



Rural Development Programme for Ireland (RDP) 2014-2020

Response to SEA Public Consultation from Mountaineering Ireland

June 2014

1. Context

Hillwalkers and climbers rely on Ireland's upland areas for their activities. As the national representative body for all aspects of mountaineering, one of Mountaineering Ireland's key priorities is the sustainable management of Ireland's upland areas. Ireland has a very limited stock of upland, and what we have is being altered all the time, through a range of factors including changes in agricultural practice, drainage, afforestation and renewable energy development. Demographic factors and the economic situation in hillfarming also pose threats to maintaining the integrity of Ireland's upland environment.

It is worth reflecting on the fact that, due to the high level of public goods delivered, society has more to gain from the positive management of the uplands than hillfarmers. Design of the Rural Development Programme 2014-2020 represents a critical opportunity to direct public funding in a way that secures a more positive future for Ireland's upland environment for the benefit of society as a whole.

As many of the issues raised in our February 2014 submission (Appendix 1) have yet to be addressed, we have re-submitted these (see Appendix 1) along with some brief comments below.

2. Specific comments

While Mountaineering Ireland's core focus is on the Uplands of Ireland, we broadly support the *Response to the draft SEA material by the European Forum on Nature Conservation and Pastoralism and Sligo IT* (Moran, J. and Jones, G. et al., 2014), which, similar to our own submission, highlights the need for a targeted and collaborative approach in order to achieve improvements in habitat quality, maintain biodiversity and sustain economic and social sustainability.

The EFNCP and Sligo IT submission proposes mechanisms that could well provide a workable solution to the difficult challenge of achieving collective management of commonage lands. The point above about the benefit to society being greater than the benefit to individual farmers is particularly pertinent with regard to commonage. Skilled facilitation and financial incentives are essential, otherwise hillfarmers will disengage from commonage and Ireland will be faced with the consequences of further land abandonment, much of it in Natura 2000 areas.

Mountaineering Ireland notes the provisions within the draft material for a top-up payment to island farmers through the ANC scheme. Farmers in upland areas face many of the same challenges, including remoteness from services, poor land quality, limited return from farming activity and the importance of their land for tourism and recreation.

Mountaineering Ireland calls on the Department of Agriculture, Food and Marine across the design of the Rural Development Programme 2014-2020, to focus attention towards upland areas, and supporting the delivery of public goods and environmental benefits.

Appendix 1

Mountaineering Ireland's submission in response to Stakeholder Consultation (February 2014)

1. Introduction

Mountaineering Ireland* welcomes the opportunity to provide feedback on the Department's Consultation Paper (January 2014) regarding the measures to be included in Ireland's Rural Development Programme for the period 2014 to 2020. In particular we welcome the scope through GLAS+ to address the challenges in securing the sustainable management of the important natural resources in Ireland's upland areas.

As the national representative body for walkers and climbers, Mountaineering Ireland has a keen interest in the conservation and sustainable management of Ireland's upland areas. During 2012 and 2013 Mountaineering Ireland was instrumental in bringing together a range of stakeholders, including farming organisations, environmental organisations and government bodies involved in agriculture and nature conservation, to examine the opportunities to support the sustainable management of upland areas under the next Rural Development Programme (RDP). Arising from this a National Uplands Working Group was formed to develop proposals for a suite of measures that could be incorporated into the next RDP. This submission from Mountaineering Ireland complements the submissions made by the National Uplands Working Group.

2. The importance of Ireland's uplands and key issues

The Irish uplands have very special significance for society. Ireland's upland areas are a major element in our landscape, providing defining geographic features, some of our most beautiful scenery and our largest areas of relatively wild land. As well being a distinct landscape type, these high quality, living, lived-in farmed environments are a rich tapestry of heritage and biodiversity. The Irish uplands incorporate two thirds of the country's semi-natural vegetation and also encompass a substantial proportion of designated Natura 2000 sites. Our upland landscape is the product of a system of low intensity agriculture; in addition to farming, the upland environment delivers a host of ecosystem services including biodiversity, carbon storage, water quality and flood mitigation. Upland areas attract people for passive and active recreation and for education purposes, thus making a hugely valuable contribution to community well-being.

For many people the appeal and value of the Irish uplands lies in their wild and rugged character. Upland areas also have a vital role within Ireland's rural tourism offering. Research shows that 776,000 overseas visitors engaged in hiking or cross-country walking in 2011 (Fáilte Ireland, October 2012). Hiking has also been shown to be the most popular active leisure pursuit amongst domestic holidaymakers (Fáilte Ireland, December 2012).

The condition of Ireland's upland environment is inextricably linked with the health and well-being of our population in other ways too. For example, streams in the uplands account for over 50% of Ireland's entire river network and almost 82% of the water we use is taken from rivers and lakes that are fed by streams from the mountains (Maunsell, 2013). It is notable that a report recently published by the Environmental Protection Agency highlights a decline in Ireland's high status water bodies (Ní Chathain, Moorkens and Irvine, 2012).

The labour intensive nature of farming in upland areas, combined with the low rate of return, are leading to land abandonment, with consequent decline in the quality of our most significant natural resources. The most cost-effective way to ensure a healthy upland environment is by linking farm payments to environmental outputs.

As highlighted in our January 2013 submission, there is an urgent need for a specific suite of measures to address some of the key challenges facing the Irish uplands including:

- land abandonment (with overgrowth of vegetation giving rise to fire risk; also loss of traditional skills);
- low average farm income (which results in an older age profile amongst hillfarmers);
- degradation of peatland (leading to carbon loss and decline in water quality) and
- pressure from increasing recreation activity (e.g. congestion on narrow roads, damage to fences and disturbance of livestock).

3. Agri-environment climate measures

GLAS

Mountaineering Ireland would like to see greater targeting of agri-environment payments towards low intensity agricultural systems, such as hill grazing, which deliver the highest environmental quality in terms of water quality, climate change and biodiversity.

Mountaineering Ireland proposes that the following be included in the priority Environmental Actions for Tier 1 of GLAS:

- Priority access for upland conservation should not be restricted to commonage lands as large tracts of the uplands are held in individual ownership. The basis for the inclusion of commonage should be reviewed. Many upland farmers could be excluded from the GLAS scheme due to the difficulty in achieving collective agreement amongst commonage shareholders (minimum 80% required).
- The four additional actions proposed for priority access are focused towards intensively farmed land, Mountaineering Ireland would like to see management options added for semi-natural grassland and heathland, as appropriate grazing and related actions on these lands will deliver a higher environmental dividend.
- A measure to support the maintenance of heritage features (historic monuments both recorded and unrecorded and more recent cultural features). The role of farmers in preserving, protecting and managing heritage features should be acknowledged and supported through the RDP.

- The GLAS / GLAS+ scheme should include conditions to protect the environmental integrity of upland areas. For example, the scheme should ensure there is no fencing of previously unfenced mountain land, or the creation of new vehicle tracks in semi-natural landscapes. The criteria for eligible land should take account of elements within the upland landscape which may be beneficial to biodiversity, scenic value and recreational enjoyment. Unfortunately much valuable habitat has been lost in recent years due to scrub clearance and heather burning so as to avoid deductions in area-based payments. This would seem to arise from an unwise interpretation of EU rules.

GLAS+

Mountaineering Ireland welcomes the provision for GLAS+; we believe that with increased funding, this has significant potential to address the challenges facing upland areas and we make the following observations and recommendations:

- As GLAS+ is directed towards farmers who take on particularly challenging actions which deliver an exceptional level of environmental benefit, this measure would initially appear to be suitable for hillfarmers and others farming high nature value land. However an additional payment of up to €2,000 is unlikely to be attractive to farmers in challenging situations as it does not reflect the work involved. As a result, the payment could go to farm situations where there is less constraint, thus failing to deliver the desired environmental benefit.
- It is Mountaineering Ireland's strong recommendation that GLAS+ is used to drive an improvement in the management of priority habitats, by providing for a substantial increase in the maximum €2,000 payment, with the amount payable to each farmer based on environmental outputs delivered. The report published by the Heritage Council in December 2013 on an outcome-based agri-environment programme (McGurn and Moran) provides an outline for how such outputs could be scored. A progressive scheme such as this would help to address the European Commission's request for better targeting of agri-environment payments.
- Examples of actions which could be funded under GLAS+ include: shepherding to manage grazing for best ecological output; removal of bracken and rhododendron; restoration of degraded Peatland; and regeneration of heather through flailing or controlled burning. All of these actions are labour intensive, particularly on remote or exposed land, however all would be valuable in delivering on Priority 4 'restoring, preserving and enhancing ecosystems dependent on agriculture'. There is excellent coherence with the cross-cutting themes of climate change and environment and considerable scope for innovation.
- A higher payment under GLAS+, as proposed above, could also be used to incentivise younger farmers to take over the active management of hillfarms. Due to the labour involved and the lower market return, hillfarming is currently failing to attract young farmers. Consequent land abandonment presents a serious threat to the quality of the upland environment.

Targeted output-based local agri-environmental projects

While Mountaineering Ireland welcomes the Department's inclusion of a targeted output-based agri-environmental approach within the agri-environment climate measures, we believe this should be applied on a national basis through GLAS+. We offer the following comments regarding the options in the Consultation Paper:

- The BurrenLIFE project and the Burren Farming for Conservation Programme have proven the value of an outputs-based approach in achieving farmer commitment to delivering sustainable agricultural management of high nature value farmland. The success of this model is evidenced in the demand to extend this scheme, and requests for similar schemes in other areas. The scheme has also proven to be cost-effective.
- The funding of €5m indicated for output-based agri-environment projects could fund the extension of the Burren programme, but it is far too little to achieve anything worthwhile in terms of applying this model across a wider area. As indicated above, it is our view that GLAS+ offers the scope to introduce a national outputs-based agri-environmental scheme, sitting as a higher tier above GLAS.
- The Burren project has demonstrated the merit in establishing local projects to focus on the particular challenges facing different geographical areas. Mountaineering Ireland recommends an increased funding allocation to accommodate both the extension of the Burren Farming for Conservation Project and the funding of a series of research and innovation projects to provide a knowledge-base to inform the design of the RDP post-2020. These projects should operate as local pilot agri-environment schemes with a focus on identifying best practice in the sustainable management of high nature value farmland.

4. Areas of natural constraint

Funding for areas of natural constraint (formerly known as less favoured areas) is essential to ensuring continuity in farming, particularly on more marginal lands such as uplands. Mountaineering Ireland appreciates that a re-designation of areas of natural constraint is required during the period of the next RDP.

Mountaineering Ireland supports greater targeting of this payment towards landowners who are subject to more severe constraints. The current payment structure makes relatively little distinction between mountain areas and lowland which may have a significantly greater stock-carrying capacity. The constraints in upland areas include: remoteness; nature conservation designations; planning restrictions; shorter growing season; and higher rainfall combined with soft, peaty soils which limit agricultural production and the use of machinery.

5. Knowledge transfer measures

Knowledge transfer groups

Mountaineering Ireland welcomes the inclusion of a competitive fund for knowledge transfer groups as we believe this has the potential to make a positive contribution to the

sustainable management of upland areas. We would like to see upland areas included within Priority Bundle 1, perhaps linked with water quality and biodiversity as there is a direct relationship between the management of upland areas and water quality. There could also be scope through knowledge transfer groups to:

- a) enable knowledge transfer between different upland farming regions;
- b) encourage younger farmers to take up hillfarming;
- c) build understanding of the various public goods delivered through hillfarming.

Continued professional development

Given the focus within the RDP on agri-environment and climate measures, the up-skilling of agricultural advisors is welcome, but there should also be provision for qualified environmental scientists and other relevant disciplines to be included on the list of approved advisors.

The development of a face-to-face relationship between the upland farmer and their farm advisor, and the quality of advisory support, will be pivotal to the success of a targeted uplands agri-environmental scheme. Upland farmers bring their unique experience of managing the uplands and hence this experience should inform their farm plans. The approach of the farm advisor must combine a sound knowledge of upland habitats, with an understanding and appreciation of the individual circumstance of upland farmers, and must be participatory in nature and delivery.

6. Support for collaborative and quality focused measures

This measure has the potential to contribute to other priority areas, particularly Priority 4 'restoring, preserving and enhancing ecosystems dependent on agriculture' if it was used to support pilot projects to achieve collective management of commonage.

The challenges in achieving collective management should not be under-estimated. On very many commonages there is a history of tension between shareholders; there are also difficulties associated with a high proportion of inactive shareholders on some commonages. Julia Aglionby's presentation at the Teagasc National Agri-Environment Conference November 2013 showed that difficulties between commonage shareholders are not unique to Ireland. The presentation also highlighted that with the support of a skilled facilitator agreements can be achieved (Aglionby). Mountaineering Ireland would like to see support within this measure for the negotiation of collective agreements for the management of commonage areas.

7. LEADER measures

Rural tourism, recreation, heritage and culture

There is scope to increase the social, environmental and economic benefits that flow from rural tourism and recreation, however investment in this area should be underpinned by a commitment to respect and protect the key attraction; Ireland's natural environment.

Ireland has a very limited stock of undeveloped land, and we are already making both large and small changes that cumulatively are using up our wild landscapes at an alarming rate. The LEADER measures should guard against the suburbanisation of wild landscapes through the inappropriate development of facilities to support tourism and recreation (e.g through trail-marking, signage and unnecessary safety features).

In 2012 Mountaineering launched the Helping the Hills initiative to advocate a considered, quality approach to the management of path erosion and to ensure that interventions do not detract from the character of the upland environment. Adherence to the Helping the Hills principles should be a condition of funding for future path repair or trail development projects in upland areas. See www.helpingthehills.ie for further details.

While recreation and tourism deliver a host of positive benefits for participants and rural areas; there is also the potential for adverse impacts on the natural environment and the host community. Examples of such impacts include obstruction of narrow roadways with parked vehicles, damage to fences, littering, disturbance of livestock by dogs and the introduction of invasive species to lakes and rivers. Investment in tourism and recreation projects should incorporate guidance for responsible recreation, based on the well-established Leave No Trace programme. See www.leavenotraceireland.org.

Social inclusion, capacity building, training and animation

The key to sustainable management of Ireland's upland areas is a convergence of recreational, agricultural, community, statutory, environmental and economic interests. The formation of upland forum / partnership groups to develop and deliver local management plans, would enable a community-led response to the challenges facing upland areas. Mountaineering Ireland would like to see support for upland groups and integrated management plans included in the RDP; this would help to address all priority areas within the RDP, but notably Priority 6 'promoting social inclusion, poverty reduction and economic development' in rural areas'.

8. Closing comments

Ireland's uplands are one of our most important natural assets, which we have a duty to protect, but these areas also have the potential, through sensitive management to deliver considerable benefit in terms of national economic, environmental and social well-being.

With more than two thirds of Ireland's semi-natural vegetation in upland areas, and the continuity of traditional hillfarming practices hanging in the balance, it is vital that the RDP 2014-2020 embraces the central role of low intensity (yet labour intensive) agricultural practices in enhancing environmental quality, and incorporates measures to reward the active management of semi-natural areas.

In this submission we have brought attention to the value and vulnerability of Ireland's upland areas and the potential to support these special areas through the measures outlined in the January 2014 consultation paper. Mountaineering Ireland now seeks the

Department's commitment to address the challenges facing Ireland's upland areas in the finalisation of the RDP for 2014 to 2020.

9. Further information

Mountaineering Ireland would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

Please contact:

Karl Boyle (Chief Executive Officer)

Mountaineering Ireland, Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.

Telephone: 0 1 6251115

E-mail: karl@mountaineering.ie

Website: www.mountaineering.ie

10. References

Aglionby, J. (2013) *A Common Cause – Collective Agreements for Upland Commons*, presentation at Teagasc National Agri- Seminar, Tullamore, 7th November 2013, available online at: <http://www.teagasc.ie/publications/2013/2990/JuliaAglionby.pdf>

Fáilte Ireland (October 2012) *Activity Product Usage among Overseas Visitors in 2011*, published by Fáilte Ireland, available online: [http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_Insights/3_General_SurveysReports/Activities_2011\(f\).pdf?ext=.pdf](http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_Insights/3_General_SurveysReports/Activities_2011(f).pdf?ext=.pdf)

Fáilte Ireland (December 2012) *Domestic Tourism 2011 - An overview of Irish residents' travel within the Republic of Ireland in 2011*, published by Fáilte Ireland, available online: http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_Insights/3_General_SurveysReports/Domestic_Tourism_2011.pdf?ext=.pdf

Maunsell, M. (November 2013) Presentation at Helping the Hills seminar, Dublin, 14 November 2013, available online at: <http://www.helpingthehills.ie/Docs/upload/M.Maunsell-HelpingTheHillsNov2013.pdf>

McGurn, P. and Moran, J. (December 2013). *A National Outcome-based Agri-environment Programme Under Ireland's Rural Development Programme 2014-2020*. Report produced for the Heritage Council. November 2013. http://www.heritagecouncil.ie/fileadmin/user_upload/Press_Releases/Press_Releases_2013/AGRI_ENVIRONMENT_SCHEME_RDP_2014-2020_final12Dec.pdf

Ní Chathain, B., Moorkens, E. and Irvine, K. (2012) *Management Strategies for the Protection of High Status Water Bodies – STRIVE Report Series No. 99*, published by the Environmental Protection Agency, Wexford, available online at: http://www.epa.ie/pubs/reports/research/water/STRIVE_99_web.pdf

*** Mountaineering Ireland**

Mountaineering Ireland is the representative body for walkers and climbers on the island of Ireland. Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both the Irish Sports Council and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes walking, rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 11,500 members, comprising 161 clubs and approximately individual members (October 2013).

The work of Mountaineering Ireland includes:

- Representing the interests of walkers and climbers;
- Providing a comprehensive range of services to members;
- Improving and securing access to Ireland's mountains, hills, forests, crags, and coast;
- Promoting conservation and responsible use of the upland environment;
- Encouraging safe practice and promoting skills and leadership training.

Mountaineering Ireland is an active contributor to Comhairle na Tuaithe, the national body established in 2004 to address matters including access to the countryside, agreement of a countryside code and the development and implementation of a National Countryside Recreation Strategy. Comhairle na Tuaithe comprises representatives of the farming organisations, recreational users of the countryside and state bodies with a role in land management, tourism and recreation. Comhairle na Tuaithe's work is supported by the Rural Recreation Section within the Department of Environment, Community & Local Government. Further information is available on www.countrysidecouncil.ie.