



A Guide to the completion of the GLAS Commonage Plan August 2015

1. Introduction

The conservation and sustainable management of commonages is a key aim of the Green, Low-carbon, Agri-environment Scheme (GLAS). Commonages are categorised as a Priority Environmental Assets (PEAs) under the Scheme and those farmers who partake of a Commonage Plan are guaranteed entry to GLAS.

The Commonage Plan, as drawn up by a trained agricultural advisor, is central to ensuring that the desired outputs are delivered by GLAS in terms of commonage lands. The plan should set out defined stocking levels and activities for participant farmer(s). The plan must be based on a comprehensive site assessment, complemented by other pertinent data such as livestock numbers and types of habitat.

A comprehensive on-line system to facilitate the submission of commonage plans will be provided by DAFM. The on-line system will include:

- A mapping capability including habitats layer;
- Details of individual participants signed up to commonage;
- The GLAS commonage area (i.e. payable area);
- Recommended minimum and maximum stocking figures.

Any issues of relevance to the management of the commonage should be outlined in the plan so that a clear baseline is established with a road map for future management put in place.

2. Methodology for drawing up a Commonage Plan

2.1 Assess the Condition of the Commonage

In the first place, an assessment of the current condition of the commonage must be carried out on-site. A decision on the habitat condition of the commonage is usually determined by aggregating the results of assessments made at a series of waymarks within the commonage. These waymarks may also serve as a means to identify parts of the site where key issues of concern exist.

Commonages comprise various habitats and those that are predominant must be identified and graded in terms of their condition. The grading system shown in Table 1 is to be used:

Table 1

Habitat	Habitat Condition
I = Blanket Bog	
II = Wet Heath	P = Poor
III = Dry Heath	A = Average
IV = Upland Grassland	G = Good
V = Other	

As a guide to establishing the Habitat Condition the assessment card at Table 2 may be of assistance. The assessment card scores the condition across a greater range which could be amalgamated to arrive at **Poor/Average/Good** rating; the key to the scores shown on the assessment card is as follows:

Habitat Condition

U* = Rank & Undergrazed

U = Undamaged

MU = Moderate Undamaged

MM = Moderate Damage

MS = Moderate Severe

S = Severe

S* = Very Severe

2.2 Using the Assessment Card

The Assessment Card at Table 2 may be used, in conjunction with the habitats layer on the original Commonage Framework Plan at www.commonage.agriculture.gov.ie, to assess a point location or waymark.

2.3 Waymarks – How Many and How Big?

There can be no hard and fast rule as to the number of waymarks required. However a sufficient number to represent the range of conditions found should be selected and the selection should be representative in order to avoid erroneous conclusions being drawn. In general smaller commonages will need a greater number relative to their area than larger sites.

How big is a waymark? A waymark should be 3m by 3m in size.

2.4 What information needs to be retained?

The data collected is for the use of the advisor in developing a CMP/CFP. However, it may also be required by the Commonage Implementation Committee or by DAFM and so should be retained by the advisor.

Table 2

1. Bare Peat/ Soil (S* rating overrides all other parameters)							
	<1%	1%	2%	3%	4%	5-9%	>10%
Score	U/U*	MU	MU/MM	MM	MM/MS	S	S*
2. Heather (<i>Calluna Vulgaris</i> only)							
	Heather, Height >50cm Over 30% cover Height >50cm Woody, little or no evidence of browsing	Heather, Height >50cm Less than 20 % cover or significant signs of browsing evident	All Growth Habit types present Average height <50cm		Suppressed or drumstick growth habits only		
Score	U*	U*/U	U/MU/MM		MS/S/S*		
3. A. Molinia (November – April)							
	Leaf litter very evident >50%			Leaf Litter Abundant 10-50%			
Score	U*/U			U/ MU			
3. B. Molinia (May – June)							
	Young leaves very evident >50%			Young leaves Abundant 10-50%			
Score	U*/U			U/ MU			
3. C. Molinia (July – October)							
	Molinia >50% cover, ungrazed and over 50cm in height	Molinia >50% cover, but grazing is evident, height less than 50cm	Molinia 10-50% cover but little evidence of grazing.	Molinia 10-50% cover, heavily grazed, height less than 20 cm.			
Score	U*	U*/U	Note for management planning as opposed to condition scoring.	Note for management planning as opposed to condition scoring			
4. Scrub (all woody tree/shrub species except Bog Myrtle and dwarf heaths)							
	>10% cover, no grazing under canopy/little evidence of browsing	>10% cover, evidence of browsing and/or grazing underneath canopy	<10% cover, signs of expansion such as abundant seedlings and young plants present	<10% cover, extent of woody species appears stable, minimal presence of seedlings/young plants			
Score	U*	Note for management planning as opposed to condition scoring	U*/ U	Note for management planning as opposed to condition scoring			
5. Sward							
	Woody Species and or rank vegetation >20%	Diverse Sward	<i>Nardus</i> Frequent 5-20% (Wet Heath/Blanket Bog only)	Grazing resistant species, e.g. <i>Nardus</i> , Heath Rush >20%			
Score	U*	U	Change, generally by one band, e.g. U-MU, MU- MM etc	MS/S			
6. Observed evidence of livestock/grazing/dung/hoof prints.							
	Easy to find		Evidence Hard to find		No evidence of grazing		
Score	MM/ MS/S/S*		U/MU		U*		
Assessors overall evaluation of current condition of vegetation cover. U* U MU MM MS S S*							
<i>Ignore all irrelevant parameters</i>							

2.5 Determine sustainable stocking levels

A review of the Commonage Framework Plans, which were first published in 2002, was carried out in 2012. The review was carried out on a commonage LPIS parcel basis and set a minimum and maximum number of ewe equivalents required to graze the commonage parcel to ensure that it remains in eligible condition. These figures have now been reconfigured at Commonage ID level, rather than LPIS level, and are displayed on the [Commonage Container](#) as a guide to advisors preparing a CMP. It is open to the Advisor to accept these figures but s/he must detail the grounds on which they have been accepted by means of selecting options from a drop down menu in the on-line system as follows:

- Commonage is currently being adequately grazed by Ewe Equivalents that are between the min and max figures and my assessment confirms that it is in good health and that the existing recommended grazing regime is appropriate.
- Commonage is currently not being grazed to the recommended min and max figures and my assessment confirms obvious signs of undergrazing, to the detriment of both land eligibility and conservation and maintenance of the habitat. Implementation of the recommended min-max figures is appropriate.
- Commonage is currently over-stocked compared to the recommended min and max figures and my assessment confirms obvious signs of over-grazing to the detriment of both land eligibility and conservation and maintenance of the habitat. Implementation of the recommended min-max figures would restore balance.

Where the Advisor decides that these figures should be amended a Scientific Assessment Document, (Appendix 1) must be completed and uploaded to the Commonage Plan online system. It is recommended that the sustainable stocking rate be determined by reference to Tables 3 and 4 below. Table 3 outlines the 'undamaged' stocking rate for undamaged habitats and Table 4 outlines the stocking co-efficient to be applied to the 'undamaged' stocking rate depending on the condition of the Habitat. The formula for determining the sustainable stocking rate is therefore as follows:

Sustainable Stocking Rate = Undamaged Stocking Rate x Stocking Co-efficient.

An advisor may use their professional judgement to employ a different methodology to arrive at the sustainable stocking rate but it must have a sound scientific basis. Any workings or relevant data used to arrive at the Sustainable Stocking Rate should be retained by the advisor for future reference.

Table 3

Habitat Type	Undamaged Stocking Rate.
Blanket Bog	0-0.75 ewe equivalents per Ha.
Wet Heath	0.75-1 ewe equivalents per Ha.
Dry Heath	1-1.5 ewe equivalents per Ha.
Upland grassland	1.5-5 ewe equivalents per Ha
Other Habitat	Variable

Table 4

Habitat Condition Code	Stocking Coefficient
U*	1-1.25
U	1
MU	0.80-0.99
MM	0.40-0.79
MS	0.2-0.39
S	0-0.19
S*	0

Calculating Minimum and Maximum Stocking Rates

The minimum and maximum stocking numbers are calculated as a deviation from the calculated Sustainable Stocking Rate. This deviation will vary depending on the dominant habitat type on the commonage as detailed on table 5.

Table 5

Habitat Type	Deviation
Blanket Bog/ Wet Heath	Up to +/- 20%
Dry Heath/ Upland Grassland	Up to +/- 10%

Derogations

In exceptional cases, derogation from the rules on stocking levels may be sought by means of appeal to the Commonage Implementation Committee (CIC), (see Section 3.4.1).

2.6 Identify activities to be carried out on the Commonage

Grazing is the primary management activity on commonages. That said, other activities, which help to restore habitat loss, reduce invasive vegetation, and ease pressure on delicate ecosystems, should also be prescribed where appropriate. Such activities should form an integral part of the farming practices adopted to conserve and restore commonage land and should complement sustainable grazing practices.

2.7 Management issues and pressures

Commonages represent a mosaic of habitats with varied conditions and situations obtaining. There may be factors impacting on the current management of the commonage or its future management which should be recorded so that future outcomes can be viewed in the correct context. Such issues might include for example;

- Boundaries are open to adjacent commonages;
- Extensive overgrazing in the past had led to the erosion of certain habitats;
- Previous burning practices had led to a profusion of Molinia.

3. Completion of the on-line Commonage Plan – What does it involve?

3.1 Commonage Map

The Advisor will be able to access a map of the commonage via a deep-link with GIS. The map will include a layer displaying habitats data originating from the Commonage Framework Plan.

A mapping facility to identify/edit exclusions and/or new boundaries will be provided to the advisor. A process will be in place for this amended map to be reported to BPS as an amendment to the declared area for the Commonage on the 2015 Basic Payment Application. BPS will then adjudicate* on whether the proposed new reference and/or digitised area is acceptable and will then take any such new area into account, as appropriate, when determining the Maximum Eligible Area (MEA) of the commonage for 2015. While the GLAS Commonage Area is the payable area, the MEA must also be retained for the duration of the GLAS contract.

**If an obvious valid exclusion (e.g. road) it will be digitised, BPS will be updated and shareholders notified; if interpretation is required a ground inspection will be carried out, the results of which will be digitised and updated to BPS as appropriate and shareholders notified.*

3.2 Management Plan submission

Commonage Management Plans and Commonage Farm Plans must be submitted online. These plans must be submitted by an approved agricultural advisor. The source of the commonage information is the commonage database. The commonage must have a current record on the Departments Corporate Customer System (CCS).

Where the commonage is greater than 10ha a single plan must be submitted. Where the commonage is less than or equal to 10ha multiple plans may be submitted with each plan being prepared for one participant. In these smaller commonages the participants interest must be greater than or equal to 0.25ha in order to submit a management plan for the commonage.

The advisor will be able to prepare a draft plan. During the drafting stage the advisor will be able to update and validate the details inputted on an ongoing basis.

The Commonage Management/Farm Plan for GLAS Tranche 1 must be submitted by 31st October 2015.

3.3 Participation Details

The system will display the overall Maximum Eligible Area (MEA) and GLAS Commonage area for 2015 for the Commonage. The MEA, although not the payable area for GLAS Commonage, must be retained for the duration of the GLAS contract. The MEA is the new payable area under BPS (previously SPS paid on reference) and makes some allowance, based on a pro-rata system, for payment of ineligible areas.

The advisor must confirm that each of the Commonage Participants on whose behalf he is authorised to act is in fact a party to the plan. Participants should only include those farmers who are in GLAS or who intend joining GLAS. If a disparity is subsequently found between the number of participants in the plan and the number in GLAS, the Department would consider the Commonage as at a high risk for inspection.

The system will advise, for each confirmed participant their individual GLAS Commonage Area (determined by using their fraction share). This value will be protected. The system will have a facility to report back changes to the MEA in 2015 from BPS in due course. Details of MEA at LPIS level will also be shown.

The advisor must also detail, for each participant, the Livestock type used on the commonage (Bovines, Equines and/or Ovines) and where sheep are advised, the relevant sheep markings for the flock(s) of each participant to be provided.

3.4 Stocking level details

The following stocking levels details, taken from the Commonage Container, will be displayed;

- Minimum Stocking Level for overall Commonage to be met by 2018;
- Maximum Stocking Level for overall Commonage to be met by 2018;
- Minimum Stocking Level for each Commonage Participant to be met by 2016.

For commonages ≤ 10 ha each individual participant must reach their minimum stocking level by end 2016 and must not exceed their individual maximum stocking level.

For commonages > 10 ha each individual must reach their individual stocking level by end 2016 and by end 2018 the sum of the participants stocking levels must reach the commonage minimum. At no time must the commonage maximum be exceeded.

Therefore, for each confirmed participant, the advisor must indicate a stocking level (ewe equivalents) for each year from 2015 to 2020.

The advisor may provide alternative minimum/maximum stocking densities for the commonage but these figures must be underpinned by a Scientific Assessment document (Appendix 1) which must be uploaded to the system. In exceptional cases derogation from the rules regarding reaching the individual or commonage stocking levels may be granted – see 3.4.1 below.

Note: The Department will issue to each approved Commonage Advisor the most up-to-date sheep census figures and bovine units from AIMS for each participant signed up to the Plan, as well as a list of the shareholders in AEOS 3, in order to assist with the drawing up of the Plan.

The Total (Hill) Sheep Numbers held by shareholders on the commonage (based on the 2014 sheep census) will be provided to any Advisor who requests it from the Department by emailing glascommonages@agriculture.gov.ie. These 'indicative' total sheep numbers are based on the returns for the Mountain, Pure Bred Mountain and Mountain Cross sheep in the 2014 Sheep Census. They include sheep numbers returned by all shareholders as listed for that commonage on the Commonage Container. The Sheep Census is a record on sheep held at a moment in time i.e. 14 December, 2014. If a shareholder is on more than one commonage their sheep will be counted in both commonages, as the Department has no way of apportioning the sheep numbers to each commonage. These figures are therefore indicative and it is the Advisors responsibility to ensure that s/he is familiar with the situation on the ground when making decisions regarding stocking density.

3.4.1. Exception to requirement to reach individual and/or commonage stocking level

The advisor may appeal to the CIC for derogations from the requirement for certain participants in the plan to reach the individual minimum stocking level by 2016 AND/OR from the requirement to reach the Commonage Minimum Stocking level by 2018. A

reduction in the individual stocking level for certain participants would arise in exceptional cases where other shareholders, (either within or outside GLAS) are heavily stocked. As a guide, each participant would have to deliver at least 50% of the individual stocking density by end 2016. The waiving of the requirement to meet the Commonage minimum would be obtained in cases where a small number of shareholders signed up to the Plan and have a genuine difficulty in stocking the commonage to the level required OR where the individual minimums have been reduced and the commonage minimum cannot be reached as a result. A facility to indicate derogations sought and to upload 'Decision of CIC' document will be provided. The application may not proceed until the relevant document is uploaded.

The Ewe Equivalents of AEOS 3 persons may be included so as to allow the Advisor reduce the overall total minimum required on the commonage. This does not require the participant to go to the CIC.

3.5 Confirmation of Stocking Level Figures:

The Advisor must answer the following questions.

Do you as the GLAS Advisor agree with the existing DAFM total minimum stocking density and total maximum stocking density for the commonage?

If 'Yes' choose the appropriate item from the drop down list provided to indicate the results of the assessment of the commonage:

- Commonage is currently being adequately grazed by Ewe Equivalents that are between the min and max figures and my assessment confirms that it is in good health and that the existing recommended grazing regime is appropriate.
- Commonage is currently not being grazed to the recommended min and max figures and my assessment confirms obvious signs of undergrazing, to the detriment of both land eligibility and conservation and maintenance of the habitat. Implementation of the recommended min and max figures is appropriate.
- Commonage is currently over-stocked compared to the recommended min and max figures and my assessment confirms obvious signs of over-grazing to the detriment of both land eligibility and conservation and maintenance of the habitat. Implementation of the recommended min and max figures would restore balance.

If 'No' complete and upload the Scientific Assessment Document.

3.6 Plan

The following details must also be completed for the Commonage in the online system:

Date of Visit by the Advisor				
General Description of the Commonage				
Predominant Habitat Types – <i>At least</i> one must be chosen:				
Blanket bog	Wet heath	Dry heath	Upland grassland	Other
Months in which the participants for this graze their Ewe Equivalents (EEs) on the Commonage ¹				
January	February	March		
April	May	June		
July	August	September		
October	November	December		
Justification must be entered here if 4 or 5 months grazing indicated as a minimum of 6 months is recommended. (Text Box)				

¹ At least four months must be advised. A warning will be given if less than six months advised but this does not stop the processing.

3.7 Activities

The advisor is also required to detail any additional activities that will be carried out during the period of the Commonage Plan at land parcel level for all of the commonage parcels.

Description	Comments Text Box	Parcel – Whole/Part	Map Required Y/N	Map Label Required	Multiple on Map
Predator control		WP	N	N/A	N/A
Controlled Burning		P	Y	Y	Y
Control of Dumping		P	Y	Y	Y
Other Measures		P	Y	Y	Y

For each of the above activities where ‘mapping required’ is identified, the advisor must provide a note, ‘map label’, providing additional information in relation to the proposed activity. The note contains the label A1, A2 etc and a separate field, associated with the label A1, etc, is populated with the date of delivery which must be before 28th February 2020.

Where the lands are designated and the activity is an Activity Requiring Consent (ARC) this should be indicated. The advice of the local National Parks and Wildlife Service (NPWS) field staff must be sought and an application for consent submitted to the Department of Agriculture, Food and the Marine (the competent authority for GLAS actions).

3.8 Overall Comments

The advisor should record any pertinent management issues or specific pressures on the commonage by means of free text under the following headings:

Description	Comments in Text Box
Management Issues and Pressures	
Boundary Issues	
Other Issues	

3.9 Alternative Contact

The applicant may advise an alternative contact with who the Department may discuss the application. The following text will also be displayed on the screen:

'The advisor, confirmed participant or a nominated authorised contact as set out below, are the only persons with whom the Department will discuss any aspect of this Commonage plan.'

In submitting this application the advisor confirms that the participants have been made aware of this provision.

3.10 A Guide to completion of the Commonage Plan

An onscreen link to this guide on the Department's website will be provided.

3.11 Plan Summary

The advisor will be able to print an application summary sheet – Plan Summary - detailing that recorded on the plan. During the draft plan stage the summary will contain details as inputted and will advise that the plan has not yet been submitted.

3.12 Amendments to Plan

Additional participants who sign up to the plan can be added on an ongoing basis. The extant commonage plan will be retained, while the new participants are added to an 'Amended Plan'. The amended plan will remain pending until the new participants are approved into GLAS, at which time it replaces the extant plan. Participants may also be deleted from the plan. There will also be a facility to allow a plan to be amended to allow redistribution of the grazing burden with the parameters of the individual minimum still being met and the overall minimum being met.

4. Commonage Implementation Committee (CIC)

A special independent committee, known as the Commonage Implementation Committee, has been established to assist with issues arising in relation to commonage management plans. It is envisaged that advisors will have recourse to the CIC in the following cases, and others, which prove intractable;

- Where there is a disagreement between shareholders.
- Where the commonage minimum cannot be reached by the target date because of too few shareholders.
- Where, in exceptional cases, a rebalancing of the minimum stocking level between shareholders signed up to the plan is sought (i.e. a participant would not have to reach the individual minimum and consequently another participant, in order to balance the overall outcome, could exceed their maximum stocking level). As a guide, each participant would have to deliver at least 50% of the individual stocking density by end 2016.

All matters for consideration by CIC should be sent to The Secretary of the Commonage Implementation Committee, GLAS Section, Department of Agriculture, Food & the Marine, Johnstown Castle Estate, Wexford or by email to glascommonages@agriculture.gov.ie.

Appendix 1
Assessment underpinning a change in the Total Minimum and Total Maximum Ewe Equivalent (EE) for a Specific Commonage

Name of GLAS Advisor	
List Herdnumbers signed up to this Assessment and related CMP	
Commonage Identifier and/or LPIS Number(s)	
SPS Digitised Area of Commonage in 2014	
SPS Reference Area of Commonage in 2014	
Existing DAFM Total Minimum EE	
Existing DAFM Total Maximum EE	
Date(s) of ground-assessment	
Overall Impression of Commonage health	
Particular Issues of concern, eg scrub encroachment, habitat deterioration, erosion, bare peat or soil, vegetation characteristics such as woody heather, extensive molinia etc. Refer to CFP habitat maps provided.	
Revised Total Minimum EE	
Revised Total Maximum EE	
Reason for the Change in Total Minimum and Maximum EE	<input type="checkbox"/> Increase in Reference Area of the Commonage since 2012* <hr/> <hr/> <hr/> <hr/> <hr/>

Decrease in Reference Area of the Commonage since 2012*

The commonages is currently being grazed to the current recommended minimum and maximum figures and my assessment confirms obvious signs of **under-grazing**, to the detriment of both land eligibility and conservation and maintenance of the habitat. In my view implementation of the current recommended minimum and maximum figures is not appropriate.

The commonages is currently being grazed to the current recommended minimum and maximum figures and my assessment confirms obvious signs of **over-grazing**, to the detriment of both land eligibility and conservation and maintenance of the habitat. . In my view implementation of the current recommended minimum and maximum figures is not appropriate.

Other Reasons

Further Detail that you may wish to add, including any additional mitigating actions you deem required in the best environmental interests of the Commonage:
