

A submission on the Rural Development Programme for Ireland 2014 – 2020

High Nature Value Farmland Measures

Introduction

The agricultural landscape in Ireland varies greatly from county to county, ranging from the agriculturally improved swards dominating the south and east of the country to large areas of semi-natural vegetation along the western seaboard. This semi-natural farmland is very significant in harbouring numerous habitat types from Annex 1 of the Habitats Directive, ranging from limestone grasslands, wet grasslands, machairs, hay meadows and heaths. These habitats support communities of flora and fauna that depend on the continuation of low-intensity grazing and/or late mowing for their survival. Typical species include the Irish Hare, Curlew, Chough and other ground nesting birds. The farming systems that produce and maintain these habitats and species are of most value for biodiversity conservation within Ireland, a fact that is widely supported by the scientific literature. They have been described as High Nature Value (HNV) farming systems. Within Europe the term High Nature Value (HNV) farming is used to describe broad types of farming that, because of their characteristics, are inherently high in biodiversity. Typically, these are low-intensity farming systems, with a significant presence of semi natural vegetation and a diversity of land cover. Since the 1990s there has been a growing recognition that the conservation of biodiversity in Europe depends on the continuation of these culturally significant farming systems across large areas of the countryside. While this type of farming may not be as productive in terms of food as more intensive farming, it is a key provider of public goods, the delivery of which is to be supported under CAP. In a multifunctional model of agriculture these are high production areas in terms of biodiversity, climate change mitigation, water quality, landscape and cultural heritage and quality food products. Supporting this type of active, low-intensity farming is critical to achieving the RDP priorities in Ireland.

In recent decades, HNV farming systems have been increasingly replaced with more intensive farming systems, and this has had a significant impact on our wildlife and our landscape, both in Ireland and across Europe. In some parts of the country, however, where the potential for intensification is limited and farming is economically marginal, other changes are taking place: some farms are being abandoned, and on many others, it appears that farming practices are changing. The current estimate on the extent of HNV farmland in Ireland by the European Environment Agency indicates an area of approximately 1,154,495 ha equating to 20% of the agricultural area. Improved estimates of the area will be available in the next two years from Teagasc and the Institute of Technology Sligo, who are identifying the distribution and extent of agricultural land of High Nature Value for the Department of Agriculture, Food and the Marine.

Supporting HNV farmland within Ireland Rural Development Policy

One of the three objectives in the European Union's Rural Development Policy post-2013 is the sustainable management of natural resources¹. The achievement of this objective is to be pursued through six Union priorities, including through "restoring, preserving and

¹ Article 4 of the European Commission's Proposal for a Regulation of the European Parliament and of the Council on support for Rural Development by the European Agricultural fund for Rural Development.

enhancing ecosystems dependent on agriculture”², focusing on biodiversity (including Natura 2000 and High Nature Value Farming) and the state of European landscapes. The October 2011 proposal on support for rural development by the European Agricultural Fund for Rural Development (EAFRD) outlines the range of measures available to Member States including agri-environment schemes, thematic sub-programmes, co-operation measures and advisory services. The Commission’s proposal states that Agri-environment schemes are to give specific attention to the additional needs of farming systems that are of high nature value³.

This submission maintains that existing agri-environment measures have not been well targeted towards HNV farming and have taken a “one-size-fits-all approach”. This approach, which is not unique to Ireland, was recently criticised by the European Court of Auditors who called for more targeting of agri-environment payments. The European Commission has accepted that better targeting of agri-environment payments is necessary and is envisaged in the framework of the CAP post-2013.

This submission further maintains that future agri-environment policies and schemes within Ireland’s Rural Development Programme should include measures that are targeted at HNV farming. If done effectively, this will ensure that Ireland will meet its obligations under: the EU 2020 Biodiversity Strategy; commitments under the EAFRD in supporting HNV farming and maintaining its biodiversity value; meeting the objectives of the EU’s Habitats and Birds Directives. It will also contribute to the implementation of the Water Framework and Nitrates Directives. The application of existing knowledge from case studies⁴ from the European Forum on Nature Conservation and Pastoralism, supported by the Heritage Council, and the outcomes of the Teagasc/Sligo IT research will enable the design and implementation of targeted, output-based measures that can either be fitted into a national agri-environment scheme structure or within a thematic sub-programme that targets HNV farmland and the associated farming systems within and outside designated areas. Such a targeted approach will have numerous associated benefits. The sustainable management delivered through this approach will have positive implications for biodiversity, landscape, carbon storage, carbon offsetting against sustainable agricultural intensification in other areas within Ireland, water quality and flood alleviation, all of which will aid the achievement of the proposed RDP priorities. It will also contribute to the sustainability of rural communities in marginal landscapes.

A suitable scheme structure for HNV farming in Ireland.

This submission advocates an outputs-driven agri-environment scheme, as demonstrated successfully by the Burren Farming for Conservation Program (BFCP). Within Europe, the BFCP has been cited as an excellent example of ensuring the sustainable agricultural management of HNV farmland, contributing to the positive management of the Burren landscape; to the cultural heritage; and to improvements in water quality and water use efficiency. The underlying principles of the BFCP can be adapted to suit other HNV farming areas around Ireland within a targeted agri-environment scheme. These principles include:

² Article 5, (4) (a).

³ Paragraph 28, page 17.

⁴ A full list of these is available at the end of this document.

- A payment system based on a field-based assessment of the environmental condition of each eligible field. This will ensure that farmers whose farmland habitats are in the best condition will achieve higher returns. It will also incentivise farmers to improve the 'score' (environmental condition) of the field, with resultant benefits for biodiversity and water quality, and thereby improve the level of payments received.
- Site-enhancement capital works which would be co-funded by the farmer and offer solutions to help improve management and thereby the condition of the habitat. Examples include scrub control, water supply and fencing for stock control.
- Simplified map- and aerial photo-based farm plans with a high level of farmer input;
- Well trained and effective knowledge transfer and advisory support service.

One of the primary weaknesses of previous agri-environment schemes in Ireland in terms of the delivery of benefits for biodiversity and cost-effectiveness is that they have not incorporated the concept of maximising the contribution that farmers can make in managing land for a desired, specified outcome. An outputs-driven scheme ensures farmers whose farmland habitats are in the best condition will achieve higher returns. Within a HNV farmland agri-environment scheme, measures should be designed and advice provided that will encourage the farmer to manage the land in such a way that the integrity of the site is maintained. It should also encourage farmers to adopt management practices that will lead to an improvement in the condition of the farm.

A HNV Agri-environment Scheme

It is proposed that a HNV Agri-environment scheme should be a whole farm scheme that encompasses both the improved and semi-improved land and areas of semi-natural vegetation. The Scheme would comprise two separate tiers:

Tier I: Measures to improve the agri-environment quality of specific features on the farm which would improve the environmental value of all land types on the farm above and beyond cross compliance rules. Examples of options may include hedgerow regeneration, stone wall repair, tree planting, wild bird cover planting, nutrient management options, rare breeds, green cover, management of archaeological monuments, maintenance and conservation of traditional farm buildings would be available under this approach.

Tier II: This HNV Tier can be layered above Tier I, for those farms that meet a set of criteria identifying HNV farmland. On these areas the farmer could avail of a higher level of payment for output based management of semi-natural vegetation. Examples of semi-natural vegetation would include grasslands (species rich dry and species rich wet), heaths (wet and dry), blanket bog and lowland breeding wader sites. Specific measures for target species for example hen harrier, chough, and freshwater pearl mussel would also be included in this Tier.

It is also proposed that payments for Tier I measures would be at a generally lower flat rate of payment due to the lower ecological interest involved.

The scheme should be designed to ensure that the best examples of semi-natural vegetation receive the highest payment and farmers who can improve the condition of the habitat are

rewarded for the benefits provided to biodiversity, water quality etc. A range of options should be available within the scheme to enable this. A Farm Advisory Service should identify factors that cause a field to be allotted a lower score as well as providing advice and guidance to the farmer on methods to overcome these. It should also provide advice on the archaeological and cultural heritage aspects of the farm, which are supported under Tier I. Thus the HNV Tier (Tier II) would consist of:

- a. A payment which reflects the condition of the habitat and entails a financial incentive for farmers to improve the habitat condition.
- b. A costed programme of associated works required to enable sustainable management.
- c. Provision of advice on grazing and associated management options to maintain and improve habitat condition.

This proposal is complementary to the proposed approach for the Irish Uplands that is being submitted to the Department by a wider group of stakeholders, but this HNV proposal can be implemented on a broader scale to support high nature value farming and farmland across the country. Upland areas are a subset of a broader range of HNV farmland types of Ireland which would also include for example the Shannon Callows, the Burren lowlands, semi-natural lowland wet and dry grasslands, off shore islands, the Curragh etc.

If the Department would like to investigate this approach in more detail, we are available to discuss eligibility rules for Tier II; detailed methodologies for calculation of output payments; options for inclusion in a targeted works programme; advisory and knowledge transfer needs; and monitoring requirements.

Articles under proposed EU regulations to incorporate HNV farmland

This submission calls for a targeted agri-environment scheme for HNV farmland. This would be implemented under Article 29 of the proposed EAFRD regulation (see below). Experience shows that agri-environment schemes are far more successful if they are backed up by supporting measures, such as tailored advisory services, investment aids, etc. These measures also need to be designed and targeted specifically for HNV farmland and farming systems. One approach would be to combine a package of measures (agri-environment, advisory services, etc.) within a Sub-programme for HNV farmland, under Article 8 (see below). Alternatively, the same measures could be included in the RDP in an integrated package for HNV farmland, but without using the Article 8 mechanism.

Article 8 allows for the inclusion of thematic sub-programmes within Member States RDPs. Whilst the recent CAP proposals give sub-programme examples such as for young farmers and short supply chains, further communication with the EU indicates that this is not an exhaustive list. Other thematic sub-programmes can be presented by Member States, providing they contribute to the priorities for rural development and a SWOT and ex-ante analysis justifies their selection. Sub-programmes can provide a higher rate of aid to the beneficiaries, although in the proposed EAFRD regulation the higher rates would only apply in certain cases, such as small farms, short supply chains and mountain areas. This Article would allow Ireland to devise a specific programme to meet the requirements of specific

areas through a combination of targeted measures. Examples of areas or species that could be addressed within a targeted HNV sub-programme are:

- The continuation of the BFCP but also incorporating other limestone areas such as the Aran Islands,
- lowland wet grassland and wetland areas (e.g. Leitrim, Shannon Callows),
- management of upland HNV areas (Connemara, Wicklow, Comeraghs, Donegal, West Cork and Kerry etc.) or
- Red Grouse, Golden Eagle, Hen Harrier or the Freshwater Pearl Mussel.

Where a thematic sub-programme is included in the Rural Development Programme, it is possible to designate one or more intermediate bodies, including local authorities, local action groups or non-governmental organisations, to carry out the management and implementation of that strategy.

Article 29, the agri-environment-climate

This Article is available to support HNV farmland through a series of targeted payments and measures within Ireland's Rural Development Programme as detailed above. The advantage of this Article is that it can encompass all the defined HNV farmland in Ireland. Sustainable management of this land will have positive implications for biodiversity, landscape, carbon storage, water quality, flood mitigation and tourism. These outcomes will all contribute to the Rural Development Programme's objectives and priorities.

Additional support measures

The effective implementation of a HNV scheme will require input through suitable Farm advisory services to advise on the agri-environmental management of the habitats and the associated works required. This can be funded through **Article 16**. The advisory support needs to be based on the development of a face-to-face relationship between the farmers and their farm advisor and conservation bodies. The ability to transfer experiences from farm to farm and region to region within Ireland can be funded through **Article 15** through processes like demonstration farms, one to one mentoring, discussion groups, workshops and seminars.

The co-operation measure in **Article 36** offers an innovative way for farmers to work together as groups along with state bodies and/or NGOs to ensure improved management of HNV farmland. Article 36 allows support for drawing up a group management agreement, running costs of the co-operation, direct costs of specific projects and promotional costs. Therefore additional incentives are available for groups to work together to deliver landscape scale management of HNV farmland with associated ecological benefits. Article 36 should be included in the Irish RDP as it can also be used for pilot projects for the development of new practices, processes and technologies in HNV farmland areas, collective approaches to environmental projects and ongoing environmental practices. Best management practices can be investigated and demonstrated with the results disseminated on a wider basis.

Support under **Article 31** Natura 2000 and Water Framework Directive payments can be granted annually and per hectare in order to compensate beneficiaries for costs incurred and income foregone in the areas concerned, related to the implementation of Directives

92/43/EEC, 2009/147/EC and 2000/60/EC and that go beyond GAEC. Whilst this measure is more applicable to Natura 2000 sites, it can include other areas which contribute to the implementation of Article 10 of Directive 92/43/EEC (up to a maximum of 5% of the area designated as Natura 2000 as ecological corridors) or which are included in river basin management plans according to Directive 2000/60/EC. The necessary support measure for Article 31 can be delivered through Article 29 (Agri-environment - climate).

Conclusion

Over recent years there has been a substantial body of international research published in the area of environmental management of farmland⁵. Ireland is now in a position to develop an evidence-based, targeted, efficient and effective adaptive management programme for HNV farmland in Ireland. The RDP 2014-2020 is ideally suited to the delivery of such a programme. Further work will be required to elaborate on the aforementioned proposals and the undersigned are willing to assist with the process to ensure the best possible outcomes.

Signatories to this Submission:

European Forum on Nature Conservation and Pastoralism (Dr Patrick McGurn)

High Nature Value Services Ltd. (Dr. Brendan Dunford)

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ANNEX: LIST OF CASE STUDIES ON HIGH NATURE VALUE FARMING.

Case Studies on High Nature Value Farming on the Aran Islands, North Connemara and the Iveragh Peninsula have been supported by the Heritage Council and undertaken by the European Forum for Nature Conservation and Pastoralism and Institute of Technology Sligo.

These Case Studies are available electronically at:

<http://www.heritagecouncil.ie/fiadhulra/initiatives/high-nature-value-farming/?L=3%252>

and at:

<http://www.efncp.org/projects/hnv-farmland-irish-uplands/>

⁵ For example <http://www.environmentalevidencejournal.org/> and <http://www.conservationevidence.com/> (74 topics, 439 individual studies on farmland conservation alone)