

From: [REDACTED]
To: [CAP Strategic Plan](#)
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Comment 1

The basis of excluding Section 1, Section 2, Section 3, Section 6, Section 7 and Section 8 of the CAP has not been properly outlined. Why have these sections been excluded? Saying this has ‘provided background information’ is not good enough. Removing for example Section 7 on the Government systems and Coordination systems and Reporting and Monitoring Systems does not make sense as these systems will have an overall effect on the measurement of the performance of the CSP and ultimately on the success of the CSP, including its ecological and biodiversity impacts. This will have land-use impacts going forward with the overall evaluation of the CSP.

Comment 2

In the ‘Baseline Context’ – what has not been included is the features of the landscape (rivers and banks, hedgerows, small wetlands and woodlands) which are of major importance for wild fauna and flora for functions such as migration, dispersal and genetic exchange OUTSIDE of the Natura sites as given by **Article 10 of the Habitats Directive**.

Article 10 of the Habitats Directive states that; Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.

If these are not considered necessary, then the reasons must be clearly outlined. Ecologists would argue that these features are essential to the ecological coherence of the Natura 2000 network and many are of major importance for wild fauna and flora. For example, the importance of the small streams network for water quality downstream – potentially in an SAC site or for a protected species e.g. Atlantic salmon and sea lampreys.

Comment 3

“Given that the CAP Strategic Plan aims to provide support for continued agricultural land use activities with a new focus on undertaking such activities in an environmentally sustainable manner and in light of the absence of existing threats or pressures from agricultural to these features of interest, they are not considered to be at risk of likely significant effects from the land use interventions of the CAP Strategic Plan. As such

further detailed examination of agricultural-related threats/pressures to these features of interest is not required and they are not considered further in this Natura Impact Statement.”

Just because there has been no research or “in light of the absence of existing threats or pressures from agricultural to these features of interest” – this does not mean these features are not at “risk of likely significant effects from the land use interventions of the CAP Strategic Plan”. Take for example Harbour and Grey seals, Seal Rescue Ireland are accumulating evidence that deteriorating river water quality is impacting on the health of these seals downstream and in the coastal waters, with nutrient enrichment (reducing fish numbers) and bacterial contamination (increasing disease) being two of the factors.

Comment 4

“The aims and objectives of the GAECs and the Pillar I Eco-Scheme and the Pillar II Interventions is to support agricultural in ways that contribute to improvements in environment conditions and climate action.” The problem is both the Pillar I eco-schemes and Pillar II intervention are voluntary schemes and there is not landscape approach in designing and applying the CAP measures.

Some of the rationale does not reflect all possibilities such as “The restriction of changes agricultural land use from grassland to arable will limit ploughing and thereby limit losses to water-depend habitats.” Firstly, if the land is no where near a water source, this will not be an issue. Secondly, buffer zones can be created to limit losses before change of land-use. Thirdly, there are other land-uses which will do not involve changing grassland to arable. Also, how can “most eligible wetlands and peatlands identified under this GAEC are managed as permanent grassland” - as grasslands are usually drained and are usually not managed as wetlands and peatlands, unless they are Turloughs. More qualification is needed on what is a grassland-wetland and grassland-peatland. Buffer strips have a proven to have a positive impact and should be compulsory and not mandatory in Natura sites and also near rivers and watercourses in areas where water quality has significantly deteriorated.

Other comments:

- GAEC schemes are voluntary and adhoc – planting for example only ‘3 native trees per hectare per year’ or ‘1 metre of hedgerow per hectare per year’ does not consider the potential of creating these linear corridors as required by Article 10 of the Habitats Directive.
- Under AECM general or other measures, planting of trees – native trees and the appropriate location needs to be considered and that these measures do NOT incentivise afforestation of high nature value less intensive farmland with non-native conifers.
- Non-productive Investments should consider ‘rewilding’ and the benefits to the

overall ecology and biodiversity of Natura sites and other landscape features important for wild flora and fauna.

- Many farm buildings applications should undergo adequate ecological assessment before being screened out for AA.
- Management Issues need to be incorporated – such as the management (and not just ‘planting’) of Hedgerows, Trees and Woodlands or areas of Afforestation.
- Organic Farm Schemes – assessment needs to be made on making payments for existing organic farms and the effect it will have on ecology and biodiversity and not just on new organic farms.

