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4 September 2009

Minister Brendan Smith TD  
Dáil Éireann  
Kildare Street  
Dublin 2

**Re: Submission on detailed content of a new environmental scheme to be introduced in 2010**

Dear Minister,

Teagasc welcomes the opportunity to provide a response to your request for comments on the detailed elements of the proposed new Agri-Environment Scheme and we look forward to working with your staff on this as the scheme develops. As you may be aware, Teagasc has established a number of internal working groups on the Water Framework Directive, Climate Change and Biodiversity, which can provide a very useful forum for more specific discussions on the proposed measures.

We have outlined below some key principles that we believe are fundamental to the success of the new scheme. These are based on our collective research and advisory experience with the previous schemes in the period from 1994 to 2009. (Further detail are set out in Appendix 1) One of the most important is the requirement for clarity on the new scheme's objectives and priorities.

1. The design of the new scheme must recognise, encourage and reward farmers for the delivery of high quality environmental goods and services from multifunctional Irish agriculture.
2. The new scheme should strongly reflect national agri-environmental priorities to ensure delivery of relevant and positive environmental impacts for the scheme objectives of climate change, renewable energies, water management and biodiversity. For example, the biodiversity objective should reflect policy priorities for the agriculture sector as outlined in Ireland's National Biodiversity Plan and the EU Rural Development Programme.
3. It is essential that the new scheme has clearly defined and specific environmental objectives. Each of the broad scheme objectives of climate change, renewable energies, water management and biodiversity should have separate budget allocations. Each objective should be further divided into a number of sub-objectives that are clearly prioritised. Subsequent decision-making about the selection and design of measures should be informed by the extent to which the measures address the sub-objectives.
4. The scheme should build on Cross Compliance and deliver the wide range of important agri-environmental products and services that are valued by society.
5. The requirement for targeting will mean that:

- i. Difficult decisions will need to be made about resource allocation to different competing sub-objectives. Such decision-making should be guided by the relative priority of the sub-objectives (see 3 above), with the higher priority environmental sub-objectives receiving more resources.
  - ii. Where targeting is to be implemented on the basis of region, farm systems or environmental sensitivity the criteria will need to be established on a strictly scientific basis.
  - iii. On individual farms, objectively based targeting of options will be required to maximise the environmental benefits. This will ensure that measures are selected to achieve the best match between scheme priorities and most appropriate objectives for individual farms.
6. Measures should be evidence-based in terms of environmental benefits and costs. To help achieve targeting and effectiveness, there should be a clear justification from research evidence or relevant experience about how the recommended environmental practices can achieve the desired environmental objectives, in what situations the benefit will be best realised, and in what situations a measure should not be selected. Measures must be realistically costed (including transaction costs) to reflect the cost of participation and implementation by farmers, and to ensure selection of measures on the basis of environmental merit rather than cost.
7. An on-going programme of monitoring the implementation of the measures on farms will be important.
8. A parallel scientific assessment programme should also be considered in order to monitor and assess evidence of delivery of the environmental objectives and value for money.
9. Professional development for participants will be essential to underpin the delivery of the scheme's objectives and should include practical demonstration of the farm management skills and their environmental impacts.
10. A critical level of payment will probably be necessary for the scheme to stimulate sufficient participation by farmers, and payment levels per farm should approach previous average REPS payments.

It is essential that the design and implementation of the new scheme results in payments for delivery of agri-environmental goods and services in an effective and efficient manner. This is important to justify and secure a long-term commitment to agri-environment payments, especially in the policy domain after 2013.

Yours sincerely,



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Professor Gerry Boyle  
**Director**

## Appendix 1

### Overall approach of scheme

- a) The scheme should offer a contract duration of 5 years.
- b) The scheme application process should include the following:
  - Farm details/background
  - Map with basic survey of habitats, landscape and heritage features on the farm.
  - Conservation objectives
  - Proposed targeted options shown on farm map
  - Annualised schedule of work and payments
  - Approval by an agri-environmentalist.
- c) Significant mapping capabilities have been developed over the past number of years to support existing agri-environmental schemes. Existing online mapping technologies should be used to illustrate environmental features and buffer zones on a map. Options chosen and the work schedule would appear as a legend.
- d) Farm records will show work done
- e) If necessary to target scarce money, successful applications will be those who deliver most environmental benefit.
- f) Agri-environment support and advice is vital
- g) A short pilot roll-out in areas representing different farming systems and landscapes would allow any initial problems to be highlighted and an estimate of likely uptake of measures.
- h) The biggest future challenge to biodiversity will most likely be land marginalisation and abandonment. The new scheme must support extensive environmentally-friendly farming. An option on extensive grassland is vital. Extensive drystock farmers with farms full of hedgerows and habitats should have the biodiversity value of their existing farming system recognised, rather than creating new habitats of lower biodiversity value.
- i) Habitats must be actively managed for the protection and improvement of biodiversity, and not just simply be retained. Information on Best Practice for individual measures is available and should be used in the new scheme specification. Measures must be more result orientated rather than purely action based. Retaining habitats and compensating for NATURA 2000 areas without consideration of how conservation value changes, will not deliver biodiversity value for money spent (cost effectiveness) without clear conservation objectives.
- j) Payments must reflect the balance of impact and effort.

### Professional support for scheme implementation

The success of REPS in the period 1994-2009 was due in no small way to the input of professional agri-environmental advisers by

- Raising awareness of environmental issues
- Knowledge transfer of agri-environmental technology
- Education and training, including practical skills
- Ongoing monitoring/management of the agri-environmental farm specific plan
- Positive attitude of advisers encouraged mass uptake of a very new model in farming

Training was effective when carried out in a practical way by trusted advisers with relevant material and demonstrations. A pool of technical expertise and knowledge especially practical skills has been built up by agri-environmentalists.

Assuming agri-environmental planning as implemented in REPS is no longer envisaged, Teagasc has the competence and skill base to play other vital roles in the new scheme, but this will depend on resource availability.

Integrated research and monitoring will be required for new initiatives and/or for the overall scheme. This will be required to establish and support the environmental and other benefits arising. There is likely to be a requirement for an extension input to improve the uptake and the quality of implementation. These types of inputs are already in place in the Agricultural Catchments and Burren Life Projects.