

CONSULTATION

Response Document



**Public consultation on the draft interventions proposed for
Ireland's CAP Strategic Plan 2023-2027**

(Department of Agriculture, Food and the Marine)

3 September 2021

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Northern Ireland Environment Link
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 260 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by our Ireland Policy Group.

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

General Comments

Proposed Schemes

We strongly support the proposed schemes that offer support for delivering benefits to the environment and ecosystem services such as improved water quality, particularly the objectives seeking to address the climate emergency and biodiversity crisis in line with wider international commitments.

We also welcome proposals to make the Eco-Scheme accessible to all farmers. However, care should be taken that the removal of barriers to entry to the scheme do not result in the results achieved and standards to be met being so low as to be poor value for money in terms of return for biodiversity and the environment. It is important that the scheme is results based and the measures and actions to be met are evidence based and their effectiveness measurable.

Of concern is the fact that actions in the Eco-Scheme need to be deliverable within a 12 month period (and presumably the target effect measurable within that time frame) due to the provision for farmers to opt in or out on an annual basis; the amount of measurable improvement in biodiversity and other environmental parameters that can occur within a 12 month period (or in disjointed 12 month periods with farmers opting in/out annually) is likely to be very low. It is questionable whether some of the examples given could have a measurable significant environmental benefit within a 12 month period (e.g. hedgerow management or reduced chemical nitrogen input). Given that a significant proportion (i.e. 25% of the Pillar 1 budget) of the maximum drawdown available to Ireland for CAP (i.e. a total of €1.186 billion) must go towards this mandatory Eco-Scheme, it is essential that value for money is delivered and that the measures implemented are evidence based.

There must be a clear transition period to prevent discontinuities for farmers currently in agri-environment schemes.

Monitoring and Enforcement

There is currently little detail on how the new schemes with an environmental/biodiversity focus will work in practice and how success will be monitored. The success of any new scheme will rely on the provision of adequate monitoring. The emphasis should be on results-based support and it is important that actions and outcomes are specific and measurable. It is essential that there is follow up and evaluation both on whether actions have been implemented and furthermore have had the intended result. Bodies must be fully funded to deliver this monitoring.

We welcome the shift towards an outcome-based scheme (AECM) from Glas however more detail is needed on how the results will be measured and deemed to have been effective.

The total indicative financial allocation for the EIP scheme intervention is not provided and should be clarified so as to confirm the level of support that CAP will provide in this area. It is also unclear how much focus there will be on supporting High Nature Value farming. Proposals must outline what proportion of High Nature Value farming will be supported and encouraged through CAP and how this will be promoted through the markets.

Minimum standards under conditionality must provide significant benefits for the natural environment and go above standard good agricultural practice if we are to address ongoing declines in biodiversity. We support a proportionate approach to enforcement but regulatory bodies must be adequately funded to deliver monitoring and enforcement actions where needed. Good practice guidance encouraging farmers and land managers to go above and beyond the minimum is also essential to deliver the urgent changes required.

Climate Emergency and the Agri-Sector

In 2017 the European Parliament's Committee on Agriculture and Rural Development reported that Ireland's agricultural output per tonne of greenhouse gas emissions was the worst in the EU. While objective 4 of the DRAFT Needs Assessment Preparations for Ireland's CAP Strategic Plan 2023-2027 recognises the role that agriculture plays in climate change, and identifies the key areas that contribute to emissions including expansion of dairy herds and nitrate derogation, the CAP strategic plan lacks robust proposals for addressing these issues. In order to achieve ambitious reductions in emissions by 2030, bold and widespread change is required in all sectors, including agriculture where practices must be brought in line with commitments to the UN Sustainable Development Goals, the Paris Agreement and the EU Green Deal.

Farmers must be supported through a just transition from carbon and nitrogen dependent farming to food production that is compatible with our legal and policy requirements to significantly reduce carbon and nitrogen emissions. They must also be adequately remunerated for the provision of 'public goods' through participation in the environment-focused schemes. This must be set out clearly to prevent uncertainty for agri-businesses. In this area, the Suckler Carbon Efficiency Programme is welcome, however, it is unclear what contribution this scheme will make towards reducing the agri sector's carbon emissions; more support is needed in this area and the proposals should outline exactly what proportion and level of carbon reduction will be supported and encouraged through CAP.

Forestry and Tree Planting

We welcome recognition that more diversity is needed in forestry and that there is an over reliance on single tree species such as Sitka spruce. The stated objective to *"Increase relatively low level of forest cover, including native and/or broadleaf species"* must be delivered in tandem with the ambition to increase biodiversity, ecosystem resilience and wider public benefits. Any planting should follow the principle of 'the right tree in the right place', i.e. using native species of local provenance where possible and avoiding 'planting up' of key open habitats that are not only important for biodiversity, but may also have a higher carbon capture capacity. Any tree planting programme on existing habitat of conservation value should be subject to an Environmental Impact Assessment.

Woodland expansion can also be achieved through natural regeneration. This can significantly reduce costs, maintain local adaptation to conditions and, in woodlands, create a varied age structure. Consideration will need to be made of the means to financially support natural regeneration through consistent funding and on-going development of the Native Woodland Scheme.

We also welcome recognition of hedgerows as an important national natural resource for biodiversity and climate change, as well as measures to protect and expand this resource with new planting. However, there are very few specifics in the CAP proposals that will implement this and we would welcome clearer objectives to achieve this.

Skills

There is a growing need for training in ecology and environmental management for the benefit of biodiversity in the agri-sector. CIEEM has developed a detailed competency framework and Continued Professional Development for professionals in this area but there is a wider need for training programmes to support young farmers to develop skills and awareness of the challenges posed by the climate emergency and biodiversity crisis. Such training could be provided through the addition of biodiversity modules to the Green Cert.

Farmers must have access to advice that is professional, objective and evidence-based from advisors who are competent to deliver this.

Appropriate Assessment

In developing the Natura Impact Statement, DAFM should be mindful that it is important that the Natura Impact Statement meets the requirements of legislative and established case law, in particular with respect to the following areas:

- identification and detailed assessment of effects on European sites in light of their conservation objectives;
- full assessment of transboundary effects;
- identification of specific mitigation measures which will be effective and proven to address the identified effects on European sites; and
- demonstration of how statutory and non-statutory consultees concerns have been addressed

Currently, the level of information available does not meet the requirements in particular with respect to the identification of specific mitigation measures which will be implemented through CAP to address the identified significant effects on European sites arising from agricultural activities. DAFM will need to ensure that sufficient level of work and assessment is undertaken in this regard.

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