



Commonage Management

The Case for an Implementation Plan.

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Current Position

- Commonage Framework Plans are obsolete.
 - The need for revision is clear.
- Considerable resistance to initial proposals.
- DAFM proposals remains wedded to the concept of a qualified majority agreement among shareholders.
- Debate has focussed almost exclusively on the 80% agreement issue.
- Very little attention as to what farmers are being asked to agree on.

RDP Objectives

- The protection and improvement of the environment and achieving water quality, climate change and biodiversity objectives.
- The conservation of high nature value farmed environments both within and outside of designated Natura 2000 sites.
- The use of nutrient management planning in farming practice.
- Fostering knowledge transfer in the area of sustainable environmental systems.

RDP Support for Commonage Farmers.

- GLAS and GLAS+.
 - Commitment of €1,450, 000, 000 over the life of the current CAP.
 - 40% to be spent on Priority Environmental Assets (including Commonage) or approx. €580,000,000.
 - Urgent need to ensure that this investment is focussed and can deliver the desired objectives.

Commonage Agreement

- We need to be very clear as to what the objectives of this process are.
 - The Strategic Environmental Assessment for the RDP gives an output target of 150,000 Ha or 50% of commonage area under contract.
 - To be of value such contracts have to be workable,
 - To be workable they have to be;
 - Realistic.
 - Flexible.
 - Attractive to participants.
 - Accessible to participants.
- There is a real danger that max/ min stocking rates and shareholder agreements will be seen as objectives in themselves and not as tools to reach desired goals.

What is needed now

- What is being proposed is a radical departure from, how previous AE schemes dealt with commonage.
- A clear concise implementation plan is needed.
- Thought has to be given to the time/ money, skill sets and administrative infrastructure required to deliver and support workable agreements at commonage level.

Implementation Plan

- All Stakeholders need to know
 - The objectives of the process at national and commonage/farm level.
 - The infrastructure that will support the attainment of these objectives.
 - For example will there be something akin to a the Peatlands Commission to adjudicate on unusual situations and facilitate communication between stakeholders.
 - The role of the different players in the process, i.e. farmers, advisors, DAFM, NPWS.
 - The timelines for implementing different stages in the process.
 - Farmers and advisors cannot plan in an information vacuum. If such a plan exists, it's contents **must be communicated** to those affected without delay.
- A series of Flagship Commonages with a good geographical spread could demonstrate what is possible.

Commonage Agreements.

- What will a commonage agreement look like?
- What issues will it encompass?
- How is the issue of dormant shareholders to be dealt with?
- How much time will be available to develop such an agreement?
- At what stage in the process will shareholders have to agree?
- How will this correspond with GLAS application periods.
- How will the presence/ absence of such an agreement affect eligibility for BPS/ ANC schemes?
- Who will facilitate such agreements? How and when will they be selected/ trained/ paid?

Integration with GLAS.

- The sustainable management plan.
 - What will it contain?
 - Who will pay for it?
 - Who will produce it?
 - Can it be used to replace or update the max/ min figures?
- Timing of agreements.
 - Two options.
 1. Agreement between shareholders reached as part of the GLAS application.
 2. Agreement developed after application to GLAS.

Both are fraught with difficulties.

Short window for GLAS applications will hamper the first option.

Requiring farmers to sign up to an unknown agreement may sink the second option.

Challenges at Farm/ Commonage Level.

- Farms with very large ratio between commonage share and good quality enclosed land.
 - For example Deroogh South Commonage in Co. Galway.
 - 492 Ha (all of it designated as SAC), 10 shareholders only 3 active, typical area of enclosed land 3 Ha (much of that very poor quality).
 - No chance of reaching proposed max/ min figures typically 137- 197 ewes if split between active shareholders.
 - These farmers keep cattle and ponies so max/ min figures equate to 20-29 bovine livestock units.
 - No housing or spreadgrounds available.
 - Catch 22 situation if rules of a scheme designed to preserve farmed landscapes serve to drive farmers out of farming leading to land abandonment.
 - If some grazing is better than no grazing at all than how can a cessation of farming benefit the RDP's objectives?

Challenges at Farm/ Commonage Level.

- Commonages with a high % of dormant inactive shareholders.
- Remaining farmers have to maintain all of the site to GAEC standards but only paid for a small portion.
- Is it realistic to expect farmers to engage on this basis?
- How will commonage agreements/ GLAS cope with situations like this?

Challenges at Farm/ Commonage Level.

- Commonages with very large number of shareholders, e.g. Achill Island.
 - Time and level of support for developing agreements will be considerable.
 - Difficulties for GLAS applications due to the long lead in time required to produce a workable agreement.
 - This has an impact on Farmers by delaying access to AE funding.
 - Facilitation of Agreements by private sector players will not be possible if funding is not provided centrally.

Challenges at Farm/ Commonage Level.

- Farmer with an interest in multiple commonages.
 - Same set of shareholders have shares in multiple commonages, e.g. Mweelrea Mountain Co. Mayo. Each shareholder has shares in 16 separate but contiguous townlands. But usage is concentrated in townlands adjacent to enclosed land.
 - Issues vary in different Land Parcels but any proposed remedy will not affect all shareholders equally.
 - Individual farmer with shares in multiple commonages but not with same set of other shareholders.
 - Difficulties in one commonage may derail his participation in GLAS and thus threaten the viability of agreements in other commonages.

Flexibility

- What flexibility will GLAS allow for changes in commonage agreements. These could be necessitated by;
 - Death / withdrawal of a participant(s).
 - Desire by a shareholder to join an existing agreement.
 - Remedies to correct unforeseen and perhaps undesirable impacts of the initial agreement.
- Lead in time to increase stock numbers/ change breeds.
- Some level of oversight to adjudicate on atypical situations. Advisors/ Farmers must be able to make a case for a derogation and get a prompt response.

Infrastructure required to support Commonage Farmers.

- Commonage Commission, a part time commission with an independent chair;
 - To oversee the process.
 - Adjudicate on atypical situations.
 - Facilitate communication between stakeholders.
- A derogation procedure to provide for cases where individual farms or commonages do not fit neatly into GLAS prescriptions, but where participation by farmers is both desired and desirable.
- A network of commonage facilitators to support farmers in developing and sustaining agreements/ grazing associations.
- Technical support to Advisors and Farmers by NPWS/ DAFM.

Commonage Facilitators.

- What skill set is required to deliver this function?
- Has there been an assessment of the availability of suitable people to perform this role. Are there enough existing FAS advisors capable of delivering this? Remember
 - Years of recession have led to downsizing and diversification of effort by farm advisors.
 - Many have retired/ changed career.
 - Teagasc involvement appears unlikely.
- What level of training and support is required to bring advisors up to the level required. A one or two day CPD seminar is not going to be adequate.
- Will this work be attractive to advisors compared to the production of GLAS applications, participation in knowledge transfer measures or other work?
- Is there a conflict of interest between being an honest broker facilitating agreement in a commonage and producing GLAS applications on behalf of **some** of the shareholders?
- What level of co-ordination and supervision is required centrally?

Level of Support Required.

- Belief in some quarters that commonage agreements will sort themselves out without guidance or mediation between parties.
- Is that credible?
- Is it compatible with safeguarding an investment of up to €580,000,000?
- Mission Creep; Is there a danger that one could go too far in the other direction and create a system that is unnecessarily complex and dysfunctional?

How Long will it take, How much
will it cost?

If we manage it well, it will take half as long and cost half as much than
it if we manage it badly.

Winston Churchill 1941

In the immortal words
of Roy Keane.

Fail to prepare,
prepare to fail.

