



Submission to the Citizens' Assembly on Biodiversity Loss

11th October 2022

Glossary of Terms

Agri-Environmental Schemes: Agri-environment schemes are part of the CAP e.g. Rural Environment Protection Scheme (REPS) and Green Low Carbon Agri-Environment (GLAS).

Areas of Biodiversity Enhancement (ABEs): Comprise open spaces and retained habitats. The ABEs are aimed at encouraging the development of diverse habitats, native flora and fauna and biodiversity in Forestry. 15 % of forestry planted must be Areas for Biodiversity Enhancement (5 – 10% open space and 5 – 10% retained habitats).

Areas of Natural Constraints (ANC) Scheme: The Areas of Natural Constraints scheme provides payments to people farming land in designated disadvantaged areas. It aims to support the continuation of farming in these area by compensating farmers for the additional costs involved in farming such land.

Commonage: Is land that is owned by more than one person but farmed collectively. Typically, each farmer owns a defined fraction of the total area, and this is detailed on each farmer's folio.

Common Agricultural Policy (CAP): The agricultural policy of the European Union. It implements a system of common programmes across the EU 27. The latest CAP has recently been approved and will run from 2023 to 2027.

Designated Land: The most important habitats are designated as Natural Heritage Areas (NHA), Special Areas of Conservation (SAC) or Special Protection Areas (SPA). Farmland within these designated areas require sensitive management and require consent prior to certain farming activities being carried out.

Eco-Schemes: In the new CAP 25% of the direct payments under Pillar I will be allocated to new eco-schemes, these include higher space nature, limiting chemical nitrogen use, planting on native hedgerow/trees and/or sowing a multi-species grassland.

Good Agricultural and Environmental Conditions (GAEC): Through cross-compliance/conditionality farmers are required to comply with high EU standards for soil, plant, and animal health.

High Nature Value (HNV) farming: High Nature Value farms are mostly semi-natural, farmed in a low intensity way, typically good for and rich in biodiversity/nature.

Improved Grasslands: Are grasslands that have been improved for agriculture. Management measures include some or all of the following: ploughing, re-seeding, fertilising, higher stocking rates, lime application or drainage.

Natura 2000 network: Natura 2000 is a European network of protected areas (SAC's and SPA's) which are important sites for breeding and resting of threatened or rare species.

Natural Heritage Areas (NHA): Are nationally designated area considered to be important for the habitats with a variety of rare species of flora and fauna. 75 raised bogs and 73 blanket bogs are designated as NHAs.

Semi-natural grasslands: Are grasslands that have not had significant inputs applied or structure altered, they are hugely important reservoirs for biodiversity, supporting a diverse range of plant and animal species.

Semi-natural habitat: A habitat that has been modified and maintained by human activities, but still holds species that occur naturally. Semi natural habitats are considered as the main source of biodiversity in agricultural landscapes.

Special Areas of Conservation (SAC): These are wildlife conservation areas designated to protect the 220 habitats and approximately 1,000 species listed under the European Union's Habitats Directive.

Special Protection Areas (SPA): Under the terms of the EU Birds Directive Protection Areas (SPAs) are designated for the protection of (i) listed rare and vulnerable species, (ii) regularly occurring migratory species and (iii) wetlands especially those of international importance.

1. Executive Summary and Conclusions

- Irish farmers, as custodians of the environment and the **“boots on the ground”** to maintain and enhance biodiversity on their farms. They have a great affinity to their local landscapes and ecosystems, and are intrinsically linked to these landscapes, sharing knowledge, skills, and practices from one generation to the next.
- Ireland has a **predominately extensive grass-based livestock farming system** which uses less inputs and provides many positive environmental benefits. Biodiversity has a fundamental role in underpinning sustainable agricultural systems.
- Irish farmland is a significant reservoir of biodiversity with **on average 12-14% of farms providing space for nature**¹. It is important that farmers’ investment and the positives changes, that have been taking place on farms in recent years, are fully recognised.
- 33% of the farmland area in Ireland (compared with an EU average of 13%) is under **agri-environmental schemes**. Irish farmers have participated on a voluntary basis in these schemes since 1994 enhancing farmland biodiversity.
- Farmers under Green, Low-Carbon, Agri-Environment Scheme (GLAS) established approx. **20,000 hectares of wild bird cover**. During the period of GLAS there was a marked recovery in the level of farmland birds recorded, numbers now 10% higher than 2000 levels.
- The new **Agri-Climate Rural Environment Scheme (ACRES)** needs to be more attractive to encourage and increased levels of farmer participation.
- Regulations on land use or farming practices on **designated land/protected areas** that impose constraints must be properly compensated. To date farmers in protected areas, have not been sufficiently compensated for loss in production or land values due to the designation of their farmland. An independent arbitration scheme should be introduced to determine the loss of value to the farm business caused by the designation, and an associated budget allocated.
- The most successful farmland programmes that protect and enhance biodiversity have been **developed in collaboration with farmers**. Local leadership and buy in is essential to deliver improvements locally but also increase the awareness of the threats to biodiversity in the wider farming community.
- **Incentivised management-based programmes** rather than regulation are more successful in securing farmer buy in.
- Farmers are continually being asked to do more to qualify for their CAP core payment. However, the level of EU funding for these core payments (known as Pillar 1) has significantly reduced. UCD analysis estimates that, in real terms, **Irish funding under Pillar 1 of CAP has declined by 17% in the 2006-2019 period**².

¹ Sheridan et al., (2017). Sheridan, H., Keogh, B., Anderson, A., Camus, T., McMahon, B., Green, S. and Purvis, G., 2017. Farmland habitat diversity in Ireland. Land Use Policy, 63, pp.206-213.

² Wallace, M (2020) What priorities and approaches are needed for improved targeting of CAP payments to ensure appropriate support and stabilisation of farm incomes? - Presentation to CAP Consultative Group Meeting on 28th April 2020.

- The lack of financing and allocation of resources to biodiversity (outside of Common Agricultural Policy (CAP) has been identified at EU level as a key failure in meeting biodiversity targets. New and **innovative funding mechanisms, separate to CAP**, must be developed to reward farmers for the wider ecosystem services provided by their actions.
- There needs to be full engagement with farmers and IFA on the **proposed EU Nature Restoration Law**. It is essential that targets are achievable, the socio-economic impacts are fully understood and that proposed actions are supported financially.

2. Ireland's extensive family farm model

Agriculture is the main economic use of land in Ireland accounting for over 65% of the land area³, while forestry accounts for a further 11%⁴, of which farmers own and manage half the area. Irish agriculture is dominated by family-owned farms with an average farm size of 33 hectares.

The Teagasc National Farm Survey showed that the average income across all farming systems, in 2021, was €34,367 with only 42% of farms deemed to be economically viable. Nearly 70% of farms were classified as part-time⁵.

In Ireland, the average livestock herd per farm is 69 cattle, while the average dairy herd is 83 cows. While some perceive our agricultural system to be intensive agriculture, the number of dairy cows on Irish farms is low relative to other countries such as USA with 317⁶ and New Zealand with 435⁷.

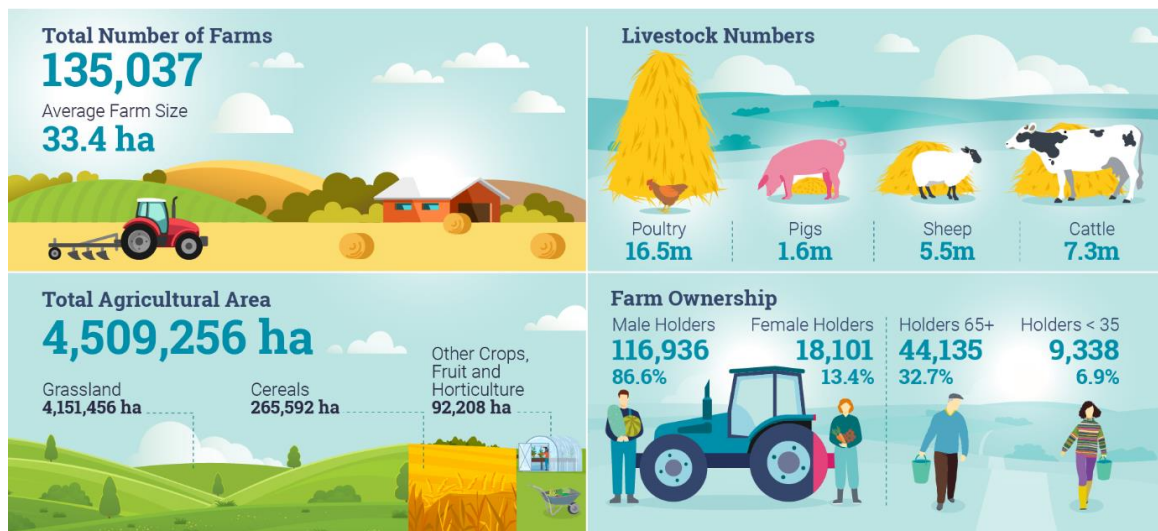


Figure 1. Census of agriculture 2020 (source: CSO)

Grass-based livestock farm systems dominate, thanks to our rich green grass growth for 9 to 10 months a year. Dairy, beef, and sheep farms make up the bulk of the farms, accounting for 90% of

³ CSO (2022). Census of Agriculture 2020 Detailed Results. CSO (Central Statistics Office). Retrieved from: <https://www.cso.ie/en/releasesandpublications/ep/p-coa/censusofagriculture2020detailedresults/>; DAFM (2022). Forest Statistics Ireland 2022. DAFM (The Department of Agriculture Food and the Marine).

⁴ DAFM (2022). Forest Statistics Ireland 2022. DAFM (The Department of Agriculture Food and the Marine).

⁵ Teagasc (2022). Teagasc National Farm Survey 2021 Final Results.

⁶ USDA (2022) USDA Milk Production Report. Retrieved from: <https://usda.library.cornell.edu/concern/publications/h989r321c>

⁷ TUPU NZ (2019) Land Use Fact Sheet- Dairy. Retrieved from: <https://www.tupu.nz/en/fact-sheets/dairy>

output. Ireland has very limited horticultural and grain production on account of its topography and climate.

The high utilisation of grazed and conserved grass (hay and silage) rather than concentrate feed, and generally moderate to low stocking rates, means that livestock production in Ireland has strong underlying environmental advantages. Irish pesticide usage is less than a third (31%) of the EU average of 2.27kg of pesticide per hectare on Utilisable Agricultura Area (UAA). Ireland uses on average 0.71kg of pesticide per hectare (see Appendix 1).

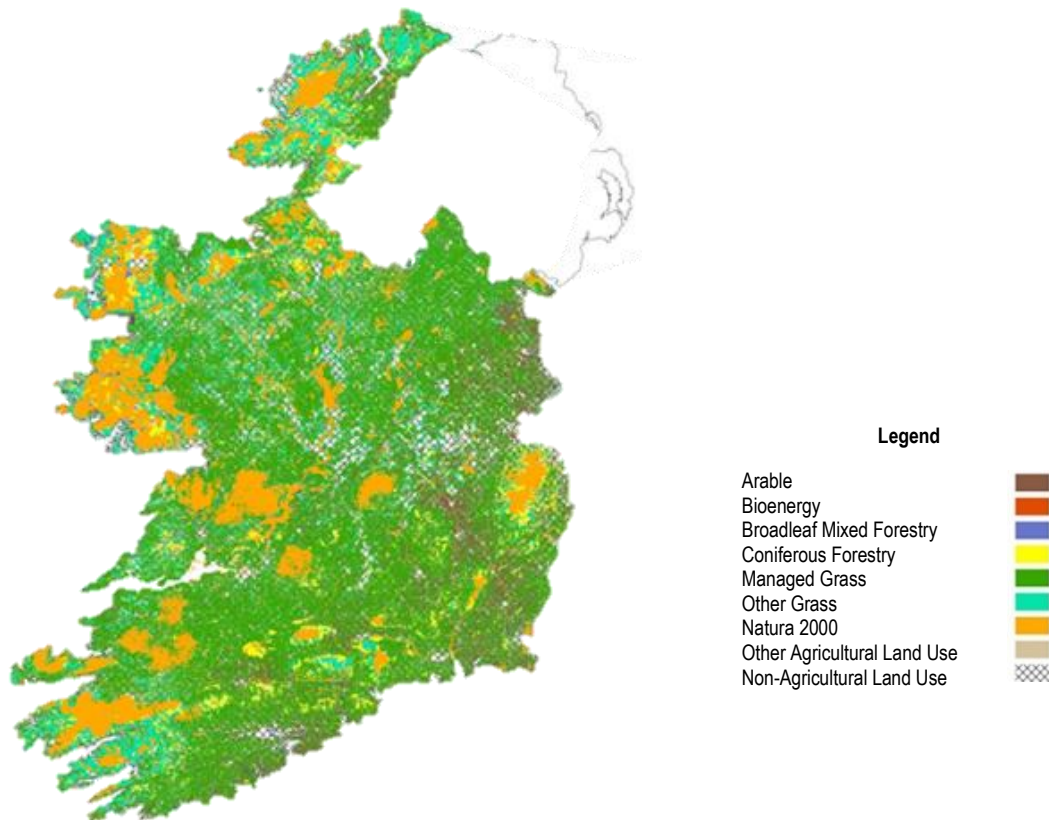


Figure 2. Indicative land use map of Ireland (source: Teagasc 2015)

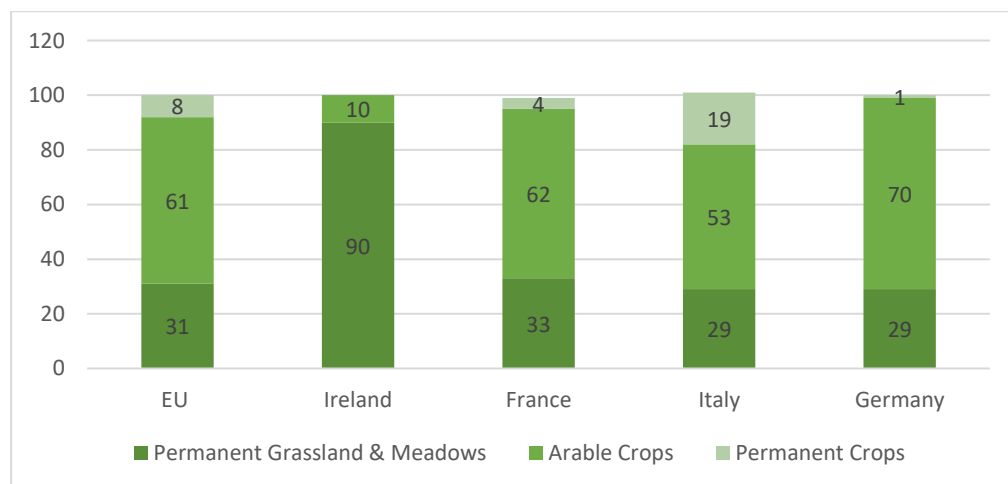


Figure 3. Utilisable agricultural area by land use (%) in 2020 (source: Eurostat).

3. Space for Nature on farms

Agriculture over many millennia has shaped the landscape of Ireland. Irish farmland is characterised by having a rich diversity of habitats such as hedgerows, field margins, ponds and streams, native woodland, bogs and species-rich meadows and pastures.

With over 90% of farmland under grass, compared with an EU average of 31%⁸, grassland contains many of our important habitats. Semi-natural grasslands are hugely important reservoirs for biodiversity, supporting a diverse range of plant and animal species.

Farmers understand that farmland habitats provide very important benefits to their farm such as shade and shelter for livestock, fencing, natural boundaries, pollination, flood prevention, water quality protection and carbon storage. They are continually tailoring management practices to protect and enhance biodiversity.

Space for Nature	Research shows that semi-natural habitats on Irish farms are on average 12-14% of the farm area, which is greater than reported in other EU countries. The Department of Agriculture, Food and Marine initial space for nature per farm mapping process is complete. While it is yet to be published, we expect the national average to be in line with the above research.
Hedgerows	<p>Hedgerows are an integral part of Ireland's lowland agricultural landscape. There is nearly 700,000 km of hedgerows, of all types, in Ireland, with an average width of 2.7 metres, which covers 2.6% of the land area⁹.</p> <p>This is the third largest total hedgerow area in the EU. Since 1994, farmers have established 6,605 kilometres of new hedgerows and planted more than 3.7 million trees on non-forest land¹⁰.</p> <p>Since 2009 farmers it is illegal to remove a hedgerow unless under exceptional circumstance and they must plant a replacement hedge of similar length in advance of the removal of the hedge. From 2023, the requirement will be to plant double the length of hedgerows removed.</p> <p>Since 2000 under the Wildlife Act farmer are prohibited to cut hedges during the bird nesting season from 1st March to 31st August each year.</p>
High Nature Value (HNV) farming	According to Teagasc, 33% of farmland is classified as High Nature Value (HNV) farming systems, that is land which is farmed under a low-intensity system which is particularly valuable for wildlife and the natural environment. 50% of total HNV farmland is part of Natura 2000 network ¹¹ .
Upland farming	There are approximately one million hectares of uplands In Ireland, 45% of which is blanket peatland. Approximately 340,000 hectares of the area is farmed as commonages by up to 15,000 farmers while other upland areas

⁸ Eurostat (2016). Share of utilized agriculture land under grassland in EU states in 2016.

⁹ O'Mara et al., (2021) Frank O'Mara, Karl G Richards, Laurence Shalloo, Trevor Donnellan, John A Finn, Gary Lanigan, Sustainability of ruminant livestock production in Ireland, *Animal Frontiers*, Volume 11, Issue 4, July 2021, Pages 32–43, <https://doi.org/10.1093/af/vfab037>.

¹⁰ DAFM (2022). Forest Statistics Ireland 2022. DAFM (The Department of Agriculture Food and the Marine).

¹¹ Moran et al., (2021). Moran, J., Byrne, D., Carlier, J., Dunford, B., Finn, J., Ó hUallacháin, D. and Sullivan, C., 2021. Management of high nature value farmland in the Republic of Ireland: 25 years evolving toward locally adapted results-orientated solutions and payments. *Ecology and Society*, 26(1).

	<p>are privately owned and farmed¹². Approximately 60% of these commonages are designated under Natura 2000.</p> <p>Uplands are associated with high nature-value farmland which perform vital ecological services that include providing important natural habitats, water storage and flood attenuation.</p>
Forestry	<p>Farmers own and manage over half of the national forest estate, approx. 400,000 hectares. Between 1980 and 2021 farmers accounted for 81% of new planting¹³.</p> <p>Since 2018, all new farm forests planted must include 15% broadleaf or native trees and 15% Areas of Biodiversity Enhancement (ABEs) to conserve and encourage biodiversity.</p>

Table 1. Overview of the space of nature and biodiversity on Irish farms.

4. European farm policy and the evolution of agri-environmental scheme (AES)

Ireland's agricultural policy is primarily driven by Europe's Common Agricultural Policy (CAP). Under CAP, Europe has a centralised budget which is used to support farming across Member States. Agreed as part of the Treaty of Rome in 1957, CAP, in its early stages, was very much focussed on both food security and farm incomes.

4.1. Qualifying for CAP core payments

Since the mid-2000's, CAP has included significant environmental regulations, known as *conditionality*, which farmers must comply with to qualify for their CAP core payments. In the new CAP 2023-2027 there is an even stronger emphasis on climate and environment through a new Green Architecture structure.

- All farmers **must comply with numerous good agricultural and environmental conditions (GAECs)** to qualify for CAP core payments. This includes protection of peatlands and wetlands, crop diversification and buffer strips, among other measures.
- Under previous CAP programmes areas designated as landscape features (woodland, scrub etc) were disallowed for core payment. From 2023, the rules relating to this have been changed and **farmers will be paid for areas designated as landscape features on their farm.**
- All farmers are now required to **devote a minimum of 4% of their agricultural land to "space for nature"**.
- **25% of farmers CAP core payment will be conditional on undertaking additional environmental actions.** These measures include higher space for nature, limiting chemical nitrogen use, planting on native hedgerow/trees and/or sowing a multi-species grassland.

¹² Teagasc (2019) 'An examination of biodiversity management practices on Irish farms and how this can be measured: the case of dairy farmers in County Waterford'.

¹³ DAFM (2022). Forest Statistics Ireland 2022. DAFM (The Department of Agriculture Food and the Marine).

- Funding of €256 million is allocated to support the development of organic farmland. This allocation aims to **increase the area under organics to the target of 7.5% or 337,500 ha in 2027.**

Farmers are continually being asked to do more to qualify for their CAP core payment. However, the level of EU funding for these core payments (known as Pillar 1) has significantly reduced. UCD analysis estimates that, in real terms, Irish funding under Pillar 1 of CAP has declined by 17% in the 2006-2019 period¹⁴ (see Appendix 1).

4.2. Agri-environmental schemes

Agri-environmental schemes (AES) have become an important part of European agricultural policy since they were introduced in 1994. Ireland has relatively high participation rates, with 33% of our farmland under an agri-environmental scheme, compared with an EU average is just over 13%¹⁵. Participation in AES schemes is voluntary.

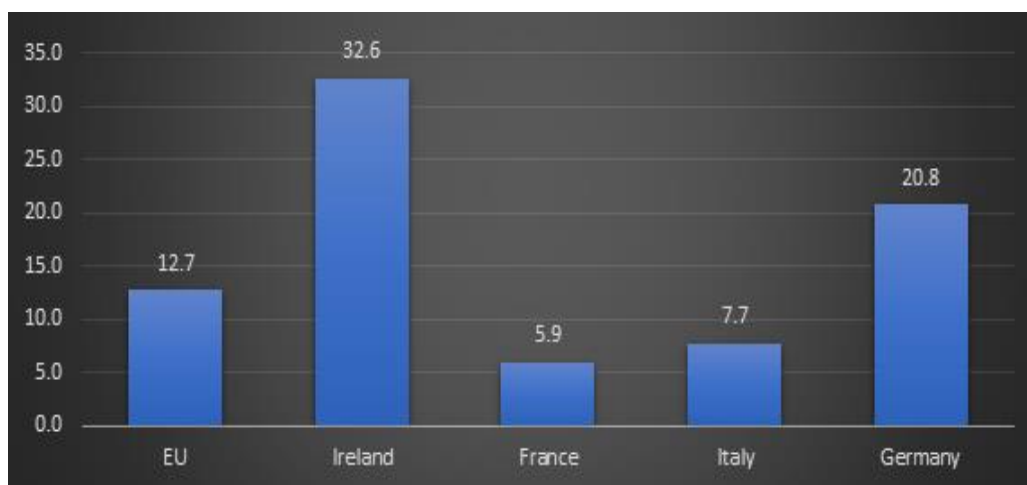


Figure 4. The percentage of farmland under agri-environmental schemes in Europe.

REPS (1994 to 2010)	<p>The Rural Environmental Protection Scheme (REPS) was the first agri-environmental scheme, and continued, following revisions, from 1994 until 2010. This was a hugely successful scheme with almost 70,000 farmers participating. The State funding was substantial, the Rural Development Plan the 2000-2006 set aside €1.9 billion in funding for the REPS scheme.</p> <p>The average payments under REPS 1 saw farmers reaching close to half of overall farm income at €6,350, with additional funds made available to applicants farming in Special Areas of Conservation, Natural Heritage Areas, and those grazing commonage. The scheme was particularly well subscribed by small to medium sized drystock farmers.</p>
AEOS (2010 to 2014)	<p>REPS was succeeded in 2010 by a smaller Agri-Environment Options Scheme (AEOS) which took a more targeted approach, focussing on part-farm actions.</p>

¹⁴ Wallace, M (2020) What priorities and approaches are needed for improved targeting of CAP payments to ensure appropriate support and stabilisation of farm incomes? - Presentation to CAP Consultative Group Meeting on 28th April 2020.

¹⁵ European Commission (2018). Environment and Climate Action (Summary) - (EU27) - European Union 27. Retrieved from: https://agridata.ec.europa.eu/extensions/DashboardIndicators/Environment.html?select=EU27_FLAG,1.

GLAS (2014 to 2020)	The Green Low-Carbon Assurance Scheme (GLAS) was introduced as part of the Rural Development Programme 2014-2020. The Budget was significantly lower when compared to REPS at just over €1 billion. Over 50,000 farmers participated in GLAS over the 2015-2022 period. This includes measures such as implementing grass margins, wild bird cover, bat boxes, bird boxes and planting hedgerows.
ACRES (2023 to 2027)	The Department of Agriculture has recently announced its new agri-environmental scheme, the Agri-Climate Rural Environment Scheme (ACRES). This scheme has a 5-year budget of €1.5 billion. IFA are concerned that this scheme is less attractive than its predecessors.

Table 2. The evolution of agri-environmental schemes since they were introduced in Ireland.

The Department of Agriculture, Food and the Marine have missed an opportunity to match the level of ambition shown previously under REPS in the new ACRES scheme. The Minister for Agriculture, Food and Marine has claimed that the budget for ACRES makes it the largest agri-environmental scheme in the history of the state. IFA estimates that the budget for REPS, when adjusted for inflation, was 19% higher than ACRES.

Similarly, the payment a typical farmer can receive under ACRES is significantly lower than REPS while the number of farmers that will be enrolled under ACRES is 50,000. This is substantially lower than the 70,000 farmers that participated in REPS. With similar budgetary commitment more could be achieved.

4.3. Wild Bird Cover

Farmers under GLAS established approx. 20,000 hectares of wild bird cover¹⁶. To put this in context, this made wild bird cover the 4th largest crop grown in Ireland, 2.5 times larger than the area planted for potatoes.

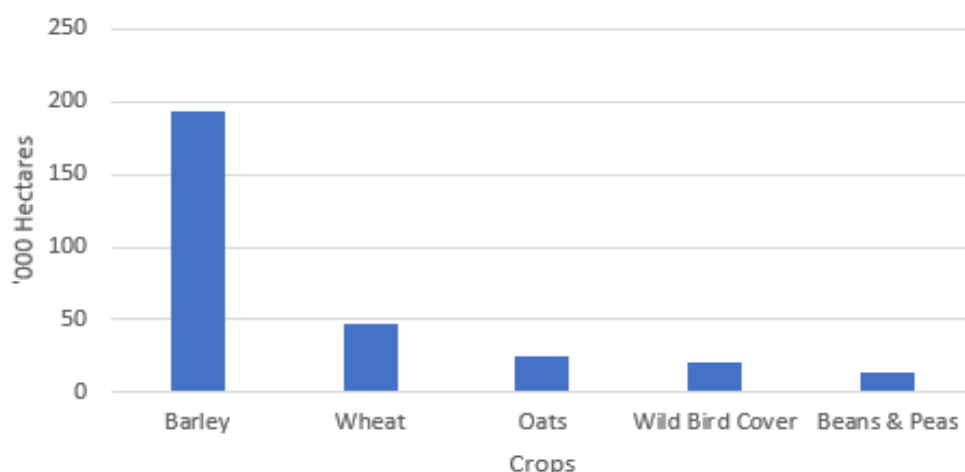


Figure 5. Top 5 arable crops in Ireland 2020 (source: CSO).

¹⁶Teagasc (2020) Teagasc Crops, Environment and Land Use Programme Farmers providing a giant bird-table-Today's Farm Retrieved from: <https://www.teagasc.ie/publications/2020/wild-bird-cover-providing-a-giant-bird-table.PHP>

During the period of GLAS there was a marked recovery in the level of farmland birds recorded, numbers now 10% higher than 2000 levels¹⁷.

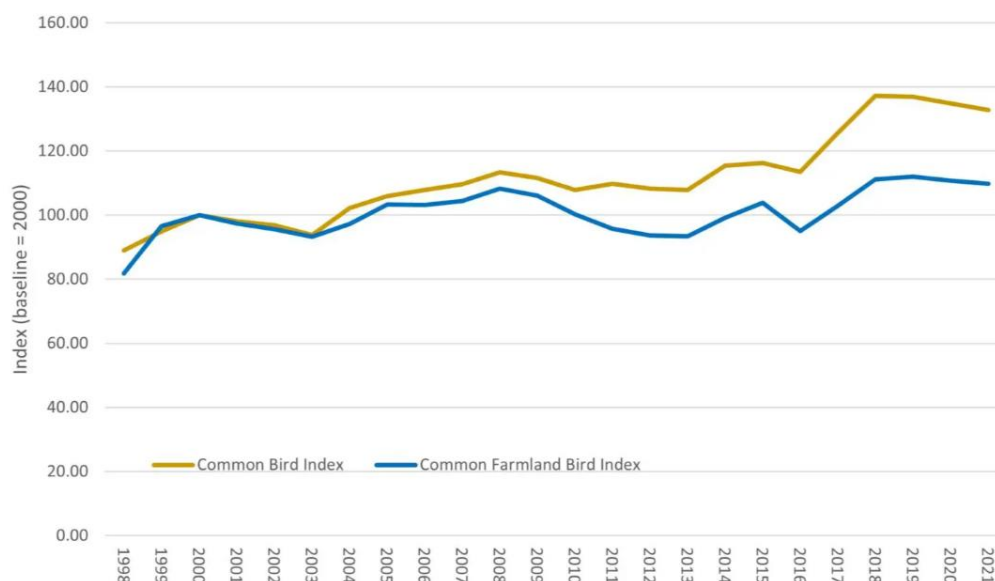


Figure 6. The Common Bird & Common Farmland Bird Index 1998 – 2021 (source: Birdwatch Ireland)

IFA recognises that we need to continue to protect and promote farmland birds but measures such as the wild bird cover illustrate how incentivised actions can have positive outcomes for all stakeholders.

5. Designated land and protected areas on farms

Natura 2000 network: is a European network of protected areas which are important sites for breeding and resting of threatened or rare species. The sites within Natura 2000 are designated under the Birds and the Habitats Directives.

Designated Land: The most important habitats are designated as:

- Natural Heritage Areas (NHAs) are nationally designated by the Irish Government as important habitats in Ireland with a variety of rare species of flora and fauna.
- Special Areas of Conservation (SAC) are for flora and fauna of European importance.
- Special Protection Areas (SPA) are for areas with birds of European importance

Farmland within these designated areas is subject to more sensitive management and require consent prior to some farming activities being carried out.

Much of the designated land in Ireland is farmland. The designation of farmland and the increased regulation associated with designation, considerably alters the economic potential of the land. Designation has been shown to (i) strongly impact land values and (ii) increase the management

¹⁷ Birdwatch Ireland (2021) The Common Bird & Common Farmland Bird Index 1998 – 2021- The Countryside Bird Survey. Retrieved from [https://birdwatchireland.ie/our-work/surveys-research/research-surveys/countryside-bird-survey/countryside-bird-population-indicators/#:-:text=Common%20Bird%20Index%20\(1998%20%E2%80%93%202021\)&text=This%20indicator%20has%20increased%20overall,increase%20by%2032%20per%20cent.](https://birdwatchireland.ie/our-work/surveys-research/research-surveys/countryside-bird-survey/countryside-bird-population-indicators/#:-:text=Common%20Bird%20Index%20(1998%20%E2%80%93%202021)&text=This%20indicator%20has%20increased%20overall,increase%20by%2032%20per%20cent.)

costs due to higher environmental standards, which decrease farmers' flexibility with regards the management of the land.

Since 2006, nearly 900 Farm Plan Schemes for designated lands have been supported by the National Parks and Wildlife Service (NPWS). They have been developed to deliver actions that benefit habitats and species in the Natura 2000 network¹⁸. However, the existing supports are inadequate and do not address the fundamental issue of loss of income and the devaluation of land values.

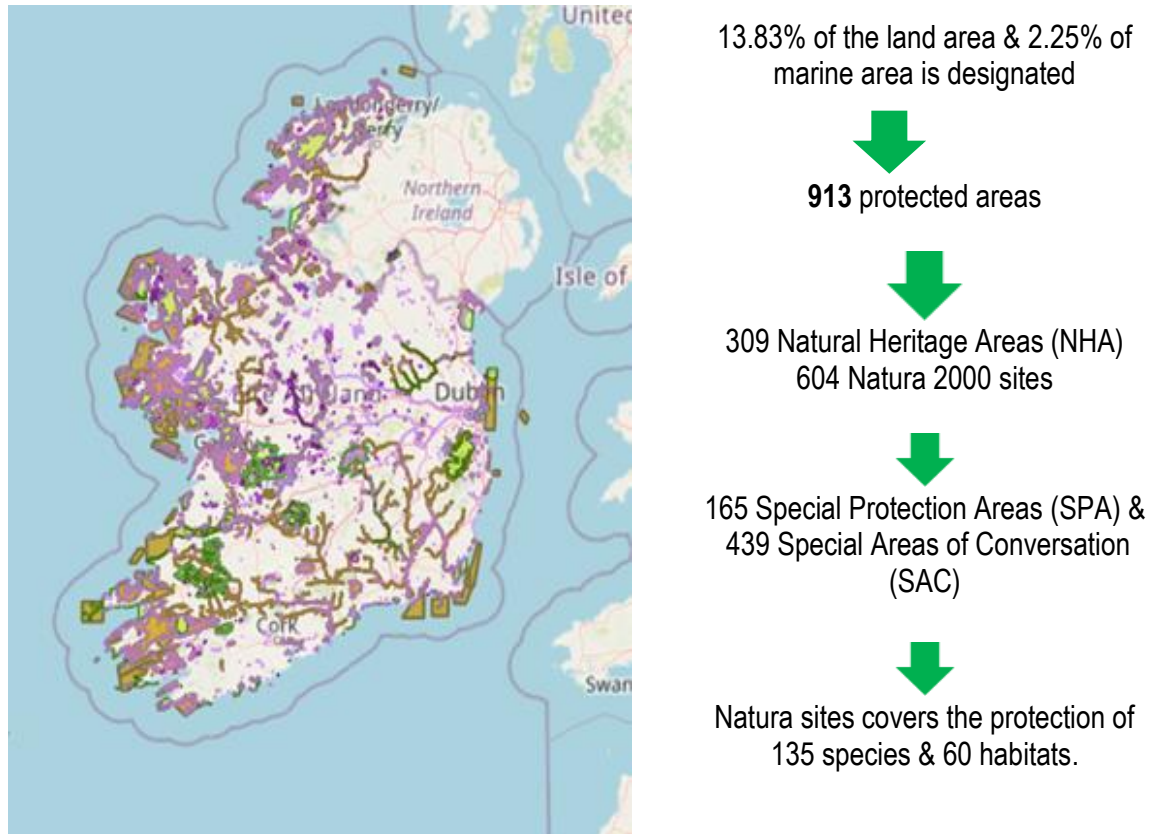


Figure 7. Map and information on network of protected areas in Ireland¹⁹.

Increased funding is required to expand the NPWS Farm Plan Scheme, payment rates need to be increased to reflect the additional costs and burden on farmers whose land is designated. An Enhanced Farm Plan Scheme must be funded through the national exchequer and cater for all farmers with designations who apply. An independent arbitration scheme should be introduced to determine the loss of value or impact on the farm business caused by designations and an associated budget allocated to cover the costs.

6. Capacity building and collaboration to protect and enhance biodiversity

In recent years, several innovative projects have developed a more interdisciplinary and collaborative solution-based approach to biodiversity, with a strong focus on peer-to-peer learning (see Appendix 3). Preventing biodiversity loss is a complicated challenge that requires a diverse range of solutions.

¹⁸ NPWS (2022) NPWS to take in new Farm Plan Scheme participants to benefit nature- the National Parks and Wildlife Service. Retrieved from: <https://www.npws.ie/news/npws-take-new-farm-plan-scheme-participants-benefit-nature>

¹⁹ BISE (2022) Biodiversity Information System for Europe- Ireland Retrieved From <https://biodiversity.europa.eu/countries/ireland>

Collaboration brings diverse perspectives, complementary skills, and resources to guide change to protect and enhance farmland biodiversity. Positive engagement with landowners, IFA and other farm organisations, and local communities have delivered biodiversity improvements locally and increased the awareness of the threats to biodiversity among the wider farming community.

Burren Programme

Farmers working in partnership to develop locally adapted agri-environmental programmes have proven to be very successful model to conserve, enhance, and restore farm biodiversity. One pioneering example is the Burren Programme, which has been working with farmers since 2005, to develop an evidence-based approach to manage species-rich grasslands, habitats, and water quality as part of livestock systems.

Central to the success of the programme are several factors; (i) farmer led, (ii) results based, (iii) flexible and adaptable, (iv) local and practical and (v) properly funded. The programme is now used as a guide of best practice at a European level for the development of agri-environmental programmes.

Agricultural Sustainability Support and Advisory Programme (ASSAP)

The Agricultural Sustainability Support and Advisory Programme (ASSAP) is a government and industry collaborative initiative, that works with farmers. It provides a free and confidential advisory service to help improve water quality in priority areas, which benefits biodiversity. Over 93% of participating farmers have engaged positively with programme, agreeing to put in place farm specific measures to help improve water quality.

Smart Farming Programme

Smart Farming is a voluntary resource efficiency programme led by the IFA in partnership with the EPA that works with farmers to improve farm returns while enhancing the rural environment. The Smart Farming programme focuses on eight key areas of resource efficiency on farms; soil fertility, grassland management, energy, water, time management, machinery, feed, inputs and waste. The aims are to minimise the use of external inputs, to reduce waste, and reduce emissions to deliver the co-benefits of improved water quality and farm biodiversity.

7. Proposed EU Nature Restoration Law

The European Commission has proposed a new Nature Restoration law²⁰, as a key element of the EU Biodiversity Strategy. The proposed regulation will require each Member State to develop a framework to clearly identify restoration measures, which together cover at least 20% of the EU's land and sea area by 2030 and all ecosystems in need of restoration by 2050.

For farmland habitats it proposes to increase (i) grassland butterflies and farmland birds, (ii) the stock of organic carbon in cropland mineral soils, and (iii) the share of agricultural land with high-diversity landscape features, restoring drained peatlands under agricultural use. In relation to drained peatlands under agricultural use it sets a target to rewet approximately 25,000 hectares by 2030 increasing to approximately 115,500 hectares by 2050.

The proposed regulation highlights that lack of financing was a key failure in the EU meeting its 2020 biodiversity targets. Therefore, it is essential that specific funds for Nature Restoration are allocated,

²⁰ EC (2022) Proposal for A Regulation of The European Parliament and of The Council on Nature Restoration- The European Commission Brussels, 22.6.2022 COM (2022) 304 final 2022/0195 (COD).

restoration can not be achieved if it is dependent on the CAP. It is necessary that restoration is funded through a dedicated financial mechanism.

There must be full engagement with farmers and a full impact assessment carried out to understand the socio-economic impact of the proposals before the Irish Government adopts a position on this EU proposal.

8. Conclusion

Irish farmers have a positive attitude to biodiversity and their sense of place and pride in local heritage should be engaged and harnessed to reverse biodiversity loss. Their knowledge and expertise must be recognised, and their involvement actively supported in policies and programmes to safeguard biodiversity.

1. Extensive farming system

Ireland has a predominately extensive livestock grass-based farming system which uses less inputs (fertilisers, pesticide etc.) and provides many positive environmental benefits.

2. Space for Nature

With space for nature now accounting for on average 12-14% of farm area. It is important that farmers' investment and the positives changes that have been taking place on farms in recent years are fully recognised.

3. High level of participation in agri-environmental schemes

33% of the farmland area in Ireland (compared with an EU average of 13%) is under agri-environmental schemes. Irish farmers have participated on a voluntary basis since 1994 enhancing farmland biodiversity. The new ACRES needs to be more attractive to encourage a level of participation similar to those in previous schemes.

4. Farmers on designated land need to be properly compensated

Regulations on land use or farming practices in designated areas/protected areas that impose constraints that increase management costs or impact production must be properly compensated. To date farmers, particularly in protected areas, have not been sufficiently compensated for loss in production or land values due to designation.

5. Collaborative approach to nature conservation works best

It is evident that the most successful programmes that protect and enhance farmland biodiversity and the wider ecological connectivity, have been developed in consultation with farmers. Local leadership and buy in is essential to deliver improvements locally but also increase the awareness of the threats to biodiversity in the wider farming community.

6. New funding structure (outside of CAP)

The lack of financing and allocation of resources to biodiversity (outside of CAP) has been identified at EU level as a key failure in meeting biodiversity targets. New and innovative funding mechanisms, separate to CAP, must be developed to reward farmers for the wider ecosystem services provided by their actions.

7. Incentive-based biodiversity policy

Incentivised management-based programmes rather than regulation, that focus on management measures tailored to local, or even farm-holding specific conditions, which are practical and not too prescriptive, can produce optimal results for biodiversity.

8. Farmers need to be fully engaged on EU Nature Restoration Law

There needs to be full engagement with farmers and IFA on the proposed Nature Restoration Law. It is essential that the biodiversity targets are ambitious, but likewise that they targets are achievable, the socio-economic impacts are fully understood and that the actions are supported financially.

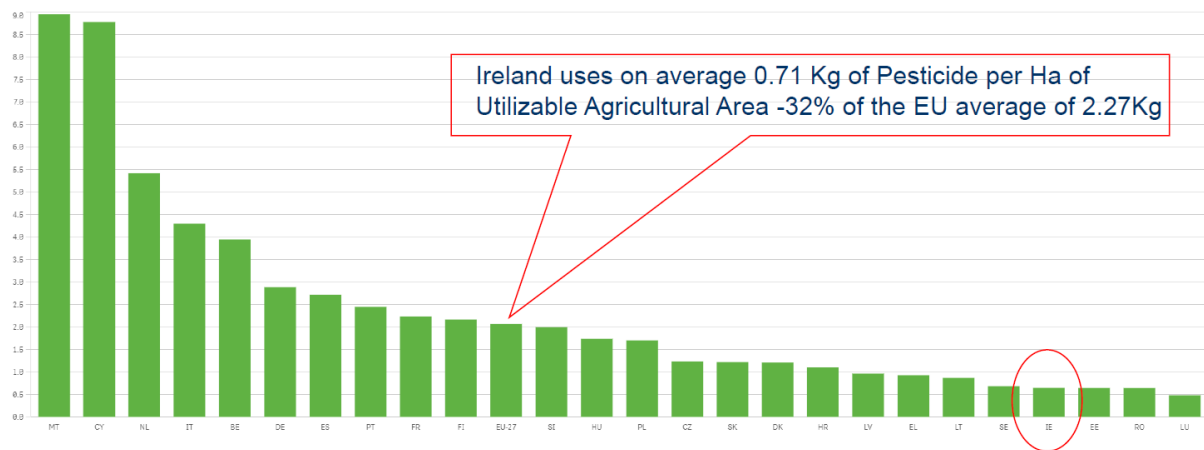
9. Farmers property rights must be respected

All measures to enhance biodiversity must be voluntary and respected Irish farmers property rights.

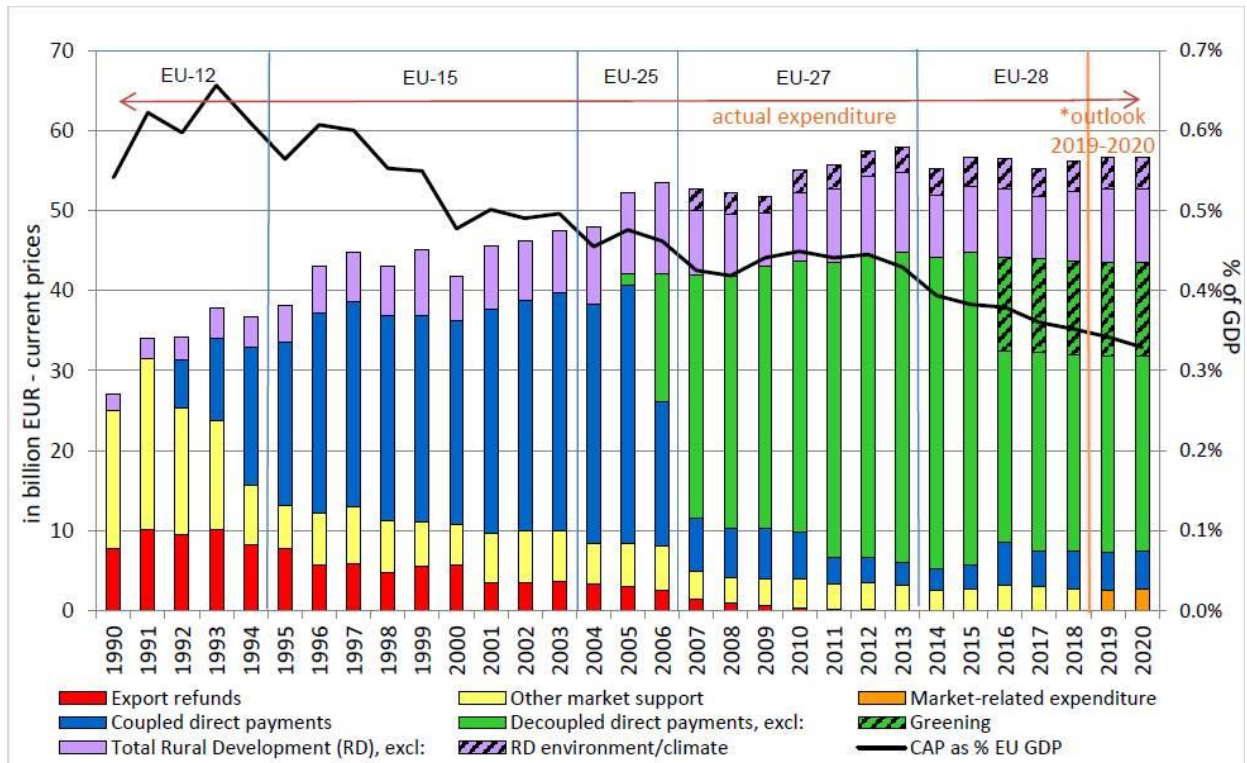
We trust that these comments are useful. If you wish to discuss any aspect of this submission, please contact Geraldine O'Sullivan, IFA Senior Policy Executive by email on geraldineosullivan@ifa.ie or on 087 9385283.

Ends.

Appendix 1: Pesticide use per hectare, by country (2020)



Appendix 2: The evolution of the CAP funding since 1990



Appendix 3: Examples of programmes of excellence in conserving farm biodiversity

All Ireland Pollinator Plan

The All-Ireland Pollinator Plan is a road map that aims to help bees, pollinating insects, and the wider biodiversity. The Plan involves partners including farmers coming together to manage the landscape to permanently support biodiversity. Implementation of the plan is coordinated by the National Biodiversity Data Centre.

The Protecting Farmland Pollinators element of the project aims to encourage farmers to make their farm more pollinator friendly in a way that is measurable and will not impact on productivity. Farmers have received a results-based payment depending on the number of pollinator-friendly habitats identified on their farm. In 2021, over 300 bare soil solitary mining bee nesting sites were created on farms and participant farmers had put up over 130 bee boxes for cavity nesting bees.

Blackstairs Farming Futures

The Blackstairs Farming Futures project aims to develop a new revenue stream for commonage farmers in the Blackstairs Mountains for the delivery of innovative eco-system services whilst improving habitat conditions in the Blackstairs Mountain Special Area of Conservation (SAC) and adjacent semi-natural habitats (peatlands, heathlands and grasslands). Farmers are supported to utilise best practice techniques where needed to improve habitat quality to include fencing Coillte plantations, bracken ('ferns') control, targeted grazing aids, management of scrub, removal and control of invasive species, possible reintroduction of cattle, implementation of a managed burning programme, nest protection/predator control and improvement of access tracks to commonages.

BRIDE Project

The BRIDE Project (Biodiversity Regeneration in a Dairying Environment) is an agri-environment project based in the River Bride catchment of north-east County Cork and west Waterford, Ireland. The Project aims to design and implement a results-based approach to conserve, enhance and restore habitats in lowland intensive farmland.

- A Biodiversity Management Plan is produced with participating farmers that identifies priority actions for the maintenance/enhancement of farmland wildlife.
- Farm-based actions target farmland habitats such as: hedgerow management, field margins, retention of winter stubble on cereal farms, skylark plots, riparian buffer strips, creation of a permanent pond, conservation of existing farm habitats, native woodlands, nest-box and bat-box installation, rodent control, and control of invasive species. •
- The project also aims to monitor the diversity of vegetation types, plants, bird, bats, and pollinators, using baseline and ongoing surveys.

Burren Programme

The aim of the Burren Programme was to incentivise sustainable grazing and removal of encroaching shrub on 328 farms over 23,000 hectares. It supports farmers to adopt practices through results-based incentives. The success of the programme shows that when given the appropriate structures, incentives and supports farmers can deliver a range of eco system services. The actions supported by Burren Programme include scrub control, water supply provision, access tracks, new feeding systems and habitat restoration.

Caomhnú Arann

The Caomhnú Arann project aims to protect and restore priority habitat on the Aran Islands at lower costs and greater efficiency through the exploration and development of innovative methods of habitat improvement and conservation. The Caomhnú Arann project is working with 127 farmers addressing

some of the issues affecting the condition of the species-rich grassland habitats which need adequate grazing to remove vegetation, allowing wildflowers, sedges, and grasses to flourish.

Comeragh Uplands and Communities EIP Project

The Comeragh Uplands and Communities EIP Project aims to build farmer's capacity to manage their upland habitats and engage with the local communities. Activities of the Comeragh Uplands and Communities EIP Project to prevent biodiversity loss including habitat management training for upland farmers and prescribed burning training.

Farming For Nature

Farming For Nature is an initiative, to support High Nature Value farming in Ireland. The objective of the initiative is to show that farming must be a part of nature and not apart from it and that farming for nature can also be agriculturally, economically, and socially progressive. The Farming for Nature project has showcased farming to support habitats and prevent biodiversity loss through its annual awards. It also provides practical resources and advisory services to farmers to support biodiversity.

Hen Harrier Project

The Hen Harrier Project is an EIP (European Innovation Partnership) Locally and is a conservation programme building partnerships with farmers to deliver sustainable benefits for biodiversity, upland ecosystems, and the local rural economy with the aim of improving the site's management and conservation condition for the benefit of the Hen Harrier. The project delivers on preventing biodiversity loss by ensuring the sustainable management of High Nature Value farmland in the most important areas for Hen Harrier in Ireland, with special emphasis on providing quality habitat for the Hen Harrier and the various other species of wildlife that share the same landscape

Inagh EIP

The Inagh EIP supports local farmers, forestry owners and members of the community to address the challenge of biodiversity loss by working to enhance habitat connectivity. The Inagh EIP is designed to deliver a new approach to address biodiversity and habitat loss in the Upper Inagh River Catchment, West Clare, by developing farming for nature and catchment sensitive farming and forestry practices. The overall aim is to demonstrate that biodiversity loss can be minimised, and site-specific mitigation measures can be implemented by farmers, scientists and advisors working together on a catchment scale.

Inishowen Upland Farmers Project

The Inishowen Upland Farmers Project aims to improve the economic sustainability of farming High Nature Value (HNV) land through the implementation of a range of measures which also deliver biodiversity, water quality and climate change. The project is delivering for biodiversity through prescribing targeted actions to farmers including measures to:

- Integrate suitable broadleaved woodland
- Plant hedgerows and manage existing hedging to create biodiversity corridors.
- Create ponds with multi-purposes of habitat creation, flood mitigation, and farm water supply.
- Trial experimental grazing regimes, for the management of biodiverse upland vegetation.
- Plan for scrub removal on the uplands.

Life IP Wild Atlantic Nature

Wild Atlantic Nature LIFE Integrated Project (IP) works with farmers, local communities, and landowners to add value to the Special Area of Conservation (SAC) network of blanket bogs and associated areas. Actions to prevent biodiversity loss include site surveys, ecological assessments, training for concrete

conservation actions, control of invasive species, fire prevention, water management, monitoring and evaluation.

MacGillycuddy Reeks EIP Project

The MacGillycuddy Reeks EIP Project is a European Innovation Partnership (EIP) which aims to improve the sustainability and support the economic viability of farming in the MacGillycuddy Reeks. Farmers are supported to develop management interventions for the preservation, restoration, and enhancement of upland habitats by removing rhododendron and bracken scrub to enable the restoration of peatland and grassland habitats.

Pearl Mussel Project

The Pearl Mussel Project aims to design and implement a voluntary results-based agri-environmental scheme with farmers that will help protect the endangered freshwater pearl mussel, as well as benefiting the wider environment. The project protects biodiversity loss by providing guidance for farmers to protect and enhance the conditions of the freshwater pearl mussel rivers and local environment and maintaining and improving natural habitats (such as wetlands, grasslands, and bogs).

Sustainable Uplands Agri-environment Scheme (SUAS)

The SUAS project aims to address the agricultural, environmental, and socio-economic challenges associated with the management of commonages and farms in the Wicklow/Dublin uplands. This project has delivered on preventing biodiversity loss through the establishment of Commonage Groups (CGs) who take responsibility for the delivery of their own Commonage Management Plan (CMP) and are supported with on-site training and practical demonstrations for example on best practices related to controlled burning and other biodiversity protection measures.