

08.12.2021

Re: Ireland's CAP Strategic Plan response to public consultation on the environmental assessment of the draft CSP 2023-2027 (8<sup>th</sup> December 2021) from the MacGillycuddy Reeks European Innovation Partnership Project Operational Group, Project Team, supported by South Kerry Development Partnership CLG

The MacGillycuddy Reeks EIP Project has been operating since August 2018, and we believe that the new CSP needs to provide a clear mechanism for expansion of existing locally led EIP projects where specific constraints exist, and that expansion should and can be considered innovative in its own right.

We have found that considerable support and encouragement is required on the ground in the MacGillycuddy Reeks, (part of the Kerry UNSECO Biosphere Reserve) due to the unique and challenging terrain of this landscape in order for farmers to undertake appropriate interventions and fear that if the proposed Co-operation project areas are too large these appropriate interventions will not be carried out. We also believe that if the budget for capital works are capped too low then uptake will be poor and positive environmental outcomes will be limited. We found that establishing 'collective groups' to support farmers getting work done was critical and without this logistical support interventions will not be done e.g. treatment of invasive species.

The time required for interventions to be assessed and the habitat assessments to be carried out in a large landscape such as this is hugely significant, and it is unlikely these will be conducted with the necessary management plans at both site and area level. Again this will present a challenge if the proposed areas are too large and the locally led approach will be lost.

The MacGillycuddy Reeks EIP Project submitted a five-year plan to the EIP DAFM section last year and this plan we feel is both needed and achievable on the ground, and should be considered because of the uniqueness and terrain of the landscape of the MacGillycuddy Reeks, in order align with CAP Strategic Plan of 'strengthening the socio-economic fabric of rural areas, and by contributing to the achievement of environmental and climate objectives at national and EU levels'.

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