

From: [REDACTED]
To: [CAP Strategic Plan](#)
Cc: [REDACTED]
Subject: Rewilding - include in CAP payments
Date: Wednesday 8 December 2021 11:12:36

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To whom it may concern,

Please include rewilding in the options for farmers who are in receipt of CAP payments.

Rewilding is an important repair action for the damage that humanity has caused to our lands, biodiversity, and communities.

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding
Date: Wednesday 8 December 2021 11:23:58

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Hello there,

[REDACTED] with an agricultural background. I believe that a major solution to many of our problems would be to include provision for rewilding into our agricultural policy. It would relieve issues regarding climate change, the biodiversity crisis, water quality crisis, flooding, soil degradation, tourism etc. Farmers could be made custodians of nature providing biodiversity services, carbon sequestration, flood attenuation, water quality improvement etc. And it would benefit everyone, present and future.

All the best

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding Recognised Officially as Government Policy
Date: Wednesday 8 December 2021 11:27:53

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A chara,

I am writing to urge you to offer meaningful incentives within the CAP for farmers to protect, reinstate and rewild a portion of their land as an immediate biodiversity and climate action policy.

Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly needed for restoration of peatlands, river flood plains and native forests and farmers should be paid for this.

I would ask that rewilding be included in the options for farmers who are in receipt of CAP payments.

Thank you.

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Include rewilding in CAP options
Date: Wednesday 8 December 2021 11:29:15

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Hello

I am a small female farmer in [REDACTED] and I would love to see grants available to those of us who wish to use our valuable land for rewilding.
I believe this is the last day for submissions so I am sending a quick email, don't want to delay and only found out this morning.

I was moved by Isabella Tree's book 'Rewilding' and am inspired to do the same here in [REDACTED].

Thank you
[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Mayo Leader Funding
Date: Wednesday 8 December 2021 11:36:49

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/ Madam

I would be very grateful if you would you provide a sustainable budget of €389 million for the LEADER Programme 2023-2027 to drive 'bottom-up, community-led' investment to create and sustain employment in rural Ireland, provide funding in the rural environment and support climate change mitigation initiatives in rural communities, as well as the identified high-level ambitions of LEADER 2023-2027 outlined in the draft CAP strategic plan.

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: RE: CAP Strategic Plan 2023-2027 / Recognise Rewilding as Government Policy
Date: Wednesday 8 December 2021 11:37:25

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To whom it may concern,

As a member of a rural community in County [REDACTED], I live surrounded by farmland and small farmers. I would like to make a submission on farm payments under the next phase of the Common Agricultural Policy (2023-2027).

As the government is finalising plans on how it will spend nearly €10 billion in public money over the rest of this decade, I hope that you will listen to small farmers and communities who want to see the land farmed in a better way.

This is an incredible - an unmissable - opportunity for rewilding.

I strongly urge that rewilding be included in the options for farmers who are in receipt of CAP payments.

Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly needed for restoration of peatlands, river flood plains and native forests and farmers should be paid for this.

Ireland declared a Climate Emergency in 2019, yet we have seen no evidence in our community that the CLIMATE AND BIODIVERSITY EMERGENCY is being treated as such.

This opportunity to change policy and introduce rewilding in Ireland should not be missed!

We don't have time to waste, the Climate and Biodiversity Crisis is moving full steam ahead, so we must do all that we can to deal with it.

The benefits of such a policy would be enormous for wildlife, for the climate, for rural communities, and above all, for farmers themselves. This policy would give them an option to act as providers and stewards of the land and thriving habitats. Our collapsing Irish wildlife desperately needs this. So do we humans.

Thank you for reading my submission.

Yours sincerely,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan 2023-2027 / Recognise Rewilding as Government Policy
Date: Wednesday 8 December 2021 11:39:32

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To whom it may concern,

I would like to make a submission on farm payments under the next phase of the Common Agricultural Policy (2023-2027).

As the government is finalising plans on how it will spend nearly 10 billion Euros in public money over the rest of this decade, I hope that you will listen to small farmers and communities who want to see the land farmed in a better way.

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I strongly urge that rewilding be included in the options for farmers who are in receipt of CAP payments.

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Thank you for reading my submission.

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan 2023-2027 / Recognise Rewilding as Government Policy
Date: Wednesday 8 December 2021 11:39:32

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Ireland declared a Climate Emergency in 2019, yet we have seen no evidence in our community that the climate and biodiversity emergency is being treated as such.

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We don't have time to waste, the climate and biodiversity crisis is moving full steam ahead, so we must do all that we can to deal with it.

The benefits of such a policy would be enormous for wildlife, for the climate, for rural communities, and above all, for farmers themselves. This policy would give an option to act as providers and stewards of the land and thriving habitats. Our collapsing Irish wildlife desperately needs this. So do we humans.

Thank you for reading my submission.

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP submission
Date: Wednesday 8 December 2021 11:50:27

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Hello,

Please allow for financial supports for farmers who wish to rewild parts of their farm/land.

Cheers,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewinding to be included in Cap strategy
Date: Wednesday 8 December 2021 11:56:02

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Hello,

I am writing to urge you to offer meaningful incentives within the CAP for farmers to protect, reinstate and rewild a portion of their land as an immediate biodiversity and climate action policy.

Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly needed for restoration of peatlands, river flood plains and native forests and farmers should be paid for this. The quality as well as the quantity of provision for biodiversity needs to be assessed, and payments should be results linked.

I would ask that rewilding be included in the options for farmers who are in receipt of CAP payments.

Thank you.

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#); [REDACTED]
Subject: Consultation
Date: Wednesday 8 December 2021 12:02:39

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Dear Sir or Madam

It is important that small schemes such as the Traditional Farm Building Scheme, as administered by the Heritage Council, are retained and supported. These buildings provide homes for our rare species of bats.

It is also important that rewilding schemes such as that carried out in [REDACTED] are supported and financially encouraged. This will enhance our biodiversity.

Also NGO's involved in biodiversity protection need financial support.

Many thanks

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: draft interventions for CAP Strategic Plan
Date: Wednesday 8 December 2021 12:03:30

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To whom it concern

Please include rewilding in the options for farmers in receipt of CAP payments.

Sincerely

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan
Date: Wednesday 8 December 2021 12:11:49

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To whom it may concern,

I would like to call on the department to add rewilding as an option for farmers receiving CAP payments in Ireland's CAP Strategic Plan (CSP) for the period 2023-2027.

The UN's Intergovernmental Panel on Biodiversity and Ecosystem Service (IPBES) has stated that nature is declining at unprecedented levels across the world due to human activity. In light of the report's irrefutable evidence, a Climate and Biodiversity emergency was declared by the Dáil. The importance of biodiversity, and recognition of its deterioration, has already been acknowledged by the government, it would be senseless for this department to not follow suit.

If the department want this plan to achieve its aim of creating "sustainable development of Ireland's farming and food sector" then it cannot ignore the impact that our declining biodiversity will have on its feasibility. The plan should do what it can to encourage, support and facilitate farmers to promote biodiversity and rewilding on their land.

Regards,

[REDACTED]

Get [Outlook for Android](#)

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP
Date: Wednesday 8 December 2021 12:16:19

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To whom it may concern,

I would like to call on the department to add rewilding as an option for farmers receiving CAP payments in Ireland's CAP Strategic Plan (CSP) for the period 2023-2027.

The UN's Intergovernmental Panel on Biodiversity and Ecosystem Service (IPBES) has stated that nature is declining at unprecedented levels across the world due to human activity. In light of the report's irrefutable evidence, a Climate and Biodiversity emergency was declared by the Dáil. The importance of biodiversity, and recognition of its deterioration, has already been recognised by the government, it would be senseless for this department to not follow suit.

If the department want this plan to achieve its aim of creating "sustainable development of Ireland's farming and food sector" then it cannot ignore the impact that our declining biodiversity will have on its feasibility. The plan should do what it can to encourage, support and facilitate farmers to promote biodiversity and rewilding on their land.

Regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP submission
Date: Wednesday 8 December 2021 12:19:32

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Hi there

Please include options and incentives for farmers in receipt of CAP payments to rewild sections of their land and/or engage with conservation projects.

Regards

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding
Date: Wednesday 8 December 2021 12:32:17

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To whom it concerns ,
Please include REWILDING in the options for farmers who are in receipt of CAP payments.

Yours sincerely,

[REDACTED]

[Sent from Yahoo Mail on Android](#)

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Women in Ag CAP
Date: Wednesday 8 December 2021 12:38:51

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Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: PLEASE ALLOW IRISH FARMERS THE OPTION TO REWILD LAND.
Date: Wednesday 8 December 2021 12:57:06

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To whom it concerns, Please ensure that rewilding be included in the options for farmers who are in receipt of CAP payments.

Best



From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding as part of the CAP Strategic Plan 2023-2027
Date: Wednesday 8 December 2021 13:03:52

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Hi,

I am writing to request that **rewilding be included in the options for farmers who are in receipt of CAP Payments.**

Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly needed for restoration of peatlands, river flood plains and native forests and farmers should be paid for this. It is the Government of Agriculture's duty to play a crucial role in climate change mitigation.

The €10 Billion of public money to be spent as part of this Plan needs to directly assist in the fight against biodiversity loss and climate change and help farmers play a key role in defying this threat.

Thank you for your time and I look forward to your reply.

Kind regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Public Consultation Regeneration & Rewilding
Date: Wednesday 8 December 2021 13:15:36
Attachments: [image.png](#)

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To whom may concern,

A brief comment for your consultation,

Please put natural regenerative processes at the top of the pyramid (especially for soil), abundant food production and lots of jobs can follow. Facilitating the transition of Ag, through sustainability (see graphic below), towards the regeneration of Irelands ecosystems.



Rewilding land and promoting ecological restoration should be a lucrative option for farmers, landowners and state agencies etc. This also needs to be build in to this strategic plan.

--

le meas,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan submission
Date: Wednesday 8 December 2021 13:50:49

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I refer to the CAP Strategic Plan and would like to see rewilding included in the options for farmers who are in receipt of CAP payments.

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding included in CAP plan
Date: Wednesday 8 December 2021 13:56:12

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Hello I would like to ask that rewilding be included in the options for farmers who are in receipt of CAP payments.

Kind regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan Submission
Date: Wednesday 8 December 2021 13:56:34
Attachments: [REDACTED]

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To whom it may concern,

I have read and followed with interest the development of the draft CAP Strategic Plan 2023-2027. I would like to submit some thoughts in relation to the proposed EcoSchemes. While there are many positives measure included as options, I believe a gaping hole remains by not including whole herd milk recording. The value of data, and its contribution to efficiency and animal welfare is well recognised within the Plan, as evidenced by its inclusion in the Suckler Carbon Efficiency and Sheep Improvement Schemes. There are many references in the draft Plan to increasing efficiencies on farm, particularly through the adoption of new technologies. While milk recording may not be considered a “new” technology from a developmental perspective, it would certainly be a new technology for many farmers to adopt, with currently less than 50% of Irish dairy farmers carrying out the practice. I would consider milk recording a key strategy for identifying the most (and least) productive cows in a herd, making informed breeding and culling decisions and improving udder health, thereby increasing farm efficiency and making a positive contribution towards greenhouse gas mitigation.

In addition, there are multiple references in the draft Plan to reducing antimicrobial use. One of the biggest drivers of antibiotic use on dairy farms is mastitis, and in particular dry cow antibiotic. Blanket dry cow therapy is commonplace on most Irish farms, as evidenced by sales data (McAloon et al., 2021). To enable farmers and their prescribers to safely and reasonably adopt selective dry cow treatment strategies, whole herd milk recording is essential. Without this invaluable information, the ability to correctly identify animals for whom treatment is justified is limited, as is the ability to evaluate dry period performance and mastitis control during lactation. All of these factors contribute towards improved animal health and welfare, and the reduction of antibiotic use on-farm.

There are many reasons why farmers do not currently practice milk recording, and there has been a very strong focus on increasing the uptake in recent years, particularly within the CellCheck Implementation Group. Many “drivers” have been explored, and the inclusion of milk recording in the proposed EcoSchemes would further motivate this behaviour change. It is fair to say that with the growing urgency to increase farm efficiency and reduce antimicrobial use, the need for more milk recording nationally is also urgent.

I hope you will give my thoughts and contribution due consideration. I am more than happy to provide any further information on this topic, if required.

Kind regards, [REDACTED]

[REDACTED]

[Redacted text]

[Redacted text]



From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding for CAP
Date: Wednesday 8 December 2021 14:07:04

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Having seen this on twitter I am also calling that an option to rewild be included for farmers who are in receipt of CAP payments.

I was struck a few years ago when flying into [REDACTED] airport how much more forest I could see coming into land that it would be ever possible to see in Ireland.

I live in [REDACTED] and if you want to go for a walk in the woods you have a few small plots of woodland half an hour from the city to choose from, ([REDACTED] [REDACTED] and precious little else.

While I am aware that there is a difference between rewilding and forest, there can be no doubt that there is a miniscule amount of wild space left in the country that I not high rocky ground or bog. The ecological consequences of this are many, obvious and well covered but as an example, the difference between the number of flying insects that hit one's windscreen while driving at night now, and 20 or 30 years ago is not possible to miss.

I am appealing to you to include the option of rewilding for CAP payments and to give our wildlife and ecosystem a chance.

Is mise le meas

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding / Government policy - petition
Date: Wednesday 8 December 2021 14:10:40

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Dear Department Of Agriculture,

I would like to see rewilding recognised officially as government policy.

Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly needed for restoration of peatlands, river flood plains and native forests and farmers should be paid for this.

I ask that rewilding be included in the options for farmers who are in receipt of CAP payments.

With Regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: WASG recommendations for developing CAP
Date: Wednesday 8 December 2021 14:12:49

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Good afternoon,

I back the WASG recommendations that the Department should take on board when developing CAP plans.

- That women with at least a Level 6 in Agriculture or who have been head of a farm holding for at least three years qualify for the TAMS 60% grant.
- The 60% TAMS age limit must be raised to the incoming pension age of 67 - this is vital in the context of ensuring that older women who are active on family farms are given the support to become equal partners before reaching pension age and avoid repeating mistakes of the past.
- Those women joining a formal farm partnership with a minimum level 6 qualification in agriculture who meet the eligible age criteria can obtain a 60% TAMS grant within the partnership.

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Re: Rewilding in Ireland
Date: Wednesday 8 December 2021 14:13:30

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Dear Sir/Madam

As part of your consultation, I would like to see rewilding included in the options for farmers who are in receipt of CAP payments.

Regards

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Cc: [REDACTED]
Subject: CAP Strategic Plan - rewilding
Date: Wednesday 8 December 2021 14:19:30

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Hi there,

I'm writing on behalf of my business. We operate a chain of [REDACTED] .

Our focus for 2022 and 2023 is to focus on vertical supply chain management. Often companies do this to increase efficiencies in their business and ultimately improve their bottom line. This is not our main reason for wanting to do this.

We want to do this as we wish to be the change we want to see in the world.

We have a captive audience of 1,000 plus customers a day (pre pandemic) and we want to be able to show them how business can be done and in due course how agriculture can be done.

Our plan is [REDACTED] or close to it and to rewild and reforest it whilst [REDACTED] and more.

I am writing to you to encourage you to make this project viable by improving allocating subsidies for rewilding.

It is believed we only have 50 harvests left due to soil degradation. We are in the midst of a biodiversity collapse, all it takes to realise that is to consider the complete disappearance of insects from your windscreen after any drive on a motorway. It is more severe than people realise. Ground nesting birds have almost completely disappeared.

We need to do everything we can to help reverse this.

Please consider this when allocating the CAP budget and make our life easier in being the change we want to see to our customers.

Thanks,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP eco scheme
Date: Wednesday 8 December 2021 14:29:58

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Hi,

I listened to the discussion on CAP on the [REDACTED] last week. Department officials did mention about forestry being part of an Eco scheme but mentioned it applying to forestry planted around 2008/9. I have forestry I planted in [REDACTED] which is [REDACTED]. This forestry is a significant benefit to the climate and biodiversity and yet I can not use it as part of my Eco scheme requirements. [REDACTED]. I'm wondering can the department facilitate small scale on farm forestry as part of the Eco schemes but not limit it to 2009. It would maybe encourage farmers to consider forestry if they were getting a benefit back through CAP/ Eco scheme's especially after premiums end.

Thanks

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding - CAP PAYMENTS
Date: Wednesday 8 December 2021 14:32:10

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Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly necessary for the restoration of our peatlands, river flood plains and native forests and farmers should be paid for this. I am asking that Rewilding be included in the options for farmers who are in receipt of CAP Payments.

Many thanks,

[REDACTED]

Get [Outlook for iOS](#)

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan
Date: Wednesday 8 December 2021 14:33:04

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir /Madam,

It is imperative that landowners farm for nature and that they are paid accordingly.

We need to return to the wild 30% of our land mass ASAP and there are thousands of landowners ready to answer the call.

We would draw your attention to Móintigh Mhór dTír Chonaill / the Great Bog of Donegal, 691,000 acres, which should immediately be preserved and restored where necessary as an imperative to redressing climate change. This is vital for the retention of the massive carbon sink our Donegal bogs represent.

We support the demands of experts such as those in the Wildlife Trust of the necessity to return to more sustainable farming methods and eradicate intensive farming for export.

To continue as Ireland is doing is ecocide.

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding in the CAP Strategic Plan
Date: Wednesday 8 December 2021 14:43:46

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Good afternoon,

I am emailing to request that rewilding be included in the options of farmers who are in receipt of CAP payments. The Irish Wildlife Trust has advocated strongly on this issue, and it is clear that Ireland needs to improve its commitment to biodiversity and climate action.

Allow rewilding to be included in these payments means that we can pursue an environmentally-just future for agriculture in Ireland. It means that we can protect our ecosystems and the livelihoods of farmers simultaneously.

Ireland is a complex mosaic of biodiversity, and formally protected areas are insufficient. We need a landscape approach to conservation where farms, rivers, and urban areas are all corridors for wildlife. In this way, we can retain multiple resource use areas for nature and people.

CAP is a vital component of this, and for too long we have been penalising rather than encouraging farmers to be a part of the solution. Introducing rewilding as one of the options will rectify this and provide the economic support farmers need.

Thank you for your consideration, and I hope you actively advocate for rewilding in the CAP Strategic Plan. Happy holidays!

All the best,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding
Date: Wednesday 8 December 2021 14:44:10

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir/Madam,

Please give farmers who are in receipt of CAP payments the option to have rewilding included.

Also please give farmers who provide a habitat for migrating birds the option to qualify for CAP payments.

I am not a farmer but I would like to see the farmers who look after nature being encouraged and rewarded for doing so.

Thank you,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan Consultation
Date: Wednesday 8 December 2021 14:52:56

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear CAP Consultation team,

I would like to submit a request to include Milk Recording (MR) as an additional Eco Scheme. Although there have been amendments to previously published Eco-scheme options and these additional measures are to be welcomed there is an omission from that list that I feel must be included, namely milk recording.

Strategic objective 9 of the Cap Strategic Plan states that the CSP “improve animal health and welfare standards and increasing awareness of antimicrobial (AMR) and anthelmintic resistance”. “ Antimicrobial Resistance occurs when bacteria, viruses, fungi and parasites change over time and no longer respond to medicines making infections harder to treat and increasing the risk of disease spread, severe illness and death.

As a result of drug resistance, antibiotics and other antimicrobial medicines become ineffective and infections become increasingly difficult or impossible to treat”. It is fundamental that we do all in our power to reduce antibiotic usage in both animal and human populations.

Under no parts of the Eco schemes does objective 9 come into consideration, in fact there is no instance in the CSP where AMR is effectively dealt with at all. There is overwhelming evidence to show that the use of milk recording reduces somatic cell count (SCC) in herds that take up this technology. Balaine et al (2020) show that milk recording is beneficial in the reduction Somatic Cell Count, with a decrease by 38,860 cells per millilitre of milk, hence improving herd health. This outcome is consistent with previous research and lower SCC leads to reductions in antibiotic usage.

As little as half of Irish dairy farmers are currently practicing MR and it would be a good incentive to increase this low number if it were included as an Eco Scheme option.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Pay farmers to rewild
Date: Wednesday 8 December 2021 14:53:13

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear sir/madam,

Please allow farmers the option of being paid to rewild their land, if they so choose. It would be transformative for biodiversity on the island.

Best regards

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan submission
Date: Wednesday 8 December 2021 14:58:52

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A dhaoine uaisle

I would be grateful if you would consider providing payment to farmers for rewilding their lands if they so choose.

Le meas

[REDACTED]

--

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:00:40

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I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

Thank you.

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding
Date: Wednesday 8 December 2021 15:01:10

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Dear Sir or Madam,

Please consider allowing payment for farmer's to allow significant rewilding on their land.

In the context of the potential disaster that is unchecked climate change and biodiversity loss, this would seem to be both logical and ethically appropriate.

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Fwd: Draft Environmental Report
Date: Wednesday 8 December 2021 15:05:25

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I recommend that the new Pillar 1 eco schemes and the Pillar 2 A.E.C.M's include recognition and reward for the maintenance and quality of our existing hedgerows.

Thank you

Yours sincerely

[REDACTED]

----- Forwarded message -----

From: [REDACTED] >
Date: Wed 8 Dec 2021, 15:02
Subject: Draft Environmental Report
To: <CAPStrategicPlan@agriculture.gov>

I recommend that the new Pillar 1 eco schemes and the Pillar 2 A.E.C.M's include recognition and reward for the maintenance and quality of our existing hedgerows.

Thank you

Yours sincerely,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Switching subsidies to augment our common future
Date: Wednesday 8 December 2021 15:06:59

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A Chara,

Could the legal barriers farmers face to promote the health of our biodiversity be removed; and the subsidies be reappropriated accordingly?

--

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:11:45

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

Regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: CAP Strategic Plan 2023 - 2027
Date: Wednesday 8 December 2021 15:14:32

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A chara,

In order to act on the climate and biodiversity crises, I would like to request that farmers be given the choice to rewild their land, while continuing to receive farm subsidies at the same levels.

Le gach dea-ghuí,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding and Agroforestry Recognised Officially as Government Policies
Date: Wednesday 8 December 2021 15:14:47

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it may concern,

I am writing to urge you to offer meaningful incentives within the CAP:

- **For farmers to protect, reinstate and rewild a portion of their land** as an immediate biodiversity and climate action policy. Rewilding is the quickest, easiest and cheapest way to restore natural ecosystems while addressing the biodiversity and climate crisis. It is particularly needed for restoration of peatlands, river flood plains and native forests - and farmers should be paid for this.
- **For agroforestry systems to be considered as eligible agricultural land ongoing** - as we need greater tree cover and these system offers immense benefits for biodiversity, climate action and productivity. A total no brainer.

I would ask that these options be included in the options for farmers who are in receipt of CAP payments.

Kind regards,
[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft interventions for CAP Strategic Plan 2023-2027
Date: Wednesday 8 December 2021 15:19:20

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

Hello,

I am contacting you in relation to the CAP Strategic Plan 2023-2027.

The current CAP has many flaws and has resulted in many price rises in feed, machinery, land and food itself.

But above all it has paid for ecological destruction.

This has to end. It is not acceptable for farmers to be forced into 'avoiding the encroachment of unwanted vegetation'.

This has led to the clearance of habitats and an ecological catastrophe throughout Ireland and Europe.

We need to rewild large areas of land and the most obvious way of doing so is to encourage farmers by awarding genuinely green subsidies for the planting of native trees and vegetation, perhaps the reintroductions of wildlife species, and other tasks needed to allow a functioning ecosystem to recover.

The present CAP system has spend vast amounts of public taxpayer's money on agriculture but has not recognised the potential benefits to the public and the opportunities for wildlife.

We need to allow for this to help improve our water quality, the climate itself, biodiversity and even as public amenity areas.

We can no longer manage nature as if tending a garden.

So please make better use of public money by allowing farmers rewild their land. This is the very minimum that should be included in the new CAP plan.

Regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:20:12

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Good afternoon,

I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

Kind regards,

[REDACTED]

Supporting a Land Mobility Service is Worthwhile

Generational Renewal is a significant challenge, a supported Land Mobility Service would represent an important tool in the suite of measures required to leverage greater generational renewal.

What would a Land Mobility Service do

The Land Mobility Service is a nationwide independent generational renewal facilitation and matching service with funding from industry, farmer participants and the Department of Agriculture. The Service is having a positive impact, its independent focused and expert nature being a major positive. The focus is on delivering sustainable solutions. Engagement with farmers and landowners has proven the benefit of and need for such a service.

However further success and engagement is curtailed by a restricted budget.

The Service provides options for landowners and opportunities for young trained farmers. There are three key elements to the service:

1. Create awareness and provide information.
2. Facilitate and deliver arrangements including matching.
3. Support operating arrangements.

The Service supports all land owners but the cohort with whom the Service most engages are farmers with no identified farming successor and those with a successor but requiring an additional land resource for viability. Studies have shown this to be a significant cohort, a cohort that requires support outside the traditional initiatives. (*Land Mobility and Succession in Ireland*, Pat Bogue 2012 48% of full-time farmers having no identified farming successor and 26% of all farmers are over the age of 65, IFAC 2020 one in three farmers don't progress succession due to viability fears, Shane Conway NUI Galway 2019 highlighted the benefit of funded facilitation to land-owners).

Based on there being 130,000 to 140,000 farmers in Ireland, those aged over 60 in this non successor and/or viability constrained cohort would represent 30,000 plus farmers. (2016 Farm Structures Survey CSO 7,400 farmers under 35 (5%) 41,200 over 65 (30%) 34,700 aged 55 to 64 (25%), Pat Bogue, IFAC, Eurostat).

A positive Generational Renewal outcome for this cohort requires matching, family input and support, non family collaboration, focused facilitation and building a sustainable farm plan. The positive outcomes would be

- A family farming succession/progression made possible by way of access to extra land for viability or
- Collaboration (non family) with a young trained farmer who has little or no land or
- Collaboration with an existing younger farmer.

The benefits of positive farmer Generational Renewal and young people to rural communities is well established. This generational renewal does not have to be confined to within the

family or land ownership, many successful and sustainable farming enterprises are operated by excellent young farmers, who own no or little land.

Apart from the social benefits delivered by young farmers there is evidence to show that they better adopt new technologies and environmental considerations, both their carbon footprint and income return per unit of output tends to be more positive than that of older farmers, Teagasc and Land Mobility Service 2019 Report (study of productivity pre and post collaboration).

The risk and past experience from relying on traditional young farmer supports and land-owner exit measures alone to deliver change is that the result is:

- a) A lack of awareness of the support measures, and how they can be availed of in conjunction with all the other elements and schemes within a CAP, e.g. a positive environmental scheme could have a negative generational renewal impact due to landowner misinformation or misunderstanding.
- b) Delivery, but not enough to reverse a trend due to insufficient support at farm level and/or facilitation with obstacles and identifying collaborators.
- c) A focus on one party rather than a sustainable and win-win outcome.
- d) Land abandonment.
- e) Conglomeration with young farmers disadvantaged and large operators accessing available land.

Having a supported facilitation service included in the suite of measures will positively impact overall generational renewal delivery.

Support needed

There is a significant cohort of farmers (exceeding 30,000 data sources Teagasc, IFAC, [REDACTED], Land Mobility Service) who are of an age to step back but need support and options outside the simple or traditional farming successor. At present, due to budget and scale constraint, the Service only manages to engage with 1 to 2% of this group annually.

A supported Service will target and support all land owners but it is this “hard to reach, problematic, needing different options” cohort that will be specifically targeted. This is the cohort most in need of a specialized service and the one that will deliver most in terms of additionality.

The Land Mobility Service currently engages with circa 400 farmers per annum and helps facilitate 100 to 150 arrangements annually. Farmers and landowners’ own advisors including accountants, solicitors and agri advisors are invariably included in the process but the stimulant and facilitator for change has been the Land Mobility Service. The service is a time consuming and people engagement process, so delivery is directly linked to having a facilitator resource in place, this is evidenced by our highest delivery in counties where resources are present

Engagement is the measure of success.

Land Mobility Service inquiry, engagement and arrangement data 2021

LMS	INQUIRIES		CLIENTS		ARRANGEMENTS		Facilitated
	Inquiries		Engagements		Cummulative	Cummulative	
	2021		2021		2020	2021	
Carlow	19		10		18	21	3
Cavan	49		25		21	28	7
Clare	18		11		19	22	3
Cork	126		63		124	142	18
Donegal	12		7		5	7	2
Dublin	6		4		2	3	1
Galway	40		21		27	33	6
Kerry	22		11		14	17	3
Kildare	26		12		16	20	4
Kilkenny	75		35		75	86	11
Laois	36		18		40	45	5
Leitrim	12		7		6	8	2
Limerick	59		32		35	44	9
Longford	24		12		12	15	3
Louth	18		9		8	11	3
Mayo	34		14		48	52	4
Meath	33		18		22	27	5
Monaghan	26		11		8	11	3
Offaly	20		10		16	19	3
Roscommon	12		6		22	24	2
Sligo	13		8		9	11	2
Tipperary	48		22		43	50	7
Waterford	25		14		35	39	4
Westmeath	36		18		19	24	5
Wexford	31		16		33	38	5
Wicklow	18		8		12	15	3
	838		422		689	812	123

Inquiries are a step in the engagement process. Inquiries to date have come from Referrals (advisors, other farmers, professionals, farm organisations and industry), Agri Media, and Information Events.

To progress an inquiry targeted, intensive and confidential support is required. Progression from Knowledge Transfer to Knowledge Exchange takes effort but has positive implications (Roberta McDonald Nuffield Paper 2016). Time and space is needed to act, transfer of knowledge takes time and incurs cost with no guarantee of outcome (Szulanski 2003 Knowledge Transfer and barriers to adoption).

There is a building process from awareness to inquiry to engagement, which takes time and specialized focused effort.

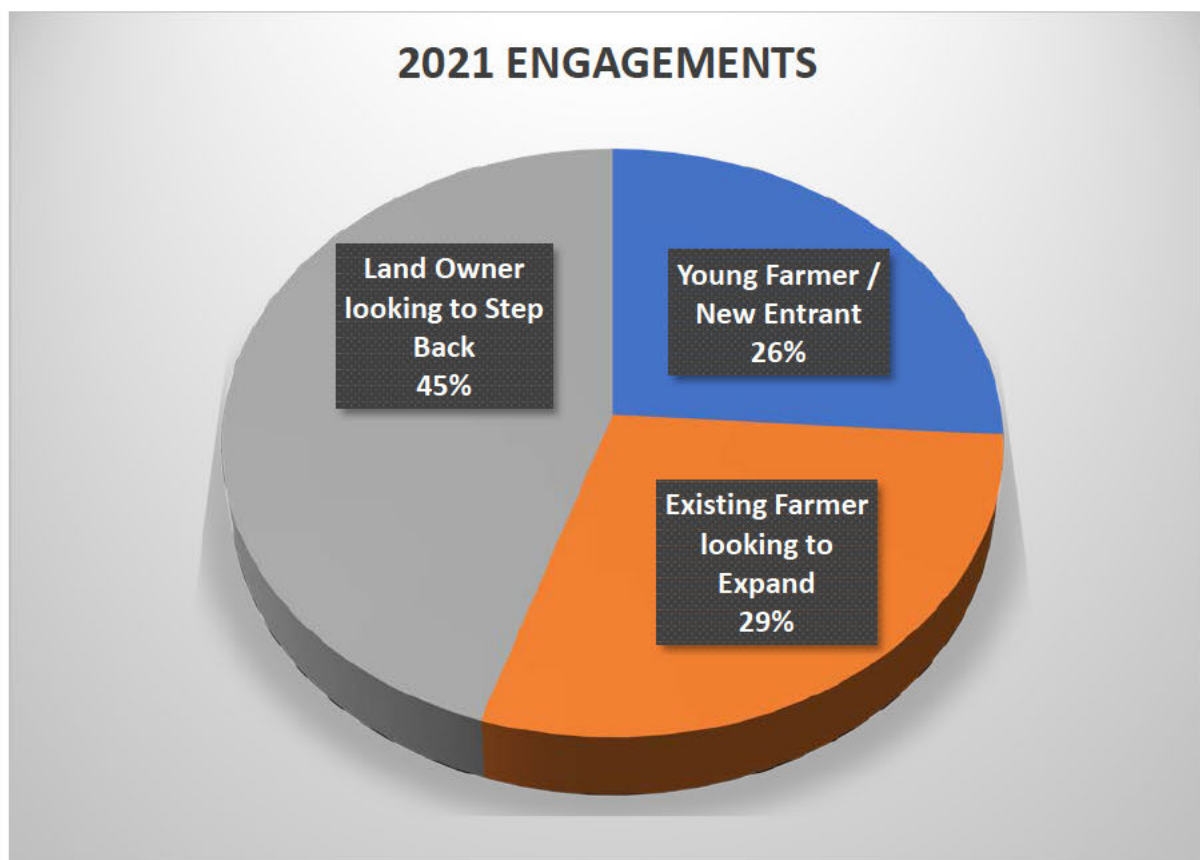
Inquiries have increased year on year with a good geographic spread, having facilitators strategically placed nationwide is necessary for good engagement and arrangement delivery.

Additional resources are required to maximise engagement. Delivery has always followed when resources are available.

The resource needed to deliver engagement are staff on the ground. The experience of The Land Mobility Service since inception has been to prove the concept and that delivery follows from the supply of a resource.

The requested support would be used to put staff in place and the outcome will be the delivery of engagements.

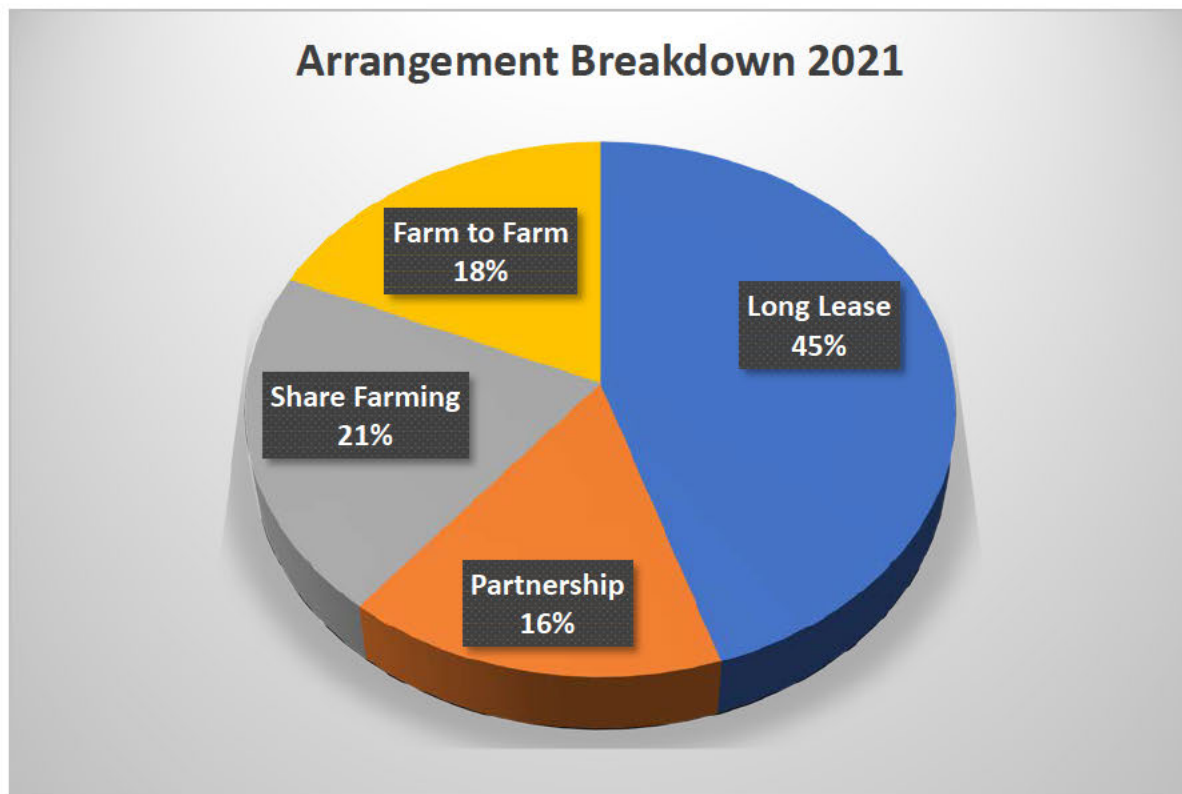
Breakdown of 2021 Engagements



It is the new entrant and older farmer cohorts that most need support and guidance.

What turns out to be the most suitable arrangement varies, it is all about facilitating a solution that works for all parties. The Service looks at all options for people.

Arrangement Type 2021



Conclusion

A big challenge with delivering generational renewal is that what you are dealing with is time consuming, often sensitive, requires expertise, discretion and patience and is often protracted. It is for this reason that a Land Mobility generational renewal facilitation service is such an important tool.

There is no immediate profit/income return or compliance/legal obligation for the participants. For this reason, it needs a supported service otherwise the status quo, to defer or do nothing is the easiest option.

Those farmers and landowners with an identified farming successor and a clear farming pathway will progress generational renewal on their own or will engage with their present professional and agri advisors to progress same. This generational renewal will happen anyway and does not need additional intervention.

This intervention is not targeted at this group but instead aimed at the hard to reach and difficult cohort identified earlier (no farming successor, viability hindrances, no clear progression path, problematic farming pathway, etc). The engagements and arrangements we are talking about will not happen without the support of this service, without this intervention. Any concerns of deadweight do not apply, delivery is additionality and providing support and facilitation for those that would not otherwise engage.

There is clear justification for this intervention as it is focused on a key CAP objective (Generational Renewal) and about delivering additionality (more than what would happen anyway).

The Land Mobility Service as an independent service has proven through the past 5-7 years that such a service is required. The concept is lauded at European level, and many other jurisdictions are modelling similar interventions on the Irish Land Mobility Service. This intervention as part of a suite of measures to support generational renewal and if scaled-up under the lifetime of the next CAP can be a very effective tool aiding generational renewal at significant levels and scale.

7 December 2021.



Macra na Feirme

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:26:41

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To whom it may concern,

I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

Best regards

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission on rewilding as part of CAP
Date: Wednesday 8 December 2021 15:26:51

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To whom it may concern,
I would like to see rewilding included in the options for farmers who are in receipt of CAP payments.
Many thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:32:14

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Hi,

I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

Thanks,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:33:39

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to whom it may concern

I recommend that the new pillar 1 eco schemes and the pillar 2 AEEM's include recognition and reward for the maintenance and quality of existing hedgerowsl

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:33:44

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it concerns:

I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

This is a really important part of the planning going forward.

With kind regards

[REDACTED]

Submission to Public Consultation on Draft CAP Strategic Plan

██████████ and ██████████

We would like to make a submission to the public consultation on the CAP Strategic Plan. ██████████ ██████████ for local customers through direct routes to market, and we are ██████████. We are also actively involved in ██████████ ██████████ ██████████ which includes nationally recognised experts and is engaged in trying to achieve protection for ecologically sensitive areas in our locality. Our points relate to these specific areas of expertise and the document “Ireland’s Summary of the draft CAP Strategic Plan 2023-2027”.

General comments

Firstly, some general comments. Many of the biodiversity actions in the draft document concern human interventions, which, though appropriate in a landscape that has been heavily cultivated, are repairing damage already done. However, there are still areas that are uncultivated for decades or even longer, small pockets of old woodland, unimproved grassland, etc, and we would suggest a greater emphasis on protection of these. It would be tragic if more of these places are lost, especially through well-intentioned environmental actions. ██████████ a wildlife corridor and stream valley, uncultivated for decades (as indicated by its population of native bluebells, completely covering it in spring), was a few years ago bulldozed to plant conifers, a practice that has been encouraged by Government grants. We need to preserve existing biodiversity where it is present – to reward leaving valuable habitats undisturbed, at a level higher than any possible economic use of the land. An eminent botanist we know once said to us “we should not try to forge Nature’s signature”, which sums it up well; it is a signature that takes decades and centuries to form, and where it has formed, we must leave it alone, and pay farmers very well to leave it alone. Human intervention to create habitats is a limited substitute.

In our work, though on a small scale, we are contributing to an effort to produce food for Ireland’s own needs. Most of the land around us is dedicated to dairy farming, and to growing crops for ██████████

██████████ Nothing that we have seen in the draft document is aimed at counteracting that increasing trend, and we continue to import especially horticultural produce that Ireland can produce very well indeed. There are some sectoral supports for large-scale horticultural production, but much of this will end up in supermarkets being sold at very low prices with a small fraction of that going to the producer. We need supports for small horticultural producers too, and especially for direct routes to market that allow more of the sales income to go to the producer. Much of the innovation in horticulture – sustainable production methods, new crops - is happening among small growers, not so much among the large-scale producers for supermarkets.

Specific comments on sections in the draft: Pillar 1

Page 18, Section (2) Conditionality, GAEC requirements

GAEC 8 imposes a minimum amount of “non-productive” land, but it places equal value on ancient woodland, unimproved grassland, and land that is fallow for a short period. It may be that there are none of the higher-value habitats on a farm, in which case fallow land is the best that can be achieved, but we would suggest that there should also be a requirement that where high-value habitats (old woodland, unimproved grassland, land uncultivated for decades) exist on a farm, these should be prioritised for GAEC 8.

The GAEC 8 ban on cutting hedges and trees in breeding / nesting season fails to protect valuable hedgerows outside of this season; for instance it is permitted to remove up to 500 metres of hedgerow without licensing, and this has happened on a large scale around us. We need to protect *all* existing hedgerows unless there is an unavoidable reason to remove them. As well as not removing hedgerows, a positive value could be given to allowing hedgerows to become wider and leaving them taller, and for creating the variety of hedgerow features that optimise their attractiveness for nesting birds.

A similar consideration applies to GAEC 4: buffer strips along watercourses may already exist, and those that exist need to be protected, as they are more likely to contain mature and biodiverse vegetation. GAEC 4 specifies “establishment” of buffer strips, but we should give higher value to maintenance of existing ones.

GAEC 9 protects only Natura 2000 sites, but there are many areas of permanent / unimproved grassland that have been judged to be of high biodiversity value outside of these sites. We need to protect *all* unimproved grassland where it has high biodiversity value, and not only when it is in a Natura 2000 site.

Page 21, Section (3) Basic Income Support for Sustainability

This is still an area-based payment, supporting farmers on a basis proportional to the amount of land they have. It is not clear why the word “sustainability” is in the title because it is not rewarding sustainable farming approaches. Some of those who are at the forefront of innovation in terms of sustainability are the ones working the smallest amounts of land, who may not qualify or receive very small payments under the BISS scheme. To support farmers to continue farming, consideration should be given to supporting the farmer as well as the land, and a move towards a universal basic income scheme for farmers. Additional supports that would better qualify for the term “sustainable” could include support for small innovative farms, for diversification, for sustainable farming methods, and specific high rewards for leaving unused land that is of high biodiversity value

Page 22, Section (4), Support for young farmers (CIS-YF)

To support based on age alone is to ignore the contribution of new educated farmers who may have much to offer but are not within the age limits of 40 years. Innovation also comes from people who have had successful careers in other fields and bring new approaches to agriculture. Importantly, we also need to support people who have been active in agriculture in other countries and come to Ireland at a mature age, and face specific obstacles in setting up (eg Ireland’s planning laws that often restrict house building to people who have grown up in the local area). Such people can have uniquely valuable knowledge and experience to impart from which Irish agriculture could benefit greatly. [REDACTED] with already years of experience in small-scale agriculture [REDACTED] that can contribute a useful perspective on Irish agriculture.

Page 23, Section (5), Eco-scheme

1. Space for Nature: The requirement to allocate at least 7% to non-productive and landscape features does not go far enough, if non-productive features can include land left fallow for a short time. We need specific and high levels of support for land that has been uncultivated for a long time (decades or more), in particular land that is of particularly high biodiversity value (eg wildlife corridors). While these should comprise as much as possible of the farm’s area, it is more important that we target support on high-value land than simply on larger areas of land of mediocre biodiversity value.

4. Planting of native trees: this is laudable on land that currently does not have trees on it, but it may be tempting for a farmer to plan the planting of native trees on “marginal land”, which may be of high biodiversity value. We have already mentioned near the beginning of this submission an area of land next to us, of high biodiversity value, destroyed to plant conifers. It could easily have been destroyed to plant native trees instead under this provision. When combined with item (1) “Space for Nature”, this suggestion could result in land of high biodiversity value that is beyond the 7% requirement of item (1) being cleared to plant young native trees. Biodiversity would be badly damaged by this, not supported.

The Eco-Scheme needs to reward first and foremost the preservation of existing biodiversity, and only then consider extra human interventions. We must not reward the clearance of scrub with small trees, which is in the process of natural succession towards mature trees, in order to plant a few native species that would not naturally be found in that situation, or not found until decades later in the succession. We would suggest adding to the “Planting native trees” paragraph a mention of supporting the evolution of natural woodland, in accordance with advice from a qualified ecologist, where an area of land is already in the process of succession to woodland.

When we are supporting tree planting, we must also support the production of these trees within Ireland; they should be grown from seed of Irish provenance, and not simply be species native to Ireland that have been grown in other countries and imported. Support for seed stands is currently only of a restricted range of species and this should be extended to cover native species in general. Tree nurseries producing from Irish provenance seed should be specifically supported.

Page 25, Section 6, Apiculture programme. This is suggested because of the “overall decline in pollinator species in Ireland”, but the support is exclusively for the farming of honeybees. It has been well said that this is like trying to reverse declines in wild bird populations by giving grants to chicken farms.

Honeybees are *not endangered*, as long as there are beekeepers to look after them and customers for their honey. But the keeping of large numbers of hives in areas where nectar and pollen sources are limited (which is the case in most of the dairy farming areas of Ireland, and increasingly so as hedgerows are destroyed) puts pressure on native pollinator species and has been shown in research in a number of countries to actually reduce numbers of wild pollinators.

Support for apiculture is of value in preserving a traditional rural activity and diversifying farm income, but our wild pollinators need *habitats*, not more honeybees to compete with them. It is important not to confuse the purpose of the support in this section.

Page 26, Section 7, Fruit and Vegetable Sector. This proposes to offer support to large producer organisations, which supports mainly existing long supply chains reaching the public via supermarkets. Small producers, selling through direct routes to market (farmers’ markets, increasingly online; vegetable box schemes; community supported agriculture), will be overlooked by this approach, but these small producers are the ones that offer the most sustainable approaches to fruit and vegetable growing, both at the point of growing and along the supply chain. As well as supporting the larger producers as currently suggested, we need support for innovation, support for small producers, and support for direct routes to market.

Page 27, Section 8, Protein crops. According to this section, the need for these crops arises because of increasingly concentrated livestock farming, most of which is producing for export. It would be a pity to support protein crops only for this reason. As we have written, our dependence on livestock-based produce for export is a problem to be solved, rather than something we should be encouraging. Protein crops are indeed much needed, but we suggest the priority should be on growing them for direct consumption by humans, in Ireland.

Page 28, Section 9, CRISS. While the aim to support smaller farms is laudable, 30 hectares is not particularly small. In horticulture, most of the innovation is happening among growers with 5

hectares or fewer. A level of support of €43 per hectare is of little use for someone with only 5 hectares. We would suggest that CRISS be supplemented with additional support for the smallest producers, providing they are working efficiently and sustainably. The horticulture sector would particularly benefit from this, as crops like soft fruit can be grown very productively on small areas of land and achieve very high value.

Specific comments on sections in the draft: Pillar 2

Page 29, Section 1, Agri-Environment Climate Measure

It appears from the document that the AECM is an optional extra in which only some farmers will choose to participate. It is anticipated that only about 20% of Ireland's agricultural land area will be included. While it is clear that some farmers will have land of higher nature value than others, and thus more opportunity to find AECM actions they can perform, we would suggest that all farmers should automatically be opted in to AECM actions and encouraged to find what opportunities they can to participate in this funding.

Page 32, "Tier 3 general actions"

It is good to see attention given in this section to planting of traditional orchards, and we anticipate that this will concentrate on traditional Irish varieties on large rootstocks, as earlier schemes have done. However, one of the most valuable features of farms not mentioned here is the *presence of old fruit trees*. We know of several farm orchards that have been destroyed to make way for farm developments. As well as creating new orchards, most of all we need to conserve the ones we already have, and research their tree varieties. Along with preservation of archaeological monuments and old farm buildings, we need support to be given in this section for protecting farm orchards (especially walled orchards), and for engaging specialist help (eg through Irish Seed Savers' Association) to conserve the trees and to identify their varieties. Although it would be outside the scope of CAP support to individual farmers, financial support to Irish Seed Savers for their fruit tree research is a high priority if we are to prevent further loss of Ireland's remaining traditional varieties of fruit, particularly apples. We are discovering "new" ancient varieties of Irish apple every year, and every year more and more old trees are lost because of disease, storms, or being in the way of someone's plans to build something. It is strange that we have no legal protection for valuable old fruit trees and orchards, of a similar sort to the listing of protected buildings.

The "Biodiversity" actions on pages 34-35 concentrate heavily on human interventions – as already mentioned, first and foremost we need to protect land that has not been cultivated for many years, existing hedgerows, existing vegetation along watercourses, etc, as this often has the highest biodiversity value.

Page 39, Section (4), Organic farming scheme

This proposes a higher area-based level of support for land farmed organically. This is suitable for large producers, but again for small producers (most of whom already work organically, but in many cases uncertified) the support is not suitable. A barrier for many is the cost of organic certification. For small producers, instead of any area-based payment, the simple expedient of subsidising the cost of organic certification would greatly assist. It would also quickly increase the fraction of Ireland's food that is certified as organic, as a substantial quantity of already organically grown produce would now be certified.

We hope that these comments will be found useful in considering how the Draft Strategic Plan is to be finalised.

Yours sincerely

A large black rectangular redaction box covering the signature area.

8th December 2021

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Rewilding and preservation of biodiversity by farmers in Ireland
Date: Wednesday 8 December 2021 15:36:42

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To whom it may concern

Can I request that you please consider that instead of farmers receiving subsidies to clear scrub land, that these subsidies instead are paid to farmers who preserve existing hedgerows, forest, marshlands and boglands and meadows and other areas of native biodiversity, and/or to rewild areas that have already been cleared. I struggle to explain to my children why, when we know now, how enormous and immediate the climate and biodiversity crises are, why we are doing nothing to change existing policy.

Currently farmers and other custodians of the land are financially and officially sanctioned for rewilding/preserving.

Yours sincerely and on behalf of my children, and all of our children.

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission from [REDACTED]
Date: Wednesday 8 December 2021 15:38:21

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Submission to Public Consultation on Draft CAP Strategic Plan

By [REDACTED]
[REDACTED] of Tracton Biodiversity Group

I have had the privilege of being reared on a mixed farm in Co [REDACTED] [REDACTED] and my mind and heart still carry the images of the beauty and richness of the natural, biodiverse rich world that surrounded me, images that have sustained me all my life.

[REDACTED] [REDACTED] and we produced almost all of our food from our farm. We were happy because our system of farming was regenerative and nature provided us with bountiful beauty and food as a result. We were well nourished and we got an education

Now we need to ask ourselves:

What matters to us and what do we value ?

What kind of a world do we want to leave to those who come after us ?

How do we care for all the beings that share our world and with whom we and our survival are inextricably linked

If we use these questions to inform our decisions on this CAP strategic plan then we won't go far wrong

Herewith my submission

Priority areas

1. Put an immediate end to habitat destruction ! Loss of habitat is the principal cause of the decline in Biodiversity . Farmers should be incentivised by being paid adequately for leaving natural habitats alone !!! and not paid as they are currently for destroying them !!! and introduce proper monitoring of these areas with severe penalties for crimes against nature both flora and fauna
2. Prioritise locally grown food for domestic consumption such as fruit and vegetables Why are we buying peas and beans from Peru and Kenya ? asparagus from France and cabbage and carrots from Spain at times when they are readily available in Ireland
3. Support farmers to move towards more diversified value added crops and shorten the supply chain from farmer to consumer by supporting the setting up co-ops for vegetable and fruit growing and distribution

4. Since much of the innovation in food production and sustainability is found among small farmers and growers, give targeted support to smaller growers and producers and food SMEs which are based on domestically produced foods

5. The dominance of the Irish food market by a few major retailers is causing havoc to local food producers with their race to the bottom on prices. Every town in Ireland should have a covered multifunctional market space funded by the local authorities to break the hold of the supermarkets on the food supply and provide local producers a route to market for their products

Section (2) GAEC

GAEC – we need more emphasis on protecting biodiversity that is already there - payments for leaving Nature alone, not mainly for human interventions.

For instance GAEC 8 imposes a minimum amount of “non-productive” land. But it places equal value on ancient woodland, ‘unimproved’ grassland, and land that is fallow for a short period. Need to focus more support on land of high biodiversity value – if land has not been cultivated for many decades or longer, it should at all costs be protected, and one way to do this would be to pay for it at a level that is substantially higher than the return from an equivalent amount of farmed land

GAEC 8 ban on cutting hedges and trees in breeding / nesting season fails to protect valuable hedgerows outside of this season. For instance it is allowed to remove up to 500 metres of hedgerow without licensing. Need to protect all existing hedgerows unless there is an unavoidable reason to remove them. Need to reward farmers for allowing hedgerows to become wider and leaving them taller, and for creating the variety of hedgerow features that optimise their attractiveness for nesting birds.

[REDACTED] Hedgerows are shaved bare every year including the tops. Birds rely on trees for their protection, food and a place to rest. There should be strict procedures on how to manage hedgerows for biodiversity and these should be implemented. County councils are major contributors to this ecocide! All agricultural contractors involved in cutting hedgerows should be required to have special licences showing they have been fully trained in correct procedures for maintaining biodiversity and all county council staff involved in hedgcutting should be similarly trained and supervised

Having the DAFM acting in a policing role of landowners infringement of existing environmental laws is not working to prevent biodiversity loss as there is a major conflict of interest. The NPWS needs to be completely reformed and resourced to effectively uphold environmental laws and have the power to impose substantial fines and recompense for damage caused

Also GAEC 4 – buffer strips along watercourses may already exist, and those that exist need to be protected, as they are more likely to contain mature and biodiverse vegetation. Reward their preservation as well as the establishment of new buffers.

GAEC 9 protects only Natura 2000 sites but there are many areas of permanent / unimproved grassland that have been judged to be of high biodiversity value outside of these sites. Need to protect (and pay for) unimproved grassland wherever it occurs, and make it more profitable to keep it than to plough it.

Section (3) Basic Income Support for Sustainability

This is still an area-based payment, supporting farmers on a basis proportional to the amount of

land they have. It is not clear why the word “sustainability” is in the title because it is not rewarding sustainable farming approaches. Some of those who are at the forefront of innovation in terms of sustainability are the ones working the smallest amounts of land, who may not qualify or receive very small payments under the BISS scheme.

There must be the rewards for small farms, for diversification, for innovation, for sustainability, specific rewards for leaving unused land of high biodiversity value

Section (4) Support for young farmers

To support based on age alone is to ignore the contribution of new educated farmers who may have much to offer but are not within the age limits of 40 years. Innovation also comes from people who have had successful careers in other fields and bring new approaches to agriculture. Importantly, we also need to support people who have been active in agriculture in other countries and come to Ireland at a mature age, and face specific obstacles in setting up (eg Ireland’s planning laws that often restrict house building to people who have grown up in the local area). Such people can have uniquely valuable knowledge and experience to impart from which Irish agriculture could benefit greatly.

Section (5) Eco-scheme

The requirement to allocate at least 7% to non-productive and landscape features does not go far enough, if non-productive features can include land left fallow for a short time. We need specific and high levels of support for land that has been uncultivated for a long time (decades or more), in particular land that is of particularly high biodiversity value (eg wildlife corridors). While these should comprise as much as possible of the farm’s area, it is more important that we target support on high-value land than simply on large areas of land of mediocre biodiversity value.

Planting of native trees, while laudable on land that currently does not have trees on it, should not be uncritically supported. It may be tempting for a farmer to plan the planting of native trees on “marginal land”, which may be of high biodiversity value. We must not reward the clearance of scrub with small trees, which is in the process of natural succession towards mature trees, in order to plant a few native species that would not naturally be found in that situation, or not found until decades later in the succession. **I would suggest the replacement of the “Planting native trees” paragraph with something on supporting the evolution of natural woodland, in accordance with advice from a qualified ecologist.** When we are supporting tree planting, we must also support the sources of these trees within Ireland; they should be grown from seed of Irish provenance, and not simply be species native to Ireland that have been grown in other countries and imported. Support for seed stands is currently only of a restricted range of species and this should be extended to cover native species in general. This initiative could spawn a significant economic benefit in the encouragement of local tree nurseries as social enterprises for communities and farmers with a direct route to market for the trees

Section 6 – apiculture programme. This is suggested because of the “overall decline in pollinator species in Ireland”, but the support is exclusively for the farming for honeybees. This is like trying to reverse declines in wild bird populations by giving grants to chicken farms. Honeybees are *not endangered*, as long as there are beekeepers to look after them and customers for their honey.

But the keeping of large numbers of hives in areas where nectar and pollen sources are limited (which is the case in most of the dairy farming areas of Ireland, and increasingly so as hedgerows are destroyed) puts pressure on native pollinator species and has been shown in research in a number of countries to actually reduce their numbers.

Support for apiculture is of some value in preserving a traditional rural activity and diversifying farm income, but our wild pollinators need *habitats*, not more honeybees to compete with them.

Section 7 – fruit and vegetable sector. This proposes to offer support to large producer organisations, which supports mainly existing long supply chains reaching the public via supermarkets. Small producers, selling through direct routes to market (farmers’ markets, increasingly online; vegetable box schemes; community supported agriculture), will be overlooked by this approach, but these small producers are the ones that offer the most sustainable approaches to fruit and vegetable growing, both at the point of growing and along the supply chain. We need support for innovation, support for small producers, and support for direct routes to market.

Section 8 – protein crops. . Protein crops are indeed much needed, but for direct consumption by humans, and along with this we need to be reducing our dependence on livestock-based production for export.

Section 9 – CRISS. While the aim to support smaller farms is laudable, 30 hectares is not particularly small. In horticulture, most of the innovation is happening among growers with 5 hectares or fewer. A level of support of €43 per hectare is of little use for someone with only 5 hectares. We would suggest that CRISS be supplemented with additional support for the smallest producers, providing they are working efficiently and sustainably. The horticulture sector would particularly benefit from this, as crops like soft fruit can be grown very productively on small areas of land and achieve very high value.

Specific comments on sections in the draft: Pillar 2

Page 29, Section 1, Agri-Environment Climate Measure

It appears from the document that the AECM is an optional extra in which only some farmers will choose to participate. It is anticipated that only about 20% of Ireland’s agricultural land area will be included. While it is clear that some farmers will have land of higher nature value than others, and thus more opportunity to find AECM actions they can perform, we would suggest that all farmers should automatically be opted in to AECM actions and encouraged to find what opportunities they can to participate in this funding.

Page 32, “Tier 3 general actions”

Along with preservation of archaeological monuments and old farm buildings, we need support to be given in this section for protecting farm orchards (especially walled orchards), and for engaging specialist help (eg through Irish Seed Savers’ Association) to conserve the trees and to identify their varieties. Although it would be outside the scope of CAP support to individual farmers, financial support to Irish Seed Savers for their fruit tree research is a high priority if we are to prevent further loss of Ireland’s remaining traditional varieties of fruit, particularly apples. We are discovering “new” ancient varieties of Irish apple every year, and every year more and more old trees are lost because of disease, storms, or being in the way of someone’s plans to build something. It is strange that we have no legal protection for valuable old fruit trees and orchards, of a similar sort to the listing of protected buildings.

The “Biodiversity” actions on pages 34-35 concentrate heavily on human interventions – as already mentioned, first and foremost we need to protect land that has not been cultivated for many years, existing hedgerows (which are an intrinsic and unique feature of Ireland’s heritage and landscape) existing vegetation along watercourses, etc, as this often has the highest biodiversity value. Where local groups have researched and documented high value Biodiversity sites in their areas, these sites should be prioritised for immediate protection . Any PNHAs already listed should be immediately given NHA status along with the effective protection that this designation merits

Page 39, Section (4), Organic farming scheme

This proposes a higher area-based level of support for land farmed organically. This is suitable for large producers, but again for small producers (most of whom already work organically, but in many cases uncertified) the support is not suitable. A barrier for many is the cost of organic certification. For small producers, instead of any area-based payment, the simple expedient of subsidising the cost of organic certification would greatly assist. It would also quickly increase the fraction of Ireland’s food that is certified as organic, as a substantial quantity of already organically grown produce would now be certified.

Sincerely and with gratitude for reading this

██████████
██████████
██████████

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission
Date: Wednesday 8 December 2021 15:38:54

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Hello,

I would like to submit my view to this consultation process about the critical need to support sustainable farming practices nationally. I strongly believe that farmers should be supported through CAP to engage in rewilding on their lands to halt the biodiversity catastrophe that is happening.

Thank you for your consideration,

Regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Pay farmers to rewild / preserve biodiverse pockets
Date: Wednesday 8 December 2021 15:38:55

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To whom it may concern

I am emailing you to request that farmers are rewarded for preserving or creating (rewilding) hedgerows, forests, heath, marshlands and other areas of native biodiversity, which are extremely important to our countries ecosystem resilience moving forward in these times of Climate Crises. Currently, Farmers and other tenders of the land are financially and officially sanctioned for rewilding / preserving.

Please alter your policies, please support farmers in their ancient role as both farmers and guardians of the land and it's wealth of biodiversity and heritage

Regards,

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:39:03

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A Chara,

I hope that the opportunity for reform will be grasped in the upcoming CAP. I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

We must ensure that the budget serves the highest goals of providing food security, protecting our environment and acting as an income support for farmers. It must not be used as a revenue stream for food producers that are already profitable and secure in their economic sustainability.

It would be wrong to allow any supports to be given to land owners that are not active farmers.

I hope you will give due consideration to my suggestions.

[REDACTED]

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Submission to CAPS strategic plan 2023-2027
Date: Wednesday 8 December 2021 15:43:00
Attachments: [image001.png](#)

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Dear sir / madam

I would like to make the following submission to CAPS Strategic Plan 2023 – 2027 on behalf of Ballina Family Resource Centre:

- *“Provide a sustainable budget of €389 million for the LEADER Programme 2023-2027 to drive ‘bottom-up, community-led’ investment to create and sustain employment in rural Ireland, provide funding in the rural environment and support climate change mitigation initiatives in rural communities as well as the identified high-level ambitions of LEADER 2023-2027 outlined in the draft CAP strategic plan.”*

Kind regards

[REDACTED]

Ballina Family Resource Centre Company Limited by Guarantee
Abbey Street
Ardnaree
Ballina
Co. Mayo
F26 C6P6

This project is funded under the Irish Government's National Development Plan 2007 to 2013 from funds provided by The National Lottery
Company Registration No: [REDACTED]

Directors: [REDACTED]



An Ghníomhaireacht um
Leanaí agus an Teaghlaigh
Child and Family Agency

From: [REDACTED]
To: [CAP Strategic Plan](#)
Subject: Draft Environmental Report
Date: Wednesday 8 December 2021 15:43:01

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie .

To whom it may concern,

I recommend that the new Pillar 1 eco schemes and the Pillar 2 AECM's include recognition and reward for the maintenance and quality of our existing hedgerows.

Yours sincerely,

[REDACTED]

The draft environmental report on the CAP Strategic plan

This submission seeks to address objective 1 and objective 4 of the draft needs assessment of Ireland's proposed CAP Strategic Plan 2023-2027 as we feel that these objectives are not adequately addressed in either the CAP Strategic Plan or the 2021 Climate Action Plan

Objective 1: support viable farm income and resilience across the Union to enhance food security

Food security - while we export 80% of our agricultural output of meat and dairy products, we import everything else- this is not food security, despite its portrayal as such by DAFM, IFA etc.

Livestock numbers are artificially high thanks to the importation of around 5.5 million tonnes of feed ingredients – from up to 60 countries – to Ireland each year. Brazil, Argentina, Canada, USA are among our prime sources for these feed ingredients, all countries which are seeing reductions in agricultural yields due to the climate crisis. ([\('Out of control' durum wheat market expected to cause pasta shortage\)](#))

Given the severity of the climate crisis and the reality that we are on track for 3 degrees of warming post COP 26 commitments (www.weforum.org), it is vitally important that we reduce dependence on countries whose agricultural exports are in jeopardy from rising temperatures. Using our prime agricultural land for the production of foods for export that are among the most carbon-intensive in the world does not make sense anymore in the light of present and future deterioration in climate stability. (Our beef may be less carbon intensive than beef from elsewhere, but beef is carbon intensive compared to most other foods, no matter how it is produced) A switch to more diverse models of farming where grains, vegetables and fruit are produced on the same farms as meat and milk will enhance food security, biodiversity, soil health and rural employment. In the past, specialisation made sense economically, but it doesn't make sense environmentally and it will not make sense economically in the future.

Farm income

Under the current economic model, more diverse, ecologically balanced models of farming are not economically viable, so they will have to be subsidised and farmers heavily incentivised to diversify. Payment schemes based on acreage don't incentivise more labour-intensive farming systems such as organic horticulture, permaculture, poly-culture vegetable and grain production etc. If we don't start making these changes immediately we may find ourselves in a situation where we cannot afford to feed our livestock, or if we can, it will be at the expense of other human beings whose agricultural systems are collapsing because of drought, deforestation, wildfires and the associated soil degradation. We also leave ourselves vulnerable to shortages of fruit, vegetables and grains and associated malnutrition. We need to bear in mind that beef and dairy consumption is falling in most developed countries, and will continue to fall as the impacts of the climate crisis are felt ever more keenly with each passing year. We should not be putting all our agricultural land, expertise and investment into one agricultural sector that is on the

decline. Due to the lack of horticulture skills among most Irish farmers and rural dwellers, we need huge investment in training to reskill people. Organisations like BASE and Irish SeedSavers are doing some of this work on a shoe-string budget while Teagasc continues to be funded to research the dead end that is monoculture livestock farming.

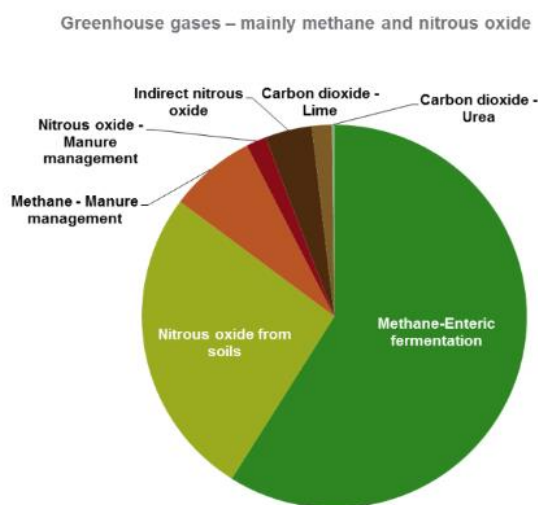
Objective 4: contribute to climate change mitigation and adaptation, as well as sustainable energy;

This table, from the current Climate Action Plan shows current agricultural emissions.

Table 16.1 - Agriculture GHG Emissions, 2018

Agriculture Emissions CO ₂ eq.	Share of Total GHG Emissions
22.03 Mt ⁴⁶	35.2%

This chart, from Teagasc clearly shows that close to 70% of agricultural emissions come directly from the animals themselves.



The Climate Action Plan lays out the required reductions in agricultural emissions by 2030, which require a reduction of 6.03 Megatonnes. The plan ignores the fact that we will have to continue to reduce emissions to zero over the following decades and only proposes actions that address the 30% of emissions that don't come from the animals. These proposed actions add up to a maximum of 3.7 megatonnes, then in 10 years time we would have no further options for decarbonisation other than reducing herd numbers. It would be much easier to start now with a gradual reduction in herd numbers and an increase in horticulture and tree crops such as fruit and nuts which can be incorporated into existing pasturing systems. These diversified food systems will also contribute greatly to our food security in a warmer future where imports may be less available and much more expensive.

(It should be noted that the emissions calculated for Ireland's agriculture are only territorial emissions- these figures don't include emissions from fertiliser production outside the state, nor emissions from imported foodstuffs for winter feeding of livestock)

In the current Climate Action Plan there is an admission that the DAFM plan to increase the dairy herd (HARVEST 2030 plan) is at odds with the plan to reduce emissions

In 2018, the sector produced 22.03 MtCO₂eq. (8% more than in 2005) driven mainly by an increase in bovine numbers and milk output, following the ending of the EU milk quota system in 2015. However, agricultural emissions decreased by 4% in 2019 largely due to a decrease in fertiliser use (-10.1%) and liming (-25.4%). If recent trends continue, with dairy herds increasing, there is a risk that emissions will grow as abatement and efficiency efforts are outstripped by herd growth.

It is entirely within the powers of the DAFM to make sure that these "recent trends" do not continue. They only continue because they are financially subsidised and incentivised. If we make it more lucrative to produce a variety of foods on the farm and provide the finance and training to do so, we will increase farm incomes, enhance food security, improve biodiversity and water quality.