

Submission Form for CAP Post 2020 Consultation

Name: Helen Lawless, Mountaineering Ireland

Farmer or Non Farmer - Non Farmer

Contact email or phone number helen@mountaineering.ie / 01 6251115

Introduction to Mountaineering Ireland's response and key points

As the national representative body for hillwalkers and climbers, Mountaineering Ireland* has a keen interest in the future of Ireland's upland areas. Ireland's mountains and upland areas are largely made up of privately owned land; owned individually or as commonage. The distinctive landscapes of Ireland's upland areas are the product of many centuries of traditional and extensive farming practices. Right up to the summits of our highest mountains, these lands have been influenced by farming activity.

For the majority of the members of Mountaineering Ireland, Ireland's mountains are more than a place to walk and climb. Members have a deep connection with Ireland's mountains and upland areas, and respect for the people who own the land and others who live and work there. Mountaineering Ireland members want to continue to enjoy these places responsibly and they want others to have the opportunity to do likewise.

Mountaineering Ireland's vision for the future of Ireland's mountains and upland areas is:

That Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

- Mountaineering Ireland believes there is need for greater policy support and investment in Ireland's uplands, with the aim of achieving a positive and sustainable future for these important areas.
- Farmers play a vital role as managers of ecosystems, habitats and landscapes, particularly in the mountains and areas of (High Nature Value (HNV) land; Mountaineering Ireland believes there is a strong argument for re-focusing farm payment schemes towards rewarding hill farmers for delivering a sustainably managed environment, on the basis of the public good this provides.
- The development of locally-led, results-based, agri-environment programmes under the European Innovation Partnerships is a welcome initiative. It is important that the EIPs commencing now in upland areas are actively supported and that learning is captured to enable wider roll-out of this model.
- It is the position of Mountaineering Ireland that statutory bodies in Ireland must explicitly acknowledge outdoor recreation as a recognised and accepted land use, and that the provision of this ecosystem service and public good should be reflected in CAP payments.

- Mountaineering Ireland urges the Department of Agriculture, Food and Marine to actively engage with the members of Comhairle na Tuaithe**, the national body with responsibility for outdoor recreation, to access the embodied wisdom of its members, but also to maximise stakeholder consensus when it comes to how CAP post 2020 achieves the best balance for Ireland in the delivery of environmental and societal benefits.

**Mountaineering Ireland is the representative body for hillwalkers and climbers on the island of Ireland. Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both Sport Ireland and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 12,500 members, comprising 184 clubs and approximately 1570 individual members (December 2017).*

***Comhairle na Tuaithe was formed in 2004 under the Department of Community, Rural & Gaeltacht Affairs, it is now within the Department of Rural & Community Development.*

The questions below are to provoke thinking. There may of course be other questions you consider more relevant and we would welcome your input on those as well.

1. Simplification:

How can the CAP be simplified for beneficiaries and administrators, while maintaining an appropriate balance in terms of public accountability and value for money for EU taxpayer's funds?

The case for targeting payments towards ecosystem services

Mountaineering Ireland welcomes the proposed move from a one-size-fits-all approach to a tailor-made approach at Member State level, with actual needs on the ground reflected in a CAP strategic plan for Ireland.

Ireland's CAP strategic plan should be structured in a way that recognises that much of Ireland's farmland is not productive in the conventional sense, but that such land, which is often in upland areas where natural constraints prevent intensification, is highly productive in terms of the ecosystem services or public goods that it provides.

Proposals primarily focused on upland areas:

1. Address conflicts between EU agricultural, environmental and social policies

Land eligibility

The structure of payments and the rules in relation to land eligibility should be examined from an ecological perspective to ensure there is not an incentive to destroy areas of environmental value. The clearance, drainage and re-seeding visible in upland areas over recent years was clear evidence of conflict between EU agricultural policy and environmental policy.

Fencing in the uplands

Mountaineering Ireland acknowledges the right of farmers to erect fences for agricultural purposes, however members have reported an upsurge in fencing in upland areas, some of which we understand to have been erected with grant aid, to draw down area-based payments. The fencing of traditionally open high areas of rough grazing detracts from the quality of the upland landscape and presents a barrier to recreational users. In some cases tracks have been bulldozed up hillsides to facilitate the erection of fencing, further diminishing the ecosystem services potential of the land.

In December 2013 Minister Simon Coveney announced that fencing is not required on hill land which was previously unfenced and which continues to be actively farmed in the traditional manner (KildareStreet.com, 3rd December 2013). Ireland's CAP strategic plan should not require or incentivise the fencing of mountain land. Where upland fencing is necessary for agricultural purposes, and planning permission is granted, it should be a condition of approval that stiles are included at appropriate points; this will help prevent damage to fences by people walking the hills. Landowners within the Mountain Access Areas currently being developed through Comhairle na Tuaithe will be indemnified for any claims that may arise in relation to recreational activity on their land.

Loss of payment due to trails

Landowners who permit the development of trails on their land, or who allow informal recreation activity which results in the development of paths with the loss of vegetation, currently lose payments for the area that is affected. It is unfair that landowners should be penalised for facilitating an activity which provides social benefit.

2. Move towards an outcomes based approach

In addition to supporting hillwalking and other recreational activities, Ireland's upland areas provide multiple benefits to everybody in society including carbon storage, water supply, scenic landscapes and biodiversity. Mountaineering Ireland believes there is a strong case for re-focusing farm payment schemes towards rewarding hill farmers for delivering a sustainably managed environment, on the basis of the public good or ecosystem services this provides.

Mechanisms are required to measure and reward this public good. The recent development of locally-led, results-based, agri-environment programmes under the European Innovation Partnership initiative provides a relevant starting point. The CAP strategic plan should seek to actively support and learn from the Hen Harrier Programme and the EIPs commencing now in three other upland areas – the Wicklow Mountains, the Blackstairs and the MacGillycuddy Reeks. Building on the Burren model (www.burrenprogramme.com) these EIPs aim for flexibility and simplicity at beneficiary level.

Ecosystem outcomes should be determined for land parcels (or for the full farm) and where possible aligned between neighbouring farms, or across a commonage area, where there is similar habitat so as to achieve better outcomes. The outcomes should be primarily based on the natural capital, ecosystem services and public goods that can be delivered by the land parcel. Outcomes should be progressive over the lifetime of the next CAP or on a five-year basis so that there is scope for better environmental management to result in increased payment levels.

Farmer engagement could be enhanced through a higher degree of self-reporting on agreed metrics

that indicate successful movement towards the 'landscape' outcomes, through a user-friendly digital platform.

3. Recreation should be included in the metrics for outcomes based payments

It is the firm position of Mountaineering Ireland that statutory bodies in Ireland must explicitly acknowledge outdoor recreation as a recognised and accepted land use, and that the provision of this ecosystem service and public good should be reflected in CAP payments. There should be a mechanism for farmers who can provide evidence of pedestrian recreational activity on their land to include this at application stage so that it can be factored into an outcomes-based payment for ecosystem services. Recreation is recognised as an ecosystem service within the cultural ecosystem services category, (see <https://www.npws.ie/sites/default/files/publications/pdf/IWM95.pdf>).

4. The positivity of an outcomes-based approach

In terms of ensuring value for EU and Irish taxpayers' funds, the current GAEC arrangements assume compliance and then impose penalties where breaches are found. Even though the thresholds for GAEC are not particularly high, it is considered by many as turning what was just sensible good practice (not burning waste, preventing soil erosion and avoiding water pollution etc) into an obstructive hurdle that can be avoided if no one is looking. An outcomes-based model would usefully give progressive payments upon evidence of good practice towards agreed targets and turn these targets into positive aspirations (e.g. return of salmonid fish to streams; increase in biotic scores of watercourses; increase in breeding pairs of upland birds; increase in ground cover of desired vegetation).

5. Improve public understanding of CAP

The disconnect between the public understanding of what their taxes are paying for and the benefits the public gets from a properly functioning CAP should be addressed through education and public awareness initiatives focusing on ecosystem services. This in turn should increase respect for farmers and farming in upland areas, and also strengthen the pride of hillfarmers in their work and their land.

2. Direct Payments

Having regard to both the Food wise 2025 and the CAP ambition to support economic development and employment creation, particularly in rural areas, what are your views on potential proposals to target direct payments differently?

Due to the constraints imposed by the mountain landscape, including the lower productivity of the land, farmers in upland areas have limited capacity to generate income from their land by producing and selling food. Consequently there is a high dependence on direct payments, and also a decline in the number of farmers with hill land who are actively farming.

As stated under question 1, Mountaineering Ireland believes there is potential for future farm payment schemes to reward hill farmers based on the quality of the environment and the benefits their land provides for society. This seems to align with CAP objectives related to environmental protection and climate action.

Based on the options outlined in the CAP communication, the model described above seems closest to *'Enhanced focus on a redistributive payment in order to be able to provide support in a targeted manner e.g. to small-medium sized farms'*. However it is Mountaineering Ireland's position that payments in uplands should increasingly be related to the ecosystem services provided by the farm, including opportunities for pedestrian recreation activities.

3. The Environment

What do you believe should be the environmental priorities under the next CAP?

Bearing these priorities in mind and considering Ireland's ambition for the sustainable development of the food sector, how should pillar I (direct payments) and pillar II (rural development) combine with private sector funding post 2020, to help the sector contribute to National climate change obligations and increase its contribution to water quality and biodiversity?

Mountaineering Ireland's vision is that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

Mountaineering Ireland believes there is need for greater policy support and investment in Ireland's uplands, with the aim of achieving a positive and sustainable future for these important areas.

Farmers play a vital role as managers of ecosystems, habitats and landscapes, particularly in the mountains and areas of HNV land. However, there is a need to target funding towards these areas and to relate funding to outcomes. This will help build resilience into the landscape to counter extreme weather events, and to support future generations. The ways in which better landscape management in upland areas can contribute to national climate change obligations include:

1. Carbon storage

Peat soils cover 20.6% of Ireland's land area, with the greater part of this in the form of blanket bog in upland areas (Renou-Wilson *et al*, 2011, p.xi). Peatlands contain a fascinating biodiversity and they hold great value for archaeologists, but one of the strongest reasons to look after Ireland's blanket bogs is because they are a huge carbon store and have an important function in controlling the greenhouse gases that cause climate change. This function is reversed (i.e. carbon is released back into the atmosphere) when the peatland is damaged through drainage, cutting or burning.

The peaty soils which predominate in Ireland's upland areas are often thin and fragile, and at risk of being lost through changes in land use, erosion and overgrazing. As it has taken thousands of years for Ireland's peaty soils to form they are effectively non-renewable and must be protected.

2. Flood mitigation

Flood mitigation is one of the ecosystem services that can be provided through better management of upland habitats. Upland habitats in favourable condition have greater capacity for absorption of rainfall, thus slowing the flow of water to areas downstream (O'Meara, 2015). Improved habitat condition could be achieved by incentivising landowners to maintain appropriate grazing levels, through peatland restoration projects, minimal drainage of wetland areas, and by planting small woodlands of native species such as birch, alder and willow in the uplands.

3. Water supply

Most of Ireland's drinking water (81.9%) comes from surface water, i.e. rivers and lakes, which in turn have their origin in upland areas (DECLG, 2012). These small streams and rivers make up 77% of Ireland's river network, and due to a low level of dilution they are extremely susceptible to pollution (WRBD, 2007). The condition of the natural environment in the catchment around these upland streams and rivers has a direct bearing on the quality of this water and therefore also the cost to treat it.

Pillar I and Pillar II

In Ireland the balance between Pillar I and Pillar II of CAP should shift to reflect the European Commission's increased focus on environmental protection, climate action and sustainable development, with a greater proportion of funding going to Pillar II.

Afforestation

Afforestation to reduce emissions should not be at the expense of peat soils or undeveloped landscape, both of which hold valuable natural capital and provide ecosystem services which would be diminished through planting.

The references included above can be found in Mountaineering Ireland's vision for the future of Ireland's mountains and upland areas:

http://www.mountaineering.ie/files/2017619123028_28d4fe41.pdf.

4. Risk Management

What sort of risk management measures for primary producers should be considered under the next CAP and how should they complement current EU measures such as intervention, Aids to Private Storage and Exceptional Measures ?

Outcomes-based approach

An outcomes-based payment should be less vulnerable to price fluctuation than a market-based income, thus provided greater stability for low income farmers and possibly averting land abandonment.

5. Young Farmer Supports

How should the CAP encourage young people into farming, the exit of the older generation and facilitate succession planning

Shepherding

The potential for younger farmers to be paid for shepherding on behalf of multiple commonage shareholders provides an excellent route into hillfarming as well as enhanced environmental management through managed grazing. A payment for shepherding is proposed as part of the EIP project in the Wicklow Mountains.

6. Research, Innovation, Technology Transfer

How can the CAP be used to build a smarter agriculture, and to translate research outcomes into real technology adoption that contributes to improved margins, greater resilience and better environmental impact on farm?

What role should vehicles like advisory services and producer organisations play?

Research needs

It is an extremely complex process to achieve appropriate and sustainable grazing levels in a diverse upland environment, furthermore every mountain has different ecological characteristics. More research is needed to assist the development of outcomes-based agri-environment schemes for the uplands. This should include research on the ecosystem services delivered through positive upland management.

Advisory services

It is vital that sufficient, skilled advisory support is available to ensure the upland EIPs are successful and to assist them in developing a model which could be rolled out in other upland areas post-2020. This will require input from upland ecologists and relevant CPD training for existing advisors.

Knowledge transfer

The upland EIP projects should be monitored to capture learning and regular knowledge transfer events should take place to promote this outcomes-based model to other areas.

These events should also be used as opportunities to build understanding of the value of Ireland's upland environment amongst farmers and farm advisors.

7. On Farm Investment

What should the on farm investment priorities be in the next CAP and how can financial instruments (or loans) play a role?

Support for farm diversification could assist hillfarmers to remain actively farming. Positive examples of hillfarmers who have diversified include Joe Joyce at Lough Nafoeey, Co, Mayo (<https://www.facebook.com/Independent.ie/posts/10155663995588470>) and Bridget and Stephen Ryan at King's Yard in the Galtee Mountains (<http://www.exploretipperary.ie/activities-adventure/kings-yard>).

8. Strengthening the socio-economic fabric of rural areas

How can the CAP complement other European Structural and Investment Funds and the Government's Action Plan for Rural Development to support the social and economic development of rural communities, including through the development of new value chains such as clean energy, the emerging bio-economy, the circular economy or rural tourism?

Facilitating recreational access is a vital cog in the attractiveness of rural areas to visitors, and therefore important to the economic and social activity of the area. Business from walkers at the weekend could be enough to keep a shop or pub open, thereby benefiting the community as a whole. The inclusion of recreation within an outcomes-based ecosystem services payment has the potential to deliver multiple benefits.

9. Health, Nutrition, Food Waste and Animal Welfare

Can the focus of the CAP in these areas be sharpened, and can it complement other measures in emerging areas of concern such as food waste or anti-microbial resistance and if so how?

Reasonable controls on farm-based food production – e.g. food safety regulations seem more relaxed in mountain areas throughout Europe, which in turn improves the availability of artisan food products in mountain areas.

10. Position of the Farmers in the Supply Chain

Can the CAP post 2020 do more to complement other measures to strengthen the position of farmers in the supply chain and if so how?

11. Any Other Information

As agriculture is the primary land use across most of Ireland's mountains and upland areas farm payment schemes will play a pivotal role in shaping the future of these areas.

The current CAP reform process is something which Mountaineering Ireland will give more consideration to, and it is our intention to make further submissions in relation to the development of the next programme.

Thank you for taking the time to make a submission. It should be sent by email to cap_post2020@agriculture.gov.ie or by post to EU Division, Department of Agriculture, Food and the Marine, Floor 6 Centre, Agriculture House, Kildare Street, Dublin 2, marked "Submission on CAP post 2020". **The deadline for receipt of submissions is 23rd March 2018.**

Please note your submission may be subject to a Freedom of Information request.