Submission on the Rural Development Programme 2014-2020 Consultation Paper:

We welcome the publication of the RDP Consultation Paper and the opportunity to comment on it. There are a few key issues that we would like to raise:

Agri-Environment Climate Measures

1. There needs to be clearer justification of the proposed costing, targeting and selection criteria for GLAS to ensure maximum environmental impact at minimal cost. The proposal for 50,000 farmers at a maximum payment of €5,000 may not satisfy the European Commission's request for better targeting of agri-environment payments. Furthermore, where details of specific targeting/selection criteria are proposed under the "*Other Actions allowed to achieve maximum payment*", this appears to include farms where the issues will be covered under Single Farm Payment criteria i.e. greening, cross compliance and GAEC.

2. A study by Carlin et al (2010) found that many of the options under REPS 4 suffered from poor targeting, and a poor evidence base for prescriptions. All GLAS measures must be evidence-based in terms of their design if they are to achieve the desired impact. For example, taking the low-input permanent pasture action, there is clear scientific evidence that even low levels of fertiliser input (as permitted in AEOS 3) can reduce the ecological value of pastures; research has shown that levels of Nitrogen between 20 and 50kg/ha resulted in a reduction of 50% in the total number of plant species, while forb species were very low when Nitrogen applications exceeded 75kg/ha (Plantureux et al 2005).

3. Additional options should be included for low intensity agricultural systems which deliver the highest environmental quality in terms of water quality, climate change and biodiversity. This is key if GLAS is to address Priority 4 - restoring, preserving and enhancing ecosystems dependent on agriculture. Suitable options would include:

    a. Management options for all semi-natural grasslands and heaths as defined by Fossit 2000.
    b. Maintenance and restoration of wetland and peatland options enhancing flood mitigation on farmland
    c. Maintenance of wet grasslands for breeding waders
    d. Management options for internationally or nationally threatened/vulnerable species e.g. marsh fritillary, chough, shrill carder bee.

4. The management of historic monuments and cultural features, including the Traditional Farm Buildings Scheme, could and should be included as actions in GLAS. Traditional Farm Buildings could follow the successful approach under REPS, whilst the presence of sites listed on the Register of Historic Monuments could initially determine eligibility for a dedicated measure dealing with other cultural sites. Unlisted or newly discovered monuments, once verified, could also be included.

5. A well designed, independent and robust system of environmental monitoring should be put in place as soon as possible to assess the impact of GLAS. The MTR of the RDP should then take account of findings from this monitoring programme to improve the effectiveness of measures.

6. Any shortfall in the annual spending limit for GLAS of €230m – particularly in the early years of the RDP as new systems are put in place - should be rolled over to future years to ensure this critical investment in farming and in the environment – is not lost.

7. Please note that the Consultation Paper should include the stipulation that restoring, preserving and enhancing ecosystems relates to *agriculture related ecosystems only* and the proposed measures should reflect this.

8. GLAS+ offers a welcome opportunity to target certain farms to achieve specific objectives. Article 5 of Reg. 1305-2013 specifically highlights that in achieving Priority 4 (restoring preserving and enhancing ecosystems related to agriculture), there needs to be a focus on Natura 2000 areas, areas facing natural or other specific constraints, and High Nature Value (HNV) farming. GLAS+ should be constituted as an output based mechanism through which HNV farmers (both inside and outside Natura 2000 areas) are incentivised to improve the day to day management of priority habitats (as per the Prioritised Action Framework-PAF) on their land, particularly those habitats which are most threatened (as identified under Article 17 reporting for example).

9. There needs to be a clearer, more integrated approach to the delivery of agri-environment measures across GLAS, GLAS+ and O/P based AE projects. The implementation of the three measures should complement each other to deliver the required output of multiple ecosystem services (production, regulatory, support, aesthetic and cultural products and services) in any one area. There is a need for much better targeting to ensure maximum impact with a 'narrow and deep' approaches of GLAS+ and the O/P based AE, complementing the more 'broad and shallow' approach of GLAS (in other words a 'tiered' approach).

    a. Suggested targeting of GLAS+: This should be aimed at addressing issues identified in PAF; throughout the country, farms could be targeted using self-assessment of presence of certain indicators (example in Appendix I of system used to identify high nature value farms). A farm with a certain threshold of nature value would be targeted in GLAS+.
    b. Suggested targeting for targeted O/P based AE projects: Identify specific HNV farmland areas to pilot best practice (supported by research, monitoring and knowledge transfer under an EIP), for example, the Burren, the Wicklow Uplands, Connemara and West Mayo, Boleybrack Mountain area in Leitrim, Semi-natural wet grasslands of North Leitrim, the Shannon Callows, Slieve Aughtys, Donegal Uplands and the Islands.

10. The inclusion of Targeted Output Based AE Projects in the Consultation paper is a very welcome and progressive step. However, the indicative available funding of €5 million is

far too small, equating to projected requirements for the expansion of the Burren Farming for Conservation Programme alone. For an effective output this needs to be increased to at least €20m p.a. Also, as with GLAS funding, any annual underspend should roll-over from year to year and this should sit on top of GLAS funding;

11. While the strength of targeted O/P based AE projects is their potential to focus on the unique needs of different geographical areas, in the interests of quality control and peer learning, such projects will need to share some level of integration and oversight. They also offer excellent potential for a communal approach to branding of produce.

12. Work on the development of O/P based AE projects should begin immediately (in 2014) to enable such projects to be rolled out in 2015. There is sufficient information readily available both to identify suitable areas and develop the necessary programmes.

13. We welcome the acknowledgement of the specific requirements of Island farming and the priorities areas of the RDP that can be addressed on Islands, most of which are exemplars of HNV farming systems. In the RDP support for Island Farming can be designed within the targeted, O/P based approach once specific funding is allocated under 6B. The suggested targeted support under Section 6B should be locally administered, improve infrastructure and develop the link between the farming systems and the ecosystem services associated with the islands, as has occurred in the Burren. An excellent model is provided by the EU LIFE funded AranLIFE project, which offers a unique opportunity to demonstrate best practice in parallel with the delivery of targeted Island measures in the RDP. This can ensure that the finding of the AranLIFE project could be immediately incorporated into the RDP at the mid-term review.

14. Under knowledge transfer measures, the proposed continued professional development for advisors seems to apply to agriculture and vet qualified advisors only. To deliver the RDP programme, given the amount of funding allocated to the agri-environment and climate measures, the up-skilling of agricultural advisors is of course very important and welcome, but the process should also include already qualified environmental scientists on the list of approved advisors.

15. Further details on output based agri-environment schemes and their design specific to Ireland is available at:

    http://www.heritagecouncil.ie/fileadmin/user_upload/Press_Releases/Press_Releases_2013/AGRI_ENVIRONMENT_SCHEME_RDP_2014-2020_final12Dec.pdf

References

Carlin, C., Gormally, M.J., Ó hUallacháin, D., Finn, J.A (2010). Experts' assessments of biodiversity options and supplementary measures in REPS 4. Report for the Department of Agriculture, Fisheries and Food (as part of Stimulus RSF).

Fossitt, J.A. (2000). *A Guide to habitats in Ireland.* The Heritage Council, Kilkenny.

Plantureux, S., Peeters, A. & McCracken, D. (2005). Biodiversity in intensive grasslands: Effects of management, improvements and challenges. *Agronomy Research*, **3(2)**, 153-164

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Appendix 1 DRAFT Field Sheet for the identification of HNV status of farms

Farmer: _____ Date: _____
Address: _____Ph no:_____

Step1. Gather farm data and calculate measurements

Questions	Answers
The size of farm in hectares?	
The percentage of the farm improved? (%)	
The length in meters of field boundaries including stone walls, earth banks, tree lines, hedgerows, open drainage ditches, streams, rivers? (m)	
Linear features per hectare of farm (m/ha).	
Livestock on the farm?(LU)	
The area of the farm described as utilisable agriculture area (UAA)?	

Step 2. Circle the relevant scores for % improved agricultural grassland, Livestock Units/ha/UAA, Linear total (m/ha)

% improved agricultural grassland	Score	Livestock Units/ha/UAA	Score	Linear total (m/ha)	Score
91-100	**0.5**	>2.26	**0.3**	<100	**0.2**
81-90	**1**	2.01-2.25	**0.6**	101-125	**0.4**
71-80	**1.5**	1.76-2	**0.9**	126-150	**0.6**
61-70	**2**	1.51-1.75	**1.2**	151-175	**0.8**
51-60	**2.5**	1.26-1.50	**1.5**	176-200	**1**
41-50	**3**	1.01-1.25	**1.8**	201-225	**1.2**
31-40	**3.5**	0.76-1	**2.1**	226-250	**1.4**
21-30	**4**	0.51-0.75	**2.4**	251-275	**1.6**
11-20	**4.5**	0.26-0.5	**2.7**	276-300	**1.8**
0-10	**5**	0.15-0.25	**3**	>300	**2**

Step 3. Add the three scores together

Total Score=

Score	HNV status
<4.5	Non HNV
4.5-10	HNV

Based on work at IT Sligo and NUI Galway. Boyle, P., Hayes, M., Gormally, M., Sullivan, C. & Moran, J. (in prep.) Calculating the nature value of pastoral farmland – a rapid farm-level assessment. Submitted to Journal of Applied Ecology.