

National Uplands Working Group & Wider Consultation Group



Submission on Rural Development Programme for Ireland (2014-2020)

16th January 2013

Future National Upland Rural Development Measures

Submission to Department of Agriculture Food & Marine

Background to Submission

A range of stakeholders, including farming organisations, environmental organisations and government bodies involved in agriculture and nature conservation attended a workshop on the 9th October 2012 to determine the best way to support appropriate and sustainable farming in the Uplands under the next Rural Development Programme (RDP). The workshop arose out of the ongoing work of various bodies to build a shared vision for the sustainable future of Ireland's upland areas and to do so through partnership building. One outcome of the workshop was the formation of a National Uplands Working Group, and a wider Consultation Group, to develop a suite of measures that could be incorporated into the next RDP.

Contributing Organisations

The following bodies: Irish Farmers Association; Irish Cattle and Sheep Farmers' Association; Irish Creamery Milk Suppliers Association; Department of Arts, Heritage and the Gaeltacht (National Parks and Wildlife Service); Department of Environment, Community and Local Government; Teagasc; The Heritage Council; European Forum on Nature Conservation and Pastoralism; Burren Farming for Conservation Programme; BirdWatch Ireland; Irish Peatland Conservation Council; Irish Uplands Forum; Wicklow Uplands Council; Mountaineering Ireland; Golden Eagle Trust; National Association of Regional Game Councils; Wicklow Cheviot Sheep Owners Association; Irish Landowners Organisation; Institute of Technology Sligo (Department of Environmental Science); Vincent Wildlife Trust and South Kerry Development Partnership, are party to this submission and are represented on the National Uplands Consultation Group.

The group now wishes to make the following submission for the inclusion of specific measures which will help address the issues faced in Upland areas in the Rural Development Programme for Ireland (2014-2020). The submission concentrates on a targeted agri-environment measure under Article 29 and incorporates associated Articles 15, 16 and 36. Article 31 (Natura 2000 and Water Framework Directive payments) and Article 32 - 33 (Payments to areas facing natural or other specific constraints) are also very relevant to the uplands. The submission is an initial version of the full submission. The National Uplands Working Group is hopeful it will be afforded the opportunity to unpack the full submission in due course.

The Importance of Ireland's Uplands & Key Issues

The Irish uplands have very special significance for Irish society. They are a high quality, living, lived-in farmed landscape. They are a rich tapestry of heritage and biodiversity and are a critically important component of the Irish make-up. The uplands are the place of work of farmers and foresters, and a place of recreation and community well-being for society in general. They are a distinct landscape type in an Irish context. There now exists an urgent need for a specific suite of measures to address the crisis in upland farming and to support rural communities in Ireland's upland areas. Some of the key issues facing the Irish uplands include:

- Low average farm income, with a disproportionately high dependency on direct farm payments among the upland farmers. In many upland farm households, the age profile is skewed to more elderly farmers, with poor, or no, succession plans in place and limited interest by younger farmers to take on traditional upland farm practices.
- In recent years, upland farming has been shaped by off-farm employment, SAC designations and the requirements of agri-environmental schemes which, for the most part, have not taken account of local land conditions, resulting in a farming system where traditional farm practices and skills have been lost and where land abandonment is on the increase.
- Overgrazing and Undergrazing - destocking has led to a significant decline in livestock numbers grazing upland areas. While certain upland areas, negatively impacted by overgrazing in the past, continue to be a problem, undergrazing has now emerged as major concern in several upland areas.
- Purple moor grass (*Molinia*), traditionally grazed by the cattle, is now becoming dominant in some upland areas leading to a denigration of floristic biodiversity of upland areas and increasing the risk of fire. In the east there has been a decline in heather burning management leading to a change in vegetation structure and an increase in the risk of uncontrolled burns.

- There is also an increasing problem of erosion of track-ways and paths on certain upland areas due to recreational activity and problems such as scrub encroachment (including bracken) and the spread of invasives (*Rhododendron* and *Gunnera*)
- Upland landscapes have considerable cultural value and possess a long legacy of human settlement. In earlier times these areas were extensively farmed and were also exploited for their mineral wealth and woodland resources. This has created a rich legacy of monuments such as hilltop cairns, ancient field systems, hut sites and enclosures as well as particular types of vernacular architecture. The preservation of archaeological upland complexes has been due to extensive traditional farming practices and the continued survival of such practices is essential for the preservation and visibility of much upland archaeology. To date the State's programmes of archaeological mapping and recording have not sufficiently surveyed upland areas and more intensive surveys are only beginning to understand and reveal the scale of this resource. Agri-environment measures which assist in the preservation and visibility of this valuable resource are urgently required

Farming in Ireland's uplands is principally responsible for the rich biodiversity to be found in the hills and incorporates a large proportion of Ireland's High Nature Value (HNV) farmland. It needs to be supported and encouraged. The proposals outlined hereunder are specifically designed to offer such support. In a wider context, there is an urgent need for a holistic and area-based approach to support upland areas, with a clearer integration of policies across government departments, agencies, authorities and interest groups. Policy measures, legislation and local supports should be focused on maintaining communities, supporting upland farming practices and conserving upland landscapes.

Future National Upland Rural Development Measures

The next RDP must include specific measures to meet the requirements of Ireland's upland areas. The measures should be targeted at upland farmers who commit to managing land that has a high percentage of semi-natural vegetation. The semi-natural vegetation will include dry heath, wet heath, blanket bog, upland acid grasslands, species-rich *Nardus* grasslands, *Molinia* meadows, montane heaths, montane grasslands and other habitat types associated with extensive upland systems. The nature of Ireland's Atlantic climate means that "upland" vegetation can occur down to sea level, therefore character of the land and not altitude could define eligibility.

National Upland Rural Development Measures are vital for Ireland to meet requirements under the European Agricultural Fund for Rural Development (EAFRD) as they contribute directly to:

- **The competitiveness of agriculture;**
Based on figures for the Single Farm Payment scheme, the counties with the lowest average per hectare payment are Donegal, Leitrim, Mayo, Kerry, Sligo and Galway. These are counties which contain the greatest extent of Irish Uplands. Specific upland Rural Development measures will start to address this imbalance and will thus help maintain agricultural production in areas with specific natural constraints where there is risk of land abandonment
- **The sustainable management of natural resources, and climate action;**
The Irish uplands incorporate a large area of the country's semi-natural vegetation and also encompass a substantial proportion of designated Natura 2000 sites. Past agricultural policies have resulted in negative impacts through overgrazing, whilst the decoupling associated with the present agricultural policy is leading to abandonment. The net result is that significant areas of Ireland's uplands are not in favourable conservation status due to the dual forces of abandonment and intensification. A new approach is therefore required to meet Ireland's obligations under Target 1 of the EU 2020 Biodiversity Strategy.

In relation to climate change, the degradation of peatlands is now recognised as a major and growing source of anthropogenic greenhouse gas emissions. Carbon dioxide emissions from peatland drainage, fires and exploitation are estimated to currently be equivalent to at least 3,000 million tonnes per annum or equivalent to more than 10% of the global fossil fuel emissions. Peatland restoration resulting in reduced greenhouse gas emissions is seen as a very cost-effective measure for long-term climate change mitigation and adaptation. Therefore National Upland Rural Development Measures will contribute directly to sustainable management of natural resources, and climate action.

- **A balanced territorial development of rural areas.**

National Upland Rural Development Measures will improve targeting of financial support which will lead to increased rural employment, allow greater promotion of rural economic diversification and encouragement of diversity in farming systems through improving conditions for small farms and local markets. It will keep farmers actively farming and will help maintain the viability of the farming operation itself, while enhancing the conservation status of such upland areas.

These objectives can be achieved through funding specific measures which address five of the six priorities for rural development:

- 1. Fostering knowledge transfer and innovation**

Article 15 Knowledge transfer and information actions

Article 16 Advisory services, farm management and farm relief services

- 2. Enhancing competitiveness of all types of agriculture and enhancing farm viability**

Article 32 - 33 Payments to areas facing natural or other specific constraints

Article 18 Investments in physical assets

Article 20 Farm and business development

- 3. Promoting food organisation and risk management**

(Not applicable)

- 4. Restoring, preserving and enhancing ecosystems and promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy**

Article 28 Setting up of producer groups

Article 29 Agri-environment - climate

Article 31 Natura 2000 and Water Framework Directive payments

Article 36 Co-operation

Article 8 Thematic sub-programmes

- 5. Promoting social inclusion, poverty reduction and economic development in rural areas**

Article 21 Basic services and village renewal in rural areas

Article 42 – 45 LEADER

While not limiting measures, the most applicable of the financial measures available for an Upland Strategy include:

Article 8 Thematic sub-programmes

Article 31 Natura 2000 and Water Framework Directive payments

Article 32 -33 Payments to areas facing natural or other specific constraints

Article 36 Co-operation

Article 29 Agri-environment - climate

Article 15 Knowledge transfer and information actions

Article 16 Advisory services, farm management and farm relief services

Article 8 Thematic sub-programmes

Member states can include thematic sub-programmes within their RDPs. These sub-programmes should combine a higher rate of aid to the beneficiaries. Whilst recent CAP proposals give examples ranging from young farmers to short supply chains, further communication with the EU indicates that this is not an exhaustive list and other thematic sub-programmes are possible (providing they contribute to the EU priorities for rural development and a SWOT and ex-ante analysis justifies the selection of a given thematic sub-programme). The use of Article 8 allows for more targeted schemes for particular areas and could be used for a targeted uplands/High Nature Value (HNV) sub-programme, or the programme could be incorporated into an agri-environment scheme under Article 29.

Article 29 Agri-environment - climate

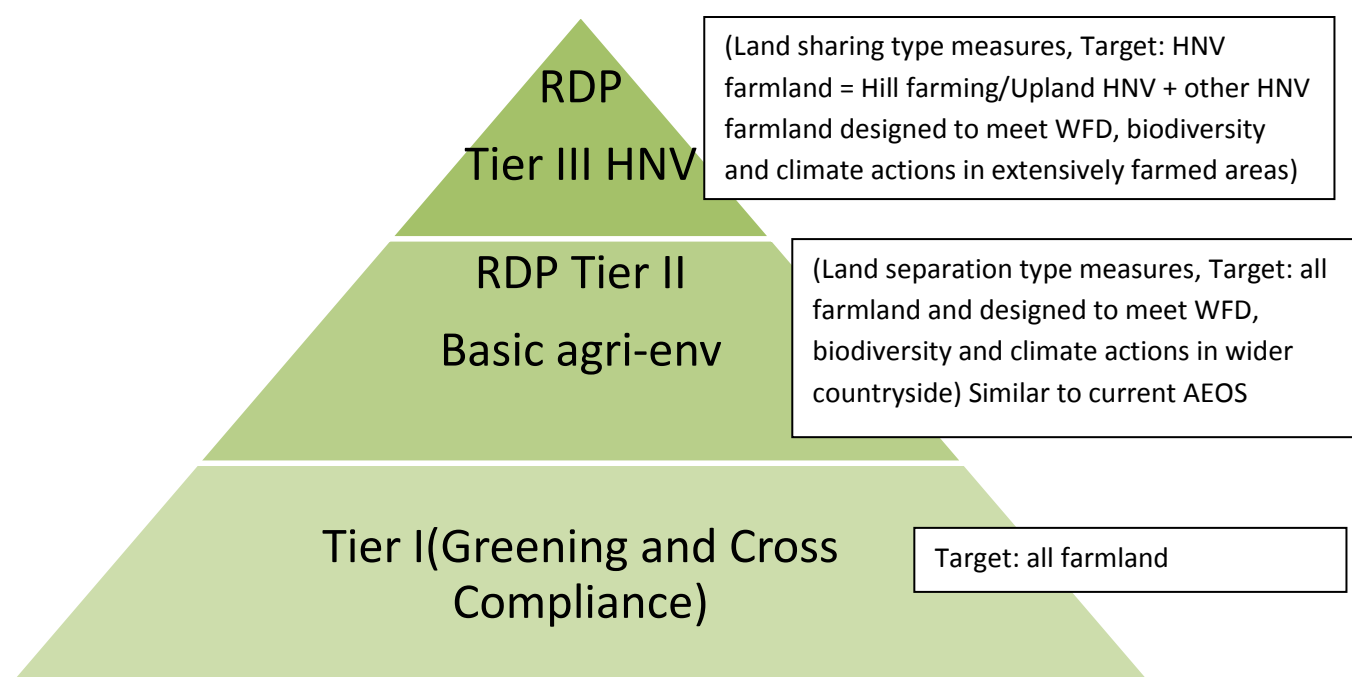
Article 29, the agri-environment measure, provides the best opportunity to support upland farmers through a series of targeted payments. The EC has accepted that better targeting of agri-environment payments is necessary in the framework of the CAP post-2013. In order to improve targeting in Ireland, future agri-environment policies and measures should be delivered via a national upland agri-environment scheme, with

targeted options available to meet the needs of specific areas. Such a targeted approach will have numerous associated benefits, as sustainable management of the uplands will have positive implications for biodiversity, carbon storage, carbon off-setting against agricultural intensification in other areas within Ireland, water quality, flood mitigation and tourism. These outcomes will all contribute to the Rural Development Programme's objectives and priorities.

It is proposed that a specific agri-environment scheme for the uplands should be developed for incorporation into Ireland's Rural Development Plan. The scheme will focus on the maintenance and re-introduction of sustainable farming practices to restore, preserve and enhance ecosystems dependent on agriculture. It will also incorporate enhancement measures required to meet the programme's objectives. The requirements of the scheme will go beyond those required under Good Agricultural and Environmental Condition (GAEC). It will also differ from the existing LFA scheme as the new measures will be targeted to semi-natural areas, with specific interventions available to enhance their condition. This measure can also help address issues involving collective commonage management, as commitments undertaken by groups of farmers can incur payments to cover transaction costs to a value of up to 30% of the premium paid for the agri-environment - climate commitments.

This submission recommends a **tiered structure** of payments as outlined in Figure 1. Such an approach will deliver more targeted payments, tailored to the needs of the site/farm. Tier I will apply to all farms in receipt of Single Farm Payment (SFP) and who meet the requirements of the proposed greening measure and Cross Compliance. The agri-environment scheme (Tier II and III) would be available to those farmers who select options that go beyond the Tier I requirements. Tier II will be targeted at all farmland and designed to meet the Water Framework Directive, and will deliver general biodiversity and climate actions. Examples of work under Tier II would include options for hedgerow management, stone walls, margins, native tree planting, riparian margins, wild bird cover, nutrient management, rare breeds, green cover, and management of heritage sites. Tier III options will be available for farms with a significant proportion of semi-natural vegetation such as is found in Irish uplands areas. This tier could be adapted to include options for other HNV farms types or for specific species such as freshwater pearl mussel, lesser horseshoe bat, hen harrier, chough and other upland birds of conservation concern as listed on amber and red lists, e.g. Red Grouse. By their nature, Tier III options would be more complex than Tier II options and would demand greater inputs from the farmer. Tier III options would be a voluntary component within the agri-environment scheme and targeted at farmers who wish to maximise and maintain the high nature value of their farm. Tier II and III measures should be administered under the one system to reduce costs and burden and improve efficiencies from both a government and farmer perspective.

Figure 1: A tiered and targeted approach to Ireland's agri-environment schemes



An Uplands agri-environment scheme

This submission advocates for an outputs-driven scheme. Past schemes have not incorporated this concept and therefore have not maximised the contribution farmers can make in managing land for a desired outcome. The Burren Farming for Conservation Programme (BFCP) has been lauded throughout Europe as a great example of an outputs-driven scheme which incorporates a high level of farmer input, simple farm plans and which rewards farmers for the quality of their habitat. An outputs-driven scheme ensures farmers whose farmland habitats are in the best condition will achieve higher returns. The aim of an Uplands agri-environment scheme would be to provide the advice and measures to encourage farmers to manage land in a way that maintains the integrity of the site in question and encourages them to adopt management practices which will lead to an improvement in the condition of other areas within the farm.

The approach is for a whole farm scheme that encompasses the green (in-bye) land and the outlying semi-natural areas. All the land on the farm would come under Tier II at a generally lower rate of payment, with options for the farmer to select higher-level (Tier III) commitments that deliver greater environmental and public good. Tier II options may include *inter alia* hedgerow regeneration, stone walls, margins, native tree planting, riparian margins, wild bird cover, nutrient management, rare breeds, green cover, management of heritage sites. Upland farmers would then also be eligible for Tier III options which would focus on areas of semi-natural vegetation. Both Tier II and Tier III options are voluntary.

The structure of the scheme will encourage farmers to manage land in a way that will improve the overall condition of the habitat(s). Measures to aid this will include:

1. a targeted output payment to encourage farmers to improve the habitat condition as outlined above,
2. grazing and associated management to achieve a favourable condition,
3. a targeted programme of works to enable sustainable management

Under the plan the farmer will receive a map outlining obligations under Tier II and III and the necessary guidance documentation in a simplified plan structure. This plan will highlight the agreed commitments in reference to the map and the expected payment for each undertaking.

Tier III Measure 1: Targeted output payment

Tier III will consist of three broad measures. Measure 1 is an outputs-based payment and will be determined by the quality of semi-natural vegetation in the managed plots on the farm. The payment will be determined by a 5 point scoring system which will be assessed annually by the advisor. Depending on annual condition assessment, the payment rate will be determined accordingly (see Table 1). The maximum payment rate under Tier III is calculated on the basis of the full cost of compliance. This scoring system is based on the principle that management plays a significant role in determining the condition of upland vegetation in terms of the structure of the habitats and the diversity of species present. It sets out to assess the management and habitat quality of each area in terms of both the actual management and the additional management that is needed to get it into a favourable condition. Each area is assessed by answering a series of questions, the results of which are used to calculate a final score on a scale of 1 (poor) to 5 (excellent) in terms of habitat quality. Similar assessments exist under the Commonage Framework Plan and are currently being successfully implemented by the Burren Farming for Conservation Programme. The assessment can be adapted for upland grasslands, dry heath, wet heath, blanket bog and semi-natural grasslands. Running in conjunction with the land payment system will be a targeted works programme (Measure 3) that will address the issues that prevent the habitat achieving the maximum score.

Score	Condition (Examples)	Works required (Examples)	Payment Rate
1	Poor overgrazed	Reduced grazing	20%
2	Poor, undergrazed, unwanted vegetation control required	Additional grazing, controlled grazing. Control of scrub/unwanted vegetation	40%
3	Fair, <i>Molinia</i> dominated	<i>Molinia</i> control	60%
4	Good but minor scrub/unwanted vegetation issues	Control of scrub/unwanted vegetation	80%
5	Excellent ecological condition	No additional work required	100%

Table 1: Payment structure based on condition scores for Measure 1

Tier III: Measure 2: Grazing and associated management to achieve favourable status

Measure 2 is an advisory and guidance measure that outlines the input required to help achieve favourable condition and improve the condition of the semi-natural vegetation. The main issue affecting the condition of the uplands is the requirement for sustainable grazing management. At present the numbers of livestock are based on historical numbers less deductions through the Commonage Framework Plans (CFPs) and REPS schemes. The alternative would be to determine the sustainable stocking rate for individual areas (commonage and private land) based on the carrying capacity of the habitats present and their current condition. This measure will also highlight any additional works necessary that can be completed under Measure 3.

For commonage, this will require agreement among the shareholders through a more formal commonage management structure which will have to be established (and could be incentivised through Article 36 measures incorporated into the scheme). Determining suitable grazing levels will be problematic, but scientific literature does exist on similar habitat types within Ireland and Scotland. Initial minimum and maximum calculations from the CFPs could also be taken as starting point for calculations. This will be the starting point for the implementation of a collective management plan.

Tier III: Measure 3: Targeted works programme to enable sustainable management

Tier III will require some optional capital works which will aid in improving the management of areas of semi-natural vegetation. This will work in a similar manner to procedures used in payment for works under Tier II such as hedge restoration. Maximising the contribution of the semi-improved and improved green land is essential to reduce the grazing pressure on the semi-natural areas and options to improve the condition of these areas should also be included under Measure 3. Despite its importance, many areas of permanent pasture are in poor agricultural condition as a result of recent scrub invasion with willow (*Salix* spp.) and whins (*Ulex europaeus*). Other areas are dominated by soft rush (*Juncus effusus*), greatly reducing their agricultural output. Areas of in-bye land could be improved through targeted scrub control, soft rush (*Juncus effusus*) control, improved fencing to control sheep and improvements in land fertility via nutrient management planning, where appropriate.

Options to enable management under Measure 3

3.1 Targeted grazing with sheep: Shepherding is no longer a common practice on hill farms in Ireland, but previous generations farmed full-time and moved their sheep around to areas where there was better grazing. Specific payments would be available for the practices that allow habitat types that are very sensitive to grazing and trampling to have very low levels of grazing or no grazing, yet allow the other habitat types to be farmed with moderate levels of grazing.

3.2 Re-introduction of cattle grazing: In the past cattle played a very important part in the agricultural output of the uplands, but numbers have declined dramatically over a number of years. Several factors are responsible for their decline, including the general expansion of sheep numbers under CAP in the 1980s, the preference of farmers to farm sheep under the CFPs and the need to exclude cattle from some mountain streams and the need to provide adequate wintering facilities in REPS. More recently, the high cost associated with complying with

slurry storage requirements under the Nitrates Directive has also prevented farmers from reverting to cattle farming.

Targeted grazing systems with cattle and sheep are widely recognised as being the best form of management for upland areas and with correct management, a controlled grazing regime using cattle on some areas could be an important management tool to improve the condition of these upland areas. On sites where appropriate this will be an important measure.

3.3 Restoration of damaged areas: Some areas that have been overgrazed or otherwise damaged in the past or on areas of bare soil after controlling vegetation may no longer contain sufficient seed source for successful regeneration. Funding will be available to allow small areas of eroded mineral soils and eroded or unvegetated peat to regenerate either through stock exclusion and/or management techniques such as transplanting or brashing.

3.4 Control of purple-moor grass (*Molinia*): Although *Molinia* is present as a typical component of many upland vegetation communities, it does become dominant in some situations, often to the exclusion of other species. Areas with almost complete *Molinia* dominance (perhaps >80%) and with few other species of interest appear to show most rapid reversion to a more diverse moorland vegetation, through a combination of mechanical techniques combined with a site-specific restoration programme.

3.5 Fencing to aid management of specific habitats: In the absence of shepherding, the temporary erection of stock-proof fencing to control grazing distribution on certain habitat types could be considered.

3.6 Control of weed species and scrub (unwanted vegetation - non-native and native species):

Rhododendron, *Gunnera*, Whins, Willow, Bracken, Blackthorn, Birch can also encroach onto farmed areas reducing both their ecological integrity and agricultural output. Funding will be available for selective and sensitive control of encroaching species using methods that cause minimum damage to the underlying vegetation and soil structure.

3.7 Regeneration of heather through burning and flailing: On appropriate sites, a heather regeneration plan will be produced, outlining the extent and location of the areas to be burnt or flailed and the timing of same. Funding will be available for appropriate burning or flailing of blocks of heather moorland in a planned sequence to encourage regeneration. The aim will be to produce a patchwork of heather of different ages, which increases grazing quality, encourages livestock to graze the whole area and benefits wildlife.

3.8 Management for specific species: A specific agri-environment scheme for the uplands should have an option for farmers in specific areas to adapt their system to manage for targeted species. This will include specific species as listed in Annex II of the EU Habitats Directive: as well as birds protected under the Birds Directive. Examples could include measures for: Marsh fritillary; Hen harrier; Chough; Red grouse; other upland birds of conservation concern as listed on amber and red lists; catchment management for Freshwater pearl mussel. Evidence-based measures would be designed for these species specific to the land use, socio-economic needs and in accordance with specific targets.

3.9 Management of Upland Paths: The Irish uplands are a source of inspiration to a great many hillwalkers from both the domestic and overseas markets. A specific agri-environment scheme for the uplands should allow payment to farmers who are willing to provide and manage walking routes in upland areas. Such provision will mean access is granted by the landowner on a permissive basis rather than as a public right, thus no public right of way is established. The management should be focused on the delivery of effective environmental management on the route and the adjoining land. It would be specifically focused on routes which link the public road with upland areas via existing paths and tracks. The management measures would include water management to address path erosion and soil loss, stone wall restoration, stone wall protection and maintenance and earth bank management. The measure would ensure permissive access to the uplands for recreation, in a manner sympathetic to upland farming activity.

These are just an indicative list of possible options in each measure and more options may be applicable and further investigation is required during the design of the programme.

The case for Commonage within Article 36 (Co-operation)

Commonage in Ireland plays an important role as an agricultural, environmental, recreational and cultural resource as well as forming an important element of the farming tradition as a grazing resource. It also plays a key role in the management of habitats and the Irish landscape. Commonage can deliver environmental and public benefits including landscape quality, recreation opportunities and benefits for soils and soil carbon management, for water management and for the management of biodiversity. The total estimated area of commonage in Ireland is 422,415 ha accounting for 8.5% of the total utilised agricultural area in 2010 (CSO, 2012). In addition, circa 60% of Irish commonages have some form of nature designation (i.e. SAC, SPA or NHA). Management of Irish commonage has been problematic in past Rural Development Plans. Destocking was required on many commonages in Ireland following the findings of Commonage Framework Planning process, which was completed in 2002. There are approximately 4,500 CFPs covering approximately 440,000 ha (note: larger than the figure from CSO 2012). These have been re-monitored over the last 10 years and commonages vary in terms of their grazing condition (i.e. overgrazed, undergrazed or sustainably grazed). Currently discussions are underway to introduce a completely new management system for commonages across Ireland based on their livestock carrying potential. Part of the proposals is a requirement for all farmers using the commonage to agree on the number of ewes each shareholder can graze to ensure overall commonage minimum and maximum livestock numbers are maintained. Proposed measures in the new RDP could help in the implementation of the proposed commonage management system.

The proposed agri-environment scheme would incorporate commonages which work together to produce an overall management plan in the Tier II and Tier III structure. The co-operation measure in Article 36 offers an innovative way for farmers to work together along with state bodies to ensure good commonage management. Article 36 allows support for drawing up a management agreement with shareholders, running costs of the co-operation, direct costs of specific projects and promotional costs. Alternatively Article 29 allows a maximum level of premium of 30% instead of 20% where farmers collaborate together. Therefore additional incentives are available for commonage shareholders to form a management structure. Article 36 should be included in the Irish RDP as it can be used for pilot projects (e.g. on commonage), the development of new practices, processes and technologies in the uplands, collective approaches to environmental projects and ongoing environmental practices. Specific commonage management plans can be demonstrated with the results disseminated to a wider base.

To encourage uptake among shareholders it is possible to provide funding under Article 16 (Advisory services, farm management and farm relief services). Advisors can help to establish new formal groups, facilitate and encourage commonage shareholders to establish a formal group and apply for agri-environment schemes and grazing plans under the new commonage management system.

Farm advisory service and knowledge transfer requirements (Article 15 and 16)

The scheme will require an advisory input from suitable qualified personnel 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 a “bottom-up” approach and based on the development of a face-to-face relationship between the upland farmer and their farm advisor. The approach of the farm advisor must show understanding and an appreciation of the individual situation and circumstance of upland farmers.

The farm advisory support must be participatory in nature and delivery. It should focus on the participation and co-operation of farmers, advisors, nature conservation bodies (where applicable – Teagasc, NPWS, Coillte, IFI, EPA, etc) and consumers (e.g. local food producers, local hillwalking clubs). Upland farmers bring their unique experience of managing the uplands and hence this experience should inform their farm plans. The conservation bodies bring their knowledge and understanding of upland habitats and species and the requirements to maintain and enhance the conservation status of the Irish uplands and thus the farm advisor must seek to act as a bridge between both, as necessary.

The ability to transfer experiences from farm to farm and region to region within Ireland can be funded through Article 15. A specific agri-environment scheme for the uplands should seek to disseminate information and mainstream best practice through farmer/advisor training, “training the trainer” sessions, model demonstration

farms, one-to-one farm visits, upland catchment management groups, active discussion groups, focused practical workshops, seminars, websites and user friendly resource materials.

Article 31 Natura 2000 and Water framework directive payments

Support under this measure shall 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).

Article 32 - 33 Payments to areas facing natural or other specific constraints

Payments to farmers in mountain areas and other areas facing natural or other specific constraints shall be granted annually per hectare of UAA in order to compensate farmers for additional costs and income foregone related to the constraints for agricultural production in the area concerned providing the areas designated as per Article 33. The uplands of Ireland will come under areas of natural constraints. Ireland could designate a specific Mountains Area category which reflects the considerable limitation of the possibilities for using the land with slopes too steep for use of machinery. The present LFA minimum stocking rate is not sufficiently tailored to the condition status of the vegetation at farm level and a specific category for Mountain Areas allows for more targeted design and ultimately more effective implementation of this article.

Monitoring

There will be a requirement to monitor the impact of the measures on the ground not just after the scheme has finished, but at commencement of the scheme and on an ongoing basis, and to use such data to evaluate and, if necessary, to amend the measures. This is part of the overall adaptive management principles that should be adopted in the scheme design. An independent body should be engaged to manage the monitoring and evaluation process throughout the lifetime of the programme. The independent body will undertake ongoing evaluation throughout the lifetime of the programme to examine progress, improve the quality of the programme and its implementation and examine proposals for substantive changes to the programme.

Conclusion

It is not the intention of this submission to give detailed descriptions of the measures for an uplands programme, but to provide pointers which can be developed in the coming months. Further work will be required to elaborate on these proposals and the stakeholders through the National Uplands Working Group, are willing to assist with the process to ensure the best possible outcomes.