

Proposals for the CAP Green Architecture and Implementation in Ireland

A working paper of the Farming for Nature Technical Group

Contents

Heritage Council Foreword	2
Key messages	2
About us.....	3
Meeting the practical needs of Government.....	4
Our vision for the CAP Green Architecture in Ireland	4
Role of cross-cutting measures	5
Tier 1: Enhanced Baseline Conditionality	6
Tier 2: Eco-schemes in Pillar I.....	7
Tier 3: AEC Measures in PILLAR II.....	7
Stream A: National AEC measure	8
Stream B: Locally Adapted Farming for Nature AEC measure	8
AEC Stream B: Locally Adapted Farming for Nature measure proposed implementation.....	9
Enhanced Delivery Model	10
Summary:.....	12

Heritage Council Foreword

The Heritage Council has long advocated for the support of High Nature Value (HNV) farming systems in Ireland. In response to declared national crises in both climate change and biodiversity, the Council sought a focused response, setting out how Ireland might best apply these principles in the context of expected changes to CAP and the new Green Deal.

This proposal is driven by partners previously supported by the Council and by EIPs operating locally-adapted results-based agri-environment programmes. A number of EIPs have developed large-scale programmes, while displaying a deep understanding of the local systems and, through partnership, recompensing farmers who achieve set targets that benefit us all.

We all recognise that systems and policies must deliver much more than just agricultural products for the market; including keeping our waters clean, supporting our natural heritage and safeguarding our carbon stores.

This proposal is the result of many people's work, knowledge and understanding; it was compiled by consensus, in an effort to showcase how society's desired objectives can be better delivered through farming smarter, using highly dynamic systems, by those who are best positioned to deliver those outcomes – farmers themselves.

VIRGINIA TEEHAN , CHIEF EXECUTIVE, APRIL 2020

Key messages

There are six core considerations in our proposals for the CAP green architecture in Ireland. These are value for money; farmer engagement; evidence-based; integrated and simplified; results-based and auditable; and relevance. We propose an integrated framework across Pillar I and II of the CAP that has three tiers with increasing environment ambition and delivery as you move from baseline conditionality (Tier 1) to eco-scheme (Tier 2) to agri-environment climate measures (Tier 3).

We propose that the three tiers in this green architecture are supported/complemented by other CAP measures such as ANC payments, farm advisory services (and wider Agricultural Knowledge and Innovation Systems (AKIS)), EIP operational groups, support for non-productive investments, payments related to Natura 2000 and Water Framework Directive interventions, and technical assistance.

Enhanced baseline conditionality is proposed along with a simple point-based eco-scheme that should be integrated with industry sustainability programmes, such as Origin Green, to reduce the administrative burden on farmers and improve overall integration and coherence in communications on environment standards.

Finally, we are proposing an innovative approach to agri-environment climate measures; a third tier with two streams. Stream A is a national agri-environment scheme while Stream B is a locally adapted farming for nature scheme. Stream A would be available throughout Ireland while Stream B would be targeted to priority areas and objectives. We propose that both streams would have a results-based payments component. Stream A should have results-based payments options to complement its largely action-based approach. Stream B is a hybrid results-based framework, locally-adapted and aimed at national environmental priorities and targeted at specific HNV farming regions.

About us

We, the Farming for Nature Technical Group, were convened by the Heritage Council as part of its ongoing High Nature Value (HNV) Farming Ireland work, in association with GMIT and EFNCP. Together, we offer many years' worth of experience of working directly with HNV farmers across Ireland, including through EIP AGRI Groups, and with a range of other partners including the Heritage Council, DAFM and NPWS.

Much of our work focusses on the development and delivery of locally-adapted Agri-Environment Climate (AEC) Schemes, working closely with farmers and other stakeholders and using tried-and-tested 'result-based payment' measures to meet a range of key environmental objectives. Building on our collective experience, we now wish to propose a reformed CAP Green Architecture under the CAP Strategic Plan to include a 'Locally Adapted Farming for Nature Measure'.

The proposal provides a pathway to delivering DAFM's stated ambition in **Section 8.2.10 of Ireland's RDP 2014-2020** of using the EIP AGRI experience to inform the next RDP.

This proposal summarises the reflections of many individuals, groups and consultations over many years e.g. discussions during a range of workshops and study trips in 2019, including at the Burren Winterage School, formal and informal discussions with DAFM officials and NPWS staff, and workshops held with the DG Env and DG Agri in Brussels. We see this proposal as a starting point for discussion and would welcome the input of others, in particular EIP-AGRI Operational Groups and, of course, DAFM.

This proposal is intended to be practical and constructive, based on good science and many years of experience from reliable sources operating at a significant scale. It recognises and, we feel, addresses the challenges faced by DAFM in delivering more with less under the new CAP. It does this by simplifying the CAP for Irish farmers, satisfying exacting EU audit needs and accommodating a range of competing sectoral interests.

While our approach is innovative and ambitious, we nonetheless believe that it is practical and achievable at scale. We also feel that, at a time of environmental crisis, it is an essential and timely evolution of our Agri-environment structure:

Lorcan Scott (The Heritage Council)
Patrick Crushell (Freshwater Pearl Mussel Project EIP (PMP))
Brendan Dunford (Burren Programme (BP))
Gwyn Jones (EFNCP and RBAPS Project)
James Moran (GMIT and RBAPS Project)
Patrick McGurn (AranLIFE Project and Caomhnú Árann EIP)
Derek McLoughlin (PMP and RBAPS Project)
Fergal Monaghan (Hen Harrier Project EIP (HHP))
Caroline Sullivan (HHP)

Meeting the practical needs of Government

With our experience of delivering agri-environment and EIP Agri payments on a large scale, we are acutely aware of the administrative needs of Government. Our proposal is therefore informed throughout by the following core considerations of:

- **Value for Money** – we believe that our proposal ensures value for the public funding paid to farmers. In addition, evidence from existing projects (BP, HHP, PMP) indicates that the ‘administrative’ cost of locally-adapted projects can offer excellent value for money.
- **Farmer Engagement** – the local-adaptions of Tier 3 Stream B in particular would ensure better buy-in from farmers and other stakeholders (one of the key successes of the BP but maintained even in the larger HHP and PMP). *The flexibility and design of results-based incentives appeals to farmers as evidenced by high level of engagement and the very low attrition rates under existing projects (e.g. <1% attrition from BP, HHP, PMP).*
- **Evidence Based**– our proposal has a strong evidence base, built on many years of research and programme delivery. Much of this has been collated through the CAP4Nature initiative¹ and includes peer-reviewed papers and tried-and-tested score cards for a range of common Irish habitats, along with the technology to efficiently deliver it.
- **Integrated and Simplified** – our proposal is fully integrated across the CAP framework – BPS, Eco Scheme, National AECM, and HNV-targeted scheme – and proposes a simple ‘one plan’ integrated interface for all participating farmers. It would also integrate and take forward the work of many existing EIP-AGRI projects, retaining these projects’ critical local presence and local adaptability while optimising operational efficiency and reducing costs by means of a central administrative hub.
- **Results-based and auditable** – the use of scorecards and other quantitative indicators would continuously generate reliable, real-time data on the efficacy of these programmes. Results from up to 10 years of work demonstrate the positive environmental impact of our proposed approach (e.g. 11.5% increase in field scores (2010-19) under BP, 35% increase in chicks fledged 2017-19 in HHP). These results are easily auditable for both Irish and EU officials.
- **Relevant** – our proposals address biodiversity loss on farmland, offer significant nature-based solutions to climate change, Natura 2000 objectives, Water Framework Directive, and Nitrates Directive, and are fully consistent with a range of strategies at national (as promoted by Bord Bia, EPA, NPWS etc.) and EU level (Green Deal, Farm to fork).

We are committed to supporting DAFM in the integration of these proposals into the CSP and in their subsequent implementation – in such areas as capacity building, technical support, advice on IT and mapping needs. By adopting this proposal, DAFM can cement its position as an EU leader in adopting innovative approaches to enhance farmland biodiversity, improve farmer engagement in environmental management and offer the taxpayer a compelling argument for investing in the CAP.

Our vision for the CAP Green Architecture in Ireland

Under the proposed new delivery model for CAP post 2020, there are clear opportunities for a more integrated approach across Pillar I and Pillar II via Member States’(MS) CAP Strategic Plans (CSP). A key opportunity for achieving the enhanced environmental ambition of the CAP post-2020 is the new CAP Green Architecture, combined with a move towards a more results-orientated approach. The three main

¹ <https://www.cap4nature.com/>

components of the Green Architecture (baseline conditionality, eco-schemes and agri-environment-climate measures (AECM)) need to be designed in an integrated fashion and cognisant of the diverse agricultural land base in Ireland and the range of farm types. Overall, the design of the Green Architecture will determine whether we meet the three out of nine CAP objectives, which relate to the environment and climate:

- Contribute to **climate** change mitigation and adaptation, as well as sustainable **energy**;
- Foster sustainable development and efficient management of **natural resources** such as **water, soil and air**;
- Contribute to the protection of **biodiversity**, enhance **ecosystem services** and preserve **habitats and landscape**

Role of cross-cutting measures

To deliver better policy outcomes, it is essential for the Green Architecture to be supported/complemented by other CAP measures such as ANC payments, farm advisory services (and AKIS), EIP operational groups, support for non-productive investments, payments related to Natura 2000 and Water Framework Directive interventions, and technical assistance (Fig. 1). We return to this theme as we discuss our detailed proposals for AECM.

The AKIS to support this ambitious stream of the proposed Irish AEC measure is already substantially developed. For example, in Ireland we have the Farming for Nature (FFN) platform, which includes a network of farming ambassadors around the country sharing knowledge, with background support from a range of specialists. It includes a database of online resources and guidance to support FFN. Well over 100 advisors have been trained in the current CAP programming period through the Burren Programme, EIPs and Results-Based Agri-Environment Payment Scheme (RBAPS) pilots alone – the expansion of this resource is eminently deliverable.

Identification guides, online apps and access to biodiversity records are all available through the National Biodiversity Data Centre and the various projects. Complementary resources and specialist help are available from other countries and from relevant EU networks. Building on this strong base in the post-2020 AKIS, we can ensure better delivery for the Irish taxpayer and farmer and keep Ireland as a leader in the field.

A critical component of the CAP are the **eligibility criteria** for the Basic Payment, which are linked to the definition of “agricultural land” to be specified at MS level² within the context of “framework definitions” set at EU level. It is critical that the definition of “agricultural activity” and “agricultural land”, including “permanent grassland and permanent pasture” (together referred to as “permanent grassland”) do not hamper but rather assist the delivery of policy outcomes on Irish farms. That means that they should reflect local conditions in Ireland and convey a coherent message. The new flexibility in the framework must be utilised to ensure that all features on farmland that are contributing to the CAP objectives, including environment and climate objectives, and which require farming intervention of some kind, are eligible for support.

² Jongeneel, RA. (2018). Research for AGRI Committee – The CAP support beyond 2020: assessing the future structure of direct payments and the rural developments interventions in the light of the EU agricultural and environmental challenges. Brussels, European Parliament, Policy Department for Structural and Cohesion Policies.

Our proposal for the future CAP green architecture in Ireland’s CSP consists of three Tiers, with increasing levels of environmental ambition and delivery as you progress from Tier 1-3 (Fig. 1):

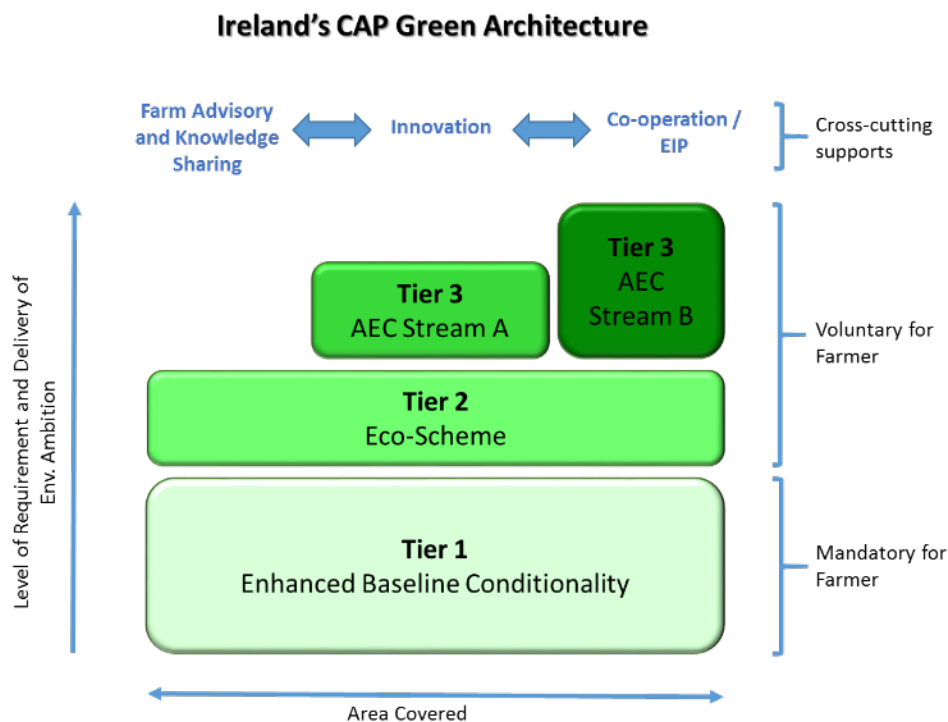


Figure 1: Proposed new three tier green architecture of the CAP in Ireland with enhanced conditionality and eco-schemes in Pillar I, and a 2-stream climate and environment measure in Pillar II. Stream A is a national agri-environment scheme while stream B is a locally adapted farming for nature scheme.

Tier 1 addresses Enhanced Baseline Conditionality, Tier 2 addresses Eco-schemes and Tier 3 addresses the Agri-Environment Climate Measure. For effective, more targeted action, and building on the benefits and lessons from the EIPs, we propose that the Tier 3 AEC measure be divided into 2 streams:

- Tier 3 Stream A builds on Ireland’s 25 years of experience with national agri-environment schemes
- Tier 3 Stream B builds on 10 years of experience with locally-adapted, hybrid results based agri-environment payments.

Tier 1: Enhanced Baseline Conditionality

Enhanced baseline conditionality sets the minimum standards to keep agricultural land in GAEC and must be cognisant of the specific characteristics of the range of farmland types and the overall objectives of the CAP. The baseline conditions set in relation to climate, water, soils and biodiversity³ are of particular importance in the context of this proposal. These baseline conditionality requirements would secure a minimum quantity of green infrastructure on farms and ensure no net loss. The eco-schemes and AEC measures can then focus on increasing the quantity and enhancing the

³ GAEC 2 Appropriate protection of wetlands and peatlands; GAEC 4 establishment of buffer strips along water courses; and GAEC 9 including *inter alia* minimum share of agricultural areas devoted to non-productive features or areas and retention of landscape features

quality of our national green infrastructure, contributing to climate and environment objectives. Baseline conditionality in Pillar 1 needs to acknowledge the ecosystem services provided by non-farmed and farmed semi-natural areas in the ecological context of the whole landscape. The value of these areas must be clear to the farmer: retaining them should not result in a reduction in payments but instead should attract enhanced support under the eco-schemes and AEC measures.

Tier 2: Eco-schemes in Pillar I

Eco-schemes are aimed at supporting practices that are beneficial to the environment and climate. These are mandatory for MS but voluntary for farmers and it is envisaged that between 20-30% of the value of Pillar I direct payments will be dedicated to these schemes. This equates to ~€220-€330 million per annum. These give MS much more autonomy in defining the environment and climate actions that are supported under Pillar I. As a minimum, we feel that this instrument should put a value on semi-natural features on farms and must go beyond the requirements of GAEC 9 in particular. It should set clear environmental targets for all farms. They should maintain and expand semi-natural vegetation to a defined minimum cover on all farms, which will deliver benefits for biodiversity, climate, water and landscape.

All farmers should be given the opportunity to retain their current Pillar 1 payment (i.e. the 30% ring fenced for eco-schemes) by reaching a set target e.g. 100 points. This would be equivalent to 10-12% of cover of eligible features/habitats, which not only includes non-productive areas but also food producing semi-natural pastures⁴. If a farm is below 100 points, farmers would have the option to build up points by undertaking a limited number of actions that would increase the proportion of eligible features on their farm e.g. hedgerow planting, riparian buffer zone creation, field margins, tree planting, pond creation etc. Crucially, these equivalent actions should have clear environmental benefits and no chemical inputs should be permitted with any of them.

It is important that these should be simple measures, easy to verify and monitor using remote sensing techniques e.g. aerial/satellite imagery. Eligible areas could be pre-populated on BPS applications accompanied by self-declaration/verification by farmer. Remote sensing should be supplemented by simple tech solutions where farmers can 'self-declare' their eligible habitats. Where a farmer exceeds 100 points then additional funding should be available through AEC measures (to which such farmers could be given priority access based on their points) which are designed to enhance the quality of semi-natural features/habitats on farms.

Most importantly, the scope of the requirement should be clearly stated ensuring that there is full complementarity with both the demands of conditionality in the lower Tier and the possibility of support in the higher Tier. The eco-schemes points should be integrated with industry sustainability programmes such as Origin Green to reduce the administrative burden on farmers, improve overall integration and coherence in communications on environment standards.

Tier 3: AEC Measures in PILLAR II

We are proposing two streams within Tier 3. Stream A; a national agri-environment scheme and Stream B; a locally-adapted farming for nature scheme. We propose that participating farmers can

⁴ Note that the 10-12% figure is dependent on standards set by baseline conditionality.

only participate in one stream at a time. Stream A would be available to all farmers while Stream B would be targeted to priority areas and objectives. Participation in either of the streams would be voluntary and generally the farmer can choose which stream they want to join, subject to available funding. An exception is where a *high water status* Stream B option is available since catchment level coordination is essential. In this case, B should be the only stream available to the farmer. Where Stream B is available, it should be more rewarding for a farmer to choose this option, which would have higher environment targets. We propose that both streams would have a results-based payments component. Stream A should be largely action-based with specific complementary results-based payments options. Stream B should be a hybrid results-based framework, locally adapted to specific national environmental priorities and targeted at specific HNV farming regions.

Stream A: National AEC measure

Tier 3 Stream A (Tier 3A) is a national AEC measure building on previous national schemes i.e. GLAS, AEOS and REPS. Tier 3A would focus on a broad range of national agri-environment actions that promote agricultural production which protects the environment, water quality, the landscape and its features, endangered species of flora and fauna and climate change mitigation.

It is envisaged that Stream A would reward actions relating to e.g. cover crops, hedgerows, buffer zones and some targeted species-specific management options such as Wild Bird Cover, taking successful targeted elements of GLAS. It should also include simple results-based payments options targeting high nature value features on farmland e.g. semi-natural grassland and hedgerow measures. We do not propose a simple transfer of the current GLAS options. Stream A would be the mainstream vehicle for the roll-out of the successful approaches to both result-based and action-based payments, and non-productive investments developed by EIP programmes such as BRIDE, DANÚ and Protecting Farmland Pollinators.

Stream B: Locally Adapted Farming for Nature AEC measure

We propose an additional component of Pillar II, which is focused on a higher level of environmental ambition than 3A. This combines elements of current initiatives - targeted delivery of national priorities by local teams - and the capacity and resilience which scale brings on the administration side. Stream B consists of a series of locally-adapted projects co-ordinated via a central administration hub. Each project would have a defined geographic focus and address specified environmental priorities/targets.

This stream is targeted at HNV farmland areas, High Status Water Bodies and national biodiversity targets with co-benefits for climate and water. We have identified eight broad indicative HNV farming regions (based on national distribution of HNV farmland⁵) across the country whose characteristics enable them to deliver this broad ranging high-level environment ambition.

Tier 3, Stream B provides a framework to facilitate the development of the successful locally-adapted DAFM-funded programmes including BP, HHP and PMP. The design of these programmes / EIP projects facilitates payments to farmers that reflect their contribution to EU priority habitats and

⁵ Caroline A. Sullivan, Shafique Matin, John A. Finn, Daire Ó hUallacháin, Stuart Green, David Meredith, James Moran (2020). Assessing the distribution and extent of High Nature Value farmland in the Republic of Ireland. *Ecological Indicators*, 108. <https://doi.org/10.1016/j.ecolind.2019.105700>.

species, carbon sequestration and storage, water quality, and other eco-system services. They are results-based (hybrid), locally-adapted programmes which can be delivered successfully across a broad range of landscapes. The expansion of this approach to more HNV farming regions would apply this highly successful approach to a broader range of national biodiversity and water priorities. These areas also have a high concentration of peatland soils and this stream will have significant co-benefits for climate action.

The national priorities delivered by this stream include:

- **Climate:** The securing of carbon stocks locked in soils is necessary if a net reduction in emissions from agriculture is to be realised. This stream would incentivise management practices that reduce the loss of carbon from soils and support interventions to increase carbon sequestration. Climate adaptation would be achieved by encouraging practices to slow the runoff of water from land to reduce flooding and actions to reduce the risk of wildfires.
- **Water Framework Directive:** Management that delivers improved hydrological functioning and water quality is incentivised through the results-based approach.
- **Nitrates Directive:** The whole-farm approach of water-quality-focused programmes provide strong incentives to deliver the Nitrates Action Plan objectives.
- **Natura 2000 Directives:** Stream B aims to deliver on the conservation objectives of designated sites within the targeted geographic areas.
- **Priority Action Framework:** Projects in Stream B would be adapted at a local-level to meet the needs of Annex I and II habitats and species. Experience with the PMP and HHP shows that this can be done by tailoring habitat scorecards to incentivise management for specific objectives.

AEC Stream B: Locally Adapted Farming for Nature measure proposed implementation

DAFM have funded a series of ambitious and innovative programmes in recent years including the EIPs and the Burren Programme in the current RDP. The Department has cited a number of reasons for doing so, including weaknesses or areas of underperformance in mainstream measures and have committed to incorporate the lessons learnt from these in the next RDP. Tier 3 Stream B is the main instrument we envisage delivering this roll out in the case of biodiversity, with co-benefits for water and climate action. The Stream B proposal is both locally-adapted and has efficiencies of scale.

We thus propose a framework where a range of new higher-level, locally-adapted, hybrid result-based⁶ AEC projects can be delivered. This structure has been designed to deliver solutions to the environmental challenges facing Ireland and to provide optimal support to farmers through a resilient and cost-effective delivery model.

⁶ For further details and guidance on hybrid results based measures (i.e. Agri-environment measure approach that uses a mix of results- and management (or action)-based payments) see https://rbapseu.files.wordpress.com/2019/01/rbaps_gh01_general_guidance.pdf

In order to fulfil the potential of these solutions, three key issues of **administrative resilience, simplification and cost effectiveness** must be addressed:

1. Increased Administrative Resilience for Higher-level Programmes

- Most projects in the higher-level AES would operate with 1,000+ participants, a size which allows for team sizes large enough to provide a broad skills base.
- The skill sets available to projects would be broadened, as projects would be able to share expertise with other projects or access additional skill sets through the central hub.
- Uniform operating procedures would increase the administrative resilience of projects by creating capacity for the lateral transfer of human resources between projects. This can be used for
 - Adding capacity for occasional large-scale fieldwork
 - Cover for short term vacancies within projects

2. Simplification

- Farmer participation in a single agri-environment scheme would simplify the administrative burden on the farmer and DAFM
- Management and reporting systems, including calculation of payments due to farmers would have a common format. This would:
 - Simplify administration and reporting
 - Enable comparisons between projects
 - Streamline advisor training needs

3. Cost effectiveness

- Participation in a single scheme would reduce transaction costs for the farmer
- Administration costs for higher-level programmes in absolute terms can be minimised. Efficiencies can be achieved through the economies of scale of increased ratio of participant farmers to staff, a reduction in the duplication of management functions and by synergies between projects
- The single scheme model, increased efficiencies and the spreading of fixed costs across a larger pool of participant farmers would reduce the proportion of overall administration costs
- Administration costs for DAFM would be reduced through a reduction in the number of farmers in a national scheme and the simplification of reporting procedures by using common procedures across multiple projects
- The provision of data that can be used to meet DAFM and NPWS reporting requirements would further reduce costs for those organisations in other areas

Enhanced Delivery Model

This proposal is highly ambitious for the next CAP while addressing some of the inefficiencies that exist in the current delivery model. This can be done without losing the strengths of the locally-adapted approach that is tailored to specific targets. Tier 3B would sit on top of a national scheme. They would operate as a hybrid results-based model. This stream would include biodiversity, climate adaptation / mitigation, achievement and sustaining of high water-quality status and the preservation of cultural and landscape assets as objectives.

1) Simplifying farmer engagement with agri-environment objectives

Farmers should only participate in Stream A or Stream B. Farmers could join Stream B directly or migrate to it from the National Scheme (Stream A). In all cases, the money should follow the farmer. Undertakings in the original contract would be replaced by equivalent commitments in Stream B, which would cover all of the objectives encompassed by Stream A as well as specific additional or adapted elements. The application process to Stream B would be simple and involve little or no expense, as in the Burren and current EIP projects.

This single scheme model reduces the transaction costs for the farmer, reduces the administration costs of the national scheme, avoids mixed messages to farmers and removes any risk of double funding.

2) Enhancing the delivery model for higher level AEC measures through a central hub

This can be done by providing locally-adapted Stream B projects with a standardised administrative and IT framework and supporting them through a central hub. The hub would enhance the capacity and efficiency of the individual project teams while maximising the potential for achieving economies of scale. The hub would support the project teams through the management of the collection and collation of data using an advanced data management system. This approach has been successfully tested by the HHP and PMP. The data management system would calculate payments for participating farmers using a common format for all projects. The geotagging of imagery and data would increase confidence in the payment system by providing a digital trail connecting payments back to the point of assessment. Additional benefits would be reliable and rigorous auditing systems and the increase in advisor and project officer capacity through enhanced use of technology.

The hub would:

- Ensure a minimum quality of service delivery among projects
- Assist with farm advisor training
- Co-ordinate and foster cooperation between projects
- Provide specialist support in areas such as the EU Habitats Directive Assessment and the Birds Directive, archaeology, governance, hydrology, human resources, IT support, legal services and wildfire resilience
- Realise economies of scale by managing back-office functions on behalf of the project teams
- Work with DAFM to develop synergies with other elements of the CAP
- Liaise with other agencies such as NPWS, Local Authorities, Bord Bia etc.
- Support the development of solutions to technical challenges by linking individual projects to the wider agri food industry and research communities.
- Data management system for audit purposes

The terms and conditions for all projects would be based on a single template and could incorporate uniform costings for non-productive investments. The expanded set of targeted and locally adapted projects would operate within a simplified structure and operate a common payment and reporting system. The projects and the central hub would collectively function as a Higher Level (Tier 3B) AEC measure.

3) Project Teams

The projects would continue to have a targeted focus with their own dedicated project teams, but they would use a common IT system and integrated scorecards. Project teams would concentrate on engagement with advisors and farmers, monitoring, the management of landscape level interventions and the verification of payment claims. They would also contribute to programme-level tasks by sharing expertise. This improved focus would allow for greater effectiveness in the delivery of results on the ground.

The project teams should also, as at present, be funded to deliver a wider range of the supporting measures which the CAP offers, including a range of advisory and knowledge transfer roles, some community development functions and the encouragement and development of innovation through EIP-type instruments. These supporting measures would be funded out of the appropriate Pillar II measures. The proportion of the budget needed to cover these elements would be modest. The more the CAP measures are integrated into a coherent whole locally, the better for delivery and the effective use of limited resources.

Summary:

This document proposes a CAP green architecture for Ireland based on decades of combined experience. There are six core considerations in our proposal. These are value for money; farmer engagement; evidence-based; integrated and simplified; results-based and auditable; and relevance.

A key criterion for this architecture working effectively is the definition of “agricultural activity” and “agricultural land”, including “permanent grassland and permanent pasture” (together referred to as “permanent grassland”). It should reflect local conditions in Ireland and ensure that all features on farmland that are contributing to the CAP objectives, including environment and climate objectives, and which require public intervention of some kind, are eligible for support.

We propose three tiers in this green architecture. Tier 1 addresses Enhanced Baseline Conditionality, Tier 2 addresses Eco-schemes and Tier 3 addresses the Agri-Environment Climate Measure. For effective, more targeted action, and building on the benefits and lessons from the EIPs, we propose that the Tier 3 AEC measure be divided into 2 streams:

- Tier 3 Stream A builds on Ireland’s 25 years of experience with national agri-environment schemes
- Tier 3 Stream B builds on 10 years of experience with locally-adapted, hybrid results based agri-environment payments.

Stream B is a hybrid results-based framework, locally-adapted and aimed at national environmental priorities and targeted at specific HNV farming regions. It consists of locally-adapted projects co-ordinated via a central administration hub. Each project would have a defined geographic focus and address specified environmental priorities/targets. We propose an enhanced delivery model for implementation of Stream B taking into account three key issues of administrative resilience, simplification and cost effectiveness.