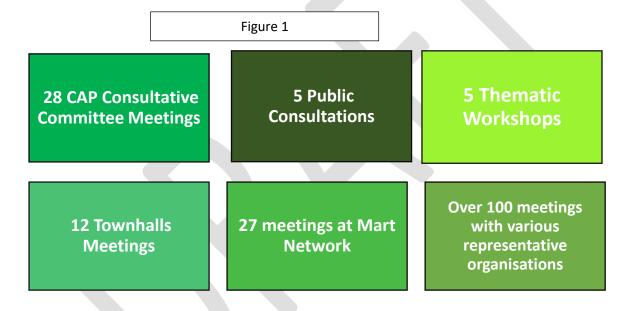
Annex III Consultation with partners

Overview

The development of the CSP has been reinforced by extensive stakeholder and public consultation that has been carried out over the course of the Plan's development, which has also involved other relevant Government Departments and agencies. As well as a specially established CAP Consultative Committee, the Managing Authority also arranged a series of themed workshops, townhall meetings as well as public consultations to afford the maximum opportunity for stakeholder input. Members of the Joint Oireachtas Committee on Agriculture, Food and the Marine were also briefed on the CAP reform negotiations as well as the development of the CAP Strategic Plan. Feedback from these engagements helped inform the development of the Plan.

A summary is included in Figure 1 below and outlined in the following sections.



The CAP Consultative Committee

Subject of the corresponding consultation

In 2019, a CAP Consultative Committee was established by the Minister for Agriculture, Food and the Marine to obtain the views of stakeholders on the CAP reform proposals, subsequent CAP negotiations and the ongoing development of the CAP Strategic Plan. The Committee comprised all the major farming- and agriculture-related representative organisations involved in Social Partnership as well as a number of academics and environmental interests.

The stakeholders represented in the Committee are:

- Department of Environment, Climate and Communications
- Department of Public Expenditure and Reform
- Department of Housing, Local Government and Heritage
- Department of Rural and Community Development
- Teagasc
- Bord Bia
- Environmental Protection Agency (EPA)
- Irish Farmer's Association (IFA)
- Irish Natura and Hill Farmers Association
- Irish Creamery Milk Suppliers Association (ICMSA)
- Irish Cattle and Sheep Farmers Association (ICSA)
- Macra Na Feirme
- Irish Co-operative Organisation Society (ICOS)
- Irish Organic Association
- Irish Grain Growers Association
- Environmental Pillar
- An Taisce
- National Biodiversity Data Centre
- University College Dublin
- University College Cork
- Irish Rural Network
- Agricultural Consultants Association
- ACORNS
- Dairy Industry Ireland
- Meat Industry Ireland
- ORNUA

The Committee is a constructive and crucial body that informed the shaping of the CAP Strategic Plan. The Committee provided a forum to allow Stakeholders express their views and remain updated as the CAP reform discussions progressed. The Committee met 28 times between 2019 and 2021 (the committee met virtually after COVID 19 restrictions were put in place):

Five times over the period May-December 2019.

Ten times over the period February-December 2020

Thirteen times over the period February-December 2021.

The presentations from these meetings are publicly available on the Department's website gov.ie - Common Agricultural Policy (CAP) Post 2020 (www.gov.ie).

The CAP Consultative Committee were provided with detailed presentations on:

- CAP negotiations;
- CAP Strategic Plan development process including the SWOT analysis and needs assessment:
- The New Delivery Model;
- The Green Architecture including conditionality, Eco Schemes and Agri Environment and Climate Measures;
- Detail on the interventions in the CSP at multiple stages of their development, including LEADER;
- Financial allocations;
- Ex ante and Environmental Assessment process.

The responses received and the expert input to the Consultative Committee helped to inform Ireland's position in the negotiations on the future of the CAP and in the subsequent development of CAP Strategic Plan 2023-2027. The presentations from these meetings are publicly available on the Department's website gov.ie - Common Agricultural Policy (CAP) Post 2020 (www.gov.ie).

LEADER consultation

Subject of the corresponding consultation

Consultation with LEADER stakeholders has been a key element in the design process of the new CAP Strategic Plan. The new CAP and LEADER Programme will be clearly linked and play a central role in delivering in the Government's vision for rural Ireland as set out in Our Rural Future: 2021-2025.

Various bilateral meetings and discussions have taken place with programme stakeholders throughout the course of the year, these include, the Irish Local and Development Network ILDN) and other stakeholder bodies such as the Local Government Management Agency (LGMA) in the design of the next LEADER programme, together with a review of the delivery models of the 2014-2020 Programme. In addition, the Department of Rural and Community Development (DRCD) participated in the CAP Consultative Committee which comprises representatives from a range of agricultural stakeholders including Government Departments and NGOs.

Outcome of the consultation

The design of the proposed LEADER intervention in the draft CSP has taken account of the stakeholder input received to date. During the last public consultation which centred on the

draft environmental report of the draft CSP Strategic Plan, some 174 submissions were received pertaining to LEADER.

Steering Group for the Environmental Assessment

Subject of the corresponding consultation

The Managing Authority established a steering group to help inform the environmental assessment. The steering group comprised representatives of the Department's CAP Strategic Plan development team, Department intervention design team, in-house ecological expertise and Teagasc, as well as representatives from the statutory environmental authorities - the Department of Housing, Local Government and Heritage (including the National Parks and Wildlife Service), the Environmental Protection Agency as well as the Department of Environment and Climate Change.

Outcome of the consultation

The environmental assessment process helped to inform intervention design as well as shaping the Green Architecture, including the baseline conditionality. Further details are available in the environmental report.

Public Consultations

May 2018 Consultation on the reform of the CAP Post 2020

Subject of the corresponding consultation

Following the launch by the EU Commission of "*The Future of Food and Farming*" the Minister for Agriculture, Food and the Marine, initiated a public consultation on the reform of the CAP Post 2020. The consultation period ran from 26th January to 23rd March 2018.

The consultation afforded members of the public an opportunity to outline their views on the CAP, having regard to the challenges facing the sector. These challenges included the need to configure CAP supports to strengthen the contribution of agriculture to the environment, the need to support family farm incomes and encourage generational change, and the need to improve efficiency and competitiveness in the sector.

Outcome of the consultation

The submissions revealed a variety of views on issues such as the distribution of direct payments, encouragement of environmental and climate action, mechanisms for encouraging generational renewal, the funding of risk management tools, the provision of supports for

organic and other farm enterprises, and the reduction of the burden on farmers of on-farm inspections.

There was significant support for the retention of a strong CAP budget and the need for stronger regulation of unfair trading practices, both of which were at the time subject of separate EU proposals. The issue of anti-microbial resistance and the threat to human health was also mentioned in a number of submissions.

September – October 2019 Public Consultation on Draft SWOT analysis

Subject of the corresponding consultation

The Minister for Agriculture, Food and the Marine launched a public consultation on the draft SWOT analysis in September 2019. As part of the consultation process, the Department hosted a series of townhall meetings, where attendees were given a series of presentations on the CAP post 2020 negotiations, the environmental ambition of the new CAP and an outline of the SWOT consultation process.

Outcome of the consultation

Over a hundred and fifteen submissions were received from a broad mix of stakeholders including farm organisations, environmental NGO's, social interest groups, business representatives, local and regional authorities, groups, Government Departments and Agencies as well as individuals.

The submissions received and the comments from the workshop were summarised into broad themes. The submissions broadly supported the main issues identified in the SWOT quadrants circulated with the consultation. The quality of the SWOT was improved following the submissions received and subsequent bilateral engagement with the statutory authorities responsible for the environment. This included improved language and data especially around the economic challenges facing the sector as well as additional threats and weaknesses in the area of water quality and biodiversity loss.

September 2019 Ploughing Championships Survey

Subject of the corresponding consultation

DAFM conducted a live survey at the National Ploughing Championship in 2019. Questions in the Survey covered: introduction of a voluntary Eco-Scheme for farmers; Direct Payment allocation to Eco Schemes; Convergence; succession planning for farmers; barrier to entry for Young Farmers; among others.

Over 350 submissions were received in response to this survey. Farmers were asked if they would be willing to undertake additional agricultural practices to benefit the climate and the environment to qualify for payment under an eco-scheme. 80% of the farmers said yes. 39% of farmers suggested the main influence in deciding to participate in an eco-scheme would be the payment available. 57% of all farmers surveyed favoured convergence. 49% of survey respondents said farm income/ability to earn a better income elsewhere was the main barrier to entry for young farmers. Overall, 45% of farmers surveyed had discussed succession with family members.

February 2021 Public Consultation on draft Scoping Report for the Environmental Assessment of Ireland's CAP Strategic Plan 2023-2027.

Subject of the corresponding consultation

The designated environmental authorities were consulted on the draft scoping report for the Environmental Assessment of Ireland's CSP 2023-2027. In addition to statutory consultation, the Department conducted a wider non-statutory public consultation on the draft Scoping Report for the Environmental Assessment of Ireland's draft CSP to encourage stakeholder engagement and help inform the environmental assessment of the CAP Strategic Plan. Scoping is the process of determining the range and level of detail of the environmental issues to be considered for the environmental assessment of Ireland's CAP Strategic Plan 2023-2027. The consultation phase was open from the 17th of February to the 13th of April 2021.

Outcome of the consultation

A total of 27 submissions were received. Feedback and submissions on the scope of the SEA were varied, however a number of consistent themes were identified. Significant environmental issues and recommendations were responded to and were considered through the plan preparation and the SEA process as appropriate.

The main themes raised were interlinkages with other National / EU legislation plans and programmes, consideration in the scoping of the assessment for the subsequent phases and requirements in the overall process in respect of monitoring, governance and reporting including lessons learned from previous monitoring exercises.(of CSP and other plans eg FW2030, baseline data needs to be set in context of the CSP objectives and how impact will be measured, SEA objectives / CSP need to be aligned with EU Green Deal (Farm to Fork and EU Biodiversity strategies) and CSP recommendations etc.

July 2021 Public consultation on the draft interventions proposed for Ireland's CAP Strategic Plan 2023-2027

Subject of the corresponding consultation

A public consultation on the draft interventions proposed for the draft CAP Strategic Plan 2023-2027 was carried out over the period 30th July to 3rd September 2021. Submissions could be made by post, email or online using EU Survey.

Outcome of the consultation

Over 1000 submissions were received in response to the Public Consultation from all the key stakeholders, and from wider society.

Key themes that emerged included the need for fairness within and across the different sectors, and concerns around the possible impact of the CSP on the viability of certain farms and sectors due to the redistribution of direct payments through convergence, CRISS, and the funding of eco-schemes under Pillar 1. Many submissions received felt that payments should only go to active productive farmers, whether full or part time. Other themes that have featured strongly include generational renewal and gender balance in farming, with specific proposals being submitted around how to support both.

There was strong feedback on some elements of the proposed Pillar 2 interventions, in particular in relation to the proposed limit on suckler cow numbers for herds participating in the proposed Suckler Carbon Efficiency Programme, and the types of investments eligible for support and funding ceilings.

The submissions received were reviewed by member of the intervention design team and were taken on board in the development of the CSP. The issues raised were also discussed further with stakeholders though the CAP Consultative Committee, and bilaterally.

November – December 2021 Public consultation on the draft Environmental Report on the draft CAP Strategic Plan

Subject of the corresponding consultation

Public consultation on the draft Environmental Report on the draft CAP Strategic Plan for the period 2023-2027 started on 8 November 2021 for a 30-day period. This consultation provided stakeholders and all citizens with a further opportunity to express their views on the draft CAP Strategic Plan along with the draft Environmental Report and draft Natura Impact Statement. The Report examined the potential environmental impacts of the Plan, both positive and negative, and, where potential threats were identified, outlined key mitigation measures and recommendations.

Over 1400 submissions were received from a broad mix of stakeholders including farm organisations, environmental NGO's, social interest groups, business representatives, local and regional authorities, groups, Government Departments and Agencies as well as individuals. A further forty-five submissions were received via online EU survey.

The submissions received and the comments have been summarised into three main CAP Strategic Plan themes:

- 72% of submissions received supported the call for farmers to be incentivised to rewild larger portions of their land.
- 12% of submissions were received on the LEADER 2023-2027 programme, with the majority of comments requesting a sustainable budget be provided to drive the 'bottom up, community led' approach.
- 5% of submissions addressed the theme of gender inclusivity,
- The remaining 11% of submissions covered a wider range of themes: agrienvironmental climate measures, eco-schemes, direct payments, young farmers, bat conservation, forestry and hedgerow maintenance amongst others.

There were 14 submissions received in relation to the draft Environmental Report and the draft Natura Impact Statement. These were subsequently considered by the external consultants and by the Managing Authority (as the Competent Authority in this instance).

Following the submissions received from stakeholders including those from the statutory bodies a number of additional recommendations to improve the quality of the draft Environmental Report and draft Natura Impact Statement including additional mitigation measures were made.

Workshops

October 2019 Common Agricultural Policy Strategic Plan (CSP) Stakeholder Engagement Workshop

Subject of the corresponding consultation

The Department of Agriculture, Food and the Marine held a CAP Strategic Plan (CSP) Stakeholder Engagement Seminar in October 2019 in Tullamore. The National Rural Network (NRN) facilitated this workshop. This was a key opportunity for stakeholders to shape Ireland's draft CSP. The workshop focused on the identification of the key strengths, weaknesses, opportunities and threats (SWOT analysis) facing the agriculture sector in Ireland.

This workshop brought together a range of different stakeholders who contributed key elements for consideration.

Participants from all the discussion groups expressed the view that the reach of CAP is overextending and too many demands are being placed upon it. Participants also accepted that climate change and environmental actions are going to be a key component of the next CAP, and farmers and advisors must be educated on the need for such measures. In parallel, the public should be educated to acknowledge that farmers can be central to addressing climate change rather than the current perspective that farmers are a chief cause. It was considered that the CAP presents Ireland and the other EU member states with an opportunity to deliver significant environmental change, while also assisting rural areas to thrive in a sustainable manner; an opportunity that must be grasped.

Following the identification of a number of common issues across the nine specific objectives and one cross-cutting objective, a list of potential needs was drafted. This list was then provided to stakeholders and the competent authorities (EPA, NPWS) for their review, who were then asked to submit their own list of potential needs. Stakeholders were further consulted through the CAP Consultative Committee (CCC).

June 2020 CCC Open Focus Group Discussion for Needs Assessment

Subject of the corresponding consultation

In June 2020, the CCC held an open focus group discussion to identify the needs to be addressed by the CAP post-2020. This was a discussion exercise which provided stakeholders the opportunity to identify needs to be included in the Needs Assessment. The discussion was based on the stakeholder's submissions received to date, which had been grouped into several discussion themes. Themes included: Generational Renewal, Climate Change, Water Quality, Wetlands, Biodiversity, Organics and Income.

Outcome of the consultation

Stakeholders were invited to share their views on each topic and to send in any further written comments should they arise post discussion. A follow up meeting was held at the end of June to further discuss the feedback provided and submissions received. At this point, the feedback had been distilled down to a draft working document containing 40 needs. Committee members were asked to provide comments. Topics included: diversification, imports of animal feed, fruit and vegetables, the potential of women as farmers, the protection of water, reduction

of antimicrobial use, farm safety, farm advisory services, 3rd level courses, risk management tools and farm income.

Following this meeting, a consolidated list of needs was prepared and was subsequently circulated to members of the CCC. A further meeting was held in July 2020, in which stakeholders were asked to begin a process of prioritisation, whereby they were asked to identify their top three needs. Following their prioritisation, the needs most commonly identified as being of high priority were cross checked with the information provided in the SWOT Analysis to ensure the accurate capturing of the issues emerging from both the analysis and stakeholder consultation. A final list of prioritised needs was drawn up and again circulated to stakeholders for their review before a draft version was agreed and published.

November 2020 CAP Post-2020 Consultative Committee Eco-Scheme Workshop

Subject of the corresponding consultation

On 19th November 2020 the CAP Consultative Committee participated in an Eco-Scheme workshop. Discussion was based around three themes and a number of associated questions that were circulated to the Committee in advance.

Themes

- Engaging farmers in the Eco-Scheme.
- Mechanism for Calculating Eco-Scheme Payments.
- Eco-Scheme Structure.

Outcome of the consultation

Key issues identified were

- Importance of engaging 'active' farmers.
- Ease of administration burden for beneficiary.
- Most groups also cited the need for the Scheme to contribute positively to the environment. Communication and education was key to ensure take up.
- Payment calculation based on the top-up to BISS was preferred by Committee members over the costs incurred/income foregone calculation method.
- Stakeholders felt biodiversity and water quality/natural resources should be priority objectives for Eco-Schemes. Reducing ammonia emissions and improved animal welfare were also cited as areas where it was felt Eco-Schemes had a role.
- The need to recognise and reward existing good environmental practices.

December 2020 CAP Post-2020 Consultative Committee Eco-Scheme Workshop

Subject of the corresponding consultation

Members of the CAP Consultative Committee participated in a second workshop on 10 December 2020 which discussed the overall Green Architecture. Discussion was based around two themes and a number of associated questions that were circulated to the Committee in advance.

Themes:

- Striking the optimum balance
- Measures outside CAP

Outcome of the consultation

The Committee's views from this workshop are summarised below:

- Integrated coherent approach across the Green Architecture was required.
- Maximise Eco-Scheme by ensuring all farmers can participate with as high a proportion of farmers as possible then also participating in Pillar 2 measures.
- It was important to recognise the risk of excluding any sector could undermine the success of the Eco-Schemes.
- For Rural Development measures explore the potential to learn from the experience among some EIP's. It was felt farmers should be given choice and flexibility.
- There was recognition that CAP can't achieve everything.
- The need for policy coherence and co-ordination across CAP, the work of other Government Departments and industry supports was highlighted.

March 2021 Virtual Environmental Assessment Stakeholder Workshop

Subject of the corresponding consultation

A Virtual Environmental Assessment Stakeholder Workshop was organised on 11th March 2021.

The purpose of the workshop was to provide stakeholders with an opportunity to engage with the 'draft scoping report for the environmental assessment of the CAP Strategic Plan 2023-2027'. The workshop was attended by members of the CAP Consultative Committee and their additional nominees, including the statutory environmental bodies and representatives from the Environmental Pillar.

At the workshop, presentations were given by the consultants on the SEA process and the scoping report. The attendees were then assigned to breakout groups, consisting of two sessions, to consider a number of questions related to Environmental Assessment of draft CSP.

The workshop provided an effective means of engagement with Stakeholders on draft scoping report for the environmental assessment of the CAP Strategic Plan. The discussions at the workshop and the subsequent submissions received helped inform the scoping report which was updated following the consultation. Full details are in the Environmental Report.

September 2021 CAP Post-2020 Consultative Committee Green Architecture Workshop

Subject of the corresponding consultation

On 30th September 2021 the CAP Consultative Committee participated in an Eco-Scheme workshop. DAFM presented on Definitions, Conditionality, Eco schemes and New Agri Environment Schemes.

Outcome of the consultation

- Attendees discussed a number of issues, including landscape features, land abandonment, crop rotation/diversification, use of protein crops and the 4% in GAEC 8 across all land.
- Discussions also focused on the eco-scheme, with a strong appetite for additional measures. The list of agricultural practises available under the eco scheme was subsequently increased.
- Discussions also focused on greater clarity on the AECM measures, with a preferred focus on having a simple and transparent tier system, open to all and allowing sufficient time for planners to produce plans efficiently. The co-operative measures were also discussed.

Townhall meetings

The public consultation on the reform of the CAP Post 2020 also included a series of townhall meetings. Pre Covid-19 the Department were able to facilitate a number of in person events in regional locations throughout Ireland. Following the outbreak of COVID, the Department switched these townhall meetings to virtual webinars.

Subject of the corresponding consultation

The public consultation on the reform of the CAP Post 2020 also included 6 public meetings during the month of February 2018. These were hosted in:

- Charleville Co. Cork;
- Navan Co. Meath:

- Carrick on Shannon Co. Leitrim:
- Carlow Co. Carlow;
- Athlone Co. Westmeath:
- Claremorris Co. Mayo.

These meetings were well attended, with an average of over 200 people each night. Attendees were provided with an information pack containing the Department's consultation document, and the European's Commission's CAP communication titled the "Future of Food and Farming".

The meetings were structured around short presentations from the Department, the Environmental Protection Agency and Teagasc. Presentations covered to the EU Communication, the relationship between CAP funding and farm incomes, and the environmental challenges facing agriculture and the measures already being taken to address those. These presentations were followed by an open discussion on the issues.

Outcome of the consultation

In total, 164 written submissions were received. The submissions had a variety of views on issues such as the configuration and distribution of direct payments, encouragement of environmental and climate action, mechanisms for encouraging generational renewal, the funding of risk management tools, the provision of supports for organic and other farm enterprises, and the reduction of the burden on farmers of on-farm inspections.

There was significant support for the retention of a strong CAP budget and the need for stronger regulation of unfair trading practices, both of which were the subject of separate EU proposals at the time. The issue of anti-microbial resistance and the threat to human health was also mentioned in a number of submissions.

The views expressed during the townhall meetings and submissions received helped inform Irelands CAP negotiation position.

September and October 2019 Townhall meetings on CAP negotiations and public consultation on Draft SWOT analysis of the CSP

Subject of the corresponding consultation

The Public consultation o on Draft SWOT analysis also included 3 public meetings during the months of September and October 2019. These were hosted in:

- Mitchelstown 28th September
- Sligo 2nd October
- Portlaoise 3rd October

Feedback informed the development of the SWOT analysis. The proposed interventions in the draft CSP were designed in light of the experience of the previous Programme and are based on an objective analysis of sectoral needs and priorities identified by stakeholders during the public consultation.

August 2021 Virtual townhall meetings about draft interventions proposed for Ireland's CAP Strategic Plan 2023-2027

Subject of the corresponding consultation

To ensure that maximum stakeholder input in the Public Consultation on Ireland's CAP Strategic Plan 2023-2027, the Department arranged virtual townhall meetings on 10, 11 and 12 August 2021. The presentations from the townhall meetings are available on Department's website www.gov.ie/cap.

Outcome of the consultation

The first meeting was well attended with in the region of 700 people participating in proceedings, and an average of around 300 attending at any one time.

These townhall meetings were a key part of the CAP process where stakeholders were able to avail of the opportunity to hear the latest on draft proposals around redistribution of direct payments, capping and convergence of direct payments, and on how best to achieve the economic, environmental and social objectives of the CAP. Feedback received during the Q & A was considered by the intervention design team.

September -October 2021 Engagement at Mart Network

Subject of the corresponding consultation

The Minister for Agriculture, Food and Marine and the Ministers of State held bilateral meetings with the key stakeholders, most in-person, in September and early October 2021 to hear their views on the draft interventions. The Minister(s) and the Department continued this engagement, with wider in-person events across the country, engaging with farmers in the nationwide tour of 27 marts in 25 counties.

Outcome of the consultation

Based on the feedback received through this engagement and CCC the following changes were made to the plan:

- changed the approach to the Suckler Carbon Efficiency Programme.
- changed the eligibility requirement for beneficiaries of the Sheep Improvement Scheme.
- expanded early-stage support for producer organisations to cover other sectors, including cereals, potatoes and the amenity sector.
- improved gender balance provisions including support for qualified female farmers through higher investment support rates under the On-Farm Capital Investment measure and targeted Knowledge Transfer support.
- added two new interventions in the form of (i) a Straw Incorporation Measure to encourage tillage farmers to increase soil organic carbon content, and (ii) a Collaborative Farming Grant to provide parallel support for older farmers and encourage earlier succession planning.

2018-2021 Bilateral engagement with representative organisations

Subject of the corresponding consultation

There has been extensive engagement with all key stakeholders on the future of the CAP and the development of the CAP Strategic Plan (CSP) 2023-2027. Stakeholder groups, both involved in and outside the CAP Consultative Committee, were invited to attend bilateral discussions with Department officials to further discuss their views on the proposed interventions for the CSP.

Key stakeholders included those represented on the CAP Consultative Committee and a wider group of stakeholders including women's groups, smaller farm organisations, representative environmental groups and research / expert organisations.

Outcome of the consultation

To date the Department held over 100 bilateral meetings with stakeholders' representatives regarding the CSP. Bilateral engagement with stakeholders is an integral part of the CSP development process. This engagement has helped inform the design of interventions. DAFM is also working in collaboration with other Government Departments, State Agencies, and external experts, who are providing advice and support, in particular in relation to the development of the delivery framework for the new AECM scheme.

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