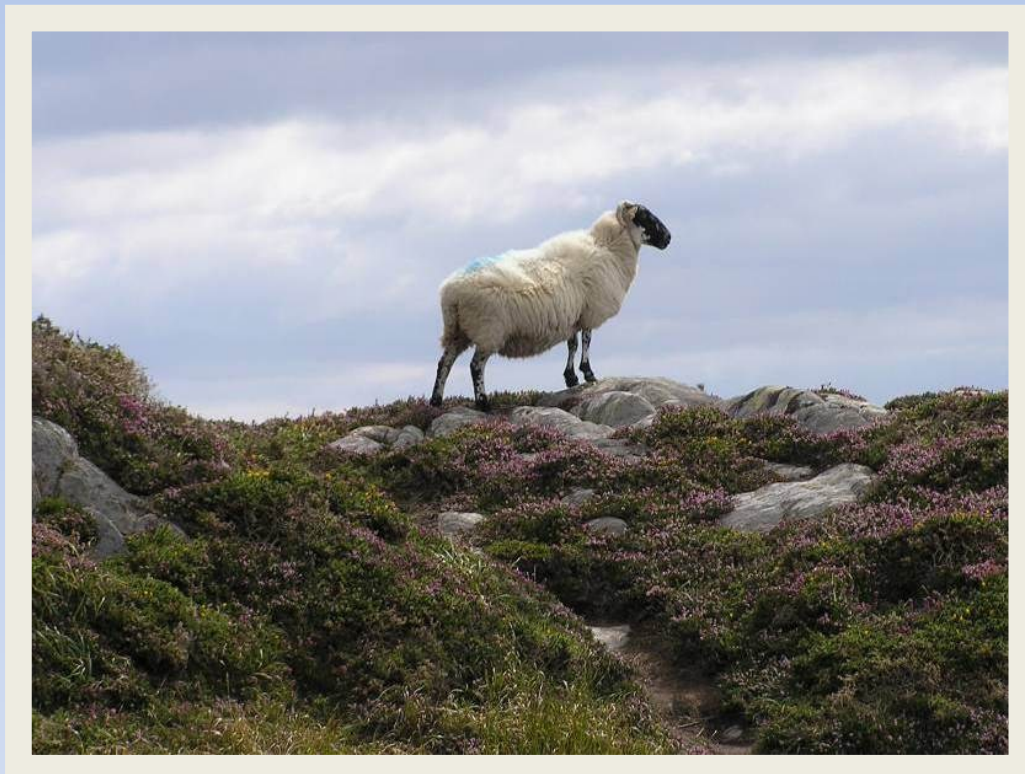


Commonage Case Studies 2014

Informing the development of Commonage Management Plans under Ireland's RDP 2014-2020



Report Compiled by:

Fergal Monaghan, www.yourcommonage.ie, part of the Tirglas Farm Advisors Group, 24 Cois Chlair, Claregalway, Co. Galway.

Michael Martyn, www.mycommonage.ie, Agri-Environment Consultancy, Kilbeg Lodge, Kilbeggan, Co. Westmeath

Pamela Boyle, Centre for Environmental Research Innovation and Sustainability, Institute of Technology Sligo.

James Moran, Centre for Environmental Research Innovation and Sustainability, Institute of Technology Sligo.

Gwyn Jones, European Forum on Nature Conservation and Pastoralism.

To cite this publication:

Monaghan, F., Moran, J., Martyn, M., Boyle, P., and G. Jones (2014). *Commonage Case Studies 2014: Informing the development of commonage management plans under Ireland's RDP 2014-2020*. Report produced for the European Forum on Nature Conservation and Pastoralism. October 2014.

Status of the Report:

This report has been prepared for the European Forum on Nature Conservation and Pastoralism (EFNCP) by Fergal Monaghan and Michael Martyn Agricultural Consultants and the Centre for Environmental Research Innovation and Sustainability (CERIS) at the Institute of Technology Sligo. This report is part of a wider work programme "Supporting High Nature Value Farming in Ireland" funded by the Heritage Council (See <http://www.efncp.org/projects/hnv-farmland-irish-uplands/> for further details). Please note that this report does not necessarily constitute the views of the Heritage Council, but will be considered by the Heritage Council as it develops its work on High Nature Value farming and may inform future Heritage Council Policy on this and other related matters.

An Chomhairle Oidhreachta
The Heritage Council



Contents

Introduction.	2
Methodology:.....	2
Summary of the situation on the case study commonages:	3
Discussion:	6
Recommendations:	14
Proposed Implementation Strategy:	15
Conclusions:	17
Appendix 1: Information Gathered during Donegal Case Study.	18
Appendix 2: Information Gathered during Wicklow Case Study.....	21
Appendix 3: Information Gathered during Kerry Case Study.	25
Appendix 4: Information Gathered during Mayo Case Study.	37
Appendix 5: Information Gathered during Sligo Case Study.....	40
Appendix 6: Information Gathered during Galway Case Study.....	41

Introduction.

Commonage is a major component of the farm area of many farms in upland areas of Ireland covering approximately 440,000 ha of land. These areas deliver significant benefits not only for the livestock farmers who live there but also in terms of public goods. Through Ireland's Draft Rural Development Programme there is the possibility to support and enhance the delivery of these public goods through targeted support measures. For example, it is recognised in the draft programme that development of a measure within an agri-environment scheme could potentially conserve carbon stores in commonage. The communal land tenure arrangements that are characteristic of commonage create certain challenges for the implementation of RDP measures. Currently there are approximately 4,500 commonage framework plans in operation on commonages in Ireland. These have been monitored over the last 10 years and it is evident that commonages now vary in terms of their grazing condition. There is a general acceptance that the commonage framework planning process needs to evolve to a more targeted sustainable management model. The commonage framework planning process needs further development, moving beyond the initial required stock reduction towards a more targeted outcome-orientated approach, but to date the way forward remains unclear. The purpose of these case studies is to gather information on the land management practices on commonages. It is hoped that the information gathered will help inform improved design and implementation of proposed agri-environmental measures for commonages in Ireland RDP.

Methodology:

Six case study areas were selected in counties Mayo, Galway, Sligo, Donegal, Kerry and Wicklow which represent a range of different commonage management types in Ireland. The locations of these commonages are not identified in this study in order to preserve the anonymity of the farmers who participated in the study. Information was gathered from existing DAFM and NPWS databases and from individual farmers at group farmer meetings which were arranged on each commonage. Case study information was gathered by Fergal Monaghan and Michael Martyn for the Donegal, Wicklow and Kerry case studies and by IT Sligo for the Sligo, Mayo and Galway case studies. The information gathered included the extent of holdings (both in byre and commonages); livestock types and numbers; patterns of commonage use and farmers' own concerns and aspirations relating to the future management of commonages. In order to ensure a consistent approach across the case study areas an initial information recording sheet was drafted and agreed by the recorders (see Appendices 1-6 for completed recording sheets). All survey work took place in September 2014.

The commonages selected for this study did not include any of the very large commonage blocks that exist. Well known examples of these include Tawnawully Mountain, in Donegal, Knocadav in Galway and Achill and Mweelrea in Mayo. These are vast tracts of open commonage, all in excess of 2,000 Ha. The number of shareholders in cases such as these is very large and issues that do not present themselves in smaller commonages will have to be dealt with. Foremost of these is the issue of hefted flocks only utilising a small part of the overall site and how the specific focus of

individual farmers on the area of interest to them can be accommodated within a management plan for the entire site.

Summary of the situation on the case study commonages:

In all six cases the engagement from commonage farmers was open and genuine. The assistance of local farm advisors and farmer representatives was invaluable and the project could not have proceeded without their help. The most striking feature of the commonages selected for the study was the diversity of farm enterprises within each commonage (Table 1). It is clear that the management patterns on the individual farms utilising each commonage vary widely. The reasons for this variation are numerous and encompass personal circumstances and economic considerations in respect of the cost/ benefit arising from commonage utilisation; some are detailed below.

Dormancy as an issue varied considerably across the case study areas although in the farmers' opinion it did not have a significant negative impact. There was concern over potential issues arising with dormant shareholders becoming active or selling shares on during the cycle of any commonage plan and the impacts this may have. Inactivity on the commonage among farmers who farmed their enclosed lands was prevalent in many locations. There are potentially many factors driving this both from the perspective of the individual farmers (e.g. labour availability, economic considerations, personal circumstances) but also wider policy issues relating to destocking requirements on hills and lack of support and advice on commonage management resulting in many concentrating their activity on their in by land.

Despite the fact that levels of activity varied among shareholders. It was found that overall half the case study areas were under the minimum figure published by DAFM with the Sligo case almost 50% below the proposed level.

The involvement of local farm advisors in this process was very beneficial both in facilitating contact with the farmers and in collating data relating to the commonage and its recent management. In some case study areas this work was made somewhat easier as the farmers all dealt with one advisor. However in other cases the situation was more complex and at least 3 advisors were involved in an advisory capacity with the shareholders on one of the commonages.

Full details of the information gathered for each case study area are given in Appendices 1-6.

Table 1: Summary of the Results of the Case Studies.

Case Study Area	Donegal	Wicklow	Kerry	Mayo	Sligo	Galway
Commonage Gross Area (ha)	197	455	508			
Commonage UAA (ha)	195	453	492	355	705	862
No. Shareholders	8	11	8	16	7	5
Dormancy %	0	9	12.5	75	85	20
Dom. Hab type	Blanket bog	wet/dry heath	Blanket bog	Blanket Bog/wet heath	Blanket bog	Blanket bog
Max no. (EE)	202	707	435	353	696	725
Min no. (EE)	142	566	304	247	487	507
Current stock (EE)	50-200	705	200	224	250	724
Cattle grazing commonage	no	no	no	yes	no	yes
Grazing pattern	stocked all year, seasonal variation	stocked all year, seasonal variation	stocked all year, seasonal variation	rested for 5 months	year round, little variation	year round, little variation
Historical stocking	400-500 1980s	1000+ 1980s	1600 1980s	year round sheep and cattle	sheep and cattle in past	sheep, cattle and ponies all year round
Natura	no	yes owned by state	yes	yes	yes	yes
Contiguous with other commonage	no	yes	yes but fenced	yes	yes	yes
Other use	turbary	recreational, shooting rights, old turbary	domestic wells, turbary	turbary and recreation	turbary	turbary and recreation
Third party use	n/a	n/a	n/a	stock from other commonages	n/a	n/a
Average % of farm = commonage	55	50	56	59	24	90
Farm enterprise sheep only (no. of farms)	6	5	3		1	1
Farm enterprise sheep and suckler beef (no. of farms)	2	5	4	3		
Farm enterprise suckler beef (no. of farms)				1		
Farm enterprise sheep, suckler beef, horses (no. of farms)						3
no of farmers with shares in other commonages	1	0	0	3	0	0

Donegal Case Study:

In the Donegal case study there had been a dramatic reduction in grazing pressure since the 1990's. Most of the farmers make relatively little use of the hill with most of the current activity being carried out by 2 of the 7 shareholders. Obstacles to other farmers increasing their activity would include inappropriate livestock, off farm employment and in one case a very large overall farm of which hill sheep form a small and most likely unprofitable component. The legacy of destocking and restrictions on stock numbers has inhibited flock development amongst the younger farmers in particular.

Wicklow Case Study:

In Wicklow, inactivity is a serious issue but in addition the active farmers have effectively stopped overwintering sheep on the commonage. Flock management has effectively changed over to a lowland model. This is contributing to a change to a rank heather dominated sward with Gorse and self-sown conifers an increasing problem. This vegetation succession is exacerbating many of the problems relating to utilisation of the hill, e.g. livestock straying, animals losing condition etc. The farmers felt that the situation is so bad that continued grazing may no longer be viable in the future. In addition they are aware that there is a real risk that at some time in the future, the continued eligibility of the land as forage area could come into question. The farmers believe that controlled burning is the only way that the situation could be restored and that stock numbers could only be increased after the initiation of a burning programme. Even with a planned restoration program some of the inactive farmers may never return to managing stock on the hill to any significant extent. Nevertheless commonage planning and advisory support should seek to engage all shareholders in management activities such as controlled burning. In time it may be possible for some of these people to re-establish flocks on the commonage.

Kerry Case Study:

In Kerry, a complex dispute between farmers relating to the very high stock numbers being kept by one individual has had a very damaging effect on the involvement of shareholders in the management of the commonage. This dispute came to a head and after a court case one individual has had a part of the commonage representing his share plus approx. 8 Ha fenced off. This action seems to have largely resolved the dispute and the remaining shareholders appear keen to develop a management program on the reduced commonage area.

Mayo Case Study:

The Mayo commonage has undergone significant destocking which has led to the improvement in the habitat quality of the commonage. The farmers all agreed that the destocking of the commonage and the introduction of a rest period, currently five months a year has significantly benefited the habitat quality and as a result has benefited condition of their livestock.

Currently, the shareholders feel there is no incentive to continue farming the commonage as they are receiving no direct agri-environment scheme support for farming this area. Until recently

farmers in this area had a specific scheme for the management of their commonage. Cessation of this support in combination with the lack of young farmers involved in this commonage creates a real risk of abandonment in this area in the future.

Sligo Case Study:

In Sligo, the commonage is currently only used by one shareholder. This farmer is happy to continue using the commonage but is concerned that a new commonage plan may be too restrictive in which case he would consider limiting his use of the commonage or abandoning it completely.

Galway Case Study:

On the Galway commonage at present there is good co-operation amongst the active shareholders. There is potential for co-operation in carrying out other management including burning which the shareholders feel would benefit the quality of the commonage. Of concern to shareholders in this commonage was the lack of consultation on previous plans and the time period within which a new plan could be developed and implemented. It is felt that more time is needed to develop a plan which takes into account the variation in commonages across the country rather than applying a plan which is not suitable in some areas and trying to rectify this half way through a plan.

Discussion:

The stand-out lesson from the data collected is the diversity that exists, both within this small set of commonages but also between the farms enterprises involved in each commonage. This variety gives us an indication of the range of situations that can be expected within the entire suite of commonages nationally. It also demonstrates the need for any agri-environmental scheme to be flexible and to be adaptable to different contexts.

The success or otherwise of any measure applied to commonage lands will to a large extent depend on the appropriateness of the management plan that underpins participation. A successful plan will set out specific and quantifiable objectives set in the overall context of a strategic vision for commonage management. A focus not just on food production is desirable and indeed necessary to deliver the multifunctional model of CAP as envisaged by the EU. A move towards including other management methods, not solely grazing actions, would be beneficial for the commonages and the shareholders.

- **Present proposals do not give guidance as to what the overall objective of Commonage Management planning is.**

Designing and implementing a plan that can achieve this cannot be a top down exercise. It is only possible to develop such a plan by working with the farmers at commonage level towards identifying the issues involved and the strategies that could deliver solutions. This is broadly accepted by all stakeholders and the feedback from the case studies reflects this.

The engagement with the farmers at commonage level provided valuable data on the role of the commonage within the different farm enterprises. The farmers' opinions and analysis of the

constraints under which their farming system operates supplements and reinforces the raw data. It gives it a context that assisted the members of the project team in coming to an understanding of the issues at play. This appreciation could not be provided by an analysis of any existing data sets alone. We believe that this level of engagement and the insight that comes from it would be essential to an advisor involved in drawing up a commonage management plan.

Our experience on these commonages leads us to believe that workable plans are not only possible but are actively desired by the farmers involved. Even in the Kerry example, where in spite of a very difficult recent history the active shareholders desire an improved standard of commonage management. However, achieving a satisfactory and workable plan will require time and a commitment from all parties. The complexity and diversity of commonage management cannot be underestimated as evidenced in the case studies detailed in this study.

In all cases we believe there is good potential for developing a workable commonage management plan. Such a plan depends on building a comprehensive engagement with the farmers and will require a considerable investment of time by an advisor/facilitator. Many participants agreed that a flexible plan with measures not solely based on grazing management should be developed with a provision for review and adjustment included, possibly after a two year period. This should be developed through thorough consultation with shareholders and should make provisions for review throughout the lifetime of a plan. A focus not just on food production is desirable and indeed necessary to deliver the multifunctional model of CAP as envisaged by the EU. A move towards including other management methods, not solely grazing actions would be beneficial for the commonages and the shareholders.

CAP and Commonage Management Plans.

The design and delivery of GLAS within Commonage Areas operates at three different levels and various issues need to be considered across each:

Farm Level: Issues such as the proportion of the farm in commonage, the distance from the farm hub, the numbers and type of livestock held, the personal circumstances of the farmer, the number of commonages that he or she is involved in, all have to be considered.

Commonage level: The current condition of the site, the conservation priorities, and the characteristics of the farm enterprises involved along with the plans and intentions of the individual farmers all influence the process. At this level the interaction of the social aspects and the desired outputs are crucial – the strength or otherwise of understanding between the shareholders interacts with the degree of such trust necessary for achieving the outcomes intended and this balance is reflected in both the design of the scheme and in the subsequent decisions of the potential participants.

National Level: This encompasses the policy settings focussing on the clarity of the scheme objectives; and the administrative framework within which Commonage Management Plans are produced and submitted. This includes the terms

and conditions of the GLAS scheme, the specifications for the commonage measure, the application procedures, the timelines for applications and the audit and control measures employed to manage the scheme.

All of the above are clearly interdependent. While the case studies in this report have focussed on the commonage and farm level, the approach to these is influenced by the situation pertaining at the national level. The absence of any clear objectives in GLAS pertaining to the desired condition of commonages is a deficiency in GLAS to the extent that we know it at present. In particular the setting of objectives and specific targets for a commonage requires guidance from national authorities on what is the strategic vision for these areas. It appears from the draft RDP that appropriate management of these areas will contribute to meeting priority 4A. This priority involves “restoring, preserving and enhancing biodiversity including in NATURA 2000 areas and in the areas facing natural or other specific constraints and high nature value farming as well as the state of European regulations”. We can explore these issues by looking at some of the examples from the case studies and assessing how the different commonages are likely to fare under the present proposals.

Box 1: Present Proposals.

Pillar 1: Only active farmers are eligible, minimum level of activity on marginal lands is defined as reaching a minimum stocking rate of 0.1 LU/ ha to be achieved by 31/12/2015.

Pillar 2: Two stage application process for GLAS, Commonage Management Plan also serves as a joint application for GLAS. There is a requirement for agreement from at least 50% of active shareholders or sufficient shareholders to account for 50% or more of the area to activate a CMP. GLAS application for private lands would be prepared separately. Minimum stocking levels for a commonage split between shareholders in accordance with commonage share. Each shareholder to reach their share of the minimum stocking number by the end of 2106 and the commonage as a unit to reach the minimum number by the end of 2018. ANC eligibility is similar to that for pillar 1.

If we examine the Donegal case we can see that this is a sheep farming commonage, not all of the shareholders are active on the commonage although they are all farming. There are significant seasonal patterns to management and the commonage is under- utilised. Let us assume that all 8 farmers are interested in joining GLAS and that they all choose to join in 2015. Table 2 below outlines the current stock numbers on each farm and the numbers required to meet the BPS and GLAS requirements based on current proposals.

It should be pointed out that the Donegal commonage is in many ways a relatively straightforward case. The number of shareholders is small, dormancy is not a factor, the inactive farmers have suitable stock, and the commonage is fenced.

At first glance it appears that on the basis of stock numbers that all of the farmers will easily qualify, both for the Basic Payment Scheme and for GLAS. However farm level stock numbers do not give us the full picture as to the agricultural dynamics on this site. At present the tall woody heather and self-sown conifers on part of the site suggest that grazing levels are low. This hypothesis is supported by the data on commonage usage which suggests that ewe numbers never exceed 200 and drop as low as 50. Furthermore the seasonal pattern shows that most of the ewes do not return to the hill after tupping.

Heather, particularly tall woody heather, is not a favoured forage plant for sheep. It may be browsed particularly in the winter months but is generally avoided when alternatives are available. The seasonal patterns of management on this site are such that browsing on heather is probably insignificant. When large numbers of sheep are present there are alternative forage sources, when alternative forage is scarce, sheep numbers are too low to make an impact. In addition rank heather is a feature on a small portion of the commonage. This probably reflects an uneven utilisation of the grazing resource. From an ecological perspective heather in different growth stages adds to the structural diversity of the vegetation which in turn increases the biodiversity value of the site. There is a real risk that the interpretation of pillar 1 eligibility criteria will conflict with the achievement of pillar 2 objectives.

Table 2: Current stock number and projected number required on each farm to meet BPS and GLAS requirements under current proposals for the Donegal case study area

	Current Stock Numbers Mountain Breeds and Cross Breeds	Stock Required for BPS LU/Ha (ee/ha)	Stock Required for GLAS (31/12/16) LU/HA (ee/ha)
Farmer 1	77	3.66 (23.76)	26.63
Farmer 2	150	4.88 (31.69)	35.50
Farmer 3	40	1.22 (7.92)	8.88
Farmer 4	80	2.43 (15.85)	17.75
Farmer 5	20	2.43 (15.85)	17.75
Farmer 6	25	1.22 (7.92)	8.88
Farmer 7	100	2.43 (15.85)	17.75
Farmer 8	20	1.22 (7.92)	8.88
Total	512	127	142

The management regime contrasts with the situation in the 1970's and 1980's when ewe numbers were more than twice as high and they were present on the hill throughout the year. The historic management system suppressed heather growth through year round grazing pressure; the current system applies a lower grazing pressure with significant spatial and temporal variations and does not appear to be significantly impacting on heather.

From a nature conservation and biodiversity point of view, the current situation is much more conducive to meeting favourable conservation status under the EU Habitats Directive than the past situation. Targeted management and slight changes to current seasonal patterns by the farmers may produce the desired outcome from an environmental perspective. However, how the rules are interpreted and implemented in relation to eligibility could have an overriding detrimental effect on the site.

In the case of commonages and upland areas in general non-herbaceous vegetation (e.g. heather) is a desired component of the sward, and essential to meeting legislative requirements under the EU Habitats Directive (i.e. achieving favourable conservation status). In these circumstances it is essential that DAFM under the direct payment regulations utilise article 4 (h) of the direct payment regulations 1307/2014. Under this paragraph member states may include under eligible permanent grassland and permanent pasture "land which can be grazed and which forms part of the established local practices where grasses and herbaceous forage traditionally not predominant in the grazing areas" (e.g. blanket bog and heath areas in commonages across Ireland). Even though the application of article 4 (h) may go some way to resolving the eligibility issues and maintaining overall farm level activity under the broad BPS and ANC schemes, a much more nuanced and targeted management needs to be incentivised under agri-environmental schemes.

In the Donegal example the current stock numbers at farm level appear adequate; the continued eligibility for payment on commonage land may require significant changes to individual farming systems. At present only two of the farmers make any significant use of the site, for the others increased utilisation of the hill is going to be required under current proposals.

- **There is a real danger that a narrow interpretation of eligibility may lead to an agri-environment scheme that damages rather than enhances biodiversity.**

In the Wicklow example the situation is more complex. The commonage is larger and is open to other extensively managed lands. The number of shareholders is somewhat greater, although still manageable but vegetation succession in response to changed grazing management patterns over the last 15 years has already altered the site in a manner that is not conducive to agriculture.

As with Donegal, a reduction in stock numbers, a large proportion of inactive shareholders and large seasonal variations in the use of the hill have contributed to the current unsatisfactory situation. Many of the farmers believe that increasing stock levels on the hill and grazing through the winter months are no longer financially viable options. They contend that livestock losses through straying, winter snows and the poor condition of the animals when they are brought down from the hill are a disincentive to maintaining a hill flock. In one way or another all of the long established farm

enterprises have reacted to these pressures by altering their farming system, either by abandoning the hill, reducing flock size and/ or by reducing winter stocking rates.

Reduced grazing pressure particularly in winter/ spring has probably encouraged heather/ self-sown conifers and scrub and militated against forage quality. This is a downward spiral where pasture deterioration leads to a reduced level of usage which in turn accelerates the rate of deterioration. The continued eligibility of the site for direct payments into the future has to be in some doubt, the farmers themselves are aware of this and recognise that the management system has to change. To date they feel unable to manage the site in the manner that is necessary due to the constraints on increasing flock numbers and restrictions on burning.

The situation is more complex than in Donegal as the problems associated with under grazing are more advanced and affect a much larger proportion of the site. One concern expressed in Wicklow was whether there would be a lag time between the initiation of a plan and the improvements to the grazing resource that would permit increased flock sizes.

Equally significant here is the delivery mechanism for the production of a commonage management plan. While some factors are favourable, such as a relatively small number of shareholders and the fact that they all deal with the same advisor there are also serious process level risks. Will a suitable advisor be available to do a plan in the time available? Will the plan be capable of review or amendment? This is very significant as it is likely that a significant amount of fine tuning of the plan will be required in this case. Managing a recovery on this site will be particularly challenging, it is achievable but only if the environment for commonage planning and implementation is correct.

Another issue on this commonage and on the Mayo, Galway and Sligo cases is that these sites are open to other commonages/ extensively farmed lands. This creates a risk that delivering improvements to the grazing resource could adversely affect hefting patterns and draw in stock owned by third parties. This requires that the commonage management plan takes this potential risk into account. To mitigate this risk, the same commonage advisor should deal with cases where open boundaries exist between adjacent commonages.

What is clearly needed is a Commonage Management Plan that incorporates a restoration program for the site. This must be designed in conjunction with those who will be expected to implement it, i.e. the active shareholders. Appropriate grazing levels will be the primary technique although in certain cases there may be a secondary role for controlled burning. Apportioning stock numbers to individual shareholders is nonsensical considering the variation of individual farmer's usage of the hill.

In the Galway case (appendix 6) the overall stocking rate is within the min max figures for the site as published by DAFM (see Table 1), however farmers 1 & 2 together meet the overall minimum numbers for the site. The stock currently held by farmer 4 is only 27% of the minimum number that he would require. For this farmer to comply with current proposals would require a 400% increase in stock numbers. This is clearly impractical in the period allowed, i.e. by the end of 2016. Equally serious is that such an increase does not take into account the capacity of his enclosed lands (100%

NATURA 2000 designated) or his farm infrastructure to support such a flock. It also unnecessarily forces destocking by the more active farmers. A similar situation exists in the Mayo commonage.

- **Present proposals do not offer the flexibility needed at commonage level to deliver an equitable and sustainable grazing regime.**

A simple solution to this is where a farmer meets the BPS stocking qualification and stock numbers on the commonage as a whole are maintained within the min/ max limits as set out in the commonage management plan, then all of the farmers should be considered as having met their requirements for BPS, Greening, ANC and GLAS. This solution also supports farmers with larger flock sizes to retain their current numbers.

Burning may not be the easy solution that some imagine it to be. Controlled burning as a rehabilitation technique presents its own challenges, it is labour intensive, it needs skilled supervision, suitable weather conditions and in many cases consent from NPWS. Can all of these requirements be met on a timeframe that will facilitate the stocking increases envisaged by the Dept. of Agriculture? There is a real risk that any program that is dependent on burning alone may fail to deliver the desired outcomes and may cause unnecessarily severe impacts on the biodiversity of the site.

Box 2. Burning is not a universal panacea – the case of *Molinia*.

In the west of Ireland one of the principal symptoms of under grazing has been the excessive dominance of purple moor-grass (*Molinia caerulea*). On under grazed wet heath habitats this species can come to dominate sites in a manner that impacts negatively on agricultural and biodiversity value. Although it burns easily in dry springs, burning actually exacerbates the problem. At the time of year when it is most flammable the above ground parts of the plant are dead. Fires do not impact on the roots but they do destroy most the species' competitors, *Molinia* sprouts new growth in early summer in an environment devoid of competitors and increased dominance of the sward often results. Grazing with cattle and horses particularly in the June July period will in most cases be a far more effective response. Planning the management of rank *Molinia* is a complex task, requiring a careful assessment of grazing patterns and the potential for adjusting these to achieve the desired outcome. Ensuring that advisors are equipped to deal with this also demonstrates the need for a comprehensive advisor training program supplemented by access to technical support.

There is a danger that burning as a potential management tool has been overplayed. It certainly does have a role, but its applicability to different situations is very variable (see Box 2). It must also be noted that heather in different growth forms is desired to meet conservation objectives and to remove all mature heather from a site is undesirable. There is sufficient flexibility in the direct payment regulations (see ref to article 4h above) to allow for a range in vegetation condition on a site provided that it still forms part of the grazing area. In certain situations a commonage management plan would need to include long term restoration plans which may include a detailed burning plan and appropriate targeted grazing strategies. Once this type of plan is being

implemented under GLAS it should sufficiently deal with any doubts that might prevail about whether or not the commonage as a whole forms part of established local grazing practices. Pillar 1 eligibility should be automatic where the Commonage Management Plan is being complied with.

While on most of the commonages selected for the case studies, the attainment of a 50% buy-in for a commonage management plan is likely, this is not going to be the case everywhere. Also the Sligo case highlights a particular issue where the majority of shareholders are dormant. In this case the farmer is required to deliver the whole area in GAEC in order to ensure eligibility while only receiving payment on a very small proportion of it. Of course the farmer receives the benefit of additional forage for his stock but this is of little use in a situation of negative gross margins. This commonage is on the verge of land abandonment and great care must be taken that administrative procedures under CAP do not guarantee this outcome. This is a wider issue on commonages but is outside the scope of this study. A derogation approach may be required in situations like this with a solution for long term management of the commonage proposed by the farmer(s) and their advisor in the commonage management plan. The Commonage Implementation Committee has a role in respect of this issue in approving such plans. This is a valuable function of the CIC, but it is dependent on a capacity to make prompt decisions. The CIC must be able to assist a farmer or group of farmers to submit a GLAS application in a timely manner.

Recommendations:

The current proposed timeline for the start of the GLAS scheme, advisor training, the preparation of CMP's and the submission of GLAS applications for the 2015 round may no longer be feasible. Submission of GLAS applications for the majority of commonage farmers for the 2015 round is appears unattainable. However minor modifications could have a dramatic impact on the number of commonage farmers that can get over the line in 2015. The Dept. of Agriculture, Food and the Marine must adopt a leadership role in this process but all stakeholders must work towards building trust in a radically new process. This will require change and adaptation from all sides and in the first instance must seek to address farmer concerns, particularly on joint applications and the issue of collective responsibility.

The current instability has also led to a considerable uncertainty among advisors. They are unsure on how much attention they could or should devote to the production of commonage plans prior to the closing date for the 2015 round. Under the current proposals advisor effort will inevitably be focussed on straightforward non commonage GLAS applications. They will also face considerable demands in respect of application for the new Basic Payment Scheme in 2015. If they are to commit to Commonage Management Planning they need reassurance on payment issues, on their legal liability, they need training and most importantly they need adequate time to deliver workable commonage plans. If these are not addressed then few commonage farmers outside of a handful of the most straightforward of commonages will be accommodated in 2015. Ironically this could result in a significant number of GLAS places being taken by applicants without priority assets while commonage farmers are left without contracts.

If a significant number of commonage farmers are to get into GLAS in 2015 then these barriers to entry must be overcome. Particular attention should be paid to;

- Farmer concerns on the issue of joint applications. A single stage application process that refers to the commonage management plan but does not entail joint applications is needed.
- Adequate time for preparation of CMP's. An application process that allows the use of the period May-Sept 2015 for the completion of Commonage Plans.
- A reliable payment model for Advisors. This must be done centrally; it must be made directly by the Dept. of Agriculture, Food and the Marine to the advisor. This will secure advisor interest in the process and ease the burden of up front transaction costs faced by the farmer. If this is not addressed few commonage farmers outside of a handful of the most straightforward of commonages will be accommodated in 2015. Ironically this could result in a significant number of GLAS places being taken by applicants without priority assets while commonage farmers are left without contracts.
- Legal Situation. An assurance that the planning process will not expose participating farmers and advisors to unreasonable risk of litigation.
- Training for Farm Advisors. Appropriate and comprehensive training for advisors must be put in place. A decision on a syllabus for this must be made in the near future.

Proposed Implementation Strategy:

1. A central clearing house within the DAFM will receive expressions of interest from farmers interested in having a commonage management plan developed. These expressions of interest may be submitted individually or by a group of farmers. They may include a nomination for a preferred advisor to deal with their case.
2. A closing date for expressions of interest will be set for each year where entry to the scheme is possible.
3. Where in excess of 50% of active shareholders or shareholders accounting for more than 50% of the shares express an interest the clearing house will appoint an approved Commonage Advisor. On appointment of an advisor the Central Clearing House will contact all claimants informing them that a Commonage Management Plan is being drawn up and the contact details for the appointed advisor. Where expressions of interest are insufficient to reach the 50% of shareholders or 50% of the land threshold in respect of a given commonage the case will be sent to the Commonage Implementation Committee for review and recommendation.
4. Where the central clearing house has allocated an advisor to a given commonage before the GLAS closing date for that year, individual applications to GLAS may be made although they will not receive a start date until the Commonage Management Plan is submitted.
5. A template for the development of the CMP and a syllabus for the training of advisors and DAFM inspectors will be developed by DAFM. NPWS could be of assistance in this matter. A panel of trained advisors will operate under the supervision of the central clearing house. Technical support for advisors will be provided by the Dept. of Agriculture, Food and the Marine and by the NPWS.
6. The central clearing house will allocate an available advisor from a pool of trained advisors who operate in that geographical area. Where farmers have nominated an advisor, the clearing house will where possible appoint that advisor to the case. This system will prioritise planning resources to commonages with farmer support for the process. The advisor will work with the farmers in that commonage to develop a commonage management plan.
7. The advisor will act as an agent of the Dept. of Agriculture, Food and the Marine. The advisor will have access to all relevant data held by DAFM in respect of that commonage. If deemed necessary he/ she will be required to sign a confidentiality agreement.
8. The advisor will be paid by the Dept. of Agriculture, Food and the Marine according to an agreed formula based on the area of the commonage and the number of farmers involved.
9. The Commonage Management Plan will be submitted on line. It will be a reference document not a joint application. Farm Advisors will then refer to the CMP on the individual GLAS applications. This could be as simple as ticking a box on the on line application stating

that the farmer will familiarise themselves with and comply with the Commonage Management Plan.

10. A timeframe for the above process should be developed by DAFM in consultation with stakeholders (Commonage Implementation Committee might be appropriate body to lead on this).
11. There must be clear guidance on eligibility criteria under direct payment regulations. Subject to all participating farmers meeting the BPS stocking qualification (0.1 LU/ha) the attainment of min/ max stock numbers should operate at commonage level rather than at individual farm level. This should be by agreement between the participating shareholders with their individual commitments detailed on the Commonage Management Plan.
12. Compliance with an approved CMP should guarantee the eligibility of commonage land for payment under all other schemes.

Conclusions:

Irrespective of farmer effort or commitment, the desired objectives of improving the agricultural and biodiversity value of a commonage may not be achievable if the planning inputs are deficient. If inadequate time and/or financial resources reduce the quality of the engagement between farmers and an appropriately trained commonage advisor the planning process faces a high risk of failure. That said it is important that management plans are not seen as an end in themselves, they can only serve as a management tool to help guide farmers towards attaining the desired objectives. If they are excessively complex, they risk frustrating the overall process. This risk exists not only at commonage level, where an excessively complex plan may not be deliverable but also at a national level in that a complex planning process may be unable to facilitate the entry of farmers into the GLAS scheme in a reasonable timeframe.

Ensuring an appropriate planning standard at commonage level requires clarity on the schemes objectives at a national level. This must then feed through to the design and implementation of a process which makes maximum use of the limited planning, time and financial resources available. The provision of adequate training, adequate time and adequate funding for this process is essential if the desired objectives are to be attained. A positive outcome is achievable but a commitment from all stakeholders is required to make this happen.

In conclusion it must be recognised that the recommendations in this report are an interim solution working towards a trajectory of sustainable management of the commonage resource in Ireland. We firmly believe that the next step requires the development of a more results orientated approach to agri-environment schemes. We have detailed proposals in a previous report titled: a national, outcome-based agri-environment programme under Ireland's Rural Development Programme 2014-2020 (see http://www.efncp.org/download/AGRI_ENVIRONMENT-SCHEME-RDP-2014-2020_final12Dec.pdf). Current proposals in Ireland RDP allow for the development of results orientated "locally led agri-environment schemes". It is essential that this measure is used to trial results orientated measures for commonages in the period of the next RDP 2014-2020.

Appendix 1: Information Gathered during Donegal Case Study.

Commonage Level	
Size of the Commonage Gross and UAA	Gross Area 197.35 ha, UAA 195 ha.
No. of Shareholders	This commonage has grazing rights rather than shares. 16 rights in all, held by 8 farmers.
Dormancy rate	No Dormancy.
Dominant habitat types	Blanket Bog.
Max/ Min Numbers	Max 202.19 Min 141.54.
Current Stock types/ Numbers and seasonal grazing patterns	50- 200 peak in Autumn (Aug/ Sept/ Oct). Min in March/ April. Mostly Scotch Blackface, some cheviots and cross bred ewes particularly in the Autumn. Not all farmers actively graze the commonage, Farmers engage in Supplementary Feeding on the commonage. This occurs in the vicinity of their enclosed lands.
Historical stock types/ numbers (Traditional Systems)	400-500 Scotch Blackface only in the 1970's & 1980's. Tupping and lambing on the hill.
Natura status	Non NATURA but adjacent to an SAC
Other Conservation Issues	None, No Red Grouse observed in many years.
Boundary Issues, e.g. open to other commonages/ private land/ public road	Boundary was fenced in the early 1970's. No access except through farmland of rights holders.
Ease of Access	Tractor/ Quad only
Current Condition	Tall Heather common, farmers and advisor expressed concern about 1 location and felt that controlled burn was required. Self- sown conifers are perceived by some farmers to be a developing problem.
Other Commonage Uses, e.g. turf cutting/ recreational use and implications for agriculture if any	Small scale Turf cutting by the farmers themselves.
Actions of third Parties/ Use by non-shareholders	Not Applicable.
Farm Level Farm 1	
Size of the farm.	3 rights on the hill, 35 Ha of commonage along with 20 Ha of enclosed land.
Ratio of commonage to inbye land.	1.75:1, 63% commonage, 37% enclosed land.
Stock types and numbers	Sheep only 77 ewes, 10 Mountain type, 67 Cheviot/ Suffolk Cross.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Straw bedded houses for lambing.
Privately owned NATURA	No privately owned NATURA lands.
Other commonages outside the trial.	No other commonages.
Farm Level Farm 2	
Size of the farm.	4 rights on the hill. 47 ha of commonage along with 31 ha enclosed land
Ratio of commonage to inbye land.	1.51:1, approx. 62% commonage 38% enclosed.
Stock types and numbers	Sheep only, 180 ewes, 30 Texels and 150 Scotch Blackface 1 Suffolk Ram and 3 Blackface Rams.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Slatted House for sheep. Up to 90 ewes housed for the winter, All ewes housed for a few weeks before lambing

Privately owned NATURA	No privately owned NATURA land.
Other commonages outside the trial.	No other Commonage.
Farm Level Farm 3	
Size of the farm.	1 rights on the hill, 12 ha of commonage along with 28 ha of enclosed land.
Ratio of commonage to inbye land.	0.43: 1, 30% of farm is commonage land.
Stock types and numbers	40 Suffolk Ewes, 40 cross bred Texel/ Blackface, 5 Blackface ewes. 20 Heifers (1-1.5 yrs.) all continental breeds and 3 cows (2 Black Whitehead and 1 Simmental) and their calves, No Bull/ farmers avails of AI service.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Slatted Sheds for cattle and sheep. All Cattle housed for the winter, All sheep housed for 2.5 months (Christmas-Mid March).
Privately owned NATURA	No privately owned NATURA
Other commonages outside the trial.	No other Commonage.
Farm Level Farm 4	
Size of the farm.	2 rights on the hill equivalent to 24 ha of commonage on this hill, 19 ha on another commonage along with 122 ha of enclosed land.
Ratio of commonage to inbye land.	0.35: 1 approx. 26% of the farm area is commonage.
Stock types and numbers	260 Lowland ewes, 80 Hill ewes (Blackface), 20 Cows and their calves plus 5-6 Heifers. Most of the cattle are continental breeds.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Slatted Sheds for cattle and sheep, Lowland Ewes are housed for a month before lambing. Mountain ewes lamb outside. Cattle are housed for 6 months
Privately owned NATURA	40 ha of privately owned NATURA.
Other commonages outside the trial.	Farms one other commonage in addition to the one in the study.
Farm Level Farm 5	
Size of the farm.	2 rights on the hill (1 owned and 1 leased), equivalent to 24 Ha. Along with 16 Ha of enclosed land.
Ratio of commonage to inbye land.	1.5:1 approx. 60% of the farm is commonage.
Stock types and numbers	80 ewes, 60 Texels and 20 Cheviot crosses
Farm Infrastructure, e.g. housing/ waste storage facilities.	Slatted Housing 50 ewes housed for January-Feb, All ewes housed in March prior to lambing.
Privately owned NATURA	No NATURA.
Other commonages outside the trial.	No other commonages.
Farm Level Farm 6	
	Not present at the meeting, estimates given by other farmers.
Size of the farm.	1 right on the hill, equivalent to 12 ha of commonage along with 7 ha enclosed land.
Ratio of commonage to inbye land.	1.71:1. Approx. 63% of the farm is commonage.
Stock types and numbers	25 ewes all Scottish Blackface.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No Data
Privately owned NATURA	No Data
Other commonages outside the trial.	No Data

Farm Level Farm 7	Not present at the meeting, estimates given by other farmers.
Size of the farm.	2 rights on the hill equivalent to 24 ha of commonage along with 12 ha of enclosed land.
Ratio of commonage to inbye land.	2:1. Approx. 67% of the farm is commonage.
Stock types and numbers	100 ewes all Scottish Blackface.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No Data.
Privately owned NATURA	No Data.
Other commonages outside the trial.	No Data.
Farm Level Farm 8	Not present at the meeting, estimates given by other farmers.
Size of the farm.	1 right on the hill equivalent to 12 ha of Commonage along with 6 ha of enclosed land.
Ratio of commonage to inbye land.	2:1. Approx. 67% of the farm is commonage.
Stock types and numbers	30 ewes of which 10 Mule type, 20 Blackface.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No data.
Privately owned NATURA	No data.
Other commonages outside the trial.	No data.
Process Level	
Farmer's views on the development of a commonage plan.	Consensus that a commonage plan could be developed.
Time required for development of commonage plan/ for implementation of plan	Farmers felt that one month would be adequate to develop a commonage plan. They felt that 3-5 years would be required to implement that plan fully.
Future modifications of Plan	The farmers saw the need to have a review of the commonage plan after 2 years.
Links to adjoining commonages where there are open boundaries.	This commonage is enclosed and is not open to other commonages.
Potential for co-operative action on non-grazing issues, e.g. burning/ dumping etc.	Farmers were willing to co-operate on the issue of managing a controlled burn of heather. Expressed concern about current seasonal restrictions on burning.
Potential for development of commonage co-operation	Potential for informal commonage governance to be developed.
Additional Information	None.

Appendix 2: Information Gathered during Wicklow Case Study.

Commonage Level	
Size of the Commonage Gross and UAA	Gross Area 455.51 ha, UAA 453.03 ha
No. of Shareholders	This commonage has grazing rights rather than shares. Originally there were 14 grazing rights holders (later consolidated into 11) allocated by the Irish Land Commission in the year 1931 on a system similar to the stints in the UK which takes account of the capacity of each farmer's enclosed land to carry sheep when taken off the commonage. Currently on the commonage 4 shareholders are active, 6 inactive, 1 dormant. The number of SPS claimants is 10. Claimed area for SPS was derived from each shareholder's sheep grazing rights expressed as a fraction of total sheep grazing rights on the commonage. This fraction was then applied to the total area to get share in hectares claimed by each individual. The Fee simple in the land is held by the <i>Minister for Environment Heritage and Local Government</i> .
Dormancy rate	2 Rights holders are dormant.
Dominant habitat types	Wet/ Dry Heath.
Max/ Min Numbers	Max 707.72 Min 566.18.
Current Stock types/ Numbers and seasonal grazing patterns	Approx. 705 ewes/ hoggets, almost all Cheviots, some crossbreds between Cheviot and Texels/ Suffolk. Typical pattern is ewes lamb on enclosed lands; ewes with single lambs go back to the hill May/June, Ewes that had twins go back after weaning. Numbers peak in Aug/ Sept. Two farmers return ewes to the hill after tugging, the other two overwinter them on enclosed lands. One farmer does not let hoggets to the hill until their second summer, c 13 months of age. No Supplementary Feeding
Historical stock types/ numbers (Traditional Systems)	1000+ Cheviots only in the 1970's & 1980's. Tugging and lambing on the hill.
Natura status	NATURA, The Fee simple in the land is held by the Minister for Environment Heritage and Local Government.
Other Conservation Issues	None, No Red Grouse observed in many years.
Boundary Issues, e.g. open to other commonages/ private land/ public road	Open to another commonage and to Dept. of Defence lands.
Ease of Access	Roads within commonage, access is good.
Current Condition	Tall Heather common, farmers and advisors expressed concern felt that controlled burning was required. Self-sown conifers are perceived by some farmers to be a developing problem.
Other Commonage Uses, e.g. turf cutting/ recreational use and implications for agriculture if any	No turf cutting. Extensive old turbarry workings occur towards the North of the site. Limited recreational use. Walking and quad bikes. Original owner still has shooting rights; these will lapse in 3 to 4 years.
Actions of third Parties/ Use by non-shareholders	Minimal. Small scale recreational activity only.

Farm Level Farm 1	
Size of the farm.	26.26 ha enclosed, 64.53 ha commonage.
Ratio of commonage to inbye land.	29% enclosed: 61% commonage.
Stock types and numbers	120 Hill ewes, 110 lowland ewes. 24 Suckler Cows.
Farm Infrastructure, e.g. housing/ waste storage facilities.	None.
Privately owned NATURA	None.
Other commonages outside the trial.	No other commonages.
Other Information	Does not use the hill at present, too much work, not enough return.
Farm Level Farm 2	
Size of the farm.	21.01 ha enclosed land (owned) plus 24.24 ha leased, 87.88 ha of commonage.
Ratio of commonage to inbye land.	34% enclosed 66% commonage.
Stock types and numbers	80 Hill ewes and 20 lowland ewes.
Farm Infrastructure, e.g. housing/ waste storage facilities.	None.
Privately owned NATURA	None.
Other commonages outside the trial.	No other commonages.
Other information	No sheep go to the hill at present, poor return, stock losses.
Farm Level Farm 3	
Size of the farm.	43.22 ha of enclosed land (owned) plus 12.12 ha enclosed land leased. 87.79 ha of commonage.
Ratio of commonage to inbye land.	38.62% enclosed 61.38% commonage.
Stock types and numbers	220 hill ewes plus 20 lowland ewes. 23 Suckler Cows.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information.
Privately owned NATURA	None.
Other commonages outside the trial.	No other commonages.
Other information	60 hoggets on the hill from May 1 st till Sept 30 th , 60 ewes and their ewe lambs from mid-June till Sept 30 th , Another 70 ewes from mid-July till Sept 30 th . Only 40 ewes returned to hill after tugging. Lower winter stocking rate attributed to availability of leased low land.
Farm Level Farm 4	
Size of the farm.	40.40 ha of enclosed land (owned) plus 8.08 ha leased. 37.75 ha of commonage.
Ratio of commonage to inbye land.	56.22% enclosed 43.78% commonage.
Stock types and numbers	90 hill ewes and 40 lowland ewes.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information.
Privately owned NATURA	None
Other commonages outside the trial.	No other commonages.

Other information	Hoggets on the hill from mid-March till end of Sept. 30 ewes and ewe lambs from first week of May, Another 90 ewes from Aug 1 st . All stock brought down in early October. Stopped over wintering on the hill because of losses among ewes, Lambs were coming down in very poor condition.
Farm Level Farm 5	
Size of the farm.	Enclosed land 60.6 ha owned plus 6.06 ha rented. 28.97 ha of commonage.
Ratio of commonage to inbye land.	70% enclosed 30% commonage.
Stock types and numbers	120 hill ewes and 30 lowland ewes.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information
Privately owned NATURA	None
Other commonages outside the trial.	No other commonages.
Other information	50 hoggets from May 1 till the end of Sept, 55 ewes and their ewe lambs from first week of May, Another 40 ewes from end of July till the end of September. NO stock overwintered on the hill.
Farm Level Farm 6	
Size of the farm.	32.32 ha of owned enclosed lands plus 29.85 ha of commonage.
Ratio of commonage to inbye land.	52% enclosed 48% commonage
Stock types and numbers	100 hill ewes. 10 Suckler Cows.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information
Privately owned NATURA	None
Other commonages outside the trial.	No other commonages.
Other information	No sheep grazed on the commonage.
Farm Level Farm 7	
Size of the farm.	46.06 ha of enclosed lands 27.26 ha of commonage.
Ratio of commonage to inbye land.	68.42% enclosed 31.58% commonage
Stock types and numbers	100 hill ewes and 50 lowland ewes. 6 Suckler cows, all offspring sold as weanlings.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information
Privately owned NATURA	None
Other commonages outside the trial.	No other commonages.
Other information	120 ewes grazed on the commonage for August and Sept. O stock overwintered on the hill.
Farm Level Farm 8	
Size of the farm.	8.80 ha of enclosed land 13.18 ha of commonage.
Ratio of commonage to inbye land.	40% enclosed 60% commonage
Stock types and numbers	28 Hill ewes and 12 lowland ewes.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information.
Privately owned NATURA	None.
Other commonages outside the trial.	No other commonages.
Other Information	New entrant (2014), No sheep grazed on the commonage.

Farm Level Farm 9	
Size of the farm.	9.29 ha of enclosed land plus 9.74 ha of commonage.
Ratio of commonage to inbye land.	48.82% enclosed 51.18% commonage.
Stock types and numbers	42 lowland ewes.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information.
Privately owned NATURA	None.
Other commonages outside the trial.	No other commonages.
Other information.	No sheep grazed on the commonage.
Farm Level Farm 10	
Size of the farm.	37.57 ha of enclosed land (owned) 14.94 ha enclosed land leased plus 44.77 ha of commonage.
Ratio of commonage to in bye land.	53.98% enclosed 46.02% commonage.
Stock types and numbers	240 hill ewes and 15 lowland ewes. 11 Suckler Cows, all offspring sold as stores.
Farm Infrastructure, e.g. housing/ waste storage facilities.	No information
Privately owned NATURA	None
Other commonages outside the trial.	No other commonages.
Other information	50 hoggets and dry ewes from May until late October plus 200 ewes from July until late October, No stock overwintered on the commonage.
Process Level	
Farmer's views on the development of a commonage plan.	Consensus that a commonage plan could be developed
Time required for development of commonage plan/ for implementation of plan	Farmers felt that one month would be adequate to develop a commonage plan. They felt that 3-5 years would be required to implement that plan fully.
Future modifications of Plan	The farmers saw the need to have a review of the commonage plan after 2 years.
Links to adjoining commonages where there are open boundaries.	Farmers felt that controlled burning should be synchronised with burning on adjacent commonages to reduce wandering of stock towards better grazing on recently burned patches. They felt having the same advisor for both commonages would help in this regards.
Potential for co-operative action on non- grazing issues, e.g. burning/ dumping etc.	Farmers were willing to co-operate on the issue of managing a controlled burn of heather. Expressed concern about current seasonal restrictions on burning.
Potential for development of commonage co-operation	Potential for informal commonage governance to be developed. Farmers felt that an annual meeting to discuss issues of concern in relation to the commonage should be held.
Additional Information	Drainage maintenance alongside roads required to protect road surface from scouring. Farmers felt that continued scheme payments are vital if a hill flock is to be maintained. They noted that younger sheep do not thrive on the hill in its current condition. Concern was expressed about the market for light lamb.

Appendix 3: Information Gathered during Kerry Case Study.

Commonage Level	
Size of the Commonage Gross and UAA	Gross Area =508 ha Ref Area/UAA =492 ha
No. of Shareholders	<p>This commonage has 8 shareholders verified from sight of Folios and Filed plans. One of these shareholders is resident in the U.S. There are 7 farmers returning commonage on their SPS applications. One of the 7, a brother of the U.S resident, makes returns on his owned share and his brother’s share as rented commonage. This is a long standing arrangement. Of the 7 farmers making returns, one has 41.67%, two have 16.71%, two have 8.21%, one has 5.54%, and one has 2.97%.</p> <p><u>Historical Issues on this commonage:</u></p> <p>While all recalled a time when harmony prevailed among shareholders grazing the commonage, there is a consensus that from the 1980’s difficulties arose whereby one of the shareholders massively increased his numbers going to the hill, over 1600 is mentioned. This grazing pressure and other matters lead to the rest with smaller numbers being “pushed off” the hill. The number of 1600 is not disputed by the other party either.</p> <p>The CFP carried out in June 1999 would seem to bear this out as in a commonage area of 1533 ha about 300 ha which also comprises part of this study area was the only significant area of severely damaged category blanket bog/ wet heath.</p> <p>It is worth noting that active turbary is indicated in the CFP (1999) on a large scale in the study area.</p> <p>In recent years the difficulties on this commonage reached the courts and a decision was handed down. It was agreed that the individual shareholder responsible for the over-grazing would be given his commonage share plus 20 additional acres. The 7 remaining shareholders would fence off the commonage, thereby fencing out his share, plus 20 acres, along the West of the commonage. This fence has been erected in the last year and relative harmony prevails.</p> <p>The new ownership details are not yet recognised on the respective land folios.</p> <p>The existing and future apportionment of land is shown on Table 3 below.</p> <p>The outcome as can be seen is 90.16 hectares, is fenced off as private land and 401.56 Ha will remain as commonage with 7 shareholders – 6 making SPS returns. Before proceeding with a CMP the new ownership structure will need to be verified by PRAI and DAFM.</p> <p>It will be noted that only one – the U.S resident shareholder- has a reduced acreage of commonage, while the others retain exactly what they had previously.</p> <p>Paradoxically the impasse on this commonage which is now resolved has led in recent years to under-grazing of the management unit which is to remain a commonage.</p> <p>This is not so on the area fenced out which will now be classed as “private” Natura requiring an Sustainable Management Plan (SMP) to be put in place.</p> <p>The new realignment of the commonage has only been fenced in the last year and after a period of absence, restocking by shareholders is only beginning and is perceptible only at low levels when walking the site. Rotational burning may be required to rehabilitate some of the coarse areas. However some reservations are expressed by farmers as to lasting negative effects of burning this type of hill. A large part is comprised of Blanket Bog and it would be preferable to rehabilitate if possible using sheep grazing or mixed grazing. Burning could be trialled in the more healthy areas in the first year.</p> <p>The time is right for a Commonage Management Plan (CMP) to be drawn up by a commonage advisor with full participation of all shareholders. Having spoken to the shareholders, it is believed that full co-operation will be forthcoming among them to manage this commonage in a sustainable way into the future.</p>

<p>Dormancy rate</p>	<p>No Dormancy. But as detailed above active farmers were inactive or relatively inactive on the commonage leading to under grazing.</p>
<p>Dominant habitat types (9/09/2014)</p>	<p>Two bog roads traverse the site East/West. To the West the site develops into a mosaic of blanket bog/wet heath while going South there is a steep incline to the mountain ridge with wet and dry heath. The ridge is flat with blanket bog. It is bounded by the new fence line. An extensive area of degraded blanket bog gently sloping Northwest bounded by a small river which divides it from enclosed land. It has extensive old turbary working. Active turbary was indicated on the CFP in 1999. The SAC survey 1999 concurs and mentions severe over-grazing also. Currently Purple moor grass is becoming rank and is outcompeting the heather. Some small flushes occur. Today active turbary occurs on a much reduced scale mostly in a defined area at the North of the site.</p>
<p>Max/ Min Numbers</p>	<p style="text-align: center;"><i>Min/Max Numbers as published in 2012</i></p> <p style="text-align: center;">Max: 435EE Min: 304EE</p> <p>These stocking review figures factored in a degree of over-grazing damage. But the inspection (9/09/14) showed under-grazing. Taking this into account undamaged Min/Max numbers calculated are as follows:</p> <p style="text-align: center;">Undamaged Max: 596EE Undamaged Min: 417EE</p> <p>Taking the current under-grazing into account these higher stocking rates may be advised in CMP</p> <p><i>Numbers amended for the newly structured commonage 401 Hectares claimed UAA:</i></p> <p style="text-align: center;"><i>Min/Max Numbers as published in 2012</i></p> <p style="text-align: center;">Max: 348EE Min: 244EE</p> <p>These stocking review figures factored in a degree of over-grazing damage. But the inspection (9/09/14) showed under-grazing. Taking this into account undamaged Min/Max numbers calculated are as follows:</p> <p style="text-align: center;">Undamaged Max: 479EE Undamaged Min: 336EE</p> <p>Taking the current under-grazing into account these higher stocking rates may be advised in CMP.</p>
<p>Current Stock types/ Numbers and seasonal grazing patterns</p>	<p>On the area fenced out of the commonage circa.90 ha It is well grazed. With 300 sheep on the hill Dec to Mid Feb then taken down. Mid-March: 80 hoggets put to hill. Mid June: 200 ewes put to hill. Aug: Additional 100 ewes put to hill. All taken down: End of Oct. This equates to c.200 sheep annualised stocking rate. On the restructured commonage as explained above the current stock numbers are very low with a start being made in recent months at re-introducing sheep grazing. Best estimate from farmers: 100 ewes: Dec – Feb inclusive. 100 hoggets (Although none at time of visit): March – Oct 100 ewes (Although none at time of visit): June – Oct.</p>

Historical stock types/ numbers (Traditional Systems)	Not heavily grazed traditionally. Escalation in numbers in late 1970's/80's/90s to unsustainable numbers up to 1600 ewes. Scotch Blackface/Dingle Scotch Blackface.
Natura status	Yes – SAC Features of interest: <ul style="list-style-type: none"> • Killarney Fern • North Atlantic Wet Heaths with <i>Erica tetralix</i> • European Dry Heaths
Other Conservation Issues	A number of wells occur on this commonage which is a source of domestic water for local households.
Boundary Issues, e.g. open to other commonages/ private land/ public road	As detailed above a new fence has been erected. The new fence enclosing this commonage is approx. 5 kilometres in length. It separates this commonage from a commonage area of c. 1,000 Ha over the ridge to the South.
Ease of Access	There is excellent access from both East and West. Two internal bog roads traverse the site.
Current Condition	Having walked the site it is seen to be under-grazed and rank vegetation occurs. This is degraded blanket bog – and unlike pristine blanket bog which can be maintained sustainably with very low grazing levels provided the wetness remains – this area has been extensively cut over and the hydrology changed irreparably. Much of it is now more akin to wet heath and as such needs management through appropriate grazing. It is probable that controlled burning of rank coarse vegetation will be required. However the consensus now is that the priority should be to get the individual shareholders actively managing the commonage. Following on from this to build increasing sheep numbers towards the levels identified in the CMP as sustainable. The review at the end of year 2 by the coming together of the Farmers and advisors is critical as farmers see it, to assess if the planned actions and targets are being realised or if there is need to make any adjustments to management. There is the possibility of one or two farmers grazing cattle on the site for periods during the Summer and this in conjunction with sheep grazing should be monitored. There is little or no scrub encroachment as yet on the site.
Other Commonage Uses, e.g. turf cutting/ recreational use and implications for agriculture if any	As referred to above extensive old turbary workings occur. Each of the shareholders has a right of turbary on from 1 to 3 acres of the commonage. In addition, an undisclosed number of locals also have turbary rights here. In the past the Irish Land Commission which holds turbary rights also used to let these yearly to local people. It was managed by an Irish Land Commission bog ranger – the last of which was father of one of the current shareholders. Recent years sees 6-10 people cutting turbary.
Actions of third Parties/ Use by non-shareholders	Not Applicable. Shareholders say it was not usually a problem on this commonage.
Process Level	
Farmer's views on the development of a commonage plan.	Under the new arrangement on the commonage there is strong consensus that a Commonage Management Plan (CMP) could be agreed by the 6 active farmers. There is some doubt as to whether farmer No. 3 will become active again in his own right, but he is in favour of an agreed CMP with some other(s) taking up his grazing allocation.
Time required for	The shareholders are ready to begin developing a CMP with an advisor/advisor.

development of commonage plan/for implementation of plan	It will take 1-3 years to build up the appropriate number of the right breeds for individuals.
Future modifications of Plan	Farmers were agreed that monitoring of the plan and a mid-term review (end of year 2) was important in order to get it right and make any necessary adjustments.
Links to adjoining commonages where there are open boundaries.	This commonage is now fenced off from adjoining commonages.
Potential for co-operative action on non-grazing issues, e.g. burning/dumping etc	Farmers will co-operate on management measures in a CMP. And issues such as burning or scrub removal in any such plan. The experience of operators who were professionally trained by Coillte to carry out controlled burning in this type of terrain should be employed if not available locally. Hard and Fast information is required from DAFM, NPWS and County Councils on controlled burning and the burning season needs to be revisited by NPWS.
Potential for development of commonage co-operation.	There is acceptance that a CMP will need to be put in place and signed up to by farmers.
Additional Information	None.
Farm 1	9/9/14
Size of the farm.	Up to present time: Commonage 82.16 Hectares, Private Land 68.14 Hectares. Total: 150.30 ha. Future: Future Ownership Structure. Total 158.30 ha. Commonage gone into private ownership 90.16 ha, Other Private Land 68.14 Ha as before.
Ratio of commonage to inbye land.	Up to present time – 55% Commonage/45% Enclosed Private. For the future – 0% Commonage/100% Enclosed Private.

<p>Stock types and numbers</p>	<p>Sheep Flock – Current management Regime Flock number – 500 ewes. Flock taken down from hill 1st week in November. Rams let out with flock. Flock returned to hill 1st/2nd week December. Replacement ewes are all 2 year old. Flock taken down for lambing beginning slowly from mid-Feb until mid-March Ewes not sponged or scanned Hoggets are put up hill when ewes are all down 20th March. Lambing – April 1st to May 7th Return ewes with single ewe lambs to hill 1st week in June. The remainder stay down until lambs are weaned. Selling lambs in Sept/Oct period. August 1st – Mothers go back up on hill, old ewes are culled and are replaced by 80-100 hoggets per year to keep breeding flock at 500 ewes. Main breed – Scotch Blackface/Dingle Scotch ewe and ram. Also Cheviot and Texel rams. The annualised stocking rate on the hill taking the above scenario into account is an average of 300 ewes on the hill over the 12 months. Published Min/Max numbers 50EE, 70EE. A provisional re-assessment for this shareholders share of commonage suggests a potential of 100 EE as being an appropriate stocking level.</p> <p>But the scenario of where the share of commonage is converted into 90.16 hectares of private Natura land will require a separate Sustainable Management Plan (SMP).</p> <p>In the 1980’s and 90’s the applicant had up to 1,600 sheep on the commonage.</p> <p>A herd of 60 suckler cows and 1 bull is carried. Calves born Dec/Jan – Selling mainly Sept/Oct. Majority Limousin and a few Belgian Blues. In addition 20 heifers are carried over.</p>
<p>Farm Infrastructure, e.g. housing/ waste storage facilities.</p>	<p>Two slatted cattle sheds, a 5 bay and a 6 bay with calving pens. All cattle housed November – March inclusive. Sheep not housed. A programme of reseeded of about 10 acres each year ensures good spring grass for ewe and lambs. Very little meal fed to sheep or cattle. All silage is taken from rented land. No silage cut on owned land.</p>
<p>Privately owned NATURA</p>	<p>Yes – The commonage going into private ownership is in an SAC.</p>
<p>Other commonages outside the trial.</p>	<p>None.</p>
<p>Farm 2</p>	<p>10/09/14</p>
<p>Size of the farm.</p>	<p>Current (SPS) Owned Commonage – 83.74 ha. Rented commonage 121.04 ha. Total commonage: 204.78 ha. Private Land 417.34 ha.</p> <p>Future (SPS) Owned Commonage – 83.74 ha Rented commonage 113.04 ha. Total: 196.78 ha.</p>

	<p>Total commonage: 196.78 ha. Private Land 417.34 ha.</p>
<p>Ratio of commonage to inbye land.</p>	<p>33% Commonage. 67% Enclosed.</p>
<p>Stock types and numbers</p> <p>A discussion was had with Farmer 2 on drawing up a CMP –The following outlines the pattern of seasonal management of the flock And doing the relevant EE calculations based on his share -</p>	<p>Total flock size – 500 ewes Rams – 5 Suffolk/2 Charalois/4 Scotch/2 Texel.</p> <p>Current Estimated Stock Numbers on the commonage. 100 ewes: Dec – Feb incl. 100 hoggets (Although none at time of visit): March – Oct. 100 ewes (Although none at time of visit): June – Oct.</p> <p>Sheep Flock – Future management Regime and CMP Farmer 2 who farms (2/5th of the commonage shares) has begun to build and this is his projected management regime as explored within the context of a future CMP.</p> <p>Ewes to Ram – Late Oct-Early November December- Half the flock 250 to the hill/commonage. Remain there until one month prior to lambing. 1st March – Flock taken down onto lowland. 160 hoggets put up to the hill at this stage. Approx. 150 ewes with single ewe lambs put back to hill 6-8 weeks after lambing around 1st June. At this stage 160 hoggets, 150 ewes and lambs on the hill. Other ewes put to hill after weaning – 100ewes All taken down late Oct for mating.</p> <p>A herd of 40 Suckler Cows (continentals) is carried. May opt to put some cows on hill after weaning calves in late Summer to dry them off. The number of cows to be accommodated by reduced sheep EE /numbers.</p> <p>The above regime translates into Sheep on commonage over the year as follows:</p> <p>250 sheep – Dec/Jan/Feb. 160 sheep – March/April/May/June/July/Aug/Sept. 150 sheep – June/July/Aug/Sept. 100 sheep – July/Sept.</p> <p>250 x 3 months equivalent to 63 for 12 months. 160 x 7 months equivalent to 93 for 12 months. 150 x 4 months equivalent to 50 for 12 months. 100 x 3 months equivalent to 25 for 12 months.</p> <p>Equivalent to 231 for 12 months.</p> <p>See below sustainable EE numbers with regard to Min/Max as published and amended Undamaged max numbers following an inspection of the site shows it to be currently under grazed.</p>

	<p>Min/Max Figures:</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th></th> <th>Min EE</th> <th>Max EE</th> <th>Undamaged Max EE</th> </tr> </thead> <tbody> <tr> <td>Townland 1</td> <td>H15600000</td> <td>8.86 HA x</td> <td>0.54 (4.78)</td> <td>0.77 (6.82)</td> <td>1.00 (8.86)</td> </tr> <tr> <td>Townland 1</td> <td>H15600000</td> <td>0.78 HA x</td> <td>0.67 (0.52)</td> <td>0.96 (0.75)</td> <td>0.96 (0.75)</td> </tr> <tr> <td>Townland 2</td> <td>H15600000</td> <td>120.85 HA x</td> <td>0.54 (65.26)</td> <td>0.77 (93.05)</td> <td>1.16 (140.20)</td> </tr> <tr> <td>Townland 2</td> <td>H15600000</td> <td>24.03 HA x</td> <td>0.45 (10.81)</td> <td>0.64 (15.38)</td> <td>1.16 (27.87)</td> </tr> <tr> <td>Townland 3</td> <td>H15600000</td> <td>15.59 HA x</td> <td>0.71 (11.07)</td> <td>1.01 (15.75)</td> <td>1.32 (20.58)</td> </tr> <tr> <td>Townland 3</td> <td>H15600000</td> <td>34.67 HA x</td> <td>0.94 (32.59)</td> <td>1.34 (46.46)</td> <td>1.34 (46.46)</td> </tr> <tr> <td colspan="2">Under Previous/Existing Ownership Structure</td> <td>204.78 HA</td> <td>125EE</td> <td>178EE</td> <td>245EE</td> </tr> <tr> <td colspan="2">Under new Commonage Ownership Structure</td> <td>196.78 HA</td> <td>120EE</td> <td>171EE</td> <td>235EE</td> </tr> </tbody> </table> <p>Having walked the commonage, 9/9/14, the condition is assessed as under grazed and the undamaged Max EE in the last column above 235EE may be advised as optimum for the commonage share. Note: these numbers on $\frac{5}{12}$ share of the commonage land area would need to be reconciled with the others shares on the commonage and whether all of these were stocked or not. Additional capacity may arise if one or more shareholders decide not to restock their share.</p> <p>He will fulfil the other conditions discussed such as burning if planned in the CMP.</p>				Min EE	Max EE	Undamaged Max EE	Townland 1	H15600000	8.86 HA x	0.54 (4.78)	0.77 (6.82)	1.00 (8.86)	Townland 1	H15600000	0.78 HA x	0.67 (0.52)	0.96 (0.75)	0.96 (0.75)	Townland 2	H15600000	120.85 HA x	0.54 (65.26)	0.77 (93.05)	1.16 (140.20)	Townland 2	H15600000	24.03 HA x	0.45 (10.81)	0.64 (15.38)	1.16 (27.87)	Townland 3	H15600000	15.59 HA x	0.71 (11.07)	1.01 (15.75)	1.32 (20.58)	Townland 3	H15600000	34.67 HA x	0.94 (32.59)	1.34 (46.46)	1.34 (46.46)	Under Previous/Existing Ownership Structure		204.78 HA	125EE	178EE	245EE	Under new Commonage Ownership Structure		196.78 HA	120EE	171EE	235EE
			Min EE	Max EE	Undamaged Max EE																																																		
Townland 1	H15600000	8.86 HA x	0.54 (4.78)	0.77 (6.82)	1.00 (8.86)																																																		
Townland 1	H15600000	0.78 HA x	0.67 (0.52)	0.96 (0.75)	0.96 (0.75)																																																		
Townland 2	H15600000	120.85 HA x	0.54 (65.26)	0.77 (93.05)	1.16 (140.20)																																																		
Townland 2	H15600000	24.03 HA x	0.45 (10.81)	0.64 (15.38)	1.16 (27.87)																																																		
Townland 3	H15600000	15.59 HA x	0.71 (11.07)	1.01 (15.75)	1.32 (20.58)																																																		
Townland 3	H15600000	34.67 HA x	0.94 (32.59)	1.34 (46.46)	1.34 (46.46)																																																		
Under Previous/Existing Ownership Structure		204.78 HA	125EE	178EE	245EE																																																		
Under new Commonage Ownership Structure		196.78 HA	120EE	171EE	235EE																																																		
Farm Infrastructure, e.g. housing/ waste storage facilities.	Adequate Winter housing for cows exists on the farm. Long-term rented coastal grassland used to out-winter some of the herd.																																																						
Privately owned NATURA	Coastal SAC 00000 Coastal SPA 000000 UAA – 263 Ha. Both Long-term rented from brother in the U.S.																																																						
Other commonages outside the trial.	Yes – $\frac{8}{35}$ share of 97.54 = 22.20 ha. $\frac{1}{17}$ share of 361.16 = 21.24 ha. Both Long-term rented from brother in the U.S.																																																						
Farm 3	10/09/14																																																						
Size of the farm.	Commonage – 40.36 ha Private – 25.00 Ha																																																						
Ratio of commonage to inbye land.	Commonage – 62% Enclosed Land – 38%																																																						
Stock types and numbers A discussion as detailed above at Farmer 2 was had	2 cows – Hereford & Angus – AI. No sheep kept – not grazing the commonage. Sheep Flock – Future management Regime and CMP Farmer 3 owns $\frac{1}{12}$ share of the commonage land area.																																																						

<p>with Farmer 3 on drawing up a CMP - following roughly the same pattern of seasonal management of the flock as outlined at Farmer 2 above. And doing the relevant EE calculations based on this farmer's share -</p>	<p>See below Sustainable EE numbers with regard to Min/Max as published And amended Undamaged max numbers following an inspection of the site shows it to be currently under grazed. Current Min 25 EE/Max 35 EE and Undamaged Max 49 EE. The under-grazed condition of the commonage would suggest building up to the higher of these three i.e. 49EE. The applicant says he will consider filling his grazing requirement using suitable breeds of bovines and needs time to consider this.</p> <p>On the face of it, he is unlikely to fill his share of the commonage. This is an example of where minimum numbers/activity would suffice as part of a CMP. If at the time of drawing up the CMP he is unable to meet even this, he may consider leasing his share or his share in EE may be allocated among the other active shareholders.</p> <p>Traditionally he says in years past 100 ewes grazed on the mountain for 9 months of the year.</p>
<p>Farm Infrastructure, e.g. housing/ waste storage facilities.</p>	<p>No Housing. 2 Cows B & B on a cousin's farm.</p>
<p>Privately owned NATURA</p>	<p>None.</p>
<p>Other commonages outside the trial.</p>	<p>None.</p>
<p>Farm 4</p>	<p>10/09/14</p>
<p>Size of the farm.</p>	<p>Commonage – 82.08 ha. Private Enclosed – 48.25 ha. (Of which – 32.00 ha is Forestry) leaving 16.25ha private UAA</p>
<p>Ratio of commonage to inbye land.</p>	<p>Commonage – 84 % Private UAA – 16%</p>
<p>Stock types and numbers</p> <p>A discussion as detailed above at Farmer 2 was had with Farmer 4 on drawing up a CMP - following</p>	<p>It would appear little or no grazing is being carried out by this shareholder on the commonage in recent due to problems outlined elsewhere.</p> <p>His current flock 100 ewes – Cheviot/Dorset Horn/Suffolk of which 50 are Scotch/Cheviot & Mountain type. He has numbers of the appropriate breed to put to the hill.</p> <p>Sheep Flock – Future management Regime and CMP</p> <p>Farmer 4 owns $\frac{1}{6}$ share of the commonage land area.</p> <p>See below Sustainable EE numbers with regard to Min/Max as published And amended Undamaged max numbers following an inspection of the site shows it</p>

roughly the same pattern of seasonal management of the flock as outlined at Farmer 2 above. And doing the relevant EE calculations based on this farmer's share -	to be currently under grazed. Current Min 50 EE/Max 71 EE and Undamaged Max 98 EE. The under-grazed condition of the commonage would suggest building up to the higher of these three i.e. 49EE. The applicant will fill his grazing share with sheep. He will fulfil the other conditions discussed such as burning if planned in the CMP. Traditionally in 1970/80's a flock of 200 Scotch ewes were put to the hill/commonage.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Slatted sheep shed with a capacity for 400 ewes.
Privately owned NATURA	None.
Other commonages outside the trial.	None.
Farm 5	10/09/14
Size of the farm.	Commonage – 14.61 ha Private Land UAA – 20.62 ha (Forestry – 15.75 ha) } 35.23 UAA
Ratio of commonage to inbye land.	Commonage – 41 % Enclosed Land – 59% (Excluding Forestry)
Stock types and numbers A discussion as detailed above at Farmer 2 was had with Farmer 5 on drawing up a CMP - following roughly the same pattern of seasonal management of the flock as outlined at Farmer 2 above. And doing the relevant EE calculations based on this farmer's share -	It would appear little of no grazing is being carried out by this shareholder currently on the commonage. His current flock: 30 Texel/Scotch ewes. His current herd: 15 Belted Galloway cows. Sheep Flock – Future management Regime and CMP Farmer 5 owns $\frac{1}{36}$ share of the commonage land area. See below Sustainable EE numbers with regard to Min/Max as published And amended Undamaged max numbers following an inspection of the site shows it to be currently under grazed. Current Min 8 EE/Max 12 EE and Undamaged Max 16 EE. The under-grazed condition of the commonage would suggest building up to the higher of these three i.e. 16EE. The applicant may fill his grazing share with sheep. But he will also consider grazing Belted Galloway cows on the commonage. He has housing capacity for the winter. He has tried it out this Summer for a short period and says it was satisfactory. He will fulfil the other conditions discussed such as burning if planned in the CMP.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Slatted cattle shed with capacity for 25-30 cows.
Privately owned NATURA	None.
Other commonages outside the trial.	None.

Farm 6	10/09/14	
Size of the farm.	Commonage – 27.21 Hectares Private Land – 10.02 Hectares	38.23 Hectares
Ratio of commonage to inbye land.	Commonage – 73 % Private Land – 27%	
Stock types and numbers A discussion as detailed above at Farmer 2 was had with Farmer 6 on drawing up a CMP - following roughly the same pattern of seasonal management of the flock as outlined at Farmer 2 above. And doing the relevant EE calculations based on this farmer's share-	<p>He is not currently grazing commonage. Problems have arisen in the past on the commonage as previously alluded to in section 1 above, following which he made a decision to stay off the commonage. Unlike the other shareholders he lives a distance away from the commonage.</p> <p>Current Flock: 100 ewes – Scotch Blackface breed.</p> <p>Sheep Flock – Future management Regime and CMP</p> <p>Farmer 6 owns $\frac{2}{36}$ share of the commonage land area.</p> <p>See below Sustainable EE numbers with regard to Min/Max as published And amended Undamaged max numbers following an inspection of the site shows it to be currently under grazed.</p> <p>Current Min 16 EE/Max 24 EE and Undamaged Max 32 EE. The under-grazed condition of the commonage would suggest building up to the higher of these three i.e. 32EE. The applicant will fill his grazing share with sheep. He will fulfil the other conditions discussed such as burning if planned in the CMP. He has the required flock numbers and breed to do so.</p>	
Farm Infrastructure, e.g. housing/ waste storage facilities.	No animal housing. Sheep out-wintered on enclosed private land.	
Privately owned NATURA	None.	
Other commonages outside the trial.	None.	
Farm 7	10/09/14	
Size of the farm.	Commonage – 40.36 ha Private Land – 56.22 ha	96.58 UAA
Ratio of commonage to inbye land.	Commonage – 42% Private Enclosed Land – 58%	
Stock types and numbers	Currently not grazing the commonage. Ewe flock – 140 Cheviot & Suffolk ewes. Did graze in the 1980's and 1990's.	

<p>A discussion as detailed above at Farmer 2 was had with Farmer 7 on drawing up a CMP - following roughly the same pattern of seasonal management of the flock as outlined at Farmer 2 above. And doing the relevant EE calculations based on this farmer's share</p>	<p>Sheep Flock – Future management Regime and CMP Farmer 6 owns $\frac{1}{12}$ share of the commonage land area.</p> <p>See below Sustainable EE numbers with regard to Min/Max as published And amended Undamaged max numbers following an inspection of the site shows it to be currently under grazed.</p> <p>Current Min 25 EE/Max 35 EE and Undamaged Max 49 EE. The under-grazed condition of the commonage would suggest building up to the higher of these three i.e. 49EE.</p> <p>The applicant will fill his grazing share with Scotch Blackface sheep as they are more suitable than his current Cheviot & Suffolk ewes breed. He will fulfil the other conditions discussed such as burning if planned in the CMP.</p>
<p>Farm Infrastructure, e.g. housing/ waste storage facilities.</p>	<p>Has suitable housing for lambs – otherwise flock out-wintered.</p>
<p>Privately owned NATURA</p>	<p>None.</p>
<p>Other commonages outside the trial.</p>	<p>None.</p>

Table 3 Case Study County Kerry 12/09/2014

		GrossHa	UAA Ha	Farmer 1	Farmer 2		Farmer 5	Farmer 6	Farmer7	Farmer 4	Farmer 3	
				(1/6)	(2/12)	Owned	Owned	Rented	(3/12)	(1/36)	(2/36)	(1/12)
Townland 1	H15600000	21.51	21.26	(1/6) 3.54	(2/12) 5.32	(3/12) 3.54	(1/36) 0.58	(2/36) 1.18	(1/12) 1.77	(1/6) 3.54	(1/12) 1.77	
Townland 1	H15600000	2.9	2.53	(1/6) 0.42	(2/12) .36	(3/12) .42	(1/36) 0.06	(2/36) 0.14	(1/12) 0.20	(1/6) 0.42	(1/12) 0.20	
Townland 2	H15600000	301.65	290.06	(1/6) 48.34	(2/12) 48.34	(3/12) 72.51	(1/36) 8.05	(2/36) 16.11	(1/12) 23.83	(1/6) 48.34	(1/12) 23.83	
Townland 2	H15600000	59.75	57.67	(1/6) 9.61	(2/12) 9.61	(3/12) 14.42	(1/36) 1.60	(2/36) 3.20	(1/12) 4.80	(1/6) 9.61	(1/12) 4.80	
Townland 3	H15600000	37.85	37.41	(1/6) 6.23	(2/12) 6.24	(3/12) 9.35	(1/36) 1.03	(2/36) 2.08	(1/12) 3.07	(1/6) 6.24	(1/12) 3.07	
Townland 3	H15600000	84.51	83.6	(1/6) 13.93	(2/12) 13.87	(3/12) 20.80	(1/36) 2.26	(2/36) 4.64	(1/12) 6.69	(1/6) 13.93	(1/12) 6.69	
		508.07	492.53									
Commonage Claimed Area HA				82.16	83.74	121.04	14.61	27.21	40.36	82.08	40.36	
				204.78 HA								
Percentage of Commonage				16.70%	41.67%		2.97%	5.54%	8.21%	16.70%	8.21%	
Other Commonage(s)				None	Yes Rented (Td-A 22HA Td-B 21HA)		None	None	None	None	None	
Private Land				68.14	417.34		20.62	10.02	56.22	48.25	25	
Forestry				None	None		Yes	None	None	Yes	None	
Habitat					Yes - 55HA (Coastal) Claimed area-0							
Total Claimed Area				150.3	622.12		35.23	37.23	96.58	130.33	98.0	65.36
New Ownership Structure*												
		508.07	492.53		83.74	113.04						
Commonage & Private Future Claimed Area (Hectares)				90.16 Private	196.78		14.61	27.21	40.36	82.08	40.36	
*subject to verification by PRAI & DAFM												

Appendix 4: Information Gathered during Mayo Case Study.

Commonage Level	
Size of the Commonage UAA	UAA 335.27 ha.
No. of Shareholders	18 shares, 16 shareholders.
Dormancy rate	4 active shareholders, 12 dormant.
Dominant habitat types	Blanket bog/Wet heath.
Max/ Min Numbers	Max 353.60 Min 247.52
Current Stock types/ Numbers and seasonal grazing patterns	250 Mountain Blackface sheep. 20 Mixed breeds' suckler cows. 3 Horses. Commonage given rest period of 5 months, sheep removed for lambing/breeding, cattle use commonage during summer.
Historical stock types/ numbers (Traditional Systems)	Mountain Blackface sheep and mixed breeds of suckler cows. Commonage used year round typically with low stocking rate.
Natura status	SAC/SPA/pNHA.
Other Conservation Issues	<i>Lutra lutra</i> recorded.
Boundary Issues, e.g. open to other commonages/ private land/ public road	Open access to other commonages, not attached to private land.
Ease of Access	4 access points, easily accessed by roadway.
Current Condition	Good, resting period has allowed for quality restoration of commonage.
Other Commonage Uses, e.g. turf cutting/ recreational use and implications for agriculture if any	Turf cutting for shareholders personal use. Local walking route. No negative impacts on agriculture, walking route has improved access to commonage.
Actions of third Parties/ Use by non shareholders	Stock from other commonages sometimes an issue but not a huge impact on commonage.
Farm Level 1	
Size of the farm.	3 shares in commonage, 39ha commonage, and 24 ha enclosed.
Ratio of commonage to inbye land.	13:8, 61.91% commonage, 38.09% enclosed.
Stock types and numbers	250 Mountain Blackface ewes 4 rams 34 suckler cows, mixed breeds. 1 bull.
Farm Infrastructure, e.g. housing/ waste storage facilities.	2 slatted sheds, 1 open shed.
Privately owned NATURA	Yes, all SAC.
Other commonages outside the trial.	Yes, 6 shares in other commonages.

Farm Level 2	
Size of the farm.	1 share in commonage, 13ha commonage, and 28.33 ha enclosed.
Ratio of commonage to inbye land.	13:28.33, 31.45% commonage, 68.55% enclosed.
Stock types and numbers	100 Blackface Mountain ewes. 4 rams. 14 suckler cows, mixed breeds.
Farm Infrastructure, e.g. housing/ waste storage facilities.	1 Shed, effluent tank.
Privately owned NATURA	Yes SAC.
Other commonages outside the trial.	Yes. 1 share in 2 other commonages.
Farm Level 3	
Size of the farm.	26.25ha, 5.06 commonage, 21.19ha enclosed
Ratio of commonage to inbye land.	5.06:26.25; 83.84% commonage, 16.16% enclosed.
Stock types and numbers	40 Mountain Blackface ewes. 5 suckler cows, mixed breeds.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Cattle overwintered on islands, limited old barns for housing.
Privately owned NATURA	Yes
Other commonages outside the trial.	Yes. 331.50 ha in other commonage.
Farm Level 4	
Size of the farm.	54ha, 32ha commonage, 22ha enclosed.
Ratio of commonage to inbye land.	11:16: 59.26% commonage, 40.74% enclosed.
Stock types and numbers	12 suckler cows, mixed breeds.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Limited housing. Dung site.
Privately owned NATURA	Yes.
Other commonages outside the trial.	No.
Process Level	
Farmer's views on the development of a commonage plan.	Currently shareholders are not receiving any monetary support for their commonage areas. There is no incentive to continue farming this area and abandonment is a real threat. Any new plan must include broad measures to cater for the range of commonage management styles across the country. The farmer should be paid to maintain special areas i.e. commonage in this area, as has been done in the Burren, Co. Clare. Allow for extra funding for commonage specific actions. Pilot schemes, as carried out in the Burren, have potential in other areas too.

Time required for development of commonage plan/ for implementation of plan	Any scheme at the moment is better than none so the quicker a new scheme is made available the better. Payments should be greater than those given as part of AEOS.
Future modifications of Plan	Plan should be monitored and reviewed on a continuous basis to ensure measures that are in action are beneficial to the commonage. Allow for extra funding for more complex actions.
Links to adjoining commonages where there are open boundaries.	If shareholders on other commonages were agreeable it would be possible. Proposed 50% shareholder agreement may not be realistic. If it is incentivised appropriately it should work.
Potential for co-operative action on non- grazing issues, e.g. burning/ dumping etc.	If incentivised appropriately.
Potential for development of commonage co-operation	If incentivised appropriately.
Additional Information	Assessment of old turf banks too severe, risk of excluding too large an area from eligibility. The resting period for the commonage, currently 5 months, is too great. Would be preferable to reduce to 2 months. Particularly problematic in spring time.

Appendix 5: Information Gathered during Sligo Case Study.

Commonage Level	
Size of the Commonage UAA	UAA 704.73 ha
No. of Shareholders	7 shares split between 4 shareholders.
Dormancy rate	6 dormant shares.
Dominant habitat types	Blanket bog.
Max/ Min Numbers	Max 696.16 Min 487.31.
Current Stock types/ Numbers and seasonal grazing patterns	Mountain Blackface/250 ewes plus 7 rams/on commonage all year, taken off for mating and lambing only.
Historical stock types/ numbers (Traditional Systems)	Previously grazed by both sheep and cattle. No cattle since 1998.
Natura status	SAC.
Other Conservation Issues	None.
Boundary Issues, e.g. open to other commonages/ private land/ public road	Fenced from private land but open to other commonage areas.
Ease of Access	3 access roads on one side, only one in use at present.
Current Condition	Considered good condition.
Other Commonage Uses, e.g. turf cutting/ recreational use and implications for agriculture if any	Limited turf cutting, does not impact on agricultural use of the commonage.
Actions of third Parties/ Use by non shareholders	None.
Farm Level	
Size of the farm.	12.70ha, 40ha enclosed.
Ratio of commonage to inbye land.	3.175:10, 24.01% commonage: 75.99% enclosed.
Stock types and numbers	Mountain Blackface 250 ewes, 7 rams.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Small amount of housing on enclosed land.
Privately owned NATURA	No.
Other commonages outside the trial.	No.
Process Level	
Farmer's views on the development of a commonage plan.	A grazing strategy which supports sustainable stocking rates considering a farmers enclosed land, farming system and housing needs to be developed for use within CFP.
Time required for development of commonage plan/ for implementation of plan	1 to 2 years to develop such a strategy with 3 to 4 years for implementation.
Future modifications of Plan	None
Links to adjoining commonages where there are open boundaries.	Other commonages should be managed and treated separately.
Potential for co-operative action on non- grazing issues, e.g. burning/ dumping etc.	N/A (this commonage has one active shareholder).
Potential for development of commonage co-operation	Farmer should have freedom to farm in desired way once it is sustainable. Supports etc. should be treated on an individual basis. One farmer should not be responsible for another's actions/management style/mismanagement.
Additional Information	None.

Appendix 6: Information Gathered during Galway Case Study.

Commonage Level	
Size of the Commonage UAA	UAA 862.13 ha.
No. of Shareholders	5 shareholders (equal shares), 4 active.
Dormancy rate	1 dormant share.
Dominant habitat types	Blanket bog.
Max/ Min Numbers	Max 724.66 Min 507.26.
Current Stock types/ Numbers and seasonal grazing patterns	580 Blackface Mountain sheep. 15 cows with calves, 4 replacement heifers, mixed breeds 5 Connemara ponies, 3 foals. On commonage all year round.
Historical stock types/ numbers (Traditional Systems)	Sheep, cattle, ponies on commonage all year.
Natura status	SAC, SPA, pNHA.
Other Conservation Issues	<i>Eriophorum gracile</i> , <i>Lycopodiella inundata</i> .
Boundary Issues, e.g. open to other commonages/ private land/ public road	Attached to both private land and other commonage. Fenced from private land, open to other commonage.
Ease of Access	Limited access from main roads. One main access point.
Current Condition	Mixed. Some areas under grazed, some areas overgrazed.
Other Commonage Uses, e.g. turf cutting/ recreational use and implications for agriculture if any	Shareholders cut some turf for personal use. Does not impact on agricultural use of the commonage. Limited use by hikers. Does not impact on agricultural use of the commonage.
Actions of third Parties/ Use by non-shareholders	N/A.
Farm Level Farm 1	
Size of the farm.	172.45 commonage, 20.23ha enclosed.
Ratio of commonage to inbye land.	43.11:5.06; 89.5% commonage, 10.5% enclosed.
Stock types and numbers	230 Mountain Blackface ewes. 5 rams. 3 cows. 1 Connemara pony.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Sheep shed. Handling pen.
Privately owned NATURA	Yes. 1.6ha SAC/SPA.
Other commonages outside the trial.	No.
Farm Level Farm 2	
Size of the farm.	172.45ha commonage, 14.16ha enclosed.
Ratio of commonage to inbye land.	86.2:7.1: 92.41% commonage, 7.59% enclosed.
Stock types and numbers	255 Mountain Blackface sheep. 3 cows & 2 Connemara ponies.
Farm Infrastructure, e.g. housing/ waste storage facilities.	Hay storage facilities. Limited housing.
Privately owned NATURA	Yes. 5.67ha SAC.
Other commonages outside the trial.	No.
Farm Level Farm 3	
Size of the farm.	172.45ha commonage, 24.19ha enclosed.
Ratio of commonage to inbye land.	43.1:6.04: 87.7% commonage, 12.3% enclosed.
Stock types and numbers	55 Mountain Blackface sheep, 9 cows & 2 Connemara ponies.

Farm Infrastructure, e.g. housing/ waste storage facilities.	Winter housing for cattle
Privately owned NATURA	12.14 ha SAC.
Other commonages outside the trial.	No.
Farm Level Farm 4	
Size of the farm.	172.45ha commonage, 12.14ha enclosed.
Ratio of commonage to inbye land.	43.1:3: 93.42% commonage, 6.58% enclosed.
Stock types and numbers	35 Mountain Blackface sheep.
Farm Infrastructure, e.g. housing/ waste storage facilities.	None.
Privately owned NATURA	All SAC.
Other commonages outside the trial.	No.
Process Level	
Farmer's views on the development of a commonage plan.	Plan needs a wide spectrum of measure to take into account that not every commonage is the same. If stocking rates had to be adjusted should not be </> 10 animals/year to avoid buying in lambs etc. and the issues that arise from this. Any plan should include alternative management measures i.e. should not be focused solely on grazing regime.
Time required for development of commonage plan/ for implementation of plan	Use AES such as GLAS for implementation of plan. Initially gain commitment from farmers to plan then allow for time to develop a suitable plan and then implement plan within the course of an AES.
Future modifications of Plan	Review of '02 Commonage Framework Plan has not been done. Carry this out and then use information in development/implementation of AES. This will help to identify issues specific to individual commonages.
Links to adjoining commonages where there are open boundaries.	Commonage should be managed separately even if they are adjoining and unfenced. Co-operation among different commonages would not work in this area but may be possible in other commonages.
Potential for co-operative action on non- grazing issues, e.g. burning/ dumping etc.	There is potential within this commonage for co-operative action. Burning in particular has potential as a co-operative measure.
Potential for development of commonage co-operation	50% agreement level is not realistic. Timing is the greatest issue. The small timeframe currently proposed will force farmers into a plan and does not allow time for developing co-operation among farmers particularly on larger commonage areas.
Additional Information	Lack of consultation has been the biggest issue throughout. It appears to farmers that the Department of Agriculture is more concerned about penalising actions not done than rewarding provision of public goods/ecosystem services. Budget should focus on non-food products more.