



TEAGASC RESPONSE TO CONSULTATION
ON RURAL DEVELOPMENT PROGRAMME
MEASURES – FEBRUARY 2014





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TEAGASC RESPONSE TO CONSULTATION ON RURAL DEVELOPMENT PROGRAMME MEASURES

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Executive Summary

- 1 In January 2014, the Department of Agriculture, Food and the Marine published a draft consultation paper in relation to the Rural Development Programme 2014-2020 after the adoption of the Rural Development Regulation in December 2013. The paper outlines a series of proposed measures to be included within the new programme. This follows an earlier consultation in 2013 scoping out potential measures. Teagasc welcomes the opportunity to make observations in relation to the programme.
- 2 The guideline expressed by the Department in relation to submissions was as follows: “Written submissions are invited from interested parties, bearing in mind that it is expected to submit a draft RDP to the EU Commission in the late Spring. It is requested that submissions focus on the development of a set of proposed measures for inclusion in the new RDP.”
- 3 The Teagasc Rural Development Programme Working Group, containing expertise from across all the areas of relevance to the Programme convened to consider the draft paper. In this document, we make observations in relation to the paper with the aim to improve the design and operational ease of these instruments and to maximise the sector’s capacity to deliver on the goals of Food Harvest 2020.
- 4 Given the competitiveness challenges that will be faced by Irish and EU agriculture over the period 2013 to 2020, the ending of the milk quota system and reforms to Pillar I measures Teagasc is of the opinion that a reformed Rural Development Programme policy should
 - Focus on increasing the capacity of farmers to adopt new technologies and ways of working on their farms through increased emphasis on farmer education, so the capacity of farmers to innovate is enhanced;
 - Give increased emphasis to agricultural extension activity so that the gap between experimental farms and commercial farms is narrowed and farmers are made aware of the benchmarks against which they should be assessing their farm businesses’ performance;
 - Consider whether increased resources be devoted to agricultural and forestry production research that aims to increase enterprise profitability while also augmenting its environmental and social sustainability.
 - Continue to support the provision of forest and agri-environmental services by the farming community through effective Agri-Environmental Schemes.
 - Contribute to Farm Viability via targeted Income Generation Measures such as LFA’s and New Business Support
 - Given the difficult public finance situation, focus on instruments that have high benefit to cost ratios.
 - Where possible build upon existing resources, strengths, infrastructure and institutions
- 5 Teagasc made a detailed submission to the earlier consultation in 2013. We believe that proposed programme substantially incorporates the recommendations made by us in that submission. We welcome in particular

- The continued resourcing of this important area of public policy to the tune of €2.1 9bn and in particular the continued co-funding by the national exchequer in a period of tight public finances.
- The incentives that are provided to help facilitate structural change in particular in relation to investment, demographic change, improved genomics and knowledge transfer (in particular the focus on discussion groups)
- A continued focus on environmental sustainability and in particular the focus within the new GLAS and GLAS+ programmes in relation to areas of most need for intervention, a focus on farmers who may have not had the right incentives to participate in Agri-Environmental schemes in the past and the introduction of area specific coordinated measures.
- The emphasis on capacity building and continuous professional development of professionals within the field

6 We make a number of recommendations summarised here in relation to the individual measures within the programme.

1.2 On Farm Capital Investments

7 The broad thrust of the proposals for on-farm capital investments as outlined in the Draft Consultation Paper is very encouraging, particularly for the scheme to be in place for the overall period.

8 However, the marking system, tranche release system and other conditions can lead to delays and frustration for farmers waiting to get approval to go ahead. It can also make the scheduling of building work and installation of equipment difficult. A way, perhaps, to make TAMS II more user-friendly would be to have online applications or at least have the marking system online. This could be designed to validate applications and allow almost automatic ranking of applicants when a tranche closes.

9 TAMS II applicants should be encouraged to produce a simple physical and financial plan, drawn up with their planner, for the duration of their involvement with the scheme. It could be designed to attract an extra grant or improve the chances of selection. This would ensure a more planned approach to expansion and a more sustainable use of funds

10 In relation to slurry storage, it would be desirable that farmers short of slurry storage capacity for present stock numbers would not be at a disadvantage in getting a grant as long as they end up compliant. Farm roadways, paddock fencing, and water supply systems have not been mentioned for grant aid. Perhaps this should be reconsidered as the benefits of better grazing management resulting from investment in these facilities would yield the biggest return to farmers and the state. The biggest stumbling block to sustainable expansion is arguably lack of good access to grass.

11 Grant aid for small scale land drainage to improve marginal paddocks, lower outfalls, tap springs with deep cut-off drains and install interception drains around farmyards would be beneficial where expansion is taking place.

12 A range of other measures are proposed in relation to, environment, pig production, machinery, equine, sheep and goats.

1.3 Knowledge Transfer Measures

- 13 Overall Teagasc welcomes and fully supports the initiatives set out in the Knowledge Transfer Measures under the Rural Development Programme (RDP) 2014 to 2020. In particular we welcome the opportunities that these measures will create to enable Teagasc to partner with a range of organisations and individuals in the delivery of effective Knowledge Transfer into the future.
- 14 We believe that if a comprehensive structure is put in place to plan, manage and evaluate all aspects of the programme from the outset it will be very effective and uptake will be high. We anticipate the programme supporting new activities across a network of existing groups as well as stimulating the creation of “specific purpose groups” to tackle particular areas of interest or concern.
- 15 Key areas for consideration will be consultation with stakeholders, timing and design of initiatives to match capacity, flexibility around the targeting and delivery of initiatives, continuous assessment and improvement of the programme throughout its lifetime and oversight of continuous professional development (CPD) for providers.

1.4 Collaborative Farming

- 16 Under all elements of the supports in this RDP 2014-2020, farmers entering into or operating in, registered farm partnerships and other recognised collaborative arrangements, should not be treated less favourably than if they were farming in their own right.
- 17 From January 2015, registered farm partnerships will be open to all farm enterprises and therefore, grant investment schemes under these enterprises should be expanded to accommodate farmers of all enterprises who are participating in registered farm partnerships.
- 18 The total funding to cover the start-up grant for collaborative arrangements should be increased in line with government targets and expected growth in registered partnership numbers.

1.5 The Agri-environment Climate Scheme – GLAS

- 19 Teagasc agrees with the provision that the agricultural planner should be FAS approved as there is a need for a minimum level of training for planners including specific environmental skills. This should be dealt with through a comprehensive continuous professional development (CPD) process for agricultural professionals who are advising/supporting farmers in areas such as FAS, IPM and scheme planning..
- 20 We recommend that consideration be given to using NMP online as the tool to submit NMP and avoid having paper plans. If payment is to be based on the requirement to have an NMP then it is likely to have to be above the statutory minimum requirement under Cross Compliance. This would require the preparation of a ‘field by field’ plan based on soil analysis. For farmers in derogation, who require more detailed NMPs and who have to submit plans, there will be a need to integrate the NMP preparation

process. There is a need to ensure that fully compliant NMPs are developed which take account of low nutrient requirements for areas such as traditional hay meadows.

- 21 All participants of the scheme should be encouraged to do a minimum of one course related to a measure being undertaken.
- 22 Record keeping should be supported by an on-line system. This will facilitate the development of a high quality up to date database in relation to scheme actions, improve compliance and reduce the requirement for compliance checks.
- 23 The two tier entry requirement is a welcome progression from the system used in AEOS in that it broadens the targeting from Natura 2000 areas to cover a broader suite of priorities. We have outlined, however, a number of concerns:
- 24 There is potential to significantly improve the targeting of the system through a combined Farmer classification and priority scoring system.
- 25 Teagasc is of the view that the application process should be completed and submitted exclusively in an on-line only process. This is enabled by the mandatory involvement of planners.
- 26 Application & Planning Timing In the case that the SPS deadline apply for application to this scheme, the application should consist of an outline plan with detailed planning such as the preparation of the Nutrient Management Plan and other detailed planning of task being carried out after the farmer is accepted into the scheme.
- 27 To facilitate emerging measures and to mitigate the possibility of oversubscription to individual measures the scheme should be reviewed and amended on an annual basis prior to opening for application.
- 28 We make a range of recommendations in relation to
 - Low Emissions Slurry Spreading
 - Minimum Tillage
 - Green Cover Establishment from a sown crop
 - Wild Bird Cover / Wild Flower Cover
 - Low input permanent pasture or traditional hay meadow
 - Riparian Margins
 - Coppicing and Laying of hedgerows
 - Traditional Stone Wall maintenance
 - Tree Planting
 - Enlarged headlands
 - Cultivation of Tramlines
 - Environmental management of fallow land
 - Arable Margins.
 - Rare Breeds
 - Birds, Bees and Bat Boxes
 - Current AEOS / REPS Measures excluded that should be included
 - Additional New Hedgerow Establishment
 - Alternative Water sources for bovines

- Establishment and Maintenance of Habitats (New Grassland Habitats)
- Archaeological Buffers
- Traditional Orchards
- Environmental Support Assessments and recommendations.
- Control of Invasive Species

1.6 The Agri-environment Climate Scheme – GLAS +

- 29 There is a potential to target GLAS+ in a number of ways which would significantly add value to the measures undertaken in GLAS but add a new dimension to the scheme. There are a number of criteria on which that targeting might be based
- Targeting towards output based measures outside the main Target Based Projects such as the Burren. (See examples below)
 - Targeting towards group based initiatives where a group of farmers work together on projects that are co-ordinated to deliver outcomes beyond the scope of the individual farm
 - Involvement in agreed research or knowledge transfer projects which aim to develop or get dissemination of environmental actions on a trial or demonstration basis
- 30 The basis of payment should relate to costs or income foregone for a single measure
- 31 Possible Measures for inclusion
- Collective approach to management of low and moderate status watercourses.

1.7 Targeted output based local agri-environmental projects

- 32 Teagasc is strongly in favour of the inclusion of targeted output-based local agri-environmental projects. The strong leadership of the Burren project in this respect and the need to extend the project to a broader group of farmers within the Burren landscape area clearly point to its inclusion as the flagship project within this measure. A number of other projects with target-based approaches can be facilitated in several other parts of the country.. This may include projects based on the Islands, projects to tackle invasive species, projects to support endangered bird species, projects related to the freshwater pearl mussel and a variety of other initiatives.

1.8 The Areas of Natural Constraint Scheme

- 33 Under Atlantic climatic environments, excess soil moisture conditions occur frequently and for prolonged periods of time on a wide range of soil types as a result of interactions between climatic and pedological conditions.
- 34 The incidence of excess soil moisture conditions is the main biophysical constraint on farming practices in these environments, causing reduced grass growth, reduced herbage utilization, limited windows of opportunity for machinery operations and as a result reduced or even prohibitively low economic sustainability for a wide range of farm enterprise types.
- 35 The designation of ANC's by reference to biophysical criteria is to be welcomed as is the continued funding of a scheme that is a direct support to economically vulnerable rural communities facing particular physical difficulties from a farming perspective..

- 36 The proposed restructuring of the eligibility criteria in the programme should maintain recognition of the unique challenges faced by farmers in a situation of excess soil moisture. Research has demonstrated that a failure to incorporate this condition in determining eligibility will leave Irish farmers at a significant disadvantage and will result in a significant reduction in income.
- 37 We support the continued funding of a scheme that is a direct support to economically vulnerable rural communities facing particular physical difficulties from a farming perspective is to be welcomed.

1.9 Support to the Beef Sector

- 38 In terms of the Beef Genomics Programme, if we are to affect significant efficiency improvements in the suckler herd we also need to give some incentive towards encouraging younger calving of suckler heifers and I would agree with him. From the latest ICBF figures only 16% of suckler heifers calve for the first time between 22 and 26 months of age. A top-up for first time calvers calving in the 22 to 26 month range could bring about real improvements in both suckler herd efficiencies and profitability levels. Paul Crosson's suckler herd model clearly show there are very large costs in calving suckler herds at 36 versus 24 months of age. Reducing the average first time calving age (currently > 50% in the national dairy herd) in the suckler herd would also have positive carbon footprint implications.
- 39 By targeting suckler heifers to calve at a younger age it would also have the knock-on affect of finishing male stock on the same farms at a younger age as management practices put in place to achieve it (a higher weight for age) would by default also improve the management of the male stock also. Any national programme to reduce the average first time calving age in suckler herds would encourage suckler farmers to start talking about it and the reasons for it which also can only be good for the industry as a whole.

1.10 Organics

- 40 Teagasc welcomes the proposal to introduce a new Organic Farming Scheme (OFS) and Schemes of Grant Aid for the Development of the Organic Sector. The scheme is acknowledged as one of the main drivers of growth in the sector which has experienced steady but slow growth in recent years in comparison to Europe.
- 41 A number of changes/alterations to a new OFS are suggested which will benefit in particular the long term sustainability of the organic sector and will address supply/market shortages where they exist. These include a tiered payment scheme to make the scheme more attractive to areas where market shortages exist including horticulture, arable crops and red clover for animal feed.
- 42 The payment structure should also be altered to encourage farmers to remain in the sector. The organic farming supply base is fragmented and relatively small in Ireland and thus producers should be given priority support for the formation of discussion groups, local producer groups and the formation of linkages and clusters. If OFS is to be put under the "umbrella" of GLAS, particular attention should be given to maximise the potential number of suitable organic entrants to OFS.

1.11 Promoting social inclusion, poverty reduction and economic development in rural areas

- 43 The 2011 National Farm Survey found that whilst the proportion of economically viable farms increased to 35% in 2011 from 27% in 2010, 35,640 (34%) farms were still considered economically vulnerable, i.e. the farm enterprise did not generate sufficient income and there was no off-farm income. A further 31% were classified as sustainable by virtue of the presence of an off-farm source of income.
- 44 There are, in addition to Teagasc, many national, regional and local, bodies with responsibility for rural economic development, enterprise support and development, skills development, and education and training. There is a need to align the activities of these bodies with the needs of local communities and better co-ordinate and further enhance the delivery of these supports and services. Teagasc identifies key barriers to rural development stemming from the inability of development bodies to engage with and activate key groups within the rural population such as farm households.
- 45 The most appropriate means of meeting these challenge is to simultaneously support the strategic development and diversification of the local economy and provide upskilling or, where necessary, reskilling of farmers and other members of farm households to ensure they can engage in the local labour market. Teagasc recommend that available resources be targeted at those areas that have experienced above average adverse effects associated with the economic downturn. Training and skills development be aligned to the needs of the area.
- 46 A specific programme targeting enterprise development supports to women in farm households should be piloted.
- 47 Teagasc recommends that dedicated tourism in rural areas and food development programme be initiated in partnership with relevant local bodies and other agencies.
- 48 Rural poverty, in general, and farm household poverty, in particular, are issues that have received insufficient attention in recent years. There is a need for up-to-date research detailing the extent and nature of rural and farm household poverty. There is a specific need to improve the uptake of Farm Assist and other income support schemes.

1.12 Artisan Food Cooperation Scheme

- 49 Teagasc welcomes the introduction of an Artisan Food Cooperation Scheme. The purpose of the Scheme identifies a number of challenges to that sector that could be addressed through such collaborative action.
- 50 There is scope for recognising cooperation efforts among a broad range of differentiated food producers under Article 35 (cooperation), where efforts for food production cooperatives/companies to mainstream the delivery of multifunctionality
- 51 Objectives of the scheme could also be fruitfully addressed within this Scheme through the addition of extra points under the Proposed Structure of the Scheme heading and through broadening the scope of the two areas already within the Proposed Structure of the Scheme (“improve and validate production quality” and

“improve awareness and marketability of locality and niche category products”.) Animation/extension support targeted at encouraging communities to imagine potential projects; appraise local resources for new projects; and build collaborations is an important preparatory prepare for initiatives that are focused on building skill sets and other instrumental forms of capacity building.

- 52 In developing new products as a means of expanding the sector, it would be useful to expand the Proposed Structure of the Scheme to “improve innovation and new product development in the sector”.
- 53 Effective communication with the consumer on the unique characteristics of the product is critical. Social media is seen as a useful mechanism for consumer engagement, including feedback on current offerings and ideas for new products”. Therefore it would be useful to add “social media” in addition to “on-line” in the text. It would be useful to expand the requirements beyond food producers to include food service providers/food retailers. Furthermore, development of routes to market should explicitly include local independent retailers, including street food and pop-up shops.
- 54 Specific supports for developing the export market could be particularly encouraged given that currently only 10% of speciality food is exported indicating that growth in the number of businesses will generally only occur by cannibalising other businesses.
- 55 The basis for the target number of groups (6 to 12, increasing to 60 by year 7) is not clear. However, if the target is broadened to a diversity of differentiated food producers, delivering multifunctional objectives, the scope for uptake is increased.

MAIN REPORT

1 Introduction

- 1 In January 2014, the Department of Agriculture, Food and the Marine published a draft consultation paper in relation to the Rural Development Programme 2014-2020 after the adoption of the Rural Development Regulation in December 2013. The paper outlines a series of proposed measures to be included within the new programme. This follows an earlier consultation in 2013 scoping out potential measures. Teagasc welcomes the opportunity to make observations in relation to the programme.
- 2 The guideline expressed by the Department in relation to submissions was as follows: “Written submissions are invited from interested parties, bearing in mind that it is expected to submit a draft RDP to the EU Commission in the late Spring. It is requested that submissions focus on the development of a set of proposed measures for inclusion in the new RDP.”
- 3 The Measures within the proposed Programme are outlined as follows
 - Agri-Environment Climate Measures
 - (i) The Agri-Environment Climate Scheme (GLAS)
 - (ii) GLAS+
 - b. The Organic Farming Scheme
 - c. Targeted output based local agri-environment projects
 - Areas of Natural Constraint
 - a. The Areas of Natural Constraint Scheme
 - On Farm Capital Investments
 - a. Proposal for a TAMS II Scheme incorporating
 - b. Targeted Young Farmers Capital Investment Support
 - Knowledge Transfer Measures (incorporating European Innovation Partnership, Knowledge Transfer Groups, Continued Professional Development for Advisors, and Targeted Veterinary Advisory Service)
 - Support for Collaborative and Quality Focused Measures
 - a. Support for Collaborative Farming
 - b. Artisan Food Cooperation Schemes
 - c. Support for Quality Schemes
 - Targeted Support
 - a. Support to the Beef Sector
 - b. Support for Island Farming
 - LEADER
 - a. Proposed areas of support using the LEADER model Page 28
- 4 The Teagasc Rural Development Programme Working Group, containing expertise from across all the areas of relevance to the Programme convened to consider the draft paper. In this document, we make observations in relation to the paper with the aim to improve the design and operational ease of these instruments and to maximise the sector’s capacity to deliver on the goals of Food Harvest 2020.

5 Given the competitiveness challenges that will be faced by Irish and EU agriculture over the period 2013 to 2020, the ending of the milk quota system and reforms to Pillar I measures Teagasc is of the opinion that a reformed Rural Development Programme policy should

- Focus on increasing the capacity of farmers to adopt new technologies and ways of working on their farms through increased emphasis on farmer education, so the capacity of farmers to innovate is enhanced;
- Support collaborative farming initiatives to address the economic, structural and social deficiencies in Irish farming. The measures under Pillar II should support collaborative farming.
- Give increased emphasis to agricultural extension activity so that the link between experimental farms and real farms is narrowed and farmers are made aware of the benchmarks against which they should be assessing their farm business's performance;
- Consider whether increased resources be devoted to agricultural and forestry production research that aims to increase enterprise profitability while also augmenting its environmental sustainability.
- Continue to support the provision of forest and agri-environmental services by the farming community through effective Agri-Environmental and Forest Environmental Schemes.
- Contribute to Farm Viability via targeted Income Generation Measures such as LFA's and New Business Support
- Given the difficult public finance situation, focus on instruments that have the highest benefit to cost ratio
- Where possible build upon existing resources, strengths, infrastructure and institutions

6 Teagasc made a detailed submission to the earlier consultation in 2013. We believe that proposed programme substantially incorporates the recommendations made by us in that submission. We welcome in particular

- The continued resourcing of this important area of public policy to the tune of €2.1 9bn and in particular the continued co-funding by the national exchequer in a period of tight public finances.
- The incentives that are provided to help facilitate structural change in particular in relation to investment, demographic change, improved genomics and knowledge transfer (in particular the focus on discussion groups)
- A continued focus on environmental sustainability and in particular the greater nuances contained within the new GLAS and GLAS+ programmes that can target areas of most need for intervention, farmers who may have not had the right incentives to participate in Agri-Environmental schemes in the past and a move to some potential area specific coordinated measures
- The emphasis on capacity building and continuous professional development of professionals within the field

7 Our document is divided into sections corresponding to the specific measures contained within the Departmental consultation paper as follows:

- On Farm Capital Investments
- Knowledge Transfer Measures
- Collaborative Farming
- The Agri-environment Climate Scheme – GLAS
- The Agri-environment Climate Scheme – GLAS+
- Targeted Output based Local Agri-environmental projects
- The Areas of Natural Constraint Scheme
- Support for the Beef Sector
- Support for Island Farming
- Organics
- Promoting Social Inclusion
- Artisan Food Cooperation Scheme

2 On Farm Capital Investments

Tom Ryan, Fintan Phelan

- 8 The broad thrust of the proposals for on-farm capital investments as outlined in the Draft Consultation Paper is very encouraging.
- 9 The expectation that grants will be available throughout the period from 2015 to 2020 will give farmers the confidence to invest and allow for a planned and phased approach to developing/expanding a farm business. However, the marking system, tranche release system and other conditions can lead to delays and frustration for farmers waiting to get approval to go ahead. It can also make the scheduling of building work and installation of equipment difficult. A way, perhaps, to make TAMS II more user-friendly would be to have online applications or at least have the marking system online. This could be designed to validate applications and allow almost automatic ranking of applicants when a tranche closes.
- 10 TAMS II applicants should be encouraged to produce a simple physical and financial plan, drawn up with their planner, for the duration of their involvement with the scheme. It could be designed to attract an extra grant or improve the chances of selection. This would ensure a more planned approach to expansion and a more sustainable use of funds.
- 11 In order to facilitate improved information in relation to the weight of animals which is necessary information to improve genetic selection, consideration should be made to include the purchase of weighing scales in TAMS
- 12 Grant aid for slurry storage is welcome. It is assumed that aid for soiled water tanks will be included also. It is presumed that this grant aid will apply to all sectors. This will benefit those wishing to expand their farm business and also support those who currently meet the minimum storage requirements, but who wish to further expand their storage to cater for exceptional circumstances, e.g. prolonged periods of wet weather. It would be desirable that farmers short of slurry storage capacity for present stock numbers would not be at a disadvantage in getting a grant as long as they end up compliant. Grant aid for slurry storage will ensure that these structures are constructed in compliance with current relevant DAFM specifications.
- 13 It is hoped that all the various tank options as well as FYM stores are to be grant aided. Grant aid for extending over-ground extendable circular slurry stores (already grant aided under FWM and FIS) would be beneficial also.
- 14 Silage pits have not been included in the draft paper and as these structures deteriorate with time a grant for replacing existing defective silage pits would be desirable.
- 15 Farm roadways, paddock fencing, and water supply systems have not been mentioned for grant aid. Perhaps this should be reconsidered as the benefits of better grazing management resulting from investment in these facilities would yield the biggest return to farmers and the state. The biggest stumbling block to sustainable expansion is arguably lack of good access to grass.

- 16 Grant aid for small scale land drainage to improve marginal paddocks, lower outfalls, tap springs with deep cut-off drains and install interception drains around farmyards would be beneficial where expansion is taking place.
- 17 Consider expanding the range of equipment grant aided under dairy equipment e.g. meal feeding systems, augers and feed bins, drafting systems, wash-down systems, teat spray systems, backing gates, cluster flushing, etc. These are items that will improve labour efficiency and milk quality, thereby reducing some of the risks inherent with expansion.
- 18 Consider funding for Health and Safety proofing of existing facilities, e.g., safety rails on silo walls, safety fencing/solid cover for external slurry and effluent stores, safety covers on external agitation points, removal of existing internal agitation points and replacement by gang slats, replacement of damaged slats, and replacement of a hinged doors/sheeted gates with sliding/roller doors, etc.
- 19 There will be no grants in 2014 under TAMS II or perhaps for the early part of 2015 which means that those planning to carry out work in 2014 and most of 2015 will have to forgo a grant. One way to reduce the impact of this is; for example, allow grant aid for erecting a roof over “topless cubicles” at a later stage. The staging of developments and allowing grant aid for the staged elements would make cash flow management easier during expansion. Grant aid for roofs on animal housing will ensure that these structures are constructed in compliance with current relevant DAFM specifications.
- 20 The funding indicated for slurry storage on tillage farms will be very beneficial to the tillage, pig and poultry sectors.
- 21 The provision of higher aid intensity (60% as against 40%) and the inclusion of funding for dairy buildings for young farmers who are setting up for the first time as the head of an agricultural holding is a good proposal.
- 22 *Environmental measures*
- 23 Even though uptake of the recent Rainwater Harvesting Scheme (RHS) was poor, provision should be made to retain the RHS as water conservation is considered a priority area.
- 24 It is suggested to provide funding for biodiversity projects targeted at species of high conservation concern in conjunction with BirdWatch Ireland or NPWS. Examples include predator-proof fencing, removal of scrub, wader scrapes and natterjack toad ponds.

2.2 Collaborative Farming

- 25 Provision shall be made to support each individual farmer participating in a Registered Farm Partnership (RFP) for grant aid in all farming enterprises(See Section “Support for Collaborative Farming” of this document).
- 26 In applying the general principle above, each farmer participating in a registered farm partnership shall be eligible to receive a payment under this scheme up to a maximum of 3 payments where there are three or more farmers involved.

- a) Eligibility Criteria: The minimum and maximum enterprise limits which a partnership must be in compliance with in order to be eligible for grant aid should take into account the number of qualifying farmers in the partnership up to a maximum of three, e.g. under the dairy TAMS scheme, farmers farming in their own right were ineligible for the grant if they held more than 1,000,000 litres of milk quota. Where they were farming in a Milk Production Partnership the limit was doubled or trebled depending on the number of eligible farmers involved. This principle should continue to be applied under the new capital grants scheme.
- b) Selection Criteria: In the qualifying criteria, the points score allocated to a young farmer in a registered farm partnership should be at least equivalent to that of a young farmer applying in his/her own right.

27 Section 3B “Targeted Young Farmer on-Farm Capital Investment Support” of Draft Consultation Paper: The 60 % grant available to young farmers should be available to young farmers in Registered Farm Partnerships where they meet the same conditions as young farmers farming in their own right. This should provide for young farmers in Registered Farm Partnerships who have management control of the holding (as is the case for the 25% top-up under the Basic Payment Scheme).

2.3 Machinery

28 Funding for trailing shoe low emission spreading equipment is proposed. This aid should be available for other low emission spreading equipment, as well, e.g. band spreader and shallow injector, etc. Most farmers cannot justify owning this type equipment, so it is recommended that all machinery contractors should be eligible to avail of this funding. Furthermore, an incentive to promote the adoption of this technology would encourage more farmers to use it.

2.4 Pig Producers

29 Funding is recommended for grower/finisher accommodation in either new or converted buildings. Some smaller breeding units will get out of production due to finance and/or animal welfare regulations. A good option for them would be to convert their breeding accommodation into finisher accommodation. There is a demand for this in many areas. Also, some other units could expand their existing breeding units and finish the pigs off site on these converted farms or new finisher sites. Therefore, provision of grant aid for new finisher accommodation would also be worthwhile and help to achieve expansion targets in Food Harvest 2020.

30 Grant aid for investment in replacing worn out items such as slats, feed systems, water supply systems, ventilation, insulation, etc. would be beneficial due to poor profitability in recent years and focus on compliance with animal welfare regulations. Items such as water systems, rainwater harvesting systems, etc., should also be supported. This will help reduce volumes of manure produced, with positive impacts for producers in terms of costs and the environment. Funding being provided for investments in energy, water meters and medicine dispensers will be very beneficial.

31 *EuroPiG Programme*: Eight EU countries, including Ireland are in the process of setting up a “Thematic Network” under Pillar II of the Rural Development Programme 2014 to 2020. The group will be called the EuroPiG thematic network.

The purpose of the group is to improve the transfer of information, research and innovation in member states, deal with emerging challenges in a constructive and informed manner, improve the technical competence of staff on pig units and help secure the financial viability of the maximum number of pig units in member states. The EuroPiG Programme outlined above are worthy of support.

- 32 *Pig Competitiveness Programme (PCP)*: The purpose of the PDP is to improve the international competitiveness of Irish pig production, the standard of record-keeping on pig units and technical competence of staff on pig units. It also proposes to deliver a structured FETAC accredited training programme for operatives on pig units and help secure the financial viability of the maximum number of pig units. Participants will be required to use the Teagasc e-Profit Monitor and engage in discussion groups. Participants must also be open to adopt new practices, attend research dissemination days and allow their progress to be analysed. The Pig Competitiveness Programme (PCP) is worthy of support.

2.5 Equine Industry

- 33 The Irish thoroughbred industry is worth in excess of €1bn per annum to the economy and the Irish sport horse industry a further €708 million. There are opportunities for development in both industries. Financial support for development of facilities would stimulate opportunities for profitability in both sectors. There has been no widely accessible support for these industries over the last five years, since the closure of the FWM and FIS schemes. Although LEADER is providing support under Axes 3 and 4, it significantly excludes thoroughbreds, facilities for the breeding and training of horses as well as artificial insemination facilities. Many farmers with hopes of expanding/developing sport horse enterprises can't get support because they do not meet all of the criteria set out by LEADER.
- 34 Currently the usage of AI in the Irish sport horse sector remains extremely low at 16% and it is one area where advancement would be hugely beneficial to the industry. We are at a significant disadvantage when compared to many of the European studbooks that have AI usage in excess of 80 and 90%.
- 35 Facilities recommended for support are: artificial insemination facilities and equipment, stabling manure and soiled water storage facilities, indoor and outdoor arenas, lunge rings and gallops, fencing, handling stocks, horse walkers, horse treadmills, horse swimming pools, and cross country courses/training facilities.
- 36 Attendance at a business planning course is recommended for eligibility.
- 37 Support for equine discussion groups: The promotion and facilitation of discussion groups for sport horse breeders would improve the productivity and profitability of the sport horse industry.

2.6 Sheep Producers

- 38 The inclusion of funding on capital investment for sheep producers in TAMS II will greatly benefit the sheep industry. We suggest that funding be provided for investment in fixed as well as mobile handling facilities. Grant aid for sheep fencing should be available in TAMS II as was the case in the Sheep Fencing/Mobile

Handling Equipment Scheme. In addition, we would like to see grant aid for electronic readers, load cells and associated software. Grant aid to replace old damaged slats with appropriate alternative slats in sheep houses would be beneficial. Farmers converting slatted cattle units to slatted sheep units would merit grant aid also.

- 39 Farmers who have dairy sheep should have access to grant aid for dairy sheep equipment (milking, storage and cooling) and dairy sheep buildings once they meet the eligibility and selection criteria.

2.7 Goat Farming

- 40 Support should be available for goat farming under TAMS II. Goats are subject to the same identification and movement requirements as sheep but they were not grant aided in the same way as sheep farming was under the Sheep Fencing/Mobile Handling Equipment Scheme.
- 41 Goats need very regular foot care so mobile and/or fixed handling equipment (particularly rollover crates) would be desirable on all goat farms. In addition, handling facilities and fencing would be important on all farms where goats are grazed outdoors. Previously, funding has been available for the development of dairy facilities (milking equipment, dairy buildings and housing) on goat farms so these types' facilities and equipment should ideally be funded under TAMS II also.
- 42 There is a lack of technological support for individual goat farmers. The best way to improve husbandry and farm practices is through discussion groups. Support for a discussion group programme for goat farmers would be invaluable.

3 Knowledge Transfer Measures

Paul Maher, Kevin Heanue, Declan McArdle, Wendy Conlon, Tom Kelly; Pat Murphy; Marie Kelly; Dan Clavin; Fintan Phelan; Thomas Curran; Jim O'Mahony; Tom ODwyer; Pearse Kelly; Ciaran Carroll; Nuala NiFhlatharta; Dermot McCarthy

- 43 Overall Teagasc welcomes and fully supports the initiatives set out in the Knowledge Transfer Measures under the Rural Development Programme (RDP) 2014 to 2020. We also welcome the opportunities that these measures will create to enable Teagasc to partner with a range of organisations and individuals in the delivery of effective Knowledge Transfer into the future. See below some comments and suggestions that may help progress these initiatives over the coming months. These focus mainly on the overall operation of the programme and we look forward to contributing more detailed suggestions for initiatives across the broad range of agri and farming sectors over the coming months, and on an on-going basis throughout the programme. To ensure effective communication between Teagasc and DAFM we suggest a small working group chaired by DAFM be established to meet regularly to discuss matters as they arise or may be anticipated – perhaps initially on a quarterly basis until the programme is up and running.

3.2 EIPs

- 44 This area of development could benefit from some information provision and co-ordination across the industry as general knowledge of the potential ambition, scope and operation of such programmes is quite limited. A national “Agri Innovation Workshop / Conference” or a series of regional workshops / conferences could be organised to kick off discussions between various agri-organisations across the industry and would help identify:
- Possible EIPs – identify who could potentially work together on “significant initiatives” that would benefit from a co-ordinated national multi-actor approach, i.e. the establishment of operational groups.
 - KT Groups – identify a priority list of production areas or technical challenges that should be targeted for support by KT Groups.
- 45 A target of getting 1-2 “national EIPs” involving at least 3 organisations off the ground for 2015 / 2016 might be a reasonable starting point. An annual target for new EIP start-ups based on budget or numbers could be set out for subsequent years.
- 46 A useful outcome here from such an event would be an agreed understanding by participants of the difference between EIP operational groups and KT groups and how they will be initiated and managed. Teagasc could usefully assist in such a workshop / conference.

3.3 KTGroups

- 47 Following on from the “National Agri-Innovation Workshop(s)” all KT Group ideas could be ranked and a tentative list of initiatives could be set out over particular time frames with suggested start and end dates and anticipated participation and remuneration rates etc. Such a list could then be the subject of a short ex-ante evaluation as part of the programme approval process.

- 48 Where possible, the list of initiatives and expected schedule of delivery should take account of current and new commitments that participants and professionals in the agri-industry are involved in to ensure that capacity is optimised across the industry – for example calving, silage and harvesting times for different sectors, and deadlines associated with the new Basic Payment System, Farm Capital Investment Programmes, GLAS, and other end of year returns. In this regard a national calendar of activities and associated key dates would be a useful reference document for all providers to improve awareness and target quality delivery of programmes.
- 49 This overall list of initiatives should be reviewed annually and adjusted based on on-going evaluation and feedback from audit etc.
- 50 Once this priority list is created an on-line “KT groups call” can be put out to which providers can respond in detail as appropriate. At this point, expectations around participant requirements (generally a mix of attendance and completion of tasks) and remuneration of provider and participant should be set out.
- 51 To minimise administration, inconsistency and errors, organisations such as Teagasc should be able to communicate centrally with DAFM on behalf of its staff in such a process.
- 52 To ensure that the process works as smoothly as possible all communication between providers and DAFM should be managed through an on-line system. This should cover
- Adviser expressions of interest, registration and details
 - Adviser alerts for new “KT calls”
 - Ability to look-up farmers from current data base lists to enable correct identification and simplify eventual payment
 - Submission of supporting documentation
 - Submission of final lists for payment and tracking of same (It is assumed that payments to participants will be processed through the DAFM payments system. Payments to providers may need to be either individual or organisational)

3.4 Continuous professional development (CPD)

- 53 It is likely that the proposed new KT programme will accelerate interest in continuous professional development (CPD) and this will drive demand for a comprehensive programme to ensure programme providers are suitably qualified and trained. A strong effort here will go a long way towards ensuring quality of programme delivery is high. Teagasc anticipate having staff involved in both the delivery and receipt of CPD.
- 54 DAFM will need to ensure that CPD records be co-ordinated fully and take on board training being taken by professionals across the industry to meet a range of requirements. Current records of training for areas such as AWRBS, FAS, SUD, SPS, REPS, DEP, BTAP and STAP are not centrally held. Additional training requirements may make this more difficult to manage. This will require oversight and management by DAFM to avoid confusion and duplication between what individual organisations consider appropriate CPD and what may be desirable for the delivery of various RDP programmes.

- 55 UCD have recently appointed a lecturer in KT and Teagasc and UCD co-operate around a Masters in Agricultural Innovation programme that currently sees an annual intake of 10 students. UCD are also planning to provide modules of training on KT as well as a taught Masters in this area. These resources, along with Teagasc research resources can potentially be leveraged to assist with on-going programme design and delivery assessment as well as delivery of some CPD requirements.

3.5 Proposed Targeted Advisory Service on Animal Health and Welfare (AHW)

- 56 To simplify things perhaps this programme could be covered under the umbrella either of the previous two headings and might be a suitable “national EIP” on animal health. Its delivery mechanism could still be different to other operational groups.

3.6 Programme Branding, Marketing and Quality Control

- 57 The best promotion for the programme will be the awareness among participants that they will receive payment for participation and that they have a choice of provider. This will ensure that there is a very effective way of marketing the programme and it will also ensure there is a high level of natural quality control over programme delivery.
- 58 Initiatives of specific interest to young trained farmers can be considered as part of our education programmes.
- 59 An area that needs careful consideration is the planned burden to be placed on the “programme provider” in relation to participant engagement. It is accepted that providers must perform to an approved standard and be subject to monitoring. However they should not be expected to fulfil the role of the regulator around every aspect of participant behaviour.

3.7 Programme Evaluation

- 60 Teagasc recommends that a planned research / evaluation effort commence straight away so that programme evaluation can be considered during design and execution phase. It is important that evaluation be to forefront at planning stage without dulling the ambition of the programme.
- 61 This will require dedicated programme expenditure and resourcing and is an area where Teagasc expertise in our Rural Economics Research Programme can become centrally involved.

3.8 Initial Programme Areas

- 62 Teagasc anticipates that programme areas under this initiative will be dynamic and will evolve as the programme matures so the following list is indicative rather than exhaustive. In general we anticipate two streams of activity:
- “KT Groups” will operate across the following areas in a structured way from year to year. These groups will pick up on various targeted initiatives incentivised under the programme that are of interest to them and deal with them at particular times of the year or throughout the year if appropriate.
 - Dairy
 - Cattle
 - Sheep
 - Tillage
 - Pigs
 - Horticulture
 - Forestry
 - Equine (See below)
 - “Specific Purpose Groups” may be created for those who do not participate in “KT Groups” to deal with specific topics of interest (for example at 3 meetings over the course of a year). These groups may or may not continue on to other topics.
 - Sustainable Use Directive
 - Farm Business Planning and Risk Management
 - New Entrants / Convertors / Rapid Expanders
 - Collaborative Farming Measures / Incubation Groups
 - Participants in “on farm capital investment” programmes
 - Environment including GLAS participants
 - Organics
 - Clustered food producers
 - Animal Health and Welfare
 - Health and Safety
 - Sustainability including Carbon Navigator
 - Other areas of special interest – eg Island Farming, Gender or age biased groups etc

3.9 Teagasc and Veterinary Ireland

- 63 Teagasc are also presenting a joint submission with Veterinary Ireland on some initiatives around animal health where both organisations feel a joint approach would be beneficial to the industry. This submission broadly covers the following two areas:
- Where established groups are targeting areas around Animal Health we see it as desirable that advisers and vets would combine in the delivery of these topics
 - To raise awareness around animal health issues amongst farmers not involved currently in groups we suggest a three year targeted animal health improvement programme (3 days / year) delivered in partnership by vets and advisers.

3.10 Collaborative Farming

- 64 Subject to a maximum of three payments, provision shall be made to support each individual farmer participating in a Registered Farm Partnership (RFP). (“Support for Collaborative Farming” of this document).

65 RDP Programme Overview – challenges and areas to consider

Spring 2014	National Agri –Innovation Workshop Plan on-line management system
Summer 2014	Screening, approval and ranking by DAFM Ex-ante evaluation of programme Build on-line management system
Autumn 2014	Call for KT Groups Application for running groups submitted by providers on-line Plan Overall Programme Evaluation
Winter 2014	Groups approval by DAFM
Spring 2015	Annual briefing of providers New groups commence
Summer 2015	On-going monitoring
Autumn 2015	Call for KT Groups Application for running groups submitted by providers on-line
Winter 2015	Groups approval by DAFM Annual Reporting and Review Payments to providers and participants
2016	Repeat annual activities as set out for 2015
2017	Repeat annual activities as set out for 2015 Mid Programme Report?
2018	Repeat annual activities as set out for 2015
2019	Repeat annual activities as set out for 2015
2020	Repeat annual activities as set out for 2015 End of Programme Report

3.11 Appendix Equine Technology Adoption Programme

Wendy Conlon and Declan McArdle

Sport Horse Industry Background

- 66 The Irish sport horse population is estimated at approximately 124,000 equines with over 29,000 individuals deriving all or part of their income from the sector. The sport horse breeding sector contributes over €225 million per annum to the economy with an estimated 19,000 active broodmares. In order to improve productivity and profitability in the sector the introduction of a discussion group model for breeders would be highly beneficial.

The Discussion Group Model

- 67 It is proposed that the promotion of the discussion group model amongst sport horse breeders would provide a platform for them to improve their profitability through targeting areas such as:
- Producing a breeding plan (aligned to market requirements)
 - Improving grassland management
 - Fertility and animal health
 - Financial management
 - Marketing/Sale Preparation

Current Teagasc Resources

- 68 Two Equine Specialists are currently employed by Teagasc and available to commence work in developing and facilitating discussion groups. They could also provide training and support material for other facilitators, and working in conjunction with partners in the industry such as Horse Sport Ireland and the Royal Dublin Society. It is envisaged that in order to support the concept a larger number of groups nationally would be necessary. (Estimated seven facilitators could support 35 groups).

Member Payment

- Ⓓ A payment of € 1,000 is proposed to be awarded to members that meet the following criteria:
- Attend a minimum of four meetings in year one and five meetings in subsequent years.
 - Complete a three year plan for their sport horse enterprise in year 1
 - After year 1 complete two tasks from a selection of specified tasks (may decide to go with common tasks or a menu)
 - Comply with relevant equine identification legislation
 - Members would individually pay their facilitator an agreed fee to allow them to join the programme and be put forward for payment.

Group Size and Discussion Group Meetings

- 70 Group size is recommended at 12-15 members with the absolute largest groups capped at twenty persons. Each facilitator will provide at least six meetings per group per year.

71 Calendar of Possible Topics for the Discussion Group Meetings

Meeting 1 – Dec / Jan	<i>Meeting 4–June/July</i>
Planning meeting for group for the year ahead	<i>Health Care</i>
Preparation of stock for mare Inspections	<i>Sales Preparation/Marketing</i>
Meeting 2– Feb / Mar	<i>Meeting 5–Aug / Sept</i>
Breeding Goals	<i>Sales Preparation/Marketing</i>
Breeding Mgt	<i>Winter Husbandry</i>
Grassland Management	<i>Grassland Management</i>
Health Care	
Practical preparation for Inspections	
Meeting 3 – Apr / May	<i>Meeting 6– Oct/Nov</i>
<i>Grassland Management</i>	<i>Winter Husbandry</i>
<i>Health Care</i>	<i>Health Care</i>
<i>Breeding Mgt</i>	<i>Stallion shortlistforfollowing year.</i>
	<i>Review of stock born during year.</i>

4 Collaborative Farming

Tom Curran, Ben Roche

4.1 General Principle:

- 72 Under all elements of the supports in this RDP 2014-2020, farmers entering into or operating in, registered farm partnerships, should not be treated less favourably than if they were farming in their own right. Heretofore, under previous schemes such as TAMS, REPS 4 and AEOS, participating farmers in registered partnerships (MPP's) have been permitted to avail of grant aid with ceilings up to three times that of an individual farmer. The ceiling of three is also used for registered partnerships in France (GAEC's).
- 73 Up to now, registered partnerships existed as milk production partnerships. From January 2015, registered farm partnerships will be open to all farm enterprises and therefore, grant investment schemes under these enterprises should be expanded to accommodate farmers of all enterprises who are participating in registered farm partnerships. In France, extra supports under investment schemes, apply to partnerships (GAEC's) irrespective of the enterprise.
- 74 In applying the general principle outlined in the introduction of this document, each farmer participating in a Registered Farm Partnership (RFP) shall be eligible to receive a payment under this scheme up to a maximum of 3 payments where there are three or more farmers involved.

4.2 Scheme Recommendation

- 75 The total funding to cover the start-up grant for collaborative arrangements should be increased in line with government targets and expected growth in registered partnership numbers based on the following.
- 76 The potential of collaborative farming can be seen using France as a best international norm. Fifteen per cent of all farmers in France are farming through registered partnerships (GAEC's) and this does not include other types of collaborative arrangements which also operate in France.
- 77 Using the French data of 15 % of farmers farming through registered partnerships, this would be equivalent to 8,948 registered farm partnerships in Ireland. This does not include the potential for other collaborative arrangements such as Share Farming and Contract Rearing. Using this 8,948 as a potential target for growth in registered partnerships by 2019, this equates to 1,790* new partnership registrations per year (this estimate allows for existing registered partnerships).
- 78 The proposed level of funding which allows for 400 new partnerships to be registered over the period 2015-2019 is only a fraction of the potential as highlighted above.
- 79 Taking everything into consideration, provision of funding for a minimum of 900 registrations per year for the next five years would be more beneficial as an incentive to increase the number of registered partnerships in Ireland by 2019. This would

equate to €2.25 million per year for the period 2015-2019, giving a total of €11.25 million of funding required for the period.

- 80 *Assuming there would be 80,000 farmers of at least 1 ESU in Ireland by 2019 and using the French GAEC's as a template, where 15 % of farmers are in registered partnerships, this would equate to 12,000 farmers in Ireland operating through registered partnerships by 2019. 12,000 farmers equates to 8,948 registered partnerships. See the estimates below.
- 81 If we look at the current registered partnerships in Ireland, two thirds are family partnerships composed of one farm and one third involve on average 2.3 farms per partnership.
- 82 The number 12,000 (Target no. of farmers) – 1,000 (existing farmers/farms in registered partnerships) = 11,000 farmers
- 7,370 (11,000 x 0.67 = 7,370 Family Partnerships involving one farm)
 - 1,578 (11,000 x 0.33 ÷ 2.3 = 1,578 Partnerships involving more than one farm i.e. 2.3 represents the number of farmers/farms per this type of partnership)
 - 8,948 = Total number of partnership registered by 2019
 - 1,790 (8,948/5years = 1,790 new registrations per year for the next five years.]

4.3 Funding to support Collaborative Farming Incubation groups

- § We support the establishment of a scheme, perhaps within the Knowledge Transfer measure, where farmers would attend a programme of participative training meetings. These meetings would be run in a discussion group format to explore and tease out information in relation to collaborative farming options. This is with a view to participants moving on to enter registered farm partnerships, share farming, contract heifer rearing and cow leasing.
- a. Funding is required to train the facilitators to a competent level.
 - b. It requires funding to employ facilitators to run the Incubation groups.
 - c. A grant to participants who successfully complete the Incubation group programme.

5 The Agri-environment Climate Scheme – GLAS

Pat Murphy, Catherine Keena; Andy Boland; Mark Gibson; Tim Hyde; John Finn; Daire ÓhUallacháin

5.1 FAS approved agricultural planner

- 84 Teagasc agrees with this provision. There is a need for a minimum level of training for planners including specific environmental skills. This should be dealt with through a comprehensive CPD process for agricultural professionals who are advising/supporting farmers in areas such as FAS, IPM and scheme planning.

5.2 Nutrient management plan in place before payment issues

- 85 Teagasc agrees with this provision
- We recommend that consideration be given to using NMP online as the tool to submit NMP and avoid having paper plans (Currently being tendered for). It is proposed that NMP online will be made available to all advisers and consultants.
 - If payment is to be based on the requirement to have an NMP then it is likely to have to be above the statutory minimum requirement under Cross Compliance. This would require the preparation of a ‘field by field’ plan based on soil analysis.
 - For farmers in derogation, who require more detailed NMPs and who have to submit plans, there will be a need to integrate the NMP preparation process.
 - The submission of the NMP should be prior to first payment date rather than on submission of application.
 - There is a need to ensure that fully compliant NMPs are developed which take account of low nutrient requirements for areas such as traditional hay meadows.

5.3 Knowledge transfer by means of a training course

- 86 All participants of the scheme should be encouraged to do a minimum of one course related to a measure being undertaken. This requirement should be fulfilled within 2 years of acceptance into the scheme. There should be an option to attend additional modules which are paid for as part of the scheme. Choice of course and option to choose additional courses should be made at any point during the life of the plan.
- A five hour training course will need to be prepared and associated with each scheme action (the same course could cover a number of closely related measures)
 - Syllabus and course materials to be prepared for each course
 - A list of DAFM approved tutors to be prepared for each course.
 - Indoor and out-door sessions to be recorded and edited to an approximate 2 hour on-line course available freely on the web

5.4 Record Keeping

- 87 Teagasc agrees with this provision. Record keeping should be supported by an on-line system. This will facilitate the development of a high quality up to date database in relation to scheme actions, improve compliance and reduce the requirement for

compliance checks. It will be important to integrate with the recording requirements under Cross compliance and nitrates derogation.

5.5 Two Tier Entry Requirement

- 88 The two tier entry requirement is a welcome progression from the system used in AEOS in that it broadens the targeting from Natura 2000 areas to cover a broader suite of priorities. There are, however, a number of concerns:
- If prioritisation is available for all farms with watercourses, then the Tier 1 status would be available to the majority of farmers. This will mean that other farmers are likely to have to opt for one of the 4 actions outlined to achieve priority 1 status to have a good chance of entry into the scheme
 - The tiering system does not provide a ranking of farmers which may be required

5.6 Ranking of Application

- 89 It is not clear how many farmers will be accepted into the scheme on an annual basis, with the indication that the opening of the scheme will be substantially influenced by the availability of budget. Given the apparent broad possibility of achieving Tier 1 status there is likely to be a requirement to achieve a competitive ranking for both Tier 1 and Tier 2 applications.
- 90 There is potential to significantly improve the targeting of the system through a combined Farmer classification and priority scoring system. This system would achieve some key outcomes including:
- Providing a basis for ranking of applications
 - Increase the targeting of measures to meet environmental priorities at farm level.
- 91 An outline of the possible *modus operandi* of such a system is set out in Annex 1. This would categorise farming systems on the following basis
- Upland
 - Mainly Tillage
 - Mainly Grassland
 - >170 Kg (Derogation)
 - 140–170Kg
 - <140Kg
- 92 Within these categories mandatory options would be given a maximum score (e.g. 100) while non-mandatory options will be given a score based on the appropriateness / priority of the action for that farm category. The system could be used to make actions that are very low priority unavailable as an option choice to certain categories. The weighting could be used in the computation of a farmers 'score' for ranking purposes – i.e. a higher score would be achieved if options appropriate to farming category are chosen. An example of how this scoring system could work is presented in Annex 1.

5.7 Application Process

- 93 Teagasc is of the view that the application process should be completed and submitted exclusively in an on-line only process. This is enabled by the mandatory involvement of planners. This has a number of potential benefits.
- A single system integrated into agfood.ie
 - Avoid duplication of work particularly in the administration section of the DAFM. (It would also avoid the confusion caused by applicants who, through misunderstanding or caution, decide to submit the applications in both on-line and paper form)
 - Facilitates improved monitoring and evaluation as full database is available immediately.
 - Facilitates automation of certification of task completion which should also be completed on-line.
 - Aid a communication process and support planners with a system which provides planners with a line of sight of the on-going status of plans submitted. This could be developed to give a comprehensive reporting structure on outstanding issues to farmers (as with SPS).
- 94 The potential benefits in this respect far outweigh the potential rigidity of online only submission.
- 95 Given the commitments given to AEOS applicants and the higher payment rates it would be desirable if there was a pathway for existing AEOS participants to migrate to GLAS prior to the completion of their 5 year contract.

5.8 Application & Timing of Planning

- 96 It is likely that the SPS deadline will apply for application to this scheme. In that case the application should consist of an outline plan with detailed planning such as the preparation of the Nutrient Management Plan and other detailed planning of task being carried out after the farmer is accepted into the scheme. The initial application should form a commitment by the applicant to enter the scheme with limited scope for subsequent change in measures.
- 97 The location of site-specific measures should only be confirmed at the detailed planning phase.

5.9 Scheme changes over time

- 98 To facilitate emerging measures and to mitigate the possibility of oversubscription to individual measures the scheme should be reviewed and amended on an annual basis prior to opening for application. The changes could include
- Provision for new actions to the scheme
 - removal of an action
 - management changes of existing actions
 - change in priority level of existing actions

5.10 Tier 1 Priority Environmental Actions

- 99 The principle of Priority Environmental Actions to achieve Tier 1 status is very positive. It is important that these habitats of conservation concern are actively and continually managed appropriately in order to ensure their habitat quality.

5.11 Low Emissions Slurry Spreading

- 100 It is assumed that this measure would require the spreading of a high proportion of slurry with low emissions technologies. The additional costs associated with low emissions technologies are published in Lalor (2014) e.g. Trailing Shoe: €1.23 / m³

5.12 Minimum Tillage

- 101 Scientific evidence indicates that there are significant questions about the environmental benefit of this measure. While, in the short term benefits may accrue in relation to retention and sequestration of soil carbon, in the longer term these benefits may not be maintained. In Northern Europe where soils are moist benefits are questionable:
- the short term benefit in soil sequestration attributed to min-till has been questioned and is likely to be attributable to incorporation of straw and green cover.
 - Build up of weed and compaction problems lead to a requirement for ploughing once in a four to five year cycle. This results in a degradation in soil OM and a release of carbon

5.13 Green Cover Establishment from a sown crop

- 102 There is strong agreement with this measure being Tier 1 as research evidence suggests that it delivers significant benefits from a Water Quality and GHG perspective.

5.14 Wild Bird Cover/ Wild Flower Cover

- 103 Teagasc is in agreement with this measure provided it does not involve the loss on existing habitats. The potential of including Wild Flower Cover for tillage farmers should also be considered.

5.15 Other possible measures which might be considered to achieve tier 1 status

- 104 A number of additional measures should be considered for inclusion here:
- Non-designated Annex 1 habitats and species (as associated with many High Nature Value farming systems) e.g. species-rich grassland currently outside the Natura2000 network.
 - Management of existing agreed high quality habitats as verified by a planner / environmentalist./ Examples include Wetlands, Native woodland, ponds
 - Other habitats of high status e.g. Marsh Fritillary sites in County Wicklow
 - Importation of Pig Slurry or Poultry Manure onto farms which can utilise effectively to reduce chemical fertiliser.

Comments on Tier 2 General Environmental Actions

5.16 Low input permanent pasture or traditional hay meadow

- 105 Low input pastures and traditional hay meadows which have been managed as such historically can be brought into the scheme and maintained with on-going low input and other appropriate management practices. These can provide environmental benefits for biodiversity, water quality and carbon sequestration.

5.17 Riparian Margins

- 106 The benefit of wide untargeted buffer strips to water quality reduces as the margins get wider above a certain threshold. This is particularly the case where the soil type is not conducive to overland flow. Wider buffers have significant benefits where a critical source for nutrient loss is identified by a planner. Guideline for planners will be required if targeted buffer areas are to be included.

5.18 Coppicing and Laying of hedgerows

- 107 Identification of appropriate hedgerows for coppicing and laying is essential. Quality of workmanship has been an issue in the past. The farmer (or contractor) must be trained prior to completion of task. A combination of laying and coppicing should be allowed as an action.

5.19 Traditional Stone Wall maintenance

- 108 There is merit in the inclusion of this option

5.20 Tree Planting

- 109 Ensure that the tree planting is carried out in appropriate places, avoiding existing inappropriate habitats. Whips are preferable and more cost effective than standard trees as they grow better.

5.21 Enlarged headlands

- 110 This measure needs to reflect the true economic cost including the risk of weed and disease infestation of the main crop in order to be taken up.

5.22 Cultivation of Tramlines

- 111 It is unclear what the objective and potential environmental benefits of this measure are.

5.23 Environmental management offallow land

- 112 Actions should be available to increase the environmental benefit of Ecological Focus Areas such as sowing crops for wildlife.

5.24 Arable Margins.

- 113 Width and shape should be flexible, including corners. There is a need for extra payment for options to plant rough grass perennial margins or annual flower rich margins. There is a need to integrate with margins under Nitrates.

5.25 Rare Breeds

5.26 Birds, Bees and Bat Boxes

- 115 A measure to erect boxes in appropriate locations for bats and birds of conservation concern is recommended. While not aware of any provision of boxes for bees, potential measures for bees include flower-rich areas or allowing white thorn trees to establish and flower to produce pollen.

5.27 Current AEOS/REPS Measures excluded that should be included

- 116 Additional New Hedgerow Establishment should be allowed but limited to either farms with a large average field size or to large fields. (Benefits related to landscape, biodiversity and carbon sequestration (Green, 2012))

5.28 Alternative Water sources for bovines

- 117 This is an essential measure to maintain and improve water quality. It compliments other watercourse measures such as fencing and buffer margins. Imminent water charges may encourage farmers to use of watercourses for drinking. Support should be available for nose pumps and solar powered pumps for extracting water.

5.29 Establishment and Maintenance of Habitats (New Grassland Habitats)

- 118 This measure can be effective if managed appropriately.

5.30 Archaeological Buffers

- 119 Maintaining buffers around visible and non-visible archaeological sites in tillage and grassland crops is recommended.

5.31 Traditional Orchards

- 120 Traditional fruit orchards are recommended to conserve traditional varieties and create a biodiversity rich area.

5.32 Environmental Support Assessments and recommendations.

- 121 Support to be provided for farmers to enlist professional assistance in carrying out one of a number of environmental assessments leading to the preparation of a recommendation for action on the farm.
- KT - Carbon Navigator - Assessment and Plan of Action
 - Electricity use on dairy farm and recommendations
 - Farm Infrastructure for point source risk and recommendations
 - Ecological Survey and recommendations
 - Bat survey and recommendations
 - Bird survey and recommendations
 - Water usage
 - Assessment of Fossil fuel usage and recommendations.

5.33 Control of Invasive Species

- 122 This measure could involve a plan of action to eradicate invasive species in conjunction with Invasive Species Ireland. Such issues tend to be highly localised, but severe where they occur.

5.34 Evaluation of the environmental effectiveness of agri-environmental schemes

- 123 Following a recent Court of Auditors report, it is likely that Member States will be required to undertake appropriate collection of data with which to measure the environmental effectiveness of agri-environment schemes. A paper by Finn and Ó hUallacháin (2013), estimated that the costs associated with such a data collection programme would amount to approximately 0.5% of scheme costs (however an appropriately designed data collection programme would have to be costed for GLAS).
- 124 Coupled with the evaluation of the environmental effectiveness of agri-environment schemes, the inclusion of an option for farmers involved in the scheme to indicate their consent for a researcher to visit their farm for the purpose of collecting environmental data should be considered (with an assurance that this data is analysed and presented in a way that would not reveal the location of the farm or other sensitive information).

5.35 Collaborative Farming

- 125 Provision shall be made to support each farmer participating in a Registered Farm Partnership (RFP) as an individual up to a maximum of three GLAS payments per partnership. (See “Support for Collaborative Farming” of this document).

6 The Agri-environment Climate Scheme – GLAS +

Pat Murphy, Catherine Keena; Andy Boland; Mark Gibson; Tim Hyde; John Finn; Daire ÓhUallacháin

126 There is a potential to target GLAS+ in a number of ways which would significantly add value to the measures undertaken in GLAS but add a new dimension to the scheme. There are a number of criteria on which targeting might be based

- Targeting towards output based measures outside the main Target Based Projects such as the Burren. (See examples below)
- Targeting towards group based initiatives where a group of farmers work together on projects that are co-ordinated to deliver outcomes beyond the scope of the individual farm
- Involvement in agreed research or knowledge transfer projects which aim to develop or get dissemination of environmental actions on a trial or demonstration basis

6.2 Basis of Payment

127 The basis of payment should relate to costs or income foregone for a single measure

128 Possible Measures for inclusion

- Collective approach to management of low and moderate status watercourses.

129 The component parts of the measure could be:

- Attendance at Group meeting and river walks
- Riverbank actions
- Temporary buffer zones
- Critical source area identification
- In-stream remediation
- Farmyard assessment
- Watercourse assessment
- Research project participation

130 An example of an action could be the installation of in-stream remediation as part of a research project or as a demonstration for use in farmer events / courses

- Upland Management

131 Output based assessment of special habitats

- Commonage group based approach

132 Support for group management and coordination

- Establishment of constructed wetlands to address diffuse nutrient sources at point of exit to watercourse

133 Work to be carried out on the following basis

- Professional assessment and oversight
- Construction / creation / amendment of wetland of wetland
- Archaeological Site Protection Works

- 134 Planning and implementation should be done in conjunction with archaeologist. This could include:
- Scrub Clearance by hand including managing growing vegetation (ivy) on masonry monuments eg castles
 - Restoration work to monuments including repairs to eroded/damaged areas
 - Temporary exclusion of livestock or grazing with sheep only
 - Repair and Maintenance of Traditional Buildings and traditional farm heritage features
- 135 These works to be carried out under the supervision of a conservation architect. This could include weatherproofing and general repair and maintenance
- Provision of walks and trails
- 136 Provision of access to the public in conjunction with recognised trails, to support local community initiative for community based walks or to provide access to features of interest. The measure would outline standards for maintenance for such trails/walks.

6.3 Collaborative Farming

- 137 Provision shall be made to support each farmer participating in a Registered Farm Partnership (RFP) as an individual up to a maximum of three GLAS+ payments per partnership. (See Section. “Support for Collaborative Farming” of this document).

7 Targeted output based local agri-environmental projects

Pat Murphy, Catherine Keena; Andy Boland; Mark Gibson; Tim Hyde; John Finn; Daire Ó hUallacháin

138 Teagasc is strongly in favour of the inclusion of targeted output based local agri-environmental projects. The strong leadership of the Burren Life project in this respect and the need to extend the project to a broader group of farmers within the Burren landscape area clearly point to its inclusion as the flagship project within this measure. A number of other projects with target based approaches are possible and could target High Nature Value farming systems. This may include projects based on the Islands, projects to tackle invasive species, projects to support endangered bird species, projects related to the freshwater pearl mussel and a variety of other initiatives. Although Teagasc are strongly in favour of this prescription, the indicative budget would seem restrictive; suggesting that very limited resources would be available to Targeted Output Based AE projects outside of the Burren.

139 Green S “Using Laser scanning to estimate carbon locked in hedgerows” Technology Update, Teagasc, Carlow 2012

140 Lalor S.T.J Cattle Slurry on Grassland – Application Methods and Nitrogen Use Efficiency, 2014, PhD Thesis for Wageningen University, Wageningen, Netherlands

7.2 Annex 1 Outline of Targeting and Ranking System to be incorporated into GLAS

141 Objectives The objectives of the targeting and ranking system are:

- to improve the targeting of measures to achieve maximum output,
- to provide an incentive to applicants to pick the most appropriate actions
- to reward those who choose targeted options with a high ranking should there be competition for acceptance into GLAS

142 It is proposed that ranking could work with the proposed tiering system in the consultation process. The streaming of applicants would be determined by a series of questions

143 1 Proposed Stocking Rate

- Upland Farming
- Predominantly Tillage (>60%)
- >170 Kg / ha (Derogation)
- 130–170kg/ha
- <130Kg/Ha

7.3 Collaborative Farming

144 Provision shall be made to support each farmer participating in a Registered Farm Partnership (RFP) as an individual, up to a maximum of three payments per partnership. (See Section. “Support for Collaborative Farming” of this document).

145 Computation System for Environmental Actions under the Agri-Environmental Scheme

							Category			
Stocking Rate	Upland		Tillage		>170Kg		140-170 Kg		<140 Kg	
% Tillage										
Core Requirements	Requirement	Scoring	Requirement	Scoring	Requirement	Scoring	Requirement	Scoring	Requirement	Scoring
Nutrient Management Planning	Enhanced	100	Enhanced	100	Derogation	100	Enhanced	100	Enhanced	100
KT - Training Course	Yes	100	Yes	100	Yes	100	Yes	100	Yes	100
Records	Yes	100	Yes	100	Yes	100	Yes	100	Yes	100
Tier 1 Priorities										
Farmland Habitat Conservation	Specified	100	Specified	100	Specified	100	Specified	100	Specified	100
Conservation of Bird Species	Specified	100	Specified	100	Specified	100	Specified	100	Specified	100
Upland Conservation	Specified	100	Specified	100	Specified	100	Specified	100	Specified	100
Fencing of Grassland watercourses	Specified	100	Specified	100	Specified	100	Specified	100	Specified	100
Buffer Zones on all watercourses	Specified	100	Specified	100	Specified	100	Specified	100	Specified	100
Tier 1 Choices										
Low emissions slurry spreading	Yes	100	Yes	100	Yes	100	Yes	100	Yes	100
Min tillage	Till>0	100	Till>0	100	Till>0	100	Till>0	100	Till>0	100
Green Cover Establishment	Till>0	100	Till>0	100	Till>0	100	Till>0	100	Till>0	100
Wild Bird Cover	NA	100	NA	100	Till = 0	100	Till = 0	100	Till = 0	100
Tier 2 General Actions										
Low Input Permanent Pasture or Traditional Hay Meadow	Yes	90	Yes	90	NA	0	Yes	80		
Riparian Margins	Yes	90	Yes	90	Yes	90	Yes	80		
Coppicing Hedgerows	Yes	80	Yes	80	Yes	80	Yes	80	Yes	80
Laying Hedgerows	Yes	90	Yes	90	Yes	90	Yes	90	Yes	90

Traditional Stone Wall Maintenance	Yes	90	Yes	50	Yes	50	Yes	50	Yes	90
Tree Planting	Yes	50	Yes	80	Yes	80	Yes	80	Yes	80
Enlarged Headlands	Yes	100	Yes	100	Yes	60	Yes	80	Yes	80
Cultivation of Tramlines	Yes	NA	Yes	50	NA		NA		NA	
Environmental Management of Fallow Land	Yes	NA	Yes	60	Yes	30	Yes	30	Yes	30
Arable Margins	Yes	NA	Yes	70	Yes	50	Yes	50	Yes	50
Rare Breeds	Yes	50	Yes	50	Yes	50	Yes	100	Yes	100
Birds, Bees and Bat Boxes	Yes	90	Yes	90	Yes	90	Yes	90	Yes	90
Tier 2 Other Proposed General Actions										
Identification and temporary fencing of Critical source Areas	NA		NA		Yes	100	Yes	80	Yes	50
KT - Carbon Navigator - Assessment and Plan of Action	NA		NA		yes	100	Yes	60	Yes	50
Clover incorporation	Yes	100	Yes	100	Yes	100	Yes	100	Yes	100
Establishing Hedgerows										

146 NB Please note that scores included are arbitrary and do not constitute a recommendation of priority

Example Computation												
Grassland farmer with watercourse @ 150Kg / Ha												
	Weighting		Year 1	Score	Year2	Score	Year3	Score	Year 4	Score	Year5	Score
NMP Enhanced	100		200	200	200	200	200	200	200	200	200	200
Records	100		200	200	200	200	200	200	200	200	200	200
Course	100		100	100		0	100	100		0		0
Fencing of Grassland Watercourse	100		2000	2000	2000	2000	2000	2000	2000	2000	2000	2000
Tree Planting	80		1500	1200	2000	1600	2000	1600	1000	800	1000	800
Bird bee and Bat Boxes	90		1000	900	600	540	500	450	600	540	600	540
Wild Bird Cover	100			0		0		0	1000	1000	1000	1000
TOTAL			5000	4600	5000	4540	5000	4550	5000	4740	5000	4740
Score			0.92		0.908		0.91		0.948		0.948	

8 The Areas of Natural Constraint Scheme

Reamonn Fealy, Fintan Phelan, Rogier Schulte

- 147 Under Atlantic climatic environments, excess soil moisture conditions occur frequently and for prolonged periods of time on a wide range of soil types as a result of interactions between climatic and pedological conditions.
- 148 The incidence of excess soil moisture conditions is the main biophysical constraint on farming practices in these environments, causing reduced grass growth, reduced herbage utilization, limited windows of opportunity for machinery operations and as a result reduced or even prohibitively low economic sustainability for a wide range of farm enterprise types.
- 149 The proposed restructuring of the eligibility criteria in the programme should maintain recognition of the unique challenges faced by farmers in a situation of excess soil moisture. Research has demonstrated that a failure to incorporate this condition in determining eligibility will leave Irish farmers at a significant disadvantage and will result in a significant reduction in income. Both modelling and empirical studies demonstrate that the economic and environmental sustainability of intensive livestock farming and tillage systems are particularly challenging in scenarios where the 80 percentile duration of excess moisture conditions exceeds 220–230 days. While this can be partly reflected in soil classification terms (e.g. poorly drained soils) the challenge is often manifested at low levels of soil moisture deficit (SMD) where the impact at field operational level is on trafficability..

8.2 Recommendations

- 150 The continued funding of a scheme that is a direct support to economically vulnerable rural communities facing particular physical difficulties from a farming perspective is to be welcomed.
- 151 The designation of ANC's by reference to biophysical criteria represents a significant new approach to the delineation of eligible areas. This delineation exercise needs to identify the most appropriate type and scale of spatial data to be used and to identify where additional data refinement needs to take place in order to properly represent and map areas of biophysical disadvantage.
- 152 As a national delineation exercise will use input mapping of varying scales, processes should be put in place that take cognisance of inherent variability in map scale and resolutions. The relationship between regional level mapping and on the ground delineation with its consequent impact on land holders needs to be considered and appropriate mechanisms for appeal should be put in place.
- 153 It is recommended that the rules be set down and that there be limited alteration of these over the course of the plan as these changes can impact of farmers plans.

- 154 The way in which the required stocking rate is calculated needs to be clear and not require extensive calculation.
- 155 The current 7 month stocking rule should be reduced to 6 months and one day. This would have the same effect (as a control measure) but reduce the required stocking period which would reduce the potential for environmental damage and potential animal welfare issues.
- 156 It remains very important for Irish agriculture that scientifically supported interactions with the Commission continue in order that areas subject to production handicaps are adequately identified and to ensure the optimum distribution of LFA support into the future.

8.3 Collaborative Farming

- 157 Provision shall be made to support each farmer participating in a Registered Farm Partnership (RFP) as an individual up to a maximum of three ANC payments per partnership. (See Section. “Support for Collaborative Farming” of this document).

9 Support to the Beef Sector

Aidan Murray, Pearse Kelly, Donagh Berry and Paul Crosson

158 In terms of the Beef Genomics Programme we would broadly support the proposal put forward by DAFM. Some thought should however also be given to the idea that farmers should be exposed to the fundamentals behind genomics and how to get efficient use from ICBF's Herdplus data which is currently been under-utilised by farmers. Three options should also be looked at:

- A replacement heifer scheme to encourage two year old calving in the suckler herd
- An incentive to use high index beef bulls
- An incentive to record more weaning weights to increase the reliability of the maternal index

The protracted calving spread on beef farms is also a major contributor to inefficiency. The reasons for this include late calvers, lighter weanlings, grassland management, animal health, etc. The availability of a maternal genomic index will be of help here by identifying (and breeding) animals with shorter calving intervals and which survive in the herd longer.

9.2 Replacement Heifer Scheme

159 Margins are very tight (often negative at net margin level) on beef farms so the cost of an additional 6 months (or greater) rearing for replacement heifers is a major burden. An area where significant efficiency improvements in the suckler herd could be made if we were to give some incentive towards encouraging younger calving of suckler heifers. From the latest ICBF figures only 16% of suckler heifers calve for the first time between 22 and 26 months of age.

160 Work from Dr. Paul Crosson in Teagasc Grange clearly shows that the most profitable age to calve heifers is 24 months. For a 50 cow herd calving 10 heifers, each additional month that calving is delayed costs €490.

161 With correct management practices heifers could be brought to appropriate bulling weights by 15 months of age to allow them to be served and join the suckler herds at 24 months. Work from ICBF looking at heifers from the beef herd that calved in 2011 shows that heifers calving at 22-26 months performed as well as older calving heifers when it comes to calving interval, % retained as second calvers etc

Age at 1 st Calving (mths)	Avg Calving Interval Overall (days)	% Calving for a Second time	Avg Calving difficulty of bulls used on heifers	% of Heifers Calving Unassisted	% Mortality at 1 st Calving
23-26mths	383 days	85%	4.7%	50%	3.2%

27-30mths	394 days	84%	5.1%	53%	2.8%
31-35mths	392 days	88%	5.2%	58%	2.6%
3640 mths	386 days	86%	5.2%	57%	2.0%

Source: ICBF

- 162 The slightly higher calf mortality figure in the 22-26 month category could be reduced with more diligent sire selection and lower calving difficulty figures.
- 163 A top-up for first time calvers, calving in the 22 to 26 month range could bring about real improvements in both suckler herd efficiencies and profitability levels. It would also incentivise the selection of the correct type of heifer if used in conjunction with the ICBF data and it could be used to accelerate the reliability of the Maternal index if appropriate heifer or progeny weights were captured. Reducing the average first time calving age (currently > 50% in the national dairy herd) in the suckler herd would also have positive carbon footprint implications.
- 164 By targeting suckler heifers to calve at a younger age it would also have the knock-on effect of finishing male stock on the same farms at a younger age as management practices put in place to achieve it (a higher weight for age) would by default also improve the management of the male stock also. Any national programme to reduce the average first time calving age in suckler herds would encourage suckler farmers to start talking about it and the reasons for it which also can only be good for the industry as a whole.

Increasing the use of High Index Beef Bulls

- 165 There is clear unequivocal evidence that genetic differences in beef manifest themselves as genetic differences in phenotypic performance. This has been clearly shown from controlled experimental work in Grange and more recently in the analysis of both terminal and maternal traits in the national database. The evidence is also clear in dairy and is the impetus behind the use of high EBI bulls. A scheme was introduced in sheep to incentivise the use of 5-star rams. A similar scheme could be implemented in beef.

9.3 Increasing Maternal Index Reliability

- 166 Maternal ability is the foundation of a long-term sustainable production system. Fertility and milk production in beef is deteriorating with selection for terminal traits. Compromised fertility eroded all revenues generated in dairying from increased milk production. Similarly this is now happening in beef and is unsustainable. Genetics (good and bad) contributes to phenotypic changes. Accurate genetic evaluations are key to genetic gain. A paucity of data on weaning weights means accurate genetic evaluations for milk yield in beef cow is difficult to achieve (especially in young bulls and cows). Incentivisation of animal weighing will not only contribute information for genetic evaluations (and thus genetic gain), assuming parentage is also recorded, but is also good practice. Weighing of cows will contribute to gains, especially production efficiency.

10 Support for Island Farming

Brendan Heneghan and Ivan Kelly

- 167 The viability of island households and communities is under constant threat. Lack of infrastructure, high costs of transport, small fragmented farm holdings, poor land quality and extensive farming systems together with limited off farm employment opportunities all combine to make socio-economic challenges. There is considerable variation between the islands and this adds to the challenge of identifying effective support mechanisms to tackle disadvantage. Teagasc propose the following actions for consideration;

10.2 GLAS

- 168 Agri-Environment schemes such as GLAS are very compatible with the low intensity farming practices of the Offshore Islands. Additional measures to increase uptake could include:
- The provision of higher aid intensity for all Offshore Island land in GLAS, for increased costs of complying with the scheme.
 - Consider non designated Annex 1 habitats associated with extensive farming on Islands for Tier 1 status in GLAS
 - Target a GLAS+ action towards High Nature Value Farming.

AranLIFE

- 169 The AranLIFE project is to run from 2014 to 2017. An extension of the programme to an 'Aran farming for conservation Programme' in 2018, similar to the Burren scheme is suggested. AranLIFE is limited to Natura designated land on the Aran Islands. A similar targeted output based project for land outside the remit of the LIFE scheme on all the Islands has merit.

10.3 On Farm Capital Investments

- 170 Stone sheds used to store fodder etc. out on the land are essential for small fragmented holdings on the Islands. Some farmers applied for the REPS 4 Traditional Farm Buildings Scheme but were rejected as the projects were too small. There is an opportunity now to make funding available for these and other small scale projects, which not only help improve the infrastructure of the farm but would also enhance the historical landscape and heritage of the Islands. It would also help to generate employment on the islands.

Breeding

- 171 The use of Artificial Insemination from high index value bulls to ensure a quality breeding programme is crucial. The purchase of Eurostar bulls is not feasible due to herd size on the Islands. However, the costs associated with transporting liquid nitrogen and semen straws are prohibitive. Similarly, while the Beef Data Programme (BDP) and Beef Data and Genomics Programme (BDGP) are very welcome, registration costs nullifies the financial incentive

on very small herds associated with the islands. A targeted programme on the islands that addresses these issues could increase the genetic merit of the herds, improve output and contribute towards a sustainable farming system.

10.4 Knowledge transfer and Innovation

172 Education models such as workshops, discussion groups and seminars should be considered to address the specific challenges of farming on the individual Islands. These include:

- Preservation of habitats and their dependence on certain farming practices.
- Farm size, stocking rates and the viability of farm families on the islands.
- Effective marketing of niche Island product.
- On-farm diversification

11 Organic Farming

Dan Clavin

- 173 Teagasc welcomes the proposal to introduce a new Organic Farming Scheme (OFS) and Schemes of Grant Aid for the Development of the Organic Sector. It is noted that DAFM is awaiting commission approval to bring OFS under the umbrella of Glas. Bearing in mind the importance of scheme support to grow the sector and the 5% UAA target stated in the Food Harvest report, there are a number of queries in relation to the draft consultation paper outlined below regarding how bringing OFS under the umbrella of Glas would benefit and help grow the organic sector.
- 174 Specifically, if Traditional Hay Meadow (THM), Species Rich Grassland (SRG) or Low Input Permanent Pasture (Glas) areas continue to be excluded from OFS payments, this will lead to direct competition between Glas and OFS for applicant numbers / land area. To comply with THM, SRG, organic farmers incur costs, make commitments and may require changes in practice above and beyond organic regulations eg.
- Can't cut land before 15 Jul (THM)
 - Must close-off land by 15 April (THM)
 - N and P cannot exceed 30-kg/ha/year. (SRG). Note: Thus, organic farmers are not allowed to spread rock phosphate or slag products which may be restrictive.
 - Cannot top land until after 15 Jul (SRG)
 - Supplementary feeding may not take place on land (SRG)
 - Cannot plough / reseed ground including inclusion of clover which is a restriction to increasing productivity on organic farmers (SRG)
- 175 As acknowledged in the SWOT analysis commissioned by DAFM, there are low levels of organic production in Ireland (1.1% UAA) compared to Europe (5.7% UAA, across EU27). According to the recent Organic Production Census, growth in the organic sector in Ireland has been steady but slow in recent years. According to research in Ireland, "higher organic production payments" and "receiving higher prices for products" are the two main drivers of adoption of organic farming for conventional farmers. (Läpple and Donnellan, 2008; Läpple, and Kelley, 2010). Thus, in order to grow the sector and to assist in reaching the 5% UAA target, particular emphases needs to be placed on these main drivers.
- 176 Teagasc recommend the following actions which we believe will benefit in particular the long term sustainability of the organic sector (keeping farmers in the sector and encouraging co-operation/linkages) and address market shortages where they exist.
1. Introduce a separate and increased rate of OFS payment for areas where supply shortages exist including organic horticulture, arable crops and red clover for animal feed, to account for barriers to entry, technical husbandry requirements and supply/market shortages.

2. Introduce staggered payment rates to reflect lower economies of scale of small holders so as to encourage more such smaller farmers to enter the sector.
3. Alter organic payment rates so as to reflect costs of remaining in the sector and to encourage farmers to remain in the sector. This will provide enhanced longer term environmental, animal welfare and market supply benefits.
4. Provide funding for the delivery of compulsory accredited training courses for OFS entry to build technical/market knowledge (similar to funding provided for REPS courses) delivered by accredited tutors.
5. Clarify the eligibility of OFS applicants to enter GLAS, GLAS +, other agri-environmental schemes, agro-forestry schemes so as to avoid conflict and encourage as many suitable organic applicants as possible to join OFS.
6. Subject to a maximum of three payments, provision should be made to support each individual OFS participant in a Registered Farm Partnership (RFP). **(See also Section. “Support for Collaborative Farming” of this document).**
7. Amend/clarify the minimum income unit requirement for the Schemes of Grant Aid for the Development of the Organic Sector on/off-farm to allow greater flexibility for organic producers, especially those commencing farming and smaller scale horticulture producers.
8. Grants for machinery under the On –Farm Scheme of Grant Aid for the Development of the Organic Sector should be given on ‘certified good quality’ (main dealer) second hand machinery as well as brand new machinery.
9. Grants for buildings under the On –Farm Scheme of Grant Aid for the Development of the Organic Sector should not require a number of quotes (increased complexity) but should be on actual costs or standard DAFM costs whichever is lower – as is the case for other grant aid schemes.
10. Due to the fragmented supply base and small size of the sector outlined in the recent Organic Production Census 2012, provision should be provided for priority support to organic farmers through organic producer groups **(See also Section. “Knowledge Transfer” of this document)** and co-operation through networks and clusters **(see also Section. “Knowledge Transfer” of this document).**
11. Improve knowledge transfer and dissemination of technical information within the sector through priority support for organic Btap, Stap and a new horticulture discussion group programme. **(See Section” Knowledge Transfer” of this document).**

11.2 Response to draft consultation paper

177 It is acknowledged that bringing OFS under the umbrella of Glas may have expected benefits in terms of administration and processing of payments to organic farmers. However, bearing in mind the linking of OFS to AEOS from 2009 and onwards which led to farmers’ scheme choices being compromised between choosing one scheme or the other, particular attention needs to be given to maximising the potential number of suitable organic entrants to OFS.

178 If a cap of €5,000 under GLAS and €7,000 under GLAS+ incorporates part of the OFS payment, this would lead to a potential disincentive to new OFS entrants and those renewing OFS contracts who could choose from a range of GLAS and/or GLAS+ undertakings over OFS with its associated additional EU regulatory undertakings and acknowledged barriers to entry as shown in

research carried out in Ireland (Läpple and Donnellan, 2008; Läpple, and Kelley, 2010).

- 179 It is proposed in the draft consultation paper to have the same core requirements for GLAS and the new OFS. If this involves carrying out a mandatory Nutrient Management Plan, this will provide a disincentive to some organic farmers especially small holders and horticulture growers (a key sector for growth/support), as many of these farms are small-scale and planning fees will be prohibitively high.
- 180 OFS was introduced as a stand-alone scheme under the last round of CAP. One of the big advantages of this was the flexibility it provided for farmers to enter. If OFS and GLAS are linked under the same umbrella, this may result in the necessity to match start dates for both schemes (similar to previous REPS schemes and organic supplementary measure SM6). This will prove a disincentive to farmers joining OFS and will inhibit growth in the sector.

11.3 References:

- 181 Clavin, D. (2012). Organic Production Census of Ireland 2012. Ref: www.teagasc.ie/organics
- 182 Läpple, D. and Donnellan, T. (2008). Farmer attitudes towards converting to organic farming. In: *Teagasc Organic Production Research Conference Proceedings*, Teagasc, Ireland, pp. 114-121.
- 183 Läpple, D and Kelley, H. (2010). Understanding attitudes towards converting to organic farming. An application of the theory of planned behaviour. In: *The 84th Annual Conference of the Agricultural Economics Society Conference Proceedings*. Edinburgh.

12 Promoting social inclusion, poverty reduction and economic development in rural areas

David Meredith and Mary Ryan

12.1 Context

184 The 2011 National Farm Survey found that whilst the proportion of economically viable farms increased to 35% in 2011 from 27% in 2010, 35,640 (34%) farms were still considered economically vulnerable, i.e. the farm enterprise did not generate sufficient income and there was no off-farm income. A further 31% were classified as sustainable by virtue of the presence of an off-farm source of income. The presence of off-farm income is particularly important to cattle farms. Research undertaken by Meredith (2011) highlighted the effect of the economic downturn on farm households and, more specifically, on farmers as a consequence of the reliance by many farmers on manual and unskilled occupations in the construction sector.

12.2 Issues

185 Whilst there are efficiency gains to be had on most farms, and Teagasc is working towards this goal, the small size and fragmented nature of many of these farms means it is likely that, even with enhanced efficiency, they will continue to require supplemental sources of income to ensure they do not experience poverty, social exclusion and deprivation.

12.3 Challenge

186 There are, in addition to Teagasc, many national, regional and local, bodies with responsibility for rural economic development, enterprise support and development, skills development, and education and training. There is a need to align the activities of these bodies with the needs of local communities and better co-ordinate and further enhance the delivery of these supports and services. Research by Macken-Walsh (2009) identifies key barriers to rural development stemming from the inability of development bodies to engage with and activate key groups within the rural population. These groups include those experiencing, or at risk of, poverty and social isolation. Other identifiable groups include the unemployed, youth, women and farm households.

12.4 Response

187 The most appropriate means of meeting these challenge is to simultaneously support the strategic development and diversification of the local economy and provide upskilling or, where necessary, reskilling of farmers and other members of farm households to ensure they can engage in the local labour market.

188 In the current financial climate when resources are limited, Teagasc recommend that available resources be targeted at those areas that have experienced above average adverse effects associated with the economic

downturn, e.g. increased unemployment, increased long-term unemployment, reduced employment etc.

- 189 Within these areas there is a need to ensure that any training and skills development be aligned to the needs of existing local enterprises or sectors identified in local strategic economic development plans as having the potential for development.
- 190 National strategies many not reflect the skills base and potential employment of local areas. Ensure the content of skills development programmes are aligned to local development strategies and the human resource needs of current and new businesses.
- 191 Within local economic development strategies, the role of women in the development of rural enterprise and, particularly, farm based enterprises should be recognised.
- 192 A specific programme targeting enterprise development supports to women in farm households should be piloted.
- 193 The discussion group model should be implemented as part of this programme.
- 194 Food and Tourism are two economic sectors that have potential to be developed in most if not all localities. The development of these sectors is frequently interrelated. Teagasc recommends that dedicated tourism in rural areas and food development programme be initiated in partnership with relevant local bodies and other agencies.
- 195 Rural poverty, in general, and farm household poverty, in particular, are issues that have received insufficient attention in recent years. There is a need for up-to-date research detailing the extent and nature of rural and farm household poverty.
- 196 There is a specific need to evaluate resistance to participation in Farm Assist and other income support schemes. This initiative should engage with relevant stakeholders including farm representative organisations and public sector bodies.

13 Artisan Food Cooperation Scheme

Maeve Henchion, Marie Kelly, Aine Macken-Walsh

- 197 Teagasc welcomes the introduction of an Artisan Food Cooperation Scheme and is willing to support the implementation of the schemes, e.g. through the Teagasc Options Programme. The Scheme addresses a number of challenges to the sector, primarily relating to cohesion, scale, marketing and innovation, which could potentially be addressed through cooperation. The importance of certification and branding for market differentiation should be emphasised in how the measure is implemented. The potential of linking the proposed beef and lamb quality scheme to participation in EU Geographic Indication regimes could be considered. The link with the tourism sector through festivals and food trails is welcomed; however it must be developed in full appreciation of its seasonal dimension.
- 198 In the title of the scheme, the specificity of the term ‘artisan’, as relating to one of many differentiated food categories, however, may be restrictive. There is an established recognition of a typology of differentiated food products, including speciality foods; regional foods (including PDO, PGO, PGI foods); and traditional foods (including TSG foods) (TASTE Council, 2004). There is scope for recognising cooperation efforts among a broad range of differentiated food producers under Article 35 (cooperation), where efforts for food production cooperatives/companies to mainstream the delivery of multi-functionality (e.g. incorporating greening and climate change measures) and to improve logistical operation at the local level (e.g. by sharing skills, services and facilities) are supported. There are many examples of how cooperative models operating elsewhere in Europe have delivered on multi-functional objectives, particularly in relation to climate change.

13.2 Proposed Structure of the Scheme

- 199 The scheme proposes actions to “improve and validate production quality” and “improve awareness and marketability of locality and niche category products”. Expanding this focus to “improve innovation and new product development in the sector” would enhance the impact of the Scheme given the need to develop new products to expand the sector. This could be done on a collaborative basis, through for example sharing facilities with others, and undertaking complementary collaborative promotional activities.
- 200 Animation/extension support targeted at encouraging communities to imagine potential projects; appraise local resources for new projects; and build collaborations is an important preparatory phase for initiatives that are focused on building skill sets and other instrumental forms of capacity building. This could also be brought within the scope of this measure. A focus on farm women and women in rural areas, acknowledged in international research to be pioneers in rural diversification, could be facilitated by a dedicated programme.

- 201 Formalised cooperation structures that have been effective internationally should be examined, such as the federated cooperative structure operating in the US (Teagasc, 2012).

13.3 Improve and validate production quality:

- 202 It would be useful to include visits to other producers as well as farm visits within the scope of this measure. Access to business mentors could also be valuable. The EU quality schemes, e.g. re PDO/PGI/TSG could be specifically mentioned in this context. The recent successful registration of the Waterford Blaa as a PGI is the result of collaborative action.

13.4 Improve awareness and marketability of locality and niche category products

- 203 In this market, connecting with the consumer and communicating the unique characteristics of the product is critical. Social media is seen as a useful mechanism for consumer engagement, providing feedback on current offerings and ideas for new products. Therefore it would be useful to specifically support social media in this measure. The following extract from the CEDRA report highlights the importance of ICT for individual food producers as well as community groups and farmers markets and the need for training to assist in exploiting the opportunity.

- 204 ICT also offers a potential solution to the fact that consumers sometimes have difficulty finding local foods (Intel, 2012) – apps, location based technology linked to locally based consumption, etc. have a role to play in addressing this barrier. Training regarding social media should be made widely available to producers but also to community groups and farmers markets.

13.5 Proposed Core Requirements and Selection

- 205 The Scheme is currently targeted at producers. It would be useful to expand the scope beyond food producers to include food service providers and food retailers. Links between the foodservice sector and producers could provide opportunities for promotion, e.g. through tasting menus based on local food, and opportunities for related diversification, e.g. Cully and Sully selling ready meals to the food service sector. Furthermore, development of routes to market should explicitly include local independent retailers, including street food and pop-up shops.

- 206 Online sales are a useful vehicle to target the export market as well as the domestic market. However according to AMAS (2012) Irish food producers are generally quite poor at using the internet, do not integrate it well into other marketing elements, are not taking the opportunity to “tell a story” well, and could do a lot more. Hence training is an important element of exploiting this opportunity. Developments such as QR codes and augmented reality should also be assessed in terms of their ability to “tell the story”.

- 207 Specific supports for developing the export market could be particularly encouraged given that currently only 10% of speciality food is exported indicating that growth in the number of businesses will generally only occur

by cannibalising other businesses if the focus remains very strongly on the domestic market.

- 208 The feasibility of virtually upscaling small businesses to achieve the economies of scale necessary to export, and employ sales staff for example could also be usefully brought in under this remit.

13.6 Targeting:

- 209 The basis for the target number of groups (6 to 12, increasing to 60 by year 7) is not clear. Speciality food producers are estimated to number 350 producers whilst artisan producers are estimated to number 70. On that basis, a target of 60 groups seems to be very ambitious. However, if the target is broadened to include a greater diversity of food producers, delivering multifunctional objectives, the scope for uptake is increased.