



Submission to the public consultation on the  
Draft River Basin Management Plan for Ireland  
2022 – 2027

31<sup>st</sup> March 2021

## 1. Executive Summary

- The draft River Basin Management Plan (RBMP) will have significant implications for farmers across all sectors of Irish Agriculture.
- IFA support the approach being adopted in the draft plan – the *right measure in the right place*. This is very much in line with the findings of the Agricultural Catchments Programme (ACP), which has shown that a one-size-fits-all approach is not effective mitigation strategy for nutrient losses to water due to the inherent variability found between and within catchments.
- Sustainability in agricultural cannot not be confined to environmental issues. To maximise farmers' uptake of environmental measures, the actions should encompass all aspects of sustainability – economic, social and environmental.
- Agriculture accounts for 68% of the national land cover, so it is not surprising that it is has been identified as the most common significant pressure on water quality.
- Although the results from the most recent EPA water quality were disappointing and showed a decrease from 55% to 53% of surface waterbodies at good or high status from the previous 2010-2015 period, it is important to acknowledge that due to delays implementing the 2<sup>nd</sup> RBMP that the majority of the actions taken by farmers were not captured in the assessment of water bodies for the period 2013 – 2018.
- The RBMP must fully acknowledge the investment being made by farmers to protect and improve water quality, and ensure that time is given to accurately evaluate the effectiveness of these measures on improving water quality.
- In the new CAP 2023 – 2027, 34.3% of the overall CAP budget (Pillar 1 & 2) is being allocated to environmental measures compared with an EU average of 30.5%.
- It is critical that our scientists and policymakers better explain the complex nature of improving water quality so that stakeholders appreciate that immediate solutions should not be expected. Indeed, a lack of understanding of hydrological principles may lead the public to believe that current intervention measures are not working, when in reality time is required to demonstrate the effectiveness of the measure on water quality.
- Given the success of the Agricultural Catchment Programme and Agricultural Sustainability Support Programme in improving water quality in the PAA's a mechanism to improve the knowledge exchange from with the wider farming community needs to be pursued and financially supported.
- A key barrier to meeting the increased ambition in the draft RBMP is the financial vulnerability of many farms. The development of a comprehensive financial strategy to support the implementation of measures in the RBMP including Accelerated Capital Allowance (ACA) schemes. In addition, new and innovative funding mechanisms outside of CAP should be considered that reward farmers for the wider eco-system services provided by their actions.
- The water quality monitoring regimes need to increase to improve both spatial and temporal resolution of the data to provide a more realistic assessment of the nitrate status of a catchment. In addition, the greater accessibility of data needs to be provided to facilitate statistical trend analysis taking account of both localised and seasonal weather impacts.

- There is ample evidence that a consideration of time lags should become standard in the design of water quality policies. By quantifying time lag the most effective management and mitigation practices can be designed, so expectations can be adjusted accordingly.
- The establishment of LAWPRO and ASSAP in the 2<sup>nd</sup> RBMP cycle significantly increased outreach, knowledge and understanding of the agriculture pressures on water quality. Both programmes have established good working relationships with farmers and communities that will be important as we enter into the next cycle.
- The scale of the challenge to meet the increased ambition set out in the 3<sup>rd</sup> RBMP cycle must not be underestimated. Continued collaboration and improved knowledge exchange with farmers and advisors to optimise the use of inputs and support farmers to change practices to protect and improve water quality will be crucial.
- A more detailed plan is needed to outline measures in the Nitrates Action Plan and new Green Architecture in the CAP Strategic Plan that will deliver a 50% reduction in nitrogen loss. This needs to be developed in consultation with farmers, and include a financial package to support implementation.
- The proposed Nature-Based Solutions must be introduced on a voluntary capacity. All operational and management costs are funded, and any loss of productive area is fully compensated. In addition, a supplementary payment that values the multiple eco-system services provided is needed to ensure sufficient coverage of spatially targeted buffer zones in critical source areas.
- Given the importance of Nutrient Management Planning (NMP) to water quality there needs to be greater focus in the plan to financially support farmers to develop tailored NMP for their farms. Mainstreaming the use Nutrient Management Plan (NMP), while simplify the process for farmers should a key objective.
- A simplified forestry regulatory system, based on sustainable management plans, similar to those operated elsewhere in Europe needs to be introduced. The current regulatory system is not fit for purpose and will not support the proposal to establish 12,500 hectares of native riparian woodland. In addition, until the system supports planting small scale woodlands it is unlikely that farmers will be willing to commit land to forestry in any instance.
- It is vital that we continue this journey of collaboration and knowledge exchange to help farmers understand and implement *the right measure, in the right place* at farm level. The expansion of the programmes like ASSAP and Smart Farming that work with farmers to deliver behavioural change will be essential to meeting the increased ambition.

## 2. Introduction

The Irish Farmers Association is Ireland's largest farming organisation with approximately 71,000 members in 940 branches nationwide. We welcome the opportunity to make a submission to the public consultation on the Draft River Basin Management Plan (RBMP) for Ireland 2022 – 2027.

The RBMP will have significant implications for farmers across all sectors of Irish Agriculture. IFA fully recognise the importance of the RBMP to set out the measures necessary to meet the Water Framework Directive objective to ensure that all waterbodies in Ireland are restored to at least *good* status.

IFA support the approach being adopted in the draft plan – *the right measure in the right place*. This is very much in line with the findings of the Agricultural Catchments Programme (ACP), which has shown that a one-

size-fits-all approach is not an effective mitigation strategy for nutrient losses to water due to the inherent variability found between and within catchments.

Although there were significant improvements in the 2<sup>nd</sup> RBMP, thanks to the work of several different agencies as well as programmes such as ASSAP and Smart Farming, there still remain gaps in the effective knowledge transfer of monitoring and research to key stakeholders such as farmers and advisors. This must be addressed as a priority if the increased ambition in the draft plan is to be achieved.

As custodians of the environment, farmers understand their responsibility to comply with regulations to protect and improve water quality. Effective and timely communication as well as financial supports will be critical to support farmers to implement the actions set out in the draft RBMP. Training and knowledge transfer, particularly on nutrient management planning, will be necessary to support changes in management practices at farm level.

The war in Ukraine has highlighted the vulnerability of our food systems and is having a big impact on food security across the continent and the wider world. Sustainability in agriculture cannot be confined to environmental issues, the goal must be to support agriculture and sustainable food systems, that provide a viable income to farmers. To maximise farmers' uptake of environmental measures, the actions should encompass all these aspects of sustainability.

### 3. Water Quality & Agriculture

Agriculture accounts for 68% of the national land cover, so it is not surprising that it has been identified as the most common significant pressure on water quality. Most farms in Ireland are family-owned and operated farms. There are almost 140,000 farms, with an average land holding of 32.5 hectares.

Although the results from the most recent EPA water quality were disappointing and showed a decrease from 55% to 53% of surface waterbodies at good or high status from the previous 2010-2015 period, it is important to acknowledge that due to delays implementing the 2<sup>nd</sup> RBMP that the majority of the actions taken by farmers were not captured in the assessment of water bodies for the period 2013 – 2018.

Farmers have made significant investments in recent years to improve nutrient management and reduce losses of nutrients into waterbodies. These improvements in farming practices and infrastructure have been driven by regulation (Good Agricultural Practice for Protection of Waters regulation), by innovate programmes (ASSAP, Smart Farming etc.) as well as increased understanding of nutrient loss pathways through research undertaken by EPA, Teagasc etc.

**It is critical to the success of the 3<sup>rd</sup> RBMP that we continue to build on these changes and support farmers to continue to adopt more sustainable farming practices. The RBMP must fully acknowledge the investment being made by farmers to protect and improve water quality, and ensure that time is given to accurately evaluate the effectiveness of these measures on improving water quality.**

#### 3.1. Agricultural Catchments Programme (ACP)

The ACP indicates that supporting farmers to make better decisions regarding how they manage nutrient applications is likely to be the single area with the greatest potential to improve outcomes for water quality on Irish farms - delivering better profits for the farmer while reducing risk of nutrient loss to water.

The findings of the programme support the approach being adopted by the draft RBMP, *the right measure, in the right place*. There are no one-size-fits-all solutions for mitigation of nutrient losses to water. A better understanding of the underlying processes is required to identify critical source areas, to select mitigation strategies, when to implement them and to build realistic expectations of their impact.



The EPA Water Quality in 2020<sup>1</sup> report reinforces the ACP findings and shows that targeted actions are helping to improve water quality. Of the 81 Prioritised Areas for Action (PAA) that have completed field work and reports under the programme, 57 of the water bodies or 70% have shown net improvements in the biological quality.

**Given the success of the ACP programme in improving water quality in the PAA's a mechanism to improve the knowledge exchange from the programme with the wider farming community needs to be pursued and financially incentivised.**

There is a need to improve support to knowledge exchange mechanisms that can deliver better farm and soil-specific Nutrient Management Plan (NMP) strategies. Knowledge exchange and advisory support is required for effective NMP.

**Given the importance of NMP to water quality, IFA would like to see a greater focus in the RBMP to support farmers to develop tailored NMP for their farms. Also, the option for suitably qualified and trained farmers and independent agricultural advisors to develop their NMP via the Teagasc Online NMP system should be provided.**

Weather drivers play a more important role in temporal nutrient transport than farm practice changes. Climate change is anticipated to increase the intensity and frequency of extreme weather events. Such weather changes can override trends of source pressures. Both long-term weather shifts and short-term weather shocks need consideration and may require different mitigation strategies.

**Given the increased risk of extreme weather events due to climate change, and the influence of weather on water quality there needs to be greater attention in the RBMP to the development of both mitigation and adaption strategies to minimise the impact of such events.**

### 3.2. Smart Farming programme

Smart Farming is a voluntary resource efficiency programme delivered by the IFA in partnership with the EPA. The programme focuses on eight key areas that offer the greatest savings to farmers and reduction of greenhouse gas emissions at farm level. Water quality is a key thematic area of the Smart Farming programme.

Farmers who take part in the programme's resource efficiency assessment receive a water sample analysis, information on their local water catchment and recommended actions to reduce fertiliser requirements, such as implementation of nutrient management plans, soil testing and the incorporation of multispecies swards and clover, to protect and improve water quality.

In 2021, Smart Farming held a scientific webinar "Sources and Solutions – The link between our Soils and Water Quality". At the event a series of short information videos were launched they included; how to improve water quality, what are EPA Catchments Pollution Impact Potential (PIP) maps? and a step-by-step tutorial on how to access the PIP maps online. The videos are available to be accessed online [here](#).

Smart Farming is currently developing a three-year vision for the programme with the EPA which will focus on increasing the programme's outreach and impact demonstrating that making small changes at farm level can make a big difference nationally. Water quality will be a key focus of the new programme with the aim to:

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<sup>1</sup> EPA (2021). Environmental Protection Agency, *Water Quality In 2020 An Indicators Report*.

- increase farmer awareness of the wider water catchment and their local catchment status.
- identify and locate point sources and critical source areas on farms with the use of EPA pollution impact potential (PIP) maps.
- inform farmers where water quality mitigation measures may be required.
- undertake research on farmer behaviour to understand farmer perceptions and barriers to determine how to increase adoption of recommended measures at farm level.

An increased focus will be placed on behavioural change and the implementation of recommended water quality measures at farm level with a programme target of each participating farmer implementing at least one action to improve water quality.

#### 4. Actions implemented by farmers in the 2<sup>nd</sup> RBMP

The consultation document highlighted that the delays producing the second cycle plan meant that the majority of the measures were not implemented at the time the EPA were collecting the monitoring data, and therefore improvements were not captured the Water Quality in Ireland 2013-2018 report.

During the second cycle of the plan farmers made significant investment and changes at farm level to protect and improve water quality these included:

- Over €82 million has been invested in Low Emission Slurry Spreading (LESS) equipment by farmers.
- The demand for protected urea continues to grow year on year. Over 50% of the urea sold in 2021 was protected urea (20,540 tonnes)<sup>2</sup>.
- Over 96% of participating farmers have positively engaged with the ASSAP programme, agreeing to put in place farm specific measures to help improve water quality.
- From 2021 all farmers must divert run off from farm roadways away from waterbodies.
- Farms stocked above 170kgN/ha must keep water troughs 20m away from water courses and fence off water courses.
- Following the interim review of the nitrates action programme in 2018 farms stocked above 170kgN/ha will face enhanced requirements:
  - o Use of Low Emission Spreading of Slurry (LESS) from 15th April 2021.
  - o Must participate in a liming programme.
  - o Reduce the crude protein content of concentrate fed to cows from April to September to below 15% (to commence in 2021).
- Following the same review farmers in receipt of a derogation faced enhanced requirements:
  - o All slurry produced on the farm must be spread with LESS by 15th April 2021.
  - o Farmers must attend environmental training.
  - o Farmers must incorporate clover in new reseedings.
  - o Incorporate a biodiversity measure on their farm aimed at improving the quality of the hedgerows on their farms.

#### 5. Agricultural Sustainability Support and Advisory Programme (ASSAP)

The ASSAP programme has been hugely successful to date in providing farmers practical advice tailored to their own land. By the end of 2020 ASSAP had undertaken 1,810 farm assessments. 96% of farmers approached engaged with the programme, while 92% have agreed actions between advisor and farmer<sup>3</sup>.

This clearly demonstrates farmers willingness to adopt targeted measures that can reduce nutrient losses to water and thereby reduce input costs.

<sup>2</sup> C. Buckley (2021). *Outlook 2021 – Sustainability* Teagasc, Agricultural Economics & Farm Surveys Department Rural Economy and Development Programme

<sup>3</sup> Teagasc (2020). *Agricultural Sustainability Support and Advisory Programme (ASSAP) Interim Report #2 2020*.

The programme has shown that the breakdown of water quality pressures in PAA has remained relatively stable since the start (2018). To date diffuse P, N and sediment losses account for 73% of the pressures identified in PAA's where investigations have occurred.

From the farm assessments 46 different issues were identified that relate to: land management practices (45%), nutrient management practices (34%) and farmyard management practices (21%). On average the farm assessment identified 6 issues that can be remedied to improve water quality.

**The information gathered through the ASSAP is an invaluable resource that can change at farm level and address agriculture pressures on water quality. Additional funding is required to support the training requirements of farmers to implement the RBMP measures outside the PAA. To encourage greater uptake any training provided should be subsidised and participants reimbursed for attending the course.**

## 6. Financial Strategy

The proposal to develop a comprehensive financial strategy to support the implementation of measures in the RBMP is welcomed. The single biggest issue to implementation and compliance is the financial vulnerability of farms. The Teagasc Farm Survey<sup>4</sup> shows that there is a major difference in farm incomes across different farm systems, with only 34% of family farms considered viable.

There will be an increased financial burden on farms to comply with the new measures in the 5<sup>th</sup> Nitrates Action Programme. In tandem, direct payments to farmers under CAP 2023 – 2027 will be reduced by 25%, with this money being re-directed to fund eco-schemes. Under this new arrangement farmers have no guarantee of being able to earn the same equivalence via eco-scheme payments. Thereby potentially reducing their overall CAP payment.

Additional financial incentives will be required to support adoption and implement the RBMP measures at the scale required to meet the increased ambition of the plan. In addition, grant aid provides a high degree of protection that the requisite design standards are applied to slurry storage systems to mitigate the potential for adverse impacts.

**IFA fully support the establishment of a high-level interdepartmental group to develop a financing strategy to support implementation. The Group need to identify new funding mechanisms to provide additional incentives to support compliance with measures. New and innovative funding mechanisms should be considered that reward farmers for the wider eco-system services provided by their actions.**

## 7. Improved Water Monitoring & Data Sharing

The EPA are currently monitoring approximately 2,700 rivers. Some rivers have not been measured at all during 2021 while others are measured with varying frequencies. The current water monitoring analysis does not take account of once-off weather events such as drought which is potentially leading to inaccurate portrayal of the long-term water quality trends. More resources should be committed to sample each river in much greater frequency to more accurately capture water quality data and trends.

**Improving the water quality monitoring regimes will improve both spatial and temporal resolution of the data to provide a more realistic assessment of the nitrate status of a catchment<sup>5</sup>.**

<sup>4</sup> Teagasc (2021). *Teagasc National Farm Survey 2020*, Agricultural Economics and Farm Surveys Department, Rural Economy Development Programme, Teagasc.

<sup>5</sup> Fenton, O et al (2018). *Practice change and water quality response*. TRESEARCH, Volume 13: Number 3.

In addition, the existing database and presentation of results within the Catchments website makes much of the data inaccessible. A detailed measurement on a publicly available database, which is accessible to all, is urgently needed. Such a database could then facilitate statistical trend analysis taking account of both localised and seasonal weather impacts.

**Improving the accessibility of information available to facilitate statistical trend analysis taking account of both localised and seasonal weather impacts would be a benefit to all stakeholders and welcomed by farmers.**

## 8. Quantifying time lag as part of Integrated Catchment Planning

The time lag between the adoption of management changes and the detection of measurable improvements in water quality can be significant and may not show results within a definitive period. It is vital that the RBMP plan recognises and quantifies time lag in each catchment so expectations can be adjusted accordingly.

Determining the length of the time lag in a catchment is of critical importance from a policy and monitoring perspective<sup>6</sup>, as correlation of the success of a legislative instrument (even assuming 100% implementation) and the current water quality status is not always possible<sup>7</sup>. In addition, observations may also be compounded by inter-annual meteorological variability<sup>8</sup>, which was evident from the spike in nitrate levels seen in 2018 due to the widespread drought.

There is ample evidence that a consideration of time lags must now become standard in the design of water quality policies<sup>9</sup>. By quantifying time lag the most effective management and mitigation practices can be designed.

The full impact of time lag is not yet fully understood or appreciated, and continued outreach and education in scientific, public and policy venues is still required.

**IFA propose that time lag is quantified in each of the catchments and that the full impact of time lag is considered as part of targets to improve water quality. Continued outreach and education in scientific, public and policy venues is still required to increase understanding and fully appreciate impact of time lag on water quality.**

## 9. Review of Implementation Structures

The establishment of LAWPRO and ASSAP in the 2<sup>nd</sup> RBMP cycle have significantly increased outreach and understanding of the agriculture pressures on water quality. The work of both these programmes were significantly impacted by COVID, despite this they have established a trust with farmers and communities that will be important as we enter into the next cycle.

### **Review of Local Authority Waters programme (LAWPRO)**

IFA support the findings of the LAWPRO review that it has been a successful initiative and should be continued. The collaborative and solution focussed approach adopted by LAWPRO's Catchments and Communities teams has supported effective engagement with rural communities on water quality issues.

<sup>6</sup> Bain, DJ et al (2012). *Legacy Effects in Material Flux: Structural Catchment Changes Predate Long-Term Studies*. BioScience, Volume 62, Issue 6, Pages 575–584.

<sup>7</sup> Fenton, O et al (2011). *Exploring the relationship between groundwater geochemical factors and denitrification potentials on a dairy farm in southeast Ireland*. Ecological Engineering, Volume 3, Issue 9.

<sup>8</sup> Bechmann, M. et al (2008). *Monitoring catchment scale agricultural pollution in Norway: Policy instruments, implementation of mitigation methods and trends in nutrient and sediment losses*. Environmental Science and Policy 11: 102– 114.

<sup>9</sup> Vero, S et al (2018). *Review: the environmental status and implications of the nitrate time lag in Europe and North America*. Hydrogeology Journal 26, 7–22.



To ensure that LAWPRO can deliver on the increased ambition in the draft plan it is vital that it is properly resourced. It is important that as LAWPRO evolves that the collaborative, bottom-up approach of involving communities and stakeholders in integrated catchment management is maintained. And that the programme continues to provide a forum to better understand local issues and concerns.

### **Review of ASSAP**

IFA support the recommendations of the External Expert Assessment of the ASSAP<sup>10</sup> that the programme:

- Should be further developed under the 3rd RBMP and expanded to include additional Priority Areas of Action as selected.
- Objectives should focus on supporting farmers' implementation of the right actions in the right place and demonstration of their impact on water quality.

The objective to seek collaboration must remain a key objective of the implementation of the programme to deliver both behavioural and practical change at farm level.

## **10. Programme of Measure**

The scale of the challenge to meet the increased ambition set out in the 3rd RBMP cycle must not be underestimated. The significant learnings gained through the ACP, ASSAP and EPA over the 2<sup>nd</sup> RBMP cycle must be applied to increase farmers' understanding of the wide range of factors that influence water quality with regards to agriculture pressure.

**Continued collaboration and improved knowledge exchange with farmers and advisors will be crucial to share learnings, to optimise the use of inputs and support farmers to change practices to protect and improve water quality.**

The draft plan proposes six goals to protect and restore water quality, that are to be delivered through a series of programmes and regulations including; the 5th NAP, CAP 2023 -2027 and new Drinking Water Directive. However, it is not clear in the Principal Actions and Additional Measure how these overarching goals will be delivered. Further clarity is required in the final draft of the plan, particularly in relation to:

### **Goal 1 - Reducing excessive nitrogen losses in agriculturally intensive areas**

The target to reduce N losses by up to 50% to water during the 3<sup>rd</sup> cycle will be extremely challenging to meet, particularly considering lag times between land management mitigation action and impacts on nitrogen (N) loads.

The time lag between the adoption of management changes and the detection of measurable improvements in water quality can vary significantly in catchments and may not show definitive results during a monitoring period or may be altered by weather events. Implementation time lag have been shown to range from 0.5-14 years depending on size of a catchment.

**A more detailed plan is needed to show how the NAP and the new Green Architecture in the CAP Strategic Plan will deliver a 50% reduction in nitrogen loss. This needs to be developed in consultation with farmers, and include a financial package to support implementation. The plan must consider the impact of time lag within each catchment and adjust target/implementation of timeline accordingly.**

### **Goal 3 - Eliminating exceedance in pesticide standards**

IFA is a member of the National Pesticides and Drinking Water Action Group (NPDWAG) and supports best practice to minimise risk to drinking water. The use of pesticides is an essential part of food and feed crop

<sup>10</sup> ASSAP Independent Review Panel (2021) *External Expert Assessment of the Agricultural Sustainability Support and Advisory Programme (ASSAP)*.

production, without the access to pesticides farmers may struggle to maintain crop output and react to new challenges posed by climate change, new pests and diseases etc.

**It is important to build on the existing Interim Pesticide Strategy and the collaborative approach with catchment stakeholders to eliminate exceedances of pesticide standards. In addition, further research and promotion of alternative pesticide use to minimise overall application is required.**

### **Goal 6 - Reducing phosphate and sediments losses**

The nature-based solutions proposed under this measure are significant and include:

- A minimum target to establish 2,500km of riverside interception or 3% of all river channels (approx. 12,500 ha's of native woodlands).
- 20,000 ha's of organic soil rewetting.

It is well evidenced that riparian woodland margins and rewetting of organic soils in the appropriate location can provide multiple benefits to water quality, biodiversity and climate change to deliver meaningful ecosystem services. Both these measures reduce a farmers' productive area and it is important to get the scale of adoption required to meet the goal that the multiple benefits to society are through valuation of ecosystem services.

**To support the implementation of measures and achieve the stated objectives:**

- **The measures must be introduced in a voluntary capacity.**
- **All operational and management costs are funded, and any loss of productive area is fully compensated. A supplementary payment that values the multiple eco-system services provided is needed to ensure sufficient coverage of spatially targeted buffer zones in critical source areas.**
- **Technical guidance on rewetting organic soils needs to be developed, in consultation with farmers, to better understand the challenges, as well as the multiple benefits provided.**
- **Local demonstration sites should be established to help to communicate how nature-based solutions can deliver and help tackle issues such as diffuse pollution and flood risk.**

## **11. Common Agricultural Policy Strategic Plan**

Ireland's CAP Strategic Plan (SP) 2023-2027 represents a significant change compared to previous programming periods, with a stronger emphasis on the achievement of a higher level of climate and environment ambition through a new "Green Architecture".

Irish farmers are allocating 34.3% of the overall CAP budget (Pillar 1 & 2) to environmental measures compared with the EU average of 30.5%.

**The re-direction of income support payments (Pillar 1) will be funding the increased climate and environment ambition, with a proportion of income support payments (25%) conditional on environmental action. This is in addition to a decreased income support budget allocation. It is important that farmers contribution to the protection and restoration of water quality is fully recognised in the draft RBMP plan.**

### **Enhanced conditionality**

Under Good Agricultural and Environmental Condition (GAEC) 4 farmers are required to provide buffer strips along watercourses where nutrients and pesticides are not permitted. Buffer strips are shown to positively impact water quality as they intercept nutrients from overland flow thereby 'breaking the pathway' and putting '*the right measure in the right place*'.

For chemical fertiliser and pesticide, a minimum 3 metre buffer strip is required where application is prohibited and for organic fertiliser a minimum 5 metre buffer strip. In order to qualify for Basic Income Support (BISS) a

farmer is required to satisfy all the requirements of conditionality and GAEC 4 is just one part of this conditionality.

To deliver this measure, a farmer's productive area will be reduced, this will have a negatively impact the production capacity on their farm and potentially reduce their income.

### **Improved Eco-schemes**

There are eight measures under the eco-scheme, of which farmers have to implement two measures to qualify for the eco-scheme payment. Many of the measures positively impact water quality including; limiting chemical nitrogen, GPS controlled fertiliser spreader, soil sampling and liming.

The eco-schemes are planned to be funded from Pillar 1 and the proposal in the CAP Strategic Plan is to ringfence 25% of Pillar 1 for eco-scheme payments. This means that farmers direct payment will be reduced by 25%, while the eco-scheme payment will be based on income foregone or cost incurred. This means in real terms that farmer income support from Pillar 1 will be reduced to implement measures to improve water quality, biodiversity and climate change.

### **Agri-Environmental Climate Measure (AECM)**

The AECM will provide capital funding for non-productive investments (AECM - NPI). These include, but are not limited to, the planting of riparian margins, which protect and improve water quality by providing a protective barrier to streams. The AECM proposes to pay farmers based on income foregone and cost incurred but provides for no additional payment for eco-system services provided.

**The proposed limit of 50,000 farmers being eligible for AECM should be removed to support the establishment of riparian woodlands in appropriate locations.**

## **12. Fifth Nitrate Action Programme 2022 - 2025**

The new Nitrates Action Programme is a key driver to deliver on the agricultural goals set out in the draft RBMP and is correctly identified as a Principal Action. The new programme strengthens and adds to existing measures to improve management practices based on the most up to date research to deliver improved water quality.

The Strategic Environment Assessment (SEA) NAP report broadly acknowledged the positive or neutral environmental impact of the proposed mitigation measures. However, it recognised the significant financial implications for farmers to comply with some of the proposed measures.

**To deliver on the measures set out in the draft RBMP plan it is vital that farmers are fully supported to comply and implement measures to optimise the positive impact on water quality.**

- **To support implementation additional incentives will be required through Targeted Agricultural Modernisation Scheme (TAMS) or the new scheme in CAP 2023 – 2027 to promote awareness and support adoption of measures. Providing grant aid provides a high degree of protection that the requisite design standards are applied to storage systems to mitigate the potential for adverse impacts.**
- **Accelerated Capital Allowance (ACA) schemes must be introduced to support the adoption of measures and improve compliance. These schemes would support farmers to rectify any slurry storage deficiency. Supporting farmers to invest in additional slurry storage capacity and improve farmyard management operation, will enable farmers to realise greater environmental standards which would benefit the entire country.**

## 13. Additional Actions

### **Farm Sustainability Plan**

The ACP had identified the management of nutrient applications to be the single area with the greatest potential to improve outcomes for water quality on Irish farms - delivering better profits for the farmer while reducing risk of nutrient loss to water.

**Mainstreaming the use Nutrient Management Plan (NMP), while simplify the process for farmers should the objective of this action. The existing online NMP tools should be made available to all farmers and agricultural advisors. A training programme should be developed to support and encourage farmers to use the online tool to encourage best practice at farm level to improve water quality.**

The Farm Sustainability Plan should be developed to complement the existing NMP tool but the focus should be improving nutrient use efficiency and the number of famers with an NMP.

### **Extension of LAWPRO and ASSAP**

IFA support the extension of the LAWPRO and ASSAP programme, both have been shown to be effective at driving positive change at farm level to improve water quality. The collaborative approach of programme has been central to the level of engagement by both farmers and communities. The response and level of implementation under the ASSAP demonstrates a willingness by farmers to change practices.

To build on the success of both programmes it is important that they are adequately resourced to deliver the work programme in the expanded PAA's. Opportunities to extend the learnings and advice to farmers outside the PAA's should be considered.

### **New Authorisation System for instream engineering**

The new authorisation system for instream engineering must be designed in consultation with farmers and relevant stakeholder, and must take account of local conditions. The development of the system should be used as an opportunity to promote careful drain management and increase awareness of the potential impact on water quality and habitats to prevent instream habitat damage. The learnings from KerryLIFE project, which aims to reduce the hydrological connectivity between sediment and nutrients source areas should input into the development of any new system.

### **Compliance Assurance**

The IFA does not condone non-compliance and considers improved communication in relation to breaches in compliances integral to improve and protect water quality. To support greater compliance there needs to be continued and improved communication and engagement with farmers.

It is important NIECE network consults with farmers on the establishment the Local Authority Agricultural Inspection programme (as set out in the NAP) to enhance compliance. The introduction of a yellow card system should be considered that affords farmers time to rectify any non-compliance identified. In addition, an annual review of the inspections is published to improve understanding and avoid unintended breaches.

Inspections are hugely stressful for farmers and it is essential that the Local Authority Agricultural Inspection programme is designed to minimise the stress and enhance compliance.

## 14. Forestry

The area of forest in Ireland is estimated to be 770,020 ha or 11% of the total land area. The Climate Action plan sets out an ambitious target to plant 8,000 ha of forestry annually to 2030. Attaining this target is necessary to sustain the forest processing industry in the long term and to reach climate targets.

Improvements to the forestry system will be key to meeting future objectives and improving compliance in relation to protecting and improving water quality. Despite the potential of the sector and the ambitious targets to increase forest cover, the afforestation programme has been in continual decline in recent years, with only 2,500ha planted in 2020<sup>11</sup>, just 30% of the 8,000ha annual afforestation target.

If licenced, all afforestation in Ireland must adhere to strict environmental requirements that include mandatory water setbacks and other protective measures regarding cultivation, fertiliser application, and herbicide use. When water setbacks are adhered to, forests can be regarded as having a low impact on water quality and can offer some benefits to water quality.

Forests when sustainably managed can offer farmers protective functions in relation to both water and soil including the interception of nutrient runoff, reduction in sediment mobilisation, shading of watercourses, bank stabilisation and regulation of floodwater. The current standards for planning, design and sustainable management of forests in Ireland are already at a high standard with higher regulatory requirements imposed on private forest owners when compared with other European countries.

**A simplified regulatory system, based on sustainable management plans, similar to those operated elsewhere in Europe needs to be introduced. The current regulatory system is not fit for purpose and will not support the proposal to establish 12,500 hectares of native riparian woodland. In addition, until the system supports planting small scale woodlands it is unlikely that farmers will be willing to commit land forestry in any instance.**

## 15. Conclusion

The draft RBMP must fully recognise the investment and positive changes that have been taking place on farms in recent years. Not just driven by regulation but also driven by increased understanding, awareness and desire to farm more sustainably.

It is vital that we continue this journey of collaboration and knowledge exchange to help farmers understand and implement *the right measure, in the right place* at farm level. The expansion of the programmes like ASSAP and Smart Farming that work with farmers to deliver behavioural change will be essential to meeting the increased ambition.

It is important that farmers investment to date and investment during the 3<sup>rd</sup> RBMP cycle is fully recognised in the plan. The single biggest issue to implementation and compliance is the financial vulnerability of farms. Additional financial incentives will be required to support adoption and implement the RBMP measures at the scale required to meet the increase ambition of the plan.

We trust that these comments are useful. If you wish to discuss any aspect of this submission, please contact Geraldine O'Sullivan, IFA Senior Policy Executive by email on [geraldineosullivan@ifa.ie](mailto:geraldineosullivan@ifa.ie) or on 087 9385283.

Ends.

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<sup>11</sup> DAFM (2022) Department of Agriculture Food and the Marine *Forestry Licensing Plan 2022*.