground. 6. Average land temperature is increased due to reduced wind chill, resulting in earlier and later grazing opportunities and reduced costs for animal husbandry enterprises. 7. Reduces Water stress on grass and fodder crops, and helps incorporate more humus into adjacent soils. <p>Other features that deserve consideration are micro-forests and individual hectares of land dedicated totally for nature in each town-land. (Support payment schemes should make these options feasible).</p> <p>Every farm has locations that suit integrated constructed wetlands, shelter belts and awkward patches where small groves of valuable bee-loving trees can be grown and managed.</p> <p>Management of spraying – certain practices should be prohibited under the scheme</p> <ol style="list-style-type: none"> 1. 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	Researcher/Academic		as an individual	I do not wish to have my name published	Please protect our wildlife, in particular wood pigeon who have been decimated for 30 years by outfitters bringing in shooting parties during the nesting season. <input type="checkbox"/> Our flock of these gamebird is nearly extinct. <input type="checkbox"/> Pay farmers to leave some stubble in the soil for longer after harvest, cut out pesticides. Pay farmers for small crop losses. <input type="checkbox"/>					

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Judy Alymer Conroy	Ecologist		as an individual	My name can be published	I would like to see if these reports can contain a section detailing the benefits of greenway. And these could be used to promote the development of greenway through the country. Local groups find it very difficult to convince councils to do any research .					

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	Farmer – full time		as an individual	I do not wish to have my name published	European farming is factory farming verses Irelands farming as animals are out doors in green fields with loads of space with trees and hedges for shade and shelter . We should not be ruled by the same regulations as the eu state it'd be naive of the eu to think a green country like Ireland should have the same environmental red tape regulations.	Ye are not talking to farmers no farmer was involved in creating them rules.	There is too much to list that's wrong with it .	Stop regulations remove some of them your killing farmers its depressing farmers ,farmers are committing suicide !!!	Remove calander farming let us have the slurry storage but we spread slurry dung when weather and ground conditions are suitable	It's anti full time farmers its anti good progressive farmers its anti young farmers

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	Representative of a civil society/NGO		an organisation	I do not wish to have my name published	Rates at which mosses grow on/in a bog environment varies, ie some faster-some slower-some die, in Eastern Ireland (Wicklow/Wexford) large areas of Mountain Bogs are Terminal. ? Average mean temps in excess of 11 degrees cent causes constituent mosses to grow at variant rates, the previous dominant species ie S Pappilosum, Subnitous, cuspidatum., Magelanicum, Rec umbrum, Ruballum, Cappillifolium, Squaros, Imbricatum, Pulchrium to name the primary surviving ones are now competing at previously unremarkable rates. (our latest mean is > 16 degrees cent.	See above	NA	No	Due recognition of prevailing environmental conditions	C

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Micheal Yore	Farmer – part time		as an individual	My name can be published	I think payments should be linked to maintenance and respect for all historic and archaeological sites.					

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Robert Pearson	Member of the Public		as an individual	My name can be published	I don't see any mention of reducing dairy and beef herds. Why not?			A reduction in the beef and dairy herd is required, you won't see any reduction in CO2 emissions from the agriculture sector unless that is undertaken..	Plant more native woodlands and stop farmers cutting all their hedgerows in a single year, it would be better to only do a third every year on a rotational basis.	

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Joseph cahalane	Farmer – part time		as an individual	My name can be published	The environment will have to be protected.the water is poisoned with fertiliser &slurry.life cannot carry on like that.they are away to many cows in the country.looking at big herds that are hungry they would throw you down going in to a house with hunger.these cows should be managed properly.the work is getting to these big farmers.it is frightening to see these large herds when they are hungry.they would walk over a person with rushing for food.					The c a p has to favour the small farmer.the previous c a p has virtually destroyed small farmers.it is a disgrace that the previous c a p was distributed.it is no wonder farming is in a mess.the big farmers are up in a heap as they cannot get help.they will be gone in a short time.a person can only do so much work.life will catch up with them .look at men in there fifty they are worn out.they think workers are fools.they are now in a situation where they cannot cope.teagasc will not milk the cows.they are great with there tongue.☐

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Declan Sweeney	Member of the Public		as an individual	My name can be published	I hope this is going to save our countryside. Our hedges, trees, bogs etc are disappearing at an alarming rate. To save our habitats for birds, animals and especially Bees is so important for or future. So I would like to know is this going to stop a'd mybe really start farmers planting instead of destroying.			To save all the habitats we have and start adding more hedges, native trees, bee friendly areas etc. I don't have to write loads of words, it's simple just keep what we have and start adding to it to make a place where all animals can thrive		

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	Farmer – part time		as an individual	I do not wish to have my name published	<p>Any farmer that receives more than 50000 euros in cap payment should be made employ at least one staff member or us the excessive monies for environmental projects <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>There is a large percentage of public owned property been submitted for basic payment each year such as industrial sites business parks etc this derelict land needs to be omitted from basic payment to even the playing field s <input type="checkbox"/></p> <p><input type="checkbox"/></p> <p>There is no point in adjusting the house if the foundations are weak and fickle <input type="checkbox"/></p> <p>Thank you</p>					

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Denis o sullivan	Farmer – part time		as an individual	My name can be published	The need to understand what kind of viability society can be maintained in the countryside. That preserve self respect of themselves indepent gives its views and culture.					

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	Farmer – part time		an organisation;as an individual	I do not wish to have my name published	Gender hasn't been mentioned. As someone who had to fight to farm fight to go to ag college and not inheriting fairly due to gender. I would prefer to see " encourage the people who want to farm farm" as part of the overall CAP objective. That in turn changes age profiles of sectors and brings a higher level of interest in verious sectors and perhaps a better educated farming community. Higher payments may be the way forward but educating our male farmers as to why females should be considered as successors is needed.	Eco schemes and reduction of chemical fertilizers for those of us who want to do this and face difficulties obtaining on chemical fertilizers this need serious attention. I am referring to the efforts that as an individual I have put into trying to find the relevant information I need to use my wool as a pelleted fertilizers. I have gone above and beyond the call of duty to find out what I can and I am simply getting nowhere because the research hasn't been done. I have found one research place in Norway but the results will not be available in time. ☐				