



IRISH
NATURA & HILL FARMERS
ASSOCIATION (INHFA)

Delivering for Suckler and Sheep Farmers
www.Inhfa.ie



**Submission from the
Irish Natura & Hill Farmers
Association**

**on the proposed
Agri-Environment Results Based
Pilot Project
February 26, 2021**

The Square, Tubbercurry, Co Sligo.
www.inhfa.ie
email: info@inhfa.ie
Tel: 0719302715 / 0879330793



Submission from the Irish Natura & Hill Farmers Association on the proposed Agri-Environment Results Based Pilot Project

Introduction

In our assessment of the Consultation document there were aspects we found vague, for example; what is a 'whole field' approach and how results are scored? On this basis, we believe that more detail is needed on how the reward structure will work with due consideration given to rewarding existing good practice.

In relation to opportunity foregone, consideration must be given to those farmers whose activities have already been restricted by the imposition of designations. Notwithstanding this, we welcome aspects of the proposal such as recognition and valuing of existing habitats, the emphasis on better education for both the farmer and DAFM personnel and the willingness to create a fair market for environmental services.

Position

Our environment is under threat. Our farming population is under threat. We are in danger of losing arguably the more environmentally benign extensive farmer to an increasingly large-scale intensive form of agriculture. This will bring further pressure on our environment and culture. Protection of the environment is restrictive and takes much work, if Irish and European governments wish to embed real environmental protection they must engage in a fair transaction with farmers and reward this work properly.

Scheme Access

The reference to "Target Lands" in the Public Consultation Document is totally unacceptable to the INHFA. Selecting lands with only "potential for environmental improvement" is totally unacceptable and discriminates against farmers who are already delivering for the environment. A farmer cannot be left to the mercy and expense of preparing an application that may fail because the selection process was not clearly set out in advance. Any selection process has got to be documented in the Terms and Conditions and selection cannot be left to be subjective efforts of Department officials after applications are received.

The scheme must cater for all farming types unlike what happened in the current GLAS where farmers on private hill land and many farming high nature value farmland had insufficient measures available to receive a meaningful payment. These farmers were and currently are delivering in terms of high environmental output which must be recognised and rewarded.

While this scheme should be available to all farmers there needs to be a basic entry requirement. This baseline should require all farmers to not exceed the Nitrates threshold of 170kg/ha on the date of application. Through the duration of the Pilot if a farmer breaches this threshold then they should be expelled from the scheme with all payments made to him/her recovered.



Scheme Details

Any scheme that is open to all farmers will require a variety of approaches that can deliver for our environment and the farmer. While this Pilot is clearly aimed at intensive farming systems it can't ignore low input farming systems that have always delivered for our environment. On this basis we are recommending the following:

Assessing & Rewarding Existing Farmland Habitats

In the discussion document, it is proposed that a full assessment of participating farms will be carried out on each field area. Firstly, there is a change in the language required here from field to LIPIS plot area and while we welcome the proposal to carry out this assessment in order to quantify the habitat status and other relevant features such as trees and hedgerow, it is vital that any baseline payment reflects the current status.

With regard to a payment model where a farm may score low on a scorecard system they would need to have adequate measures available which would be paid for and help increase their overall score. As their score increases, payment for measures reduce.

Any habitat scorecard will need to reflect the habitat status for all wildlife (including bees). However, in developing this scorecard farmers can only be held accountable for the habitat status and not the bird or animal population which could be impacted by factors outside their control e.g. migration, predation etc.

On hill areas; the habitat scorecard should recognise heather at various stages which delivers in terms of red grouse habitat and for bees (heather honey).

Finally, in the development and support of any of these habitats it is vital that all of these areas remain eligible for payments under our Pillar 1 Schemes and the ANC Scheme in Pillar 2.

Developing New Habitats & Supporting Biodiversity

As our understanding of farmland habitats develops, there is a need to support farmers in the development of additional habitats. On this basis, we are recommending the following:

Commonage and Hill Options

- On hill systems; to operate a ewe lamb replacement policy that selects ewe lambs with a view to target grazing particular areas. This could be tailored to manage their natural hefting instinct.
- Target grazing with traditional cattle on hill systems.



- Predator Control: Farmers to be trained to undertake predator control.eg Wild Mink, Grey Crows etc.
- Management of invasive species such as gorse, rhododendron, wild rhubarb, ferns.

General Options

- Pollinator Strips & wildflower meadows to provide for bees and insects.
- The establishment of ponds to support insects and biodiversity. On our uplands these can also help in flood mitigation.
- The use of native trees and hedgerow to screen farmyards and buildings.
- The INHFA have developed a proposal around the centenary commemoration of Irish Independence that involves the planting of native trees to represent current or past members associated with that farm. There is an option to include this here.
- The use of climbing plants on shed walls to reduce the requirement of painting and increase nesting options for small farm yard birds and support bees and flying insects.
- Predator Control: Farmers to be trained to undertake predator control.eg Wild Mink, Grey Crows etc.
- "Fencing Off" of Watercourses: Training to be provided in the management of Fenced Off areas.
- Orchards: To provide a natural food source for organically reared pigs and biodiversity.
- Controlled burning on hill land to nurture habitats conducive to endangered birds such as the Red Grouse. Training on this should also be available to farmers through this Pilot.
- Management of invasive species such as gorse, rhododendron, wild rhubarb, ferns.

Commonage & Natura 2000 Land

In all previous Agri-Environmental Schemes farmers with Natura & Commonage lands got priority access and this must follow here. While these lands have been designated there needs to be a recognition that they are also managed landscapes. Indeed, the management practices carried out by farmers is what created habitats worth designating. Unfortunately, we are now in a situation that these same farmers are no longer trusted with managing these valuable habitats and have seen major restrictions applied (through the 39 ARC's) that have negatively impacted these habitats. A new approach is required here and this Pilot can provide this.

In addition to this, payment rates for Natura land which are currently at €79/ha in GLAS must be substantially increased and paid on every hectare as the restrictions applies on every hectare. In the first REPS the payment rate was €242/ha and a similar rate would indicate the value the State puts on this land.



Private Hill Land

Our hills due to the land type and natural habitats are valuable assets. Unfortunately, in the current GLAS private hill land's that were not designated were effectively excluded. There is an opportunity in this Pilot to correct this mistake. This land which is rich in biodiversity and an excellent carbon store needs to be scored similar to other LIPIS plots and paid accordingly. If additional measures are required similar to those outlined above, then they can also become part of the overall plan.

Commonage Lands

The fact that there was no reference made in the discussion document to commonage lands is a major concern and a point that has been referenced to us by our members in recent days. When developing a Pilot to include commonage farmers it is vital that we learn from the mistakes made in GLAS. While the land is held in common farmers operate on an individual basis. With this in mind, we are recommending the following:

- Access to the Pilot scheme is not dependent on any farmer signing up to a collective agreement or collective responsibility.
- While we accept there will be an overall plan needed for each commonage farmers should be instructed on an individual basis what is required from them.
- Any grazing plan for the commonage should also be on an individual basis with farmers instructed on their min/max figures.
- The measures we have included above could be sufficient for a commonage farmer to deliver real environmental benefits for their commonage farm.

Conclusion

In the Consultation Document it outlined the need to address biodiversity, water quality, soil health, and climate mitigation/adaptation. The majority of the farmers that we represent are already well ahead of most in addressing these issues and it is vital that this is recognised through this Pilot. Failure to do so will send out all the wrong signals.

Against this, we do acknowledge the need to encourage others to do more, but this can't come at the expense of those that have already contributed. A balance must be found that rewards both fairly. We have also indicated that access to this Pilot should only be given to those that are farming at under 170kg/N/Ha. This should be seen as an entry requirement, but if we are serious about addressing water quality, biodiversity, and climate change then there should be a target to reduce this further over the two-year period of the Pilot. A maximum of 120kg/N/ha at the end of the two years is something that can deliver long-term meaningful change.