



Environmental Pillar Response to Public Consultation on the CAP Post-2027 Regulations

The Environmental Pillar welcomes the opportunity to contribute to the Department of Agriculture, Food and the Marine's public consultation on the design of the CAP post-2027 framework. The Environmental Pillar is a network on thirty seven national NGO's working to promote sustainable development and environmental protection. We are active members of the CAP Monitoring Committee.

In this submission, we set out a coherent package of reforms to ensure that the future CAP and the proposed National and Regional Partnership Fund (NRPF) 2028–2034 place environmental and climate ambition at their core, while delivering fair, resilient livelihoods for farmers and rural communities. We emphasise the need to restore a clear two-pillar structure, reinstate robust environmental ringfencing and conditionality, and prioritise targeted support for High Nature Value and small/extensive farms, so that public funds transparently reward the provision of public goods, including biodiversity, climate mitigation and adaptation, water protection and landscape restoration.

1. Restore a Two-Pillar CAP

- Call for the re-separation of the CAP within the MFF and the re-introduction of a distinct second Pillar for rural development and agri-environmental measures, rather than full integration into the National and Regional Partnership Fund (NRPF/NRPP).

2. Reinstate Environmental Ringfencing

- Despite a commitment to an incentive based approach to the ring-fencing for environment and climate measures has been abolished. Environment and climate objectives must be included as core objectives of the NRPF.
- Seek a binding EU-level environmental ringfence: at least the current level of spending (around 27% of the income support envelope, approximately €80 billion EU-wide) should be dedicated to agri-environmental and climate actions (AECAs) and related measures, with a clear minimum share for nature restoration.



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- Require that savings from capping and degressivity of Degressive Area Based Income Support (DABIS) are explicitly redirected to AECAs and High Nature Value (HNV) farming systems, not absorbed into general income support.
- Outside of CAP ensure that the EU LIFE programme is maintained as a dedicated ringfenced fund within the MFF.

3. Fix Co-financing Rules to Favour Environmental Measures

- End the situation where DABIS and coupled support are 100% EU-funded while AECAs require national co-financing, which disincentivises environmental ambition in Member States with tight budgets.
- Introduce a **dedicated, protected envelope** for AECAs and other environment- and climate-focused measures e.g. Maintain the status quo where funding is ringfenced for eco-schemes (currently 100% EU funded) and agri-environment-climate measures and related supports (currently 35% of Pillar II).

4. Strengthen Conditionality / “Farm Stewardship” and Apply DNSH

- Oppose the weakening of conditionality through vaguely defined “farm stewardship” practices which introduce renationalisation, broad national discretion and derogations, which risks a race to the bottom on environmental standards.
- Strengthen the environmental conditions attached to CAP payments. Demand clear EU-wide baseline standards for soil health, water protection, carbon-rich soils and the protection of landscape features, with narrow and well-defined derogations.
- If environmental baselines are not strengthened, insist that CAP support must be subject to robust Do No Significant Harm assessments that genuinely exclude harmful interventions, not just nominally refer to DNSH.
- Conditionality should include the explicit maintenance of the existing ban on ploughing/converting permanent grassland in Natura 2000 sites.

5. Re-prioritise High Environmental Ambition and Nature Restoration

- Re-insert environment and climate as headline objectives of the post-2027 CAP and NRPF, and reinstate the full suite of environmental and climate impact indicators as key performance metrics rather than relying on output-based indicators.

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- Require explicit alignment with the Nature Restoration Law, Birds and Habitats Directives and Water Framework Directive, Nitrates Directive, Climate Legislation. CAP Strategic Plans must be coherent with Nature Restoration Plans and designed to be coherent with agri-environmental measures which may be funded outside of CAP, ensuring additionality and no-double funding.
- Ensure the CAP moves beyond “less harm” towards active nature restoration across farmland and other habitats where agriculture is a major pressure, include the integration of relevant indicators for agricultural ecosystems from the Nature Restoration Law to track progress.
- Ensure continuation and expansion of EIPs and locally-led, results-based schemes that engage farmers directly in co-designing and implementing restoration measures.
- Environmental funding should focus on incentivising and rewarding custodianship of nature rather than compensation. Farmers with designated land should be guaranteed access to attractive agri-environmental schemes.

6. Reform DABIS and Shift from Untargeted Payments

- Support degressivity and capping which can positively contribute to farm viability and succession.
- In a constrained EU budget, untargeted area-based income support does not represent good value for money compared to targeted schemes that deliver ecosystem services, climate resilience and rural viability. Degressivity and capping should be part of a long-term plan to phase down un-targeted, hectare-based payments like DABIS, and progressively shifting resources to targeted environmental and social measures over successive CAP periods.

7. Protect and Reward High Nature Value and Small/Extensive Farms

- Prioritise CAP support for HNV systems, extensive grazing, marginal and upland farms, and small mixed farms, which deliver high environmental return on investment but are vulnerable to income shocks.
- Require that degressivity and capping savings are **ring-fenced** for HNV and agri-environment schemes, and that landscape features and grazed habitats remain fully eligible to support extensive systems.
- Ensure that “incentive-based” approaches do not devolve into compensating intensive farms for marginal changes while under-funding those already delivering public goods.

8. Reject environmental deregulation and embrace true simplification

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- Simplification within the current CAP and the CAP proposal is aimed at weakening environmental ambition rather than simplifying farmers participation in CAP. The next CAP must support strong environmental ambition while progressing measures such as the use of technology to deliver true simplification. Adopt measures such as the use of AI to support farmers with paperwork and transition to remote monitoring where appropriate.

9. Eliminate Coupled Support for Livestock and apply the Polluter Pays Principle

- Oppose any use of coupled support for livestock in Ireland, on the grounds that it drives intensification and over-stocking and conflicts with water quality, climate and biodiversity goals.
- Emphasise that CAP funds must not reward pollution, but instead support those delivering clear public goods, with regulation doing the core work of constraining harmful practices; apply the polluter pays principle.

10. Climate Adaptation, Mitigation and Agroecology

- Although they are largely affected by climate and nature risks, most farmers do not have appropriate insurance coverage. To reduce the protection gap and increase farm resilience, the future CAP should make insurance schemes funded under the CAP conditional on adopting some agroecological farming practices that support climate mitigation and resilience.
- Ensure that the CAP delivers climate change mitigation, including reductions in emissions from livestock and land use. Focusing on adaptation without strong mitigation in agriculture amounts to planning for the continued degradation of farming systems, given increasing climate-related losses and food price volatility.
- Promote circular and agroecological solutions that reduce dependence on external inputs (fertilisers, pesticides, feed, seeds), cut costs and increase net farm income while improving resilience.

11. Maintain High Ambition on Environmental Tracking and Performance

- Remove the automatic 40% climate/environment weighting currently assigned to generic income support tools such as DABIS and Areas of Natural Constraint (ANC), as it over-states environmental performance.
- Replace the crude 0/40/100% tracking methodology with a more granular and evidence-based system that distinguishes genuinely green measures from business-as-usual supports.
- Link performance frameworks and milestones to outcome-based indicators (biodiversity status, water quality, soil organic carbon, emissions trends) rather than only measuring spending or

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participation. In this regard DAFM should continue to develop habitat assessment criteria while also integrating environmental monitoring of space for nature /landscape features, grassland butterfly index, common farmland bird index, water quality, air quality.

12. Invest in Free, Independent Advisory Services and Innovation

- Prioritise funding for free, independent advisory services (AKIS) that support agroecological transition, social innovation and peer-to-peer learning.

13. Food Security: Use the FAO Four-Pillar Definition

- The CAP should adopt the FAO/World Food Summit definition of food security, with its four dimensions: physical availability, economic and physical access, utilisation, and stability over time.
- Stress that genuine food security depends on long-term ecosystem resilience and social equity, not just short-term production or export volumes.
- Oppose any narrow use of “food security” to justify weakening environmental standards or increasing environmentally damaging production.

14. Safeguard LEADER and Rural Development

- Resist the narrowing of LEADER to farmers and forest holders only; insist it remains a broad, community-led rural development instrument benefiting rural youth, non-farm businesses and cultural/social projects.
- Maintain a strong, distinct rural development pillar with meaningful funding for community resilience, diversification and social infrastructure beyond the farm gate.