

Circular 08/2015

13th April 2015

To: GLAS Advisors

Re: **Explanatory Note on Commonages**

This is not a legal document and is intended to provide advisors and applicants with additional information on how Commonages are treated under GLAS, in as simple and concise a fashion as possible. This note should be read in conjunction with the published Terms and Conditions for GLAS <http://www.agriculture.gov.ie/farmerschemespayments/glas/>.

Principles of the GLAS approach to Commonages greater than 10ha

The key components of the GLAS approach to Commonages greater than 10 hectares are:

- Submission of a single Commonage Management Plan (CMP), by a single qualified GLAS Advisor, acting for all participating shareholders;
- Achieving the maximum participation possible from all active shareholders;
- Developing a grazing and management plan which combines individual and, where appropriate, group-based actions ;
- Implementing a grazing regime to which everyone contributes, with an individual and group stocking requirements expressed in Ewe Equivalents (EEs);
- Flexibility and time to meet the targets set, including some sharing of the burden of grazing at Group level.
- Commitment, where appropriate to additional environmental action, over and above the grazing-regime;
- A significantly increased rate of aid (€120/ha in GLAS v €75/ha in AEOS).

Principles of the GLAS approach to Commonages less than or equal to 10 ha

The key components of the GLAS approach to Commonages less than or equal to 10 hectares are:

- No requirement for a CMP, or involvement of other shareholders;
- Minimum requirement of 0.25ha share;
- Submission of an individual Commonage Farm Plan (CFP) for the individual's own share of the commonage;
- The CFP to be prepared by the GLAS Advisor who submits the farmer's green-land application;
- Developing a grazing and management plan for their share of the commonage
- Individual has flexibility within individual minimum and maximum stocking levels;
- A significantly increased rate of aid (€120/ha in GLAS v €75/ha in AEOS).

Eligible Applicants

- Must be an active farmer;
- Must have submitted an SPS claim for his or her commonage share in 2014 and continue to do so for each year of the GLAS contract. Rented land is eligible if it was declared in the applicant's name in 2014;
- With the exception of new entrants to farming, the acquisition or declaration of a share in subsequent years will not confer Tier 1 access, and it not eligible for payment under GLAS;
- Must have submitted a GLAS application on their green-land by the Scheme closing date.

Eligible Area

The eligible area is that defined by the Department as the GLAS Commonage area. This includes non-UAA as well as UAA (Utilisable Agricultural Area), with certain exclusions (roads, buildings, afforested areas, lakes etc). The GLAS participant must be eligible for a BPS payment on the Commonage in order to qualify for a GLAS payment. The area of UAA declared at the start of the GLAS contract cannot decrease and must be maintained for at least the duration of the GLAS contract.

Payment rate

The payment rate for Commonages is €120/ha for every hectare of GLAS Commonage Area, subject to the usual per-holding ceilings of €5,000.

Area Thresholds

- If the total size of the commonage digitised area is 10 ha or less, there is no need to prepare a CMP involving other shareholders. The applicant can include his commonage area in his green-land application, drawing up a Commonage Farm Plan.
- If the total size of the commonage digitised area exceeds 10 ha, a CMP has to be drawn up jointly with other like-minded shareholders.

Application Process and Multiple Commonages

- All applications will now be made as part of the general GLAS application process and on an individual basis, but involve a commitment to join Commonage Management Plans on all relevant commonages, with at least one plan to be in place before the GLAS application may be approved.
- Intending GLAS applicants must therefore take an active role in the preparation of at least one CMP;
- While they do not have to lead on any other commonage, they must join any and all CMPs established on commonages where they have shares.
- Advisors now have until 3rd July, 2015 to submit finalised CMPs.

The Commonage Management Plan

- Must meet individual stocking requirement by end of first calendar year (i.e. end 2016 for current Tranche 1 applicants) and Group target by end of third calendar year (end 2018)
- Must maintain minimum area of Utilisable Agricultural Area (reference area) which was present at time of approval.
- Plan is expected to include both individual and, where appropriate, group actions, and to make a genuine effort to respond to the situation on the ground, recovering grazing area where possible and protecting sensitive habitats, particularly blanket bog.
- Penalties apply individually for individual non-compliance, and collectively for collective non-compliance – see penalty schedule within the GLAS Terms & Conditions.

The Commonage Container

The Commonage Container/Database contains relevant information held by the Department in relation to each commonage, including a list of all those who declared commonage land under SPS in 2014. The information for some commonages is better than others, and it is envisaged that the database will be progressively updated as further information is received from individual shareholders and advisors.

<http://www.agriculture.gov.ie/farmerschemespayments/glas/commonagedataforglas/>

Lo call 076 106 4448;

email commonages@agriculture.gov.ie

The 50% Rule

- The 50% rule for both shareholders and area is reconfigured as a target – these target figures are shown on the Commonage Container database.
- There is nothing to stop shareholders/GLAS Advisors starting a plan with less than 50%, but the GLAS Advisor has to confirm that he has at least contacted all shareholders identified in the Commonage Container.

Late-Comers to the Commonage Plan

Shareholders who join a pre-existing plan (up to end of the third full year), subject to the closing date of the scheme, will still get five year's payment but will have to continue their own individual grazing commitments after expiry of the main plan, in addition to continuing with any other GLAS Greenland actions they may have.

Commonages and AEOS 3 Shareholders

Where one or more of the shareholders on a commonage are already in AEOS 3 and do not wish to join GLAS, or to do so immediately, their grazing effort may be included by the GLAS Advisor in his or her plan for the Commonage, as follows;

- By completing the scientific assessment document and indicating the reason for the reduction in the total minimum and maximum figures is the inclusion of AEOS 3 persons who do not wish to join the GLAS CMP;
- The GLAS Advisor must list the AEOS 3 herd numbers and their individual minimum and maximum EEs;
- The scientific assessment form must be uploaded on the GLAS online system at the time of GLAS application;

Role of the GLAS Advisor

The GLAS Advisor plays a key role in the development of the Commonage Plan. S/he is expected to walk and assess the commonage and to be thoroughly familiar with conditions on the ground. S/he is expected to draw up a plan suitable to those conditions and to be mindful that the reference area as declared in the 2015 BPS application must be retained for the duration of the plan.

Appointment of the Commonage Advisor for preparation of CMPs (>10ha)

Advisors who wish to prepare Commonage Management Plans, (known as the Commonage Advisor), must have attended GLAS commonage training and will be appointed by the Department, following the process outlined below:-

1. Only one Commonage Advisor will be appointed per Commonage;
2. Applications for advisors to act on behalf of a group of commonage shareholders in preparing a Commonage Management Plan may be found at this link <http://www.agriculture.gov.ie/agfoodinformationpages/agfoodagentforms/>.
3. The advisor must contact all shareholders on the commonage to give them the opportunity to join a Commonage Management Plan, should they wish to do so.
4. The completed GLAS Commonage Authorisation Form should be returned to GLAS, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Wexford. **All GLAS Commonage Authorisation Forms from advisors must be received by the Department by 22nd May, 2015.** However, a form can be submitted at any stage up to that date and the appointment of the Advisor will then be made as soon as possible.
5. An advisor who has reached the indicative number of shareholders or the indicative area, as shown on the Commonage Container database, is *eligible* to be appointed the Master Commonage Advisor. However, the Department will not immediately appoint a Commonage Advisor but will instead publish the following details on the Department's website as, "Appointments Pending – Commonage Advisors";
 - a. Name and contact details of the Advisor seeking appointment;
 - b. Number of shareholders for whom they are authorised to prepare a CMP;
 - c. Commonage identifier and townland;
 - d. Date of notification of proposal to appoint;
 - e. Date of appointment of approval as Advisor (no earlier than five working days of the Department posting the notice).
6. If any other advisor has already recruited shareholders, s/he should talk to his/her shareholders regarding signing up to the proposed Commonage Advisor and if necessary talk to the advisor in question.
7. In exceptional circumstances, where agreement between advisors cannot be reached, another advisor has the five working days from 5(d) to 5(e) to submit a GLAS Commonage Authorisation Form seeking to act on that Commonage and the Department will decide which advisor shall be approved as the Commonage Advisor.
8. Where more than one advisor applies to become the Commonage Advisor, the Department will decide who is eligible to be appointed to the role, based on the following criteria:
 - a. No. of shareholders signed up to each advisor;
 - b. Area of commonage brought to the Plan by those shareholders;
 - c. Number who had sheep in 2014;

- d. No. of sheep held by those shareholders in 2014.
9. An email will then issue approving the chosen Commonage Advisor and s/he will be given access to the GLAS commonage application system.
10. GLAS Unit will write to those shareholders who nominated the Commonage Advisor saying s/he is now approved to prepare their Commonage Management Plan.
11. GLAS Unit will also write to all other shareholders on the Commonage to let them know that an advisor has been approved to prepare a Commonage Management Plan for the Commonage and that if they wish to be part of that Plan in GLAS they should contact that Advisor.
12. A list of “Commonage Advisors Appointed”, with Commonage ID numbers and contact details, will be published on the Department’s website. They will also be listed on the Commonage Container.

Appeals and the Commonage Implementation Committee

The role of the Commonage Implementation Committee will be to adjudicate where the Department is unable to resolve an issue e.g. where any intractable issue in relation to preparing a Commonage Plan arises, or where there is disagreement over the appointment of an Advisor. This includes formal appeals.

Commonages and GLAS+

GLAS + will be available to Commonage farmers who have one other Priority Environmental Asset, and where the value of those assets reach €7,000. No one asset can exceed €5,000 except for Farmland Birds. This means that a farmer may get €5,000 for Commonage and a further €2,000 for fencing of High Status Water Course on his other land, for instance.

The other Priority Environmental Assets are:

- Farmland Habitat (Private Natura)
- Farmland Birds (Breeding Waders, Chough, Corncrake, Geese/Swans, Grey Partridge, Hen Harrier, Twite)
- High Status Water Area
- Rare Breeds.

Specification

Advisors should read carefully the GLAS Specification for instructions on how to complete the Commonage Plan and for details of what the farmer(s) must do to comply with the Commonage Plan. In particular, advisors should note that commonages must be grazed for at least six months of the year and these months must be recorded in the CMP. In exceptional circumstances where traditional grazing practices and hill conditions dictate, the Advisor may reduce the number of months the hill is grazed to not less than 4 months. In cases where grazing for 4 or 5 months is proposed the Advisor must provide a justification for same within the CMP and the Department will flag these hills as at high-risk for inspection in order to ensure that the grazing regime is adequate.

Commonage Plan – GLAS on-line system

Once a Commonage Advisor is appointed s/he will have access immediately to the CMP Participants Tab. This Tab displays all farmers on whose behalf s/he is authorised to act . The Advisor must confirm that these are the shareholders s/he has signed up to the CMP. If new shareholders are signed up, once we are notified, their names will also appear on the Participants Tab for confirmation.

A facility to complete the CMP will be activated in the week beginning 11th May, 2015. The CMP will advise, for each confirmed participant, the GLAS Commonage Area, their share and the reference area. These details are populated from the Commonage Container Database. The share is not shown on the Commonage Container Database but will be taken from the participant's 2014 SPS declaration. If you consider that these details are incorrect please contact **Commonage Section**, at **Lo call 076106 4448**, or email commonage@agriculture.gov.ie, which deals specifically with the data on the Commonage Container database.

Any general queries in relation to the Commonage Management Plan, the appointment of Advisors etc., should be directed to **GLAS Section**, at **Lo call 0761064554** or email glas@agriculture.gov.ie

FAQS

The attached document answers **Frequently Asked Questions** on Commonages.



Microsoft Office
Word Document

[Figure 1 FAQS](#)

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