



Reflections on the innovations and lessons from EIP-Agri projects in Ireland

Introduction

In the current RDP, DAFM sets out the rationale for the current crop of EIP-Agri cooperation projects: ‘The approach ..seeks to determine whether ..locally-led approaches... can be scaled-up significantly to address environmental challenges common to a number of distinct areas and habitats and involving disparate groups of farmers’. The Hen Harrier and Freshwater Pearl Mussel EIPs will pilot this approach ‘on a subset of the geographical ranges of both species, with a view to informing the design of new schemes under the next Rural Development Programme’, while the outputs from the locally-led EIPs ‘will be monitored and disseminated with a view to informing the design of new schemes’ in that same upcoming RDP.

EFNCP believes strongly that the value and coherence of EIP groups’ input into the process of developing the next RDP is increased by continuous interaction between the groups – one that allows them to grow to understand and trust each other and to delve into the difficult details of policy. As senior DAFM civil servant Colm Hayes pointed out in the Burren Winterage, there had been no vehicle for such collaboration and knowledge sharing, at least not on an ongoing basis.

Our intention in the Heritage Council-funded HNV Ireland programme is to respond to such gaps. From this summer onwards, we have been organising regular meetings of those EIPs who had responded to earlier requests for information on their innovations, meetings which have now turned into a regular fortnightly event and which we used to help prepare our session in the Burren Winterage EIP Agri symposium.

One approach we could have taken, and the one on which we originally embarked, was to gather together information and then for us to write a synthesis report in which we summarise, generalise and draw out lessons. However, as the year went on, the author became increasingly uncomfortable with this plan; not only was it clear some EIPs were more responsive or were better able to communicate their learnings, but the filtering process just seemed out of kilter with the mutual exchange of the fortnightly meetings.

With this in mind we decided to ask the EIPs a series of detailed questions on their innovations and views on how their activities should ‘inform the next RDP’. We have published this as a separate document where our input has been nothing more than making textual and formatting corrections and prompting for clarification of ambiguous sentences or paragraphs. These fiches should stand alone as a record of the EIP groups’ opinions in their own words.





These reflections hopefully resonate with the opinions of most of the groups most of the time. But the reader should be in no doubt that they are not presented as the opinions of the group. And while they have been discussed in our HNV Ireland team (James Moran, Patrick McGurn and the author), they remain the author's personal opinion as an external observer of the Irish scene and of the EIP-Agri groups in particular.

What follows is not an attempt at a comprehensive overview or synthesis, but rather an attempt to pick out some key issues and some ways they might be rationalised in future policy approaches.

Land eligibility

Unlike some other countries, Ireland has chosen to have a single set of eligibility rules which apply more or less equally to land entered into any of its schemes (BPS, ANC, GLAS...). A significant number of groups found that this resulted in land which was integral to the delivery of public goods, and more specifically of Irish and EU policy objectives, being either beyond the reach of some of the key elements of their project or in effect getting lower aggregate support and so less encouragement to implement beneficial changes to management.

There is no justification for excluding from eligibility land which is of significance for the delivering of policy goals; any anomalies arising should be dealt with through more detailed aspects of the various measures, such as payment rates, thresholds, and so forth.

Adjusting current measures would be possible and worthwhile

While it would be misleading to say that most of the EIP innovations and ways of working could be transferred easily into the current suite of measures and schemes which apply nationally, it would also be a mistake to downplay the lessons which could usefully be transferred.

The groups point out items which could be included in the list of investments fundable through TAMS. They list techniques and technologies which they have developed or have trialled in new environments; innovations which could be disseminated through knowledge transfer mechanisms similar to those in the current RDP.

Last but not least, there are a few actions which could even be transferred into GLAS. The Protecting Pollinators EIP seems confident that its measures can be refined to a point where that could be done. And it is difficult not to see in the way the Low-Input Permanent Pasture option works (counting species, albeit at lowest common denominator level), a vehicle for a least the most basic of a higher tier payment (Caomhnú Árann's approach may show the lead). These are just examples.





Informing the Ecoscheme(s)

Alongside or instead of these adjustments to GLAS, perhaps some of the innovations and approaches could be used in the new Ecoscheme or Ecoschemes? Some of the more basic elements of BRIDE's approach, once again maybe complemented by some innovations from the Aran Islands and from the Pearl Mussel project, would appear at first sight to have quite some promise.

If not GLAS, what?

Local adaptedness

Something which struck the author hard when discussing roll-out of best practice with the EIP groups is how little of it is seen as deliverable independent of a dedicated delivery staff of some kind. Perhaps the 'simplest' environments in the suite of EIPs in terms of targets are the improved grassland dominated landscapes of the BRIDE project and Farming Rathcroghan (with its archaeological primary focus), but both projects are adamant that a local team expert in the work and invested in the results are key to success. So it seems clear that from the EIP projects' perspective, 'informing the RDP' for the most part implies designing a measure which is fundamentally different from GLAS and its predecessors in terms of the relationship between the State as promoter and implementer of the measure, advisors as assistants and interlocutors of the farmers and the farmers themselves.

BRIDE (and other projects) also stresses the local identity of the measure – that is it is a measure specifically addressing farmers in the *Bride* catchment.

Looking at things from the opposite perspective, the author is also struck by how the projects achieve a perception of local adaptedness, even when many of their characteristics appear quite incongruous to a casual observer. Both the Hen Harrier and Pearl Mussel projects are large projects covering hundreds, even thousands, of farmers; both cover widely separated and otherwise unconnected areas of the country. Yet both seem to have achieved a high degree of local buy-in, perhaps even ownership.

Similarly, while no project has exactly the same components, the close relationship between their methods is really obvious – the 'family tree' of results-based scorecards, with its roots in the Burren and most of its branches sprouting out of the RBAPS pilot, is the most glaring example. Scorecards which are subtly different (Hen Harrier and Pearl Mussel, for example) could, it seems, work alongside each other or even be combined, with a little effort, without losing effectiveness. So this aspect of local adaptedness is also perhaps overplayed. Indeed, almost all of the projects are happy to say that their approach can be rolled out to larger areas, sometimes explicitly at the very large scale (uplands or all similar peatland catchments in the west of Ireland, for example)





Taking all of this together, it seems that a reasonable case can be made that local adaptedness is as much about

- the measure's suitability locally having been specifically considered and the measure adapted accordingly (or coping with it by having some inherent flexibility designed in)
- the measure having a local branding of some kind
- there being a team responsible for implementing the measure, at least some of which are clearly assigned to the local area

What the project team does

A cynic might see this message from the EIP groups as pure self-interest – protecting their own jobs even when the evidence they themselves put up suggests that some of the key aspects of 'local adaptedness' are possibly overplayed.

The obvious riposte to this is that the approach seems to be effective. Whether on the Burren over 20 years or in the Hen Harrier SPAs over 3, it seems capable of completely changing mindsets in the local farming community – of inducing a 'culture shift', as Colm Hayes put it. An evaluation of the EIP approach which prizes value for money – 'bang for the buck' in terms of policy outcomes – may judge that the case for project implementation teams is open and shut.

Looking in from the outside, the author also sees other factors at play. The implementation teams in the various EIP projects are much more than administrators of an 'agri-environment' measure and capital grant scheme for non-productive investments. They are explainers; they are catalysts; they're enablers, honest brokers, trainers, certifiers and troubleshooters. They tweak the measures and decide on the mix of actions, with that mix changing as circumstances demand.

This is particularly obvious where the projects focus on commonage lands – the Reeks, SUAS and the Blackstairs, to name but three. But it's true to a greater or lesser extent of all the projects. And it's quite clear that it would be true were DAFM to target some other obvious targets – improving the condition of blanket bogs, mitigating the risk of wildfire and dealing with it when it occurs are just two examples.

The locally-focussed project team, able to act flexibly, is not then some incidental benefit of the 'new model' for which Colm Hayes says we now have 'proof of concept', but its single most important core feature.

Redefining 'national'

It seems to the author that a major impediment to building on such lessons – one that seems to apply to the EIPs themselves, to the Department and to wider stakeholders – is the Irish tradition of





RDP 'schemes'. They are generally simple and lacking in subtlety; they are usually uniformly applicable, often across the whole State but sometimes within more narrowly delimited areas; while they often involve advisors (sometimes – another Irish tradition – this is obligatory), those advisors need have little additional training. Local adaptation and the involvement of specialised implementation staff are rare exceptions. The Burren measure, strictly-speaking 'mainstreamed', stands out as a unique exception which only serves to highlight the uniformity of the default approach.

No wonder then that EIP groups, while wanting their methods and innovations to be rolled-out beyond the remaining non-participating farmers in their current locales, seem to struggle to imagine what a 'national' roll-out which remained true to their approaches might look like.

The last RDP, when giving the Operational Groups their mandate, could be read as assuming that the lessons would arise simply in the design of new agri-environment options. Even in the way the Burren and the EIPs have been implemented, the work of the project staff is seen through the eyes of 'administration costs', which should of course by implication then be minimised.

Is the answer in the Cooperation Article itself?

What then if the Department accepts all this? Can the RDP process cope with the challenge? One of the weaknesses of RDPs the EU over is that they are generally lacking in coherence, with measures being too stand-alone, working often ineffectively towards disparate policy goals. They are also difficult to adjust once written.

Most, if not all, of the activities undertaken in the EIP projects could fit under one of the Articles of the Regulation used in the past in Ireland to deliver 'mainstream' schemes – agri-environment, investments in physical assets, knowledge transfer, advisory services, etc..

But saying that is very different from saying that the appropriate design and mix of measures can be made available in each area, for its particular set of national targets and its geographical, social and economic conditions. That would be a considerable challenge even for the current EIP areas; how much more so for places at present outwith an EIP?

It is it becoming increasingly clear that the answer may lie in the Article of the Regulation used just now to deliver EIP-Agri in Ireland, the Cooperation Measure (currently Art. 35).

Think back to the precedent of the Hen Harrier and Freshwater Pearl Mussel. Here were two urgent issues touching on EU and national policy and political concerns, but where the detailed way forward in terms of the mix of measures and their design was far from clear – certainly not clear enough to



be written into the suite of national measures in the RDP. They were ones which required a rapid response, but a response where the design of the solution was part of the action needed – a real chicken and egg situation.

The scope of the Article is not limited to EIP Operational Groups; section 1.a allows it to support any cooperation ‘that contribute[s] to achieving the objectives and priorities of rural development policy’. In effect, it gives Ireland the chance to write and develop some of its RDP measures during the actual lifetime of that RDP, and without having to predict the detailed budgetary implication for a range of measures, and to adapt those packages of actions as things move along, just as the EIP groups have been able to.

Possible Art. 35 implementation models

What might be the core principles of how the EIPs ‘inform the RDP’? They might include:

- **Actions to be as locally adapted as necessary** to deal with the target, recognising all aspects of local conditions. That means they could be very distinctive or exactly the same as 100 miles away.
- BUT, with **opportunities for synthesis taken when available**, if workable and likely to be effective. This could even be at the national scale. Starting assumption: there is no need for a dozen slightly different ways of doing the same thing.
- Irrespective of any shared administrative or technical functions, local delivery should be **locally badged** and delivery should involve a **locally-based and skilled dedicated team**, able if possible to keep adapting in line with local need without the need to amend the RDP itself

Something along these lines can clearly be achieved through a variety of models:

The pure locally-led model

Current EIPs, if they meet a certain threshold of effectiveness and success, are converted somehow into simple cooperation projects with the ‘agri-environment payment’ element also remaining within that project. The gaps in terms of targets or geographical areas would need to be filled by more cooperation projects, perhaps going through an initial EIP stage. To the author, this seems needlessly messy and long-winded for little if any extra gain.

The expansion model

Maybe the current locally-led EIPs could merely be expanded into similar areas? This would seem eminently doable in at least some cases, but unless very tightly steered, this approach might give the worst of both worlds – insufficient sense of control and adaptedness in the newly-included areas and an over-dependency on existing capacity possibly leading to continued ‘blank’ areas in some parts of the country. It might not contribute much to increasing the coherence of delivery across Ireland.



Expansion of the two large projects is a slightly different matter. They already have experience of operating both locally and across widely-separated areas of the country. Both could expand easily into other areas of significance for their targets. The complication arises from two possible issues

- What about areas which are insignificant for those particular targets?
- What about the locally-led EIPs? If they have important work to be continued and maybe extended, how does that fit in with the enlarged larger projects?

Taken together this approach might result in areas (Kerry, Connemara...) which are a hive of activity and others which will seem completely abandoned.

Replicating the Hen Harrier/Pearl Mussel model

An alternative model might be to repeat the approach taken for the Hen Harrier and Pearl Mussel, i.e. for the Department to identify a new target and to issue a call or calls for projects which take a similar approach combining the national and the local. At a minimum, this could be made available in places outwith any current EIP area. For a quick win, this would seem an obvious way forward. It would be good however to have some plan on how integration and simplification could happen down the line. It would also be the case that it would be unworkable to have separate measures for each possible target; some 'lumping' would be prudent, raising the possibility incorporating both the Hen Harrier and Pearl Mussel measures down the track.

Integrating agri-environment separately?

One possible way forward which might be explored is whether the results-based agri-environment aspects of the EIPs could be integrated nationally, leaving all the other actions (and maybe some regionally specific AE options, as well as the administration of the AE measure itself) to be integrated at a more local level.

This in effect is the French approach, as implemented in Auvergne-Rhône-Alpes. There are national agri-environmental measures, complemented by locally integrated other actions, including supporting the implementation of AE by collectives (grazier associations in particular).

In the Irish case, it appears as if a basic integration of approaches to rough grazings and other semi-natural land covers is possible on the one hand, and a coming together of other approaches for semi-improved and improved grassland and arable land on the other. These approaches are to a significant extent, but not exclusively, results-based. Exploring the practicalities of such a package of fully-integrated AE options (note that they would have to be packages, not just single AE options) is something which should be initiated immediately, with a view to reporting in good time for possible inclusion in the next RDP.



It is very important to make it clear here that we are talking here about the measures themselves, not their implementation on the ground.

Art. 35 for AE delivery within a complementary package of actions

Were the basics of AE to be made available nationally, Art. 35 would then 'freed up' to address local needs, with local Art. 35 projects including both delivery of the AE measure and of all the other things EIP groups have shown is necessary to ensure progress towards the various policy objectives Government would have recognised in its call for proposals – a call which might also specify the scale or even location of cooperation projects. Applicants might expect to have to demonstrate local buy-in from existing EIPs.

As in SE France, the selected applicant would receive immediate support and guidance from Government; the cooperation projects would be seen not as interesting experiments, but as the cornerstone of delivery of national policy goals; Government would be a full and active partner and enabler throughout.

As with the EIPs, the next step would be the researching and writing of an Action Plan which sets out the needs of the locale and the actions needed to fulfil those needs, budget, timeframes etc.. Those actions would use existing 'mainstream' measures where appropriate, but be free to supplement them if necessary for effective delivery of outcomes. Being Art. 35 projects, those actions and the balance between them wouldn't need to be fixed; they could innovate, but wouldn't have to unless the situation demanded it at that particular time – they would be flexible and adaptable in everything programmed under Art. 35, i.e., everything except the core AE measure itself.

Possible plan of action

- 1) Set out a roadmap for moving from the current situation to one in which the whole country has available a new package of AE measures with a large results-based component; a measure which combines both green land and semi-natural options in a whole farm way, and whose delivery involves staff working for a suite of local cooperation projects whose strategies set of a locally-tailored range of methods by which to deliver the State's range of environmental objectives. The roadmap should set out clearly how and when this national framework should take over from current (and any future) EIP projects. It should clearly recognise and address the need to build capacity to design and deliver such cooperation projects and set out a realistic timetable for doing so. It should be clear about the interaction with current national measures and how this would change over time.
- 2) Initiate the design of a package of AE options for 'green land'. This might be done through a targeted EIP call (à la Hen Harrier/Pearl Mussel), with implementation through local teams mandatory. The call should identify as a priority the need to integrate and develop best



practice from all the relevant projects and initiatives, naming ones seen as being of particular relevance. The project should include a large training element designed to produce at least the team leaders for the local green-land focussed cooperation projects which would inter alia deliver the measure once it was mainstreamed. The project should be a public-private partnership to deliver the State's objectives; all the State bodies responsible for those objectives should be full and active participants in the process to a much greater extent than has been the case with the EIPs.

- 3) Initiate the design of a package of AE options for semi-natural farmland. The latter might be done in a number of ways, recognising and making best use of the much larger body of experience, geographical coverage and farmer buy-in the existing EIP groups working in HNV farmland areas (and on the Burren). A desk exercise would maybe be preferable as at least the first step to a new call for a HNV farmland EIP which makes payments to farmers, to make the most of the potential for synthesis and to avoid the wasted effort of yet another reinvention of the wheel. A short trial period might be appropriate thereafter. Having said that, short-term, limited scope EIPs dealing with issues which have proved particularly intractable thus far might prove useful - fire risk management springs to mind as one such issue. As with the green land, the priorities would be a) finalising a package of AE options to cover the spectrum of targets and conditions likely to be encountered and b) training the potential leaders of the subsequent local cooperation projects. And as with green land, the need for a new role for State bodies in the process cannot be overstated – NPWS, Coillte, Fire Services, etc., as appropriate to the objectives.
- 4) At some point after 2) and 3), but well before full roll-out, initiate a call for tenders for cooperation groups to implement the measures designed in 2) and 3) and to locate them within the larger package of actions needed for effective delivery. This step is if anything more important than the AE measure design – this is when the cooperation partners identify all the local needs, essential to effective delivery not of the *measure* but of the State's *objectives*. State actors, often laggardly or passive thus far, would need to be particularly proactive and engaged at this stage. Even when the projects are in place, staged transition from existing measures should be the aim.

Concluding remarks

These reflections are not intended as a blueprint for action; they are meant to stimulate discussion and prompt the initiation of preparatory work, and the sooner that happens the better. This work should as a key task consider seriously the mechanism and timing of transition out of the current EIP projects – something which, if done in an ill-considered way could easily result in the loss of much of the progress made.



One thing is clear though – Ireland should if possible clear its mind. The old way of doing things is not the only way out there; it's quite possibly not a very effective way. If learning the lessons of the EIPs means trying to tinker with specific options within existing measures and delivery models, possibly the greatest lesson of all will have gone unlearnt.

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